

# Coolidge Terminal Replacement Project

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## FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Prepared by:

United States Department of Transportation

Federal Transit Administration (FTA)

and

Detroit Department of Transportation (DDOT)

Pursuant to:

National Environmental Policy Act of 1969 (42 U.S.C. § 4321),

Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. § 470(f)), and Section 4(f) of the Department of Transportation Act of 1966, as amended (49 U.S.C. § 303)

Approved May 12, 2023

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# 1. Introduction

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This document provides the basis for a determination by the United States Department of Transportation (USDOT), Federal Transit Administration (FTA), of a Finding of No Significant Impact (FONSI) for the proposed Coolidge Terminal Replacement Project (the proposed Project). This determination is made in accordance with the National Environmental Policy Act of 1969 (NEPA); 42 United States Code (U.S.C.) § 4321, et seq; FTA's implementing procedures (23 Code of Federal Regulations [CFR] Part 771); Section 4(f) of the USDOT Act of 1966, 49 U.S.C. § 303; and the National Historic Preservation Act of 1966 (NHPA), 54 U.S.C. § 300101 et seq.

The FTA, as the lead federal agency, and Detroit Department of Transportation (DDOT), as the local project sponsor, jointly prepared the Environmental Assessment (EA) and Section 4(f) Evaluation, and NHPA Section 106 findings and determinations. The EA describes potential significant impacts on the human and natural environment and adverse effects to historic properties that may result from the proposed Project. The EA was prepared pursuant to 23 CFR § 771.119 and issued by FTA on February 1, 2023. This FONSI is prepared by FTA pursuant to 23 CFR § 771.121 and incorporates, by reference, the EA and other cited documentation.

## 2. Existing Conditions

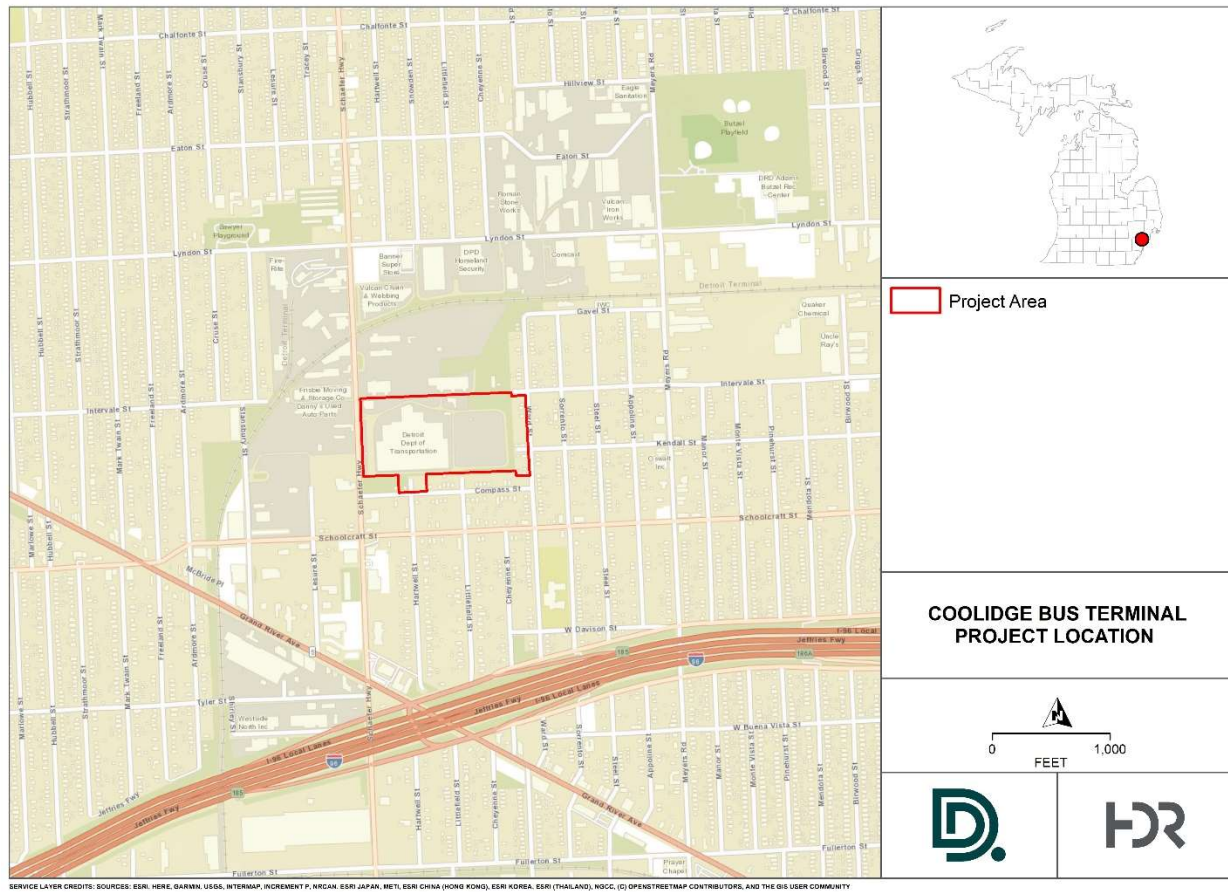
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Historically, DDOT has had four terminal sites used for bus storage, fleet maintenance, and operations. These four terminals include Coolidge Terminal located to the west, Shoemaker Terminal located to the east, Gilbert Terminal located within the mid-town area, and Central Terminal located centrally between the other three terminals. The existing Coolidge Terminal, shown on Figure 1, is currently non-operational due to damage sustained during a fire in 2011. As a result of the fire, DDOT moved bus storage, maintenance, and operations from Coolidge Terminal to the Gilbert and Shoemaker Terminals. Today, DDOT operates 37 regular bus routes. One hundred and forty-three buses are stored and maintained at Gilbert Terminal, which is located in the mid-town area, and are used for 19 of the 37 routes. The remaining 145 buses in the DDOT fleet are stored and maintained at Shoemaker Terminal on the east side of the City of Detroit (City) and used for the remaining 18 routes. Of these 18 routes, 11 serve the west side: ten originate at Gilbert, and one originates at Shoemaker. All of the existing 60' articulated buses (approximately 25% of the fleet), low-floor buses, and buses that use alternative fuels, such as electric or hybrid, must be stored and maintained at Shoemaker Terminal, as Gilbert Terminal does not have compatible infrastructure for these vehicles.

Central Terminal does not store any buses but is used for heavy repair and overhauls. DDOT expects this to continue for the foreseeable future.



**Figure 1. Coolidge Terminal Replacement Project Area**



### 3. Project Purpose and Need

The purpose of this proposed Project is to construct a facility to balance daily bus operations across the City and meet current and future storage, operations, and maintenance needs of DDOT’s fleet. Upon completion of the proposed Project, DDOT will decommission the Gilbert Terminal by removing items they can re-use at other facilities, shutting down all power, and ceasing all operations.

The following key factors highlight the need for the proposed Project:

#### Improving Transit Operations

- Current transit operations are unbalanced and inefficient across the City. DDOT has eleven western routes that serve the City with no nearby western terminal. Ten of the eleven western routes operate out of the mid-town Gilbert Terminal, which is an additional 6 miles away from the Coolidge Terminal. The remaining western route operates out of Shoemaker Terminal on the east side, which is 13 miles away the Coolidge Terminal.

- Current garage deadhead times (the time a bus travels outside of revenue service) for western routes are longer than necessary, resulting in more driving time, fuel loss and inefficiency, per information gathered by DDOT Service Development & Scheduling Division, 1/17/23.
- The absence of a working terminal in the western portion of the City results in slower incident response time from DDOT during times of need, such as inclement weather or if a bus breaks down.

#### **Accommodating Current and Evolving Fleet Needs**

- Current in operation terminals neither have the infrastructure to adequately maintain low-floor boarding buses, nor have enough spaces to adequately store or maintain 60' articulated buses.
- In 2021, DDOT examined its facility space needs to determine the amount of space needed to support a projected fleet of 216 buses for western routes, including 40' standard coach, 60' articulated, and electric and/or hybrid (diesel/battery) buses.
- Without a significant investment in a western terminal as proposed by this proposed Project, DDOT's current in operation terminals are not equipped to serve DDOT's future fleet as the number of alternative-fueled buses, including electric buses, gradually expands to meet the long-term goal of a full transition to a zero emissions bus fleet.

## 4. Alternatives Considered

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Two alternatives were developed and evaluated as part of the proposed Project EA: The No Build Alternative and the Build Alternative as defined below in Sections 4.1 and 4.2. The Build Alternative was developed through DDOT's Facilities Master Planning efforts in 2021 that assessed and considered the physical condition of the four DDOT terminals, including the Coolidge Terminal even though it is currently not operational.

The Build Alternative was developed through multiple meetings with DDOT Maintenance, Operations and Administration departments, and was presented to the public. It was determined that the Build Alternative best meets the purpose and need for the proposed Project.

### 4.1 No Build Alternative

The No Build Alternative is defined as maintaining current operations with no improvements. The No Build Alternative cannot provide the adequate space needed to store and maintain DDOT's existing or future bus fleet for the western side of the City. DDOT must rely on the functionally obsolete and deteriorated Gilbert Terminal to store, service and maintain standard buses, and upon the Shoemaker Terminal to store, service and maintain non-standard buses, such as 60' articulated buses and those that use alternative fuels. Continued reliance on the existing facilities results in unbalanced operations and inefficiencies. DDOT has determined that due to the current state of disrepair, deterioration, and vacancy, the Coolidge Terminal buildings will be demolished even under the No Build Alternative as noted in Section 4.1 of the EA.

The No Build Alternative does not meet the needs for the proposed Project.

## 4.2 Build Alternative

The Build Alternative would replace the existing Coolidge Terminal with an entirely new facility, as shown in Figure 2 and 3.

**Figure 2: Coolidge Terminal Replacement Project (First and Second Phases)**



Given the amount of funding available for the proposed Project, and the immediate need to move 143 buses out of the Gilbert Terminal, DDOT decided to phase the construction of the proposed Project.

In the first phase of the proposed Project, the new Coolidge Terminal would accommodate 144 buses, which is enough room to move all of the buses currently stored at Gilbert Terminal. This facility would need 408 employees for 24-hour operations, nearly 80 percent of them being bus operators. In the second phase, 671 employees would be needed for a 216-bus operation. The Coolidge Terminal must be able to accommodate this level of operation and three shift changes over a 24-hour period.

The new Coolidge Terminal consists of three separate buildings with interdependent programs: Bus Storage, Fleet Maintenance, and Operations (see Figures 2 and 3). The three buildings are configured to integrate with, and support, the primary on-site bus circulation while providing functional adjacencies to one another. Other improvements at the Coolidge Terminal are described in the following pages.

In the second phase of the proposed Project, the Coolidge Terminal would have additional future bays when the demand warrants, additional employee parking, interior modifications to accommodate the additional employees, and expand ancillary buildings to store more parts where additional functions for non-revenue vehicles can be performed.



This phased approach allows DDOT to close and decommission Gilbert Terminal upon completion of the first phase of construction at Coolidge Terminal and offers DDOT the ability to expand the Coolidge Terminal to accommodate the equivalent of 216 standard buses (36 articulated buses and 162 standard buses) in the future as projected by DDOT.

### Bus Operations and Administration Building

The Bus Operations and Administration building serves as the main point of entry to the buildings for employees and visitors arriving by car and is located adjacent to the east side of the parking area. Employees and visitors use designated pathways to enter the building. After entering this building from the parking lot, employees can continue to the Bus Storage and Fleet Maintenance buildings to the east via outdoor designated pedestrian pathways. The Transportation Station Workers office is located within the Operations and Administration Building with direct visibility of the south guard house and gate and main bus access drive. The single-story building provides staff, administrative, and training spaces for bus operators, dispatchers, and administrators. The bus operators' lobby faces south and opens onto an outdoor seating area, partially covered by a roof overhang and trellis. Skylights and clerestory windows provide natural daylighting and minimize energy use. A rendering of the building is shown in Figure 4.

Figure 3: Coolidge Terminal Conceptual Site Plan



**Figure 4. View of Coolidge Bus Operations and Administration Building, looking east**



### **Bus Storage/Coach Services Building**

The Bus Storage building houses both the Bus Storage and Coach Services programs and is located directly to the east of the Bus Operations and Administration Building. Buses enter from Schaefer Highway and access the Coach Services area at the rear of the building, and then circulate through the indoor storage area from north to south. The location and orientation of the building allows for future expansion to the west to accommodate all 216 buses.

The Bus Storage portion of the building includes dedicated parking for 144 buses with 24 parking stall bays measuring 27' wide x 128'-6" long and accommodating 6 buses per stall bay. Midway through the Bus Storage Building, two charging station rooms house the necessary equipment to charge up to 14 electric powered buses that are anticipated for DDOT's future 216-vehicle fleet.

The Coach Services portion of the building is dedicated to servicing and washing the bus fleet and includes a rainwater harvesting cistern as part of the wash program. Four buses can be washed simultaneously.

### **Fleet Maintenance Building with Parts Storeroom**

The Fleet Maintenance Building and the Parts Storeroom are located parallel to the Bus Storage/Coach Services Building along the north side of the Coolidge Terminal. The Fleet Maintenance Building includes bus inspection and repair bays as well as additional administrative offices and staff areas.

The location and orientation of the Fleet Maintenance Building allows for potential expansion to the east and west as needed. This space could be used for heavy repair, and for the expansion of the battery electric bus (BEB) deployment of DDOT's bus fleet, or another alternative fuel as DDOT determines is most appropriate. The Coolidge Terminal would be able to accommodate this transition in the future, as required.

### **Parking and Site Circulation**

There are two entrances/exits off of Schaefer Highway. Employees and visitors access the Coolidge Terminal from the north vehicle entrance/exit. Employee and public parking are located in the west portion of the Coolidge Terminal off of Schaefer Highway. A five-foot sidewalk along Schaefer Highway

and a bus stop in front of the Coolidge Terminal is also provided (Figures 3 and 7). Employees and visitors proceed on foot from the parking area to the Bus Operations and Administration Building to access the rest of the Coolidge Terminal.

To support the first phase of 144 bus operation, off-street surface parking for 245 automobiles would be constructed, including requisite accessible parking stalls and aisles. This includes 230 employee spaces and 15 visitor spaces. Parking stalls are approximately 9' wide x 20' deep. The lot would include pedestrian walkways and marked crossings and be landscaped according to City of Detroit ordinances, including those related to the Americans with Disabilities Act (ADA). In addition, 37 spaces for DDOT's non-revenue vehicles would be positioned directly behind the Operations and Administration Building.

The employee parking lot would be expanded to the west and south to accommodate 341 vehicles to support the full buildout in the second phase. The number of initial and future employee parking spaces considers three shifts over the 24-hour period of operation, and the overlapping of workers at shift changes.

Buses and delivery vehicles will enter and exit the Coolidge Terminal off of Schaefer Highway at the south entrance/exit and follow the two-way interior roadway. On-site bus circulation is generally organized with counterclockwise circulation, allowing for maximum visibility by DDOT personnel. Upon entering the Coolidge Terminal, buses proceed into the Bus Storage/Coach Services Building where they are fueled, interiors are cleaned, and are washed and then stored in their assigned interior parking spaces. After parking their buses, drivers will walk west through the Operations and Administration Building to access outdoor designated pathways. When leaving the Bus Storage portion of the building, buses will use the same roadway and southwest access point to Schaefer Highway.

## Utility Yard

The location of the proposed Utility Yard currently includes four 25,000-gallon underground storage tanks (USTs) dedicated to diesel fuel and one 10,000-gallon UST dedicated to unleaded gasoline. These tanks currently contain fuel, are inspected regularly, and are thought to be in good condition. The four 25,000-gallon tanks will be left in place and the fuel supply lines and pumps would be removed and replaced with new piping connecting to new fuel dispenser locations. The 10,000-gallon tank and associated piping will be removed in accordance with the UST Closure requirements per Michigan Administrative Code R29.2155.

An impressed current cathodic protection (ICCP) system was installed in August of 2021 to ensure the five USTs remain protected from corrosion to extend the service life of the system. To repurpose the existing tanks for the new fuel dispensing operation in the Coach Service building, the tank-top appurtenances will be replaced to modernize the system for increased performance. Due to the 1,200-foot distance between the Coach Services building and existing location of the USTs, each tank will include a new 5-horsepower submersible turbine pump mounted on it to supply fuel to the dispensing equipment to dispense fuel more efficiently.

A remote spill container will be set up in the delivery area to receive fuel. An overflow prevention valve will be installed at the fill connection to the tank. The gasoline tank will also include a vapor recovery line. The immediate area will be surrounded by bollards. All tank level and leak detection

instrumentation will be monitored at a common panel which will provide inventory monitoring, level alarms, and leak alarms.

### Stormwater Management, Landscaping, Perimeter Visual Barriers

To meet City of Detroit standards as noted in Section 3.4.1 of the EA, the Coolidge Terminal drainage systems will be designed to include water quality planning, since stormwater contamination is possible due to spilling of oils, fuels, and cleaning fluids in previous years. The system will be designed to control flows that may have a high concentration of contaminants.

Surface drainage of stormwater to bioswales occurs throughout the Coolidge Terminal, though primarily at the outer perimeter to allow adequate slopes to the bioretention at the outer edges. The entire system would be designed for detention, not retention, as the freeboard requirements are prohibitive, and the soils are likely not well-drained. All surface bioretention have concrete inlets for water to enter the system and will have rip rap to dissipate the energy.

In known areas of contamination, bioretention has been designed around them to manage contamination in place using a Due Care Plan, a plan to deal with hazardous materials. The Due Care Plan will be prepared in accordance with Part 201 of the Michigan Natural Resource Environmental Protection Act, 1994 Public Act 451. With this design, bioretention is located in between these brownfield zones and are connected by pipes running through the contamination, preventing its migration.

The main bus storage facility will collect roof water as one water source for daily bus washing needs. At the west entrance of the Bus Operations and Administration Building, a pedestrian pathway from the parking lot to the entrance will be constructed. There are areas of contamination here, so bioretention cells will be installed as well. The area will also be landscaped with trees, shrubs, plugs, and seed, which are essential for the bioretention zones to function.

Trees, shrubs, and grass are planned for the perimeter of the majority of the Coolidge Terminal, except on the far northwest end where the guardhouse and utility yard are located. The landscaping will provide a visual buffer to the residential areas to the east and south, as well as the frontage on Schaefer Highway. The parking lot will also be landscaped with trees and shrubs in accordance with City of Detroit zoning requirements.

The entire Coolidge Terminal will be secured with fencing or barriers for security purposes. Along the north edge, chain link fence will be installed. Along the west edge, decorative fencing is proposed. Along the east edge, an opaque privacy fence is proposed to shield the residential area. Along the south edge, a masonry or pre-cast concrete wall is proposed.

### Off-site Improvements

Street improvements along the Schaefer Highway frontage include removal and reconstruction of concrete curb and gutter, streetlights, driveway geometrics, and sidewalk. All work will be performed in accordance with the City of Detroit, Department of Public Works, City Engineering Division – Standard Specifications for Paving and Related Construction March 2009.

### Space for Future Plant (Facilities) Maintenance, Non-Revenue Vehicle Repair, and Sign Shop

The remaining space will be allocated for the future development of additional facilities to serve the full buildout in the second phase of the Coolidge Terminal. This includes a centralized location to maintain and repair various DDOT facility assets (HVAC rooftop unit components, bus stop shelters and benches, etc.); non-revenue vehicle repair and service; and the fabrication and assemblage of signs used throughout DDOT's system.



## 5. Public Involvement, Agency Coordination, and Public Opportunity to Comment

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The EA was made available for public comment from February 1 to March 2, 2023, and a legal Notice of Availability was published in the Detroit News, the Detroit Free Press, and Michigan.com on February 1, 2023. Copies of the EA were available for review online at the proposed Project website [Coolidge Terminal Replacement Project | City of Detroit \(detroitmi.gov\)](https://www.detroitmi.gov/coolidge-terminal-replacement-project) and in hard copy format at the following locations: DDOT's Office at 100 Mack Avenue, Detroit, MI 48201, the Chaney/Detroit Public Library, 16101 Grand River Avenue in Detroit and at the Federal Transit Administration Region 5 – 200 West Adams Street, Suite 320, Chicago, IL 60606. Written comments were accepted via email at [DDOTcomments@detroitmi.gov](mailto:DDOTcomments@detroitmi.gov); or by mail at "Coolidge Project Public Comment, Executive Director's Office," Detroit Department of Transportation, 100 Mack Avenue, Detroit, MI 48201. Verbal comments were accepted via a court reporter at the February 16, 2023, public hearing; or calls to DDOT at (313) 933-1300 or 7-1-1 (TTY). The Notice of Availability and copies of outreach conducted for the public review period are included in **Appendix A** of this FONSI. Information about previous public involvement efforts can be found in Appendix H of the EA published January 25, 2023.

DDOT received a total of eight comments from the public during the comment period. FTA received comments from the USEPA Region V on the Draft EA dated December 19, 2022, and on the published EA on March 2, 2023; from the Michigan Department of Environment, Great Lakes, and Energy on February 23, 2023; and from the US Department of the Interior (DOI) on March 16, 2023.

FTA and DDOT have addressed the comments in this FONSI by modifying some of the commitments as suggested by agencies as noted in **Appendix C** of this FONSI. **Appendix B** of this FONSI contains responses to the agency and public comments received.

No changes to the EA were necessary as a result of the public comments. The public comments were generally supportive of the proposed Project, and requested information regarding the proposed funding, what type of construction employment opportunities were available, and the intent of DDOT to hire local people to work at the Coolidge Terminal after it is opened .

## 6. Mitigation Measures to Minimize Harm

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The EA describes the proposed Project, its likely effects, and potential mitigation measures to avoid or minimize those effects. **Appendix C** of this FONSI describes the mitigation commitments that FTA requires of DDOT as a condition of FTA's finding that the proposed Project will have no significant impact. These environmental commitments are based on the mitigation measures identified in the published EA and presented at the public hearing. Satisfaction of the mitigation commitments will be a condition of any future FTA grant for the proposed Project.

# 7. Environmental Documentation and Findings

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## 7.1 National Environmental Policy Act (NEPA) Finding

The FTA served as the lead federal agency under NEPA for the proposed Project. DDOT will construct the proposed Project in accordance with the design features and mitigation measures presented in the EA. DDOT prepared the EA, with FTA oversight, in compliance with NEPA, 42 U.S.C. § 4321, et. seq., and 23 CFR Part 771. The FTA made an independent evaluation of the EA.

After reviewing the EA and supporting documents, FTA finds that the proposed Project would result in permanent impacts on three of the examined resources – Land Use/Zoning, Cultural Resources and Section 4(f). The following resource categories would have limited or no adverse permanent impacts related to the proposed project: Transportation, Land Use Compatibility, Neighborhoods and Community Resources, Land Acquisitions and Relocations, Economics, Visual Resources and Aesthetics, Environmental Justice, Safety and Security, Utilities, Water Resources, Geology, and Soils, Hazardous Materials, Noise and Vibration, Air Quality, Threatened and Endangered Species, Indirect and Cumulative Effects, Cultural Resources, and Section 4(f) resources. All permanent impacts will be mitigated as part of the proposed Project.

The FTA finds that the proposed Project would result in temporary construction impacts on the following resource categories: Transportation, Neighborhoods and Community Resources, Economics, Visual Resources and Aesthetics, Cultural Resources, Environmental Justice, Safety and Security, Utilities, Water Resources, Geology, and Soils, Hazardous Materials, Noise and Vibration, and Air Quality.

**Appendix C** contains proposed measures to mitigate the permanent and temporary impacts.

**Pursuant to 23 CFR § 771.121, FTA finds that, with mitigation to which DDOT has committed to, the proposed Project will have no significant impact on the environment.** The record provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required.

## 7.2 Section 106 Finding

In compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended (54 USC § 306108 et seq.), and its implementing regulations at 36 CFR Part 800 and in accordance with the Criteria of Adverse Effect described in 36 CFR § 800.5, FTA determined that the proposed Project will have an Adverse Effect on one historic property, the Coolidge Terminal, resulting from its physical demolition and subsequent permanent incorporation.

The Michigan State Historic Preservation Office (SHPO) concurred with this determination on June 21, 2022. Treatment measures to minimize and mitigate adverse effects on historic properties were developed based on input from SHPO and Section 106 consulting parties. These mitigating treatment measures are incorporated in the executed MOA (dated April 26, 2023) between FTA, SHPO, and DDOT, included as **Appendix D**. With implementation of the stipulations and treatment measures outlined in the MOA, adverse effects to the historic Coolidge Terminal will not be significant.

Based on the historic resources analysis included in the EA as well as the consultation with SHPO, and the other Section 106 consulting parties, and execution of a MOA, **FTA finds, in accordance with 36 CFR Part 800, that the Section 106 coordination and consultation requirements for the proposed Project have been fulfilled.**

### 7.3 Environmental Justice Finding

Executive Order 12898 provides that “each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and/or low-income populations.” A disproportionately high and adverse effect on minority or low-income populations is defined as an adverse effect that: (a) is predominantly borne by a minority population and/or a low-income population; or (b) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

Based on the analysis contained in the EA and the mitigation commitments made by DDOT, the proposed Project will not result in adverse effects on environmental justice populations. As a result, **FTA finds that the proposed Project will not result in disproportionately high and adverse effects on minority or low-income populations.**

### 7.4 Air Quality Conformity Finding

The Clean Air Act (CAA) (42 U.S.C. § 7401, et seq.) and its associated regulations (40 CFR Part 50) are the federal statutes and regulations governing air pollution. The Transportation Conformity Rule (40 CFR Part 93, Subpart A) requires that projects that are developed, funded, or approved by USDOT and by metropolitan planning organizations or other recipients of federal funds demonstrate conformity with the State Implementation Plan (SIP) developed pursuant to the CAA. A determination of conformity is made by the metropolitan planning organization and USDOT. The proposed Project is identified in the Fiscal Year 2020-2023) transportation improvement program (TIP) as Project Number JN 212369. As this TIP is amended and TIPs for future years are developed, additional funding will be added to support construction of the proposed Project. On May 24, 2019, the Federal Highway Administration and FTA determined that the TIP conforms to the transportation-related requirements of the 1990 Clean Air Act Amendments. These findings were in accordance with 40 CFR Part 93, "Determining Conformity of Federal Actions to State or Federal Implementation Plans." The proposed Project's design and scope are consistent with the proposed Project information used for the TIP conformity analysis; therefore, **FTA finds that the proposed Project conforms to the existing TIP and the transportation-related requirements of the 1990 Clean Air Act Amendments.**

### 7.5 Section 4(f) Finding

Section 4(f) of the USDOT Act of 1966 (49 USC § 303) is a national policy that states that the Secretary of Transportation may not approve transportation projects that use publicly owned parks, recreation areas, wildlife and waterfowl refuges, or any significant historic site unless a determination is made that

there is no prudent or feasible alternative to using that land, and that all possible planning has been done to minimize harm.

The existence of potential Section 4(f) resources was evaluated in the EA and Section 4(f) Evaluation. Based on the evaluation in the EA, the proposed Project will result in the permanent incorporation through demolition of one historic site identified as a historic property as part of the Section 106 process. The demolition of the entire Coolidge Terminal property, which consists of five contributing and two non-contributing buildings, was determined to an adverse effect under Section 106 and determined to constitute a “use” under Section 4(f). To mitigate these effects, DDOT will implement the measures identified in the executed MOA (see **Appendix D**) between FTA, SHPO, and DDOT.

There are no feasible or prudent alternatives to avoid the use of historic sites. The attached executed MOA between FTA, SHPO, and DDOT, along with the Section 4(f) Avoidance and Least Overall Harm analyses included in the EA, documents that all possible planning to minimize harm to these historic resources has been taken. On March 16, 2023, SHPO indicated that it “does not object to the Section 4(f) Determination Conclusions stated in the (EA) Section 5.10.” The Department of Interior indicated on March 16, 2023, that it concurred with FTA’s determinations as well, and that “if the MOA is fully executed and included in the environmental decision document, the Department will have no objection to the 4(f) evaluation and concur with the measures to mitigate the adverse effects of the project” (see **Appendix D**). Taking into account the mitigation commitments made by DDOT, **FTA finds that the proposed Project is in compliance with the Section 4(f) statute 49 USC § 303 and 23 USC § 138 and the implementing regulations under 23 CFR § 774.**

## 7.6 Conclusion

Based on the EA and its associated supporting documents, FTA finds that, pursuant to 23 CFR § 771.121, there are no significant impacts on the environment associated with the development and operation of the proposed Project. Preparation of an Environmental Impact Statement is not warranted.

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Kelley Brookins  
Regional Administrator  
Federal Transit Administration, Region V

May 12, 2023

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Date

APPENDIX A. ENVIRONMENTAL ASSESSMENT NOTICE OF AVAILABILITY AND  
INVITATIONS TO COMMENT

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## Public Hearing Email Notification

Email Notification of the availability of the EA and the public hearing was provided to DDOT's subscribers list of 14,882 recipients on February 2<sup>nd</sup>, 9<sup>th</sup>, and 16<sup>th</sup>.

Sent February 2 and February 9, 2023:

**From:** City of Detroit <Detroit@public.govdelivery.com>  
**Sent:** Thursday, February 2, 2023 8:50 AM  
**To:** Kristin Lukowski <Lukowskik@detroitmi.gov>  
**Subject:** [EXTERNAL] Join us for DDOT's Coolidge Terminal Replacement Project Meeting



**You are invited to comment on DDOT's proposed plans to build a new bus maintenance, storage, and operations center on the existing Coolidge Terminal site at 1044 Schaefer Highway in Detroit.**

**When:** Thursday, February 16  
**Time:** 5 p.m.  
**In person:** El-Beth-El Temple Church, 13922 Schaefer Hwy (between Schoolcraft and Compass)  
**Or join via Zoom:**  
Zoom Meeting ID: 873 7373 3357  
Call-In Number: 1 (312) 626-6799  
Link: <https://cityofdetroit.zoom.us/j/87373733357>

**JOIN ONLINE**

For latest updates, visit [www.detroitmi.gov/Coolidge](http://www.detroitmi.gov/Coolidge).

DDOT and the Federal Transit Administration have prepared an Environmental Assessment (EA) including a Section 4(f) Evaluation to evaluate the potential benefits and impacts of the Coolidge Terminal Replacement Project. DDOT is hosting the public hearing to present the findings of the EA and receive public comments. DDOT staff will be available to answer questions. Comments on the EA may be made verbally or in writing during the public hearing on February 16, 2023 or by phone, mail, or email between February 1 and March 2, 2023. The EA will be available for review in person at Chaney/Detroit Public Library, 1601 Grand River Avenue in Detroit, as well as at DDOT's office at 100 Mack Ave. in Detroit, and at the Federal Transit Administration Region-200 West Adams Street, Suite 320 Chicago, IL 60606, beginning February 1, 2023.

If you need a reasonable accommodation to attend this meeting, please contact the ADA Coordinator at least seven (7) business days in advance of the meeting. The ADA Coordinator can be reached by phone at 313-573-2939 or by email at [ADA@detroitmi.gov](mailto:ADA@detroitmi.gov). Please note that this is a video conferencing meeting, and a General Sign Language interpreter is present and does not need to be requested.

## Helpful Tips

DDOT uses Zoom as our virtual platform. If you have never used Zoom before, [please download the instructions and make sure your computer system is ready](#).

We recommend following the instructions and testing your system before the start date of the webinar. We cannot guarantee that DDOT staff will be available to help you on the day of the meeting, particularly as we approach the start time.

The audio for the Zoom meeting will come through your computer speakers. However, toll numbers are provided should you prefer to dial in for the audio. There is also a smartphone app if you choose (search for Zoom Cloud Meetings in the Apple App or Google Play stores). If you have not used Zoom before, the instructions link above will help you navigate the controls during the meeting.

- [013023\\_CoolidgePublicHearing-FlyerV2.pdf](#)

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This service is provided to you at no charge by [City of Detroit, Michigan](#).



Sent February 16, 2023:

**Reid, Janice**

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**From:** City of Detroit <Detroit@public.govdelivery.com>  
**Sent:** Thursday, February 16, 2023 10:19 AM  
**To:** Kristin Lukowski; Melanie Weaver; Ayobami Torrence; Amber Easton; Jose Payan; Marva Smiley; Rose Love; Goran Bankovic; Tamara Fant; J.Edgar Montes  
**Subject:** [EXTERNAL] Courtesy Copy: Tonight: DDOT's Coolidge Terminal Replacement Project Meeting

This is a courtesy copy of an email bulletin sent by Kristin Lukowski.

This bulletin was sent to the following groups of people:

subscribers of DDOT (14882 recipients)





## Reminder: DDOT wants your comments about its proposed plans to build a new bus maintenance, storage, and operations center on the existing Coolidge Terminal site at 14044 Schaefer Highway in Detroit.

**Submit at our public meeting:**

**When:** Thursday, February 16

**Time:** 5 p.m.

**In person:** El-Beth-El Temple Church, 13922 Schaefer Hwy (between Schoolcraft and Compass)

**Or join via Zoom:**

Zoom Meeting ID: 873 7373 3357

Call-In Number: 1 (312) 626-6799

Link: <https://cityofdetroit.zoom.us/j/87373733357>

**JOIN ONLINE**

If you can't make the meeting, the public comment period is open through March 2, 2023.

**Email:** [DDOTcomments@detroitmi.gov](mailto:DDOTcomments@detroitmi.gov) (please include "Coolidge Project Public Comment" in the subject line)

**Phone:** (313) 933-1300 or 7-1-1 (TTY)

**Mail:** Detroit Department of Transportation; Attn: Coolidge Project Public Comment; 100 Mack Ave., Detroit, MI, 48201

More information about the project and on how to submit public comment can be found at [www.detroitmi.gov/Coolidge](http://www.detroitmi.gov/Coolidge).

DDOT and the Federal Transit Administration have prepared an Environmental Assessment (EA) including a Section 4(f) Evaluation to evaluate the potential benefits and impacts of the Coolidge Terminal Replacement Project. DDOT is hosting the public hearing to present the findings of the EA and receive public comments. DDOT staff will be available to answer questions. Comments on the EA may be made verbally or in writing during the public hearing on February 16, 2023 or by phone, mail, or email between February 1 and March 2, 2023. The EA will be available for review in person at Chaney/Detroit Public Library, 1601 Grand River Avenue in Detroit, as well as at DDOT's office at 100 Mack Ave. in Detroit, and at the Federal Transit Administration Region - 200 West Adams Street, Suite 320 Chicago, IL 60606, beginning February 1, 2023.

If you need a reasonable accommodation to attend this meeting, please contact the ADA Coordinator at least seven (7) business days in advance of the meeting. The ADA Coordinator can be reached by phone at 313-573-2939 or by email at [DDOT-ADA@detroitmi.gov](mailto:DDOT-ADA@detroitmi.gov). Please note that this is a video conferencing meeting, and a General Sign Language interpreter is present and does not need to be requested.

## Helpful Tips

DDOT uses Zoom as our virtual platform. If you have never used Zoom before, [please download the instructions and make sure your computer system is ready](#).

We recommend following the instructions and testing your system before the start date of the webinar. We cannot guarantee that DDOT staff will be available to help you on the day of the meeting, particularly as we approach the start time.

The audio for the Zoom meeting will come through your computer speakers. However, toll numbers are provided should you prefer to dial in for the audio. There is also a smartphone app if you choose (search for Zoom Cloud Meetings in the Apple App or Google Play stores). If you have not used Zoom before, the instructions link above will help you navigate the controls during the meeting.

- [020723\\_CoolidgePublicHearing-FlyerV3.pdf](#)

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This service is provided to you at no charge by [City of Detroit, Michigan](#).

## Public Hearing Flyer



You are invited to comment on DDOT's proposed plans to build a new bus maintenance, storage, and operations center on the existing Coolidge Terminal site at 14044 Schaefer Highway in Detroit.

DDOT and the Federal Transit Administration have prepared an Environmental Assessment (EA) including a Section 4(f) Evaluation to evaluate the potential benefits and impacts of the Coolidge Terminal Replacement Project. DDOT is hosting the public hearing to present the findings of the EA and receive public comments. DDOT staff will be available to answer questions. Comments on the EA may be made verbally or in writing during the public hearing on February 16, 2023 or by phone, mail, or email between February 1 and March 2, 2023. The EA will be available for review in person at Chaney/Detroit Public Library, 1601 Grand River Avenue in Detroit, as well as at DDOT's office at 100 Mack Ave. in Detroit, and at the Federal Transit Administration Region- 200 West Adams Street, Suite 320 Chicago, IL 60606, beginning February 1, 2023.

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**Thursday, February 16, 2023 / 5:00pm**

**El-Beth-El Temple Church** 13922 Schaefer Hwy (between Schoolcraft and Compass)

**Or join via Zoom:**

**Zoom Meeting ID:** 873 7373 3357

**Call-In Number:** 1 (312) 626-6799

**Link:** <https://cityofdetroit.zoom.us/j/87373733357>

**Comments may be submitted by:**

**Email:** [DDOTcomments@detroitmi.gov](mailto:DDOTcomments@detroitmi.gov)

**Phone:** (313) 933-1300 or 7-1-1 (TTY)

**Mail:** Detroit Department of Transportation

ATTN:Coolidge Project Public Comment

100 Mack Ave., Detroit, MI 48201

For a look at our latest updates, please visit [www.detroitmi.gov/Coolidge](http://www.detroitmi.gov/Coolidge).

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[www.detroitmi.gov/ddot](http://www.detroitmi.gov/ddot)



Legal Advertisement: Notice of EA Availability

**Text of Ad:** 01/30/2023

*Detroit Department of Transportation  
Coolidge Terminal Replacement Project*

**Legal Notice of Availability of Environmental Assessment and Public Hearing**

Notice is hereby given that the Detroit Department of Transportation (DDOT), as project sponsor to the Federal Transit Administration, has prepared an Environmental Assessment (EA) and Section 4(f) Evaluation and to evaluate the potential benefits and impacts of the Coolidge Terminal Replacement Project in Detroit, Michigan. The Project would replace the existing Coolidge bus terminal with a new bus maintenance, storage, and operations center at 14044 Schoeler Highway.

The EA analyzes the effects of implementing the Project on the physical, human, and natural environments pursuant to the National Environmental Policy Act of 1969 (NEPA). The EA also evaluates the effects of historic properties in accordance with Section 106 of the National Historic Preservation Act and the uses of historic properties, publicly-owned parks, recreation, and wildlife/waterfowl resources protected under Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended. All interested parties are invited to review the EA and submit comments on the impacts and mitigation measures identified for the proposed improvements. The EA is available for review at [detroitmi.gov/Coolidge](http://detroitmi.gov/Coolidge) from 2/1/23 to 3/2/23. Hard copies of the EA are also available at the following locations: Choney/Detroit Public Library, 16101 Grand River Avenue in Detroit, as well as at DDOT's office at 100 Mack Avenue in Detroit, and at the Federal Transit Administration Region 5 - 200 West Adams Street, Suite 320, Chicago, IL 60606.

DDOT will hold a public hearing to present the EA and solicit public comments on February 16, 2023, at 5:00 p.m. at El-Beth-El Temple Church at 12922 Schoeler Highway. This hearing will include a presentation and DDOT staff will be available to answer questions. Comments on the EA may be made verbally to a court reporter or in writing during the public hearing. The hearing location is accessible to people with disabilities. For any person requiring an interpreter, including sign language services, or other accommodations at the public hearing, contact DDOT Customer Service at (313) 933-1300 or [ddot-odo@detroitmi.gov](mailto:ddot-odo@detroitmi.gov) a minimum of 5 days in advance of the hearing date.

The public hearing will also be streamed live via Zoom: Zoom Meeting ID: 873 7373 3357, Call-in Number: 1(312) 626-6799; Link: <https://cityofdetroit.zoom.us/j/8737373357>

A 30-day comment period from 2/1/23 to 3/2/23 has been established to take comments. All comments received during this period, and responses will be incorporated into the final NEPA decision document. Comments may be submitted by email to [DDOTcomments@detroitmi.gov](mailto:DDOTcomments@detroitmi.gov); by mail to Coolidge Project Public Comment, Detroit Department of Transportation, 100 Mack Avenue, Detroit, MI, 48201; by completing a comment form available at the 100 Mack Avenue office; or by calling (313) 933-1300 or 7-1-1 (TTY).

For more information, visit Coolidge Terminal Replacement Project | City of Detroit [[detroitmi.gov](http://detroitmi.gov)].

## APPENDIX B. AGENCY AND PUBLIC COMMENTS AND RESPONSES

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**Notice of EA Availability and Public Hearing to Agencies**

DDOT provided notice of availability of the EA and the public hearing via email to the following agencies. A copy of the sample email is included after the table.

Agency	Point of Contact
USACE	Detroit Office
USFWS Michigan Ecological Services Field Office	Scott Hicks Shaughn Galloway
USEPA Region V	Jennifer Tyler
Michigan Department of Transportation	General Olukayode (Kay) Adefeso Deanna Donahoo
Michigan EGLE - Water	General
Michigan EGLE - Air	General
US Senators	Senator Debbie Stabenow Senator Gary Peters
US House of Representatives	Rep. Rashida Tlaib – District 12
State Senators	Senator Mallory McMorrow – District 8
State House of Representatives	Rep. Regina Weiss – District 6
Southeast Michigan Council of Governments	Michele Fedorowicz Kelly Karll Kevin Vettraino
SMART Bus	Janai Story

Sample email to agencies:

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**From:** Ayobami Torrence <ayotor@detroitmi.gov>  
**Sent:** Wednesday, February 1, 2023 12:53 PM  
**Subject:** Detroit Dept. of Transportation: Coolidge Terminal Replacement Project

# Detroit Department of Transportation Coolidge Terminal Replacement Project

Legal Notice of Availability of Environmental Assessment

Greetings,

The Environmental Assessment (EA ) and Section 4(f) Evaluation for the Detroit Department of Transportation (DDOT) Coolidge Terminal Replacement Project is available for review at [detroitmi.gov/Coolidge](https://detroitmi.gov/Coolidge). The EA documents the benefits and impacts of the alternatives considered. The EA also evaluates the effects of historic properties in accordance with Section 106 of the National Historic Preservation Act of 1966 and the uses of property from historic properties, publicly-owned parks, recreation, and wildlife/waterfowl resources protected under Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended.

The review and comment period for this EA is from February 1 to March 2, 2023. Comments may be submitted via email at [DDOTcomments@detroitmi.gov](mailto:DDOTcomments@detroitmi.gov) or by mail to:

Attn: Coolidge Project Public Comment  
Detroit Department of Transportation  
100 Mack Avenue  
Detroit, MI, 48201

Written comments received during the 30-day comment period will be fully considered and evaluated in preparing the final EA. Your comments may be published as part of the EA process. We appreciate your interest in this project and welcome any comments you may have on this EA. If have any questions, please contact Coolidge Project Public Comment at 313-933-1300.



Ayobami Bell Torrence  
Outreach Ambassador Manager  
City of Detroit  
Department of Transportation (DDOT)  
100 Mack Ave.  
Detroit, MI 48201  
Email: [ayotor@detroitmi.gov](mailto:ayotor@detroitmi.gov)  
Phone: 313.833.7292  
Cell: 313.590.4058  
Mike Duggan, Mayor

Table B-1: Agency Comment Log

Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
USEPA-1	12/19/22	Kathy Triantafillou, United States Environmental Protection Agency (USEPA)	<p><b>Air Quality</b></p> <p>Thank you for committing to direct contractors to follow USEPA’s Construction Emission Control Checklist to reduce air pollution. The Council on Environmental Quality’s NEPA Implementation Regulations at 40 CFR Part 1501.5 states that an EA shall discuss the environmental impacts of the proposed action and alternatives. The proposed project would release air pollution during demolition, construction, and operations. Disclosing such impacts within the EA is important for public disclosure, project design decisions, and selection of protective measures.</p> <p>Recommendations for the EA:</p> <ul style="list-style-type: none"> <li>• Discuss current air quality, including whether the project area is in attainment status for the National Ambient Air Quality Standards. Discuss localized air pollution sources in the area, such as nearby industrial sources, that may contribute to background pollution levels.</li> <li>• Disclose expected sources of air pollution from the proposed project and quantify anticipated releases from project demolition, construction, and operational phases. Include dust from demolition, exhaust from trucks hauling materials, use of construction equipment, and bus idling, among other sources. Include details on whether all 143 buses would be at the Coolidge Terminal at any one time, or if a portion of those would be in-service.</li> <li>• Identify sensitive receptors (i.e., people in nearby homes, on-site workers) who may be impacted by air pollution from the project.</li> <li>• Assess measures to reduce air pollution beyond those already committed to in USEPA’s Construction Emission Control Checklist. For</li> </ul>	<p>See responses to USEPA recommendations, below.</p> <p>The proposed Project is included in the conformed FY 2020-2023 Transportation Improvement Program approved by SEMCOG on July 25, 2019, as well as the 2045 Long Range Transportation Plan. As this is not a capacity-adding project, this Project is exempt under <i>40 CFR Part 93.126, mass transit projects reconstruction or renovation of transit buildings and structures</i>; therefore, there are no air quality impacts and no further analysis is required. This information has been included in Section 4.2.15 of the published EA.</p> <p>Regarding air quality impacts during demolition, the selected demolition contractor will be required to comply with all the requirements set forth in the demolition plans and technical specifications. This has been included as a commitment in the FONSI.</p> <p>Regarding air quality impacts during construction, the proposed Project would refer to the USEPA’s Construction Control Checklist and other USEPA guidance for best practices to control dust and particulate matter during construction. Consultation with EGLE would occur to determine if air quality modeling is required for the proposed Project’s construction phase and what methodologies and assumptions would be used if modeling is required. Information on the best practices to be implemented to control temporary construction-related air quality will be shared with the public prior to and during construction. This information has been included in Section 4.2.13 and 4.2.15 of the published EA as well as the FONSI.</p>	Letter	Air Quality



Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
			<p>example, consider (1) staging construction equipment away from neighboring residences, (2) when planning the site layout, siting outdoor activities that generate air pollution away from homes, and (3) during the operational period, maintaining enforceable restrictions on bus idle time.</p> <ul style="list-style-type: none"> <li>If an assessment of air pollution determines that operation of Coolidge Terminal could elevate local air pollution levels, then evaluate incorporating vegetative barriers into site design. Vegetative barriers are strategically planted trees and shrubs that can reduce air and noise pollution exposures. Benefits are greatest when used in combination with a solid wall. For guidance, see The Morton Arboretum’s Vegetation Barrier Toolkit, which was developed in collaboration with USEPA. <a href="https://chicagorti.org/resources/vegetation-barrier-toolkit-for-schools-and-communities/">https://chicagorti.org/resources/vegetation-barrier-toolkit-for-schools-and-communities/</a></li> </ul>	<p>Regarding air quality impact during operation phases of the proposed Project, some of the 143 buses will be in service at various points throughout the day, as DDOT runs 24 hour bus service (see Figure 11 in the published EA). Section 3.4.1 of the published EA discusses Project landscaping and fencing/barriers associated with the proposed Project. The Coolidge Terminal Conceptual Site Plan (Figure 3 in the published EA) shows vegetation along the perimeter of the site and a solid masonry or pre-cast concrete wall along the south edge of the proposed Project area.</p> <p>DDOT will commit to communicating with neighborhoods and businesses before and during construction. The Project contractor will implement construction best management practices for erosion and dust control. DDOT has implemented an extensive outreach program within the community, and outreach will continue through the end of the NEPA process, as well as during construction. This has been included as a commitment in the FONSI.</p> <p>The Coolidge Terminal Conceptual Site Plan (Figure 3 in the published EA) shows vegetation along the perimeter of the site and a solid masonry or pre-cast concrete wall along the south edge of the proposed Project area.</p>		
USEPA-2	12/19/22	Kathy Triantafillou, United States Environmental Protection Agency (USEPA)	<p><b>Noise Impacts</b></p> <p>In line with the Council on Environmental Quality’s NEPA Implementation Regulations at 40 CFR Part 1501.5, it is important for the EA to disclose and assess noise impacts from demolition, construction, and operation. The EA states that, “There were no noise-sensitive receivers identified within the noise screening distances.” Appendix F explains, “Since the Project related noise activities will take place primarily indoors the origin of the screening distances was applied to the center of the Project Area.” With the screening distances used, the area screened does not cover the entire project property, nor does it include residences that are directly adjacent to the project property.</p> <p>Recommendations for the EA:</p> <ul style="list-style-type: none"> <li>Describe all sources of noise that would be loud enough to potentially bother neighbors. Include</li> </ul>	<p>See responses for USEPA recommendations, below.</p> <p>As described in the published EA, the center of the site was selected as the origin for the noise screening radius based on FTA guidance on page 34,</p>	Letter	Noise

Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
			<p>where on the property these noises would originate. While text states that noise would take place “primarily” indoors, it’s unclear whether outdoor noisy activities might also occur.</p> <ul style="list-style-type: none"> <li>Select a noise screening boundary that includes the full site and surrounding residences. This is particularly important because the project is sited in a community with environmental justice concerns.</li> <li>Consider measures that would reduce noise levels, such as selection of quieter equipment, sound-proofing insulation, the use of vegetation, and noise walls, if appropriate.</li> </ul>	<p>Option C – Small Stationary Facilities (FTA, 2018). The use of the center of the site is reasonable, appropriate, and consistent with the text and intent of the 2018 FTA guidelines.</p> <p>Construction activities would be conducted in accordance with City, State, and Federal guidelines, and would use best practices to limit noise, such as limiting construction activities to normal daytime working hours, limiting idling equipment, and additional preventative actions as the construction plan is finalized. This is discussed in Section 4.2.12 of the published EA.</p> <p>Most maintenance work will be done within the facility which would reduce noise levels outside of the facility from bus maintenance activities. Additional measures such as a wall on the south edge of the proposed Project area and landscaping around the proposed Project perimeter may further reduce noise levels.</p>		
USEPA-3	12/19/22	Kathy Triantafillou, United States Environmental Protection Agency (USEPA)	<p><b>Hazardous Materials</b></p> <p>The proposed project would reuse a brownfields site; reuse of such sites has local economic as well as environmental benefits. USEPA also appreciates that the EA summarizes findings from a Phase I Environmental Site Assessment (ESA), Phase II ESA, and Report of Asbestos and Universal Waste Survey.</p> <p>Recommendations for the EA:</p> <ul style="list-style-type: none"> <li>Consider best practices from USEPA’s Sustainable Management of Construction and Demolition Materials webpage. While we understand that this is not a residential project, best practices may also be applicable from USEPA’s Large-Scale Residential Demolition webpage. Use these resources to help: (1) identify environmentally sensitive activities associated with building removal and (2) develop contract language for bid packages with specific technical requirements to improve environmental results from demolition.</li> <li>Discuss practices that would be employed to control dust during demolition, which is critical for this project due to the presence of asbestos, lead,</li> </ul>	<p>See responses to USEPA recommendations, below.</p> <p>Per Section 4.2.11 of the published EA – Measures to Avoid and Minimize Harm, DDOT would prepare demolition plans and technical specifications that identify the demolition and site clearing performance requirements, asbestos abatement requirements, the removal requirements for Universal Wastes, USTs, oil-water separators, and other potentially environmentally sensitive materials, utility abandonment requirements, and demolition debris disposal requirements. These are also be included in the FONSI as mitigation commitments.</p> <p>Also as described in Section 4.2.11, the selected demolition contractor will be required to comply with all the requirements set forth in the demolition plans and technical specifications including but not be limited to the following:</p> <ul style="list-style-type: none"> <li>- A State of Michigan Accredited Asbestos Inspector will complete an asbestos survey of the former Fare Box Building and tunnel</li> <li>- Abatement of regulated ACMs prior to demolition</li> </ul>	Letter	Hazardous Materials

Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
			<p>and other hazardous materials and the proximity of neighboring homes. Discuss use of temporary building enclosure tarps.</p> <p>Request for Discussion with USEPA:</p> <ul style="list-style-type: none"> <li>The EA reports metals including arsenic, chromium, mercury, and selenium were detected in soil above Drinking Water Protection and/or Groundwater Surface Water Interface Protection (GSIP) Criteria at a sample location along Ward Avenue associated with the Detroit Land Bank's residential parcels adjoining the Coolidge Terminal to the east that</li> </ul>	<ul style="list-style-type: none"> <li>All universal wastes will be removed prior to demolition</li> <li>Removal, handling, transport, and proper disposal of all materials in accordance with local, state, and federal guidelines</li> </ul> <p>The published EA further states that DDOT would prepare a Soil and Water Management Plan (SWMP) to address the on-site management and/or proper removal, verification sampling, waste characterization sampling, handling and disposal requirements associated with the excavation of known and or potentially contaminated soils and groundwater during the demolition and site clearing activities and then all subsequent construction operations associated with the new Coolidge Terminal. The SMWP would be incorporated into specifications and contract documents that would be provided to all parties who perform work at the site and would specify policies and procedures to be followed during site work.</p> <p>Contractors working on-site shall be required to develop a Health and Safety Plan (HASP) to address potential exposure to contaminants that may be encountered during construction and excavation activities associated with each component of the proposed Project. The Contractor would be responsible for hiring an independent third-party Environmental Professional who would be responsible for overseeing the implementation of the SWMP. DDOT and their consultants/on-site representatives shall be responsible for overseeing the performance of the SWMP.</p> <p>Sections 4.2.13 and 4.2.15 of the published EA specifies that the proposed Project specifications would refer to the US Environmental Protection Agency's (USEPA) Construction Control Checklist and other USEPA guidance for best practices to control dust and particulate matter during construction. Information on the best practices to be implemented to control temporary construction-related air quality will be shared with the public prior to and during construction.</p> <p>The City of Detroit Buildings, Safety Engineering and Environmental Department (BSEED) and State of Michigan Department of Environment, Great Lakes and Energy (EGLE) are generally aware of elevated concentrations of metals found in soil throughout much of Southeast Michigan including within the City of Detroit. The City of Detroit BSEED has reviewed all environmental reports produced for the Coolidge Terminal. The contaminants found on residential parcels adjoining the Coolidge Terminal</p>		

Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
			would be transferred to DDOT for the project. Are these contaminants associated with past activities at Coolidge Terminal? Are the City and State aware of these elevated levels? Might further action be warranted to test other homes in the area?	are likely related to fill material historically placed across much of Detroit, or are naturally occurring, and there is no obvious evidence that the metals concentrations observed on adjoining parcels are related to past site activity at the Coolidge Terminal. Due to the pervasive nature of these metals throughout the City of Detroit, and since no concentrations were detected in soil above applicable EGLE Part 201 Residential Direct Contact or Volatilization to Indoor Air Pathway Screening Criteria, no additional sampling of residential parcels in the vicinity of the Coolidge Terminal appears to be warranted at this time. The City of Detroit will be in contact with the USEPA directly regarding the Request for Discussion on this matter.		
USEPA-4	12/19/22	Kathy Triantafillou, United States Environmental Protection Agency (USEPA)	<p><b>Environmental Justice</b></p> <p>Demographic information provided in the EA demonstrates the community surrounding the proposed project has higher percentages of minority and low-income residents than the overall City of Detroit and State of Michigan. In addition, the neighboring industrial corridor likely contributes to the cumulative pollution burden for residents. Environmental justice concerns in the project area further warrants the need for meaningful community engagement and commitments to protective measures. USEPA appreciates that Appendix H documents public involvement to date, including door-to-door canvassing, and provides a summary of comments received by residents at public meetings.</p> <p>Recommendations for the EA:</p> <ul style="list-style-type: none"> <li>Consider cumulative disproportionate environmental burdens faced by residents living near the industrial corridor when deciding on appropriate project mitigation measures. As discussed above, further mitigation opportunities may be available related to air pollution, noise, and risks of hazardous material exposure.</li> <li>Create a factsheet of all protective measures required for project construction, such as idle time limits, speed limits for construction trucks, and dust suppression. Include a phone number</li> </ul>	<p>See responses to USEPA recommendations, below.</p> <p>As discussed in the published EA, DDOT would consult with EGLE to determine if the proposed Project would require air quality monitoring during the construction phase.</p> <p>The proposed Project has been designed to minimize noise impacts to the extent practicable by locating noise-producing operations inside the facility itself; and by locating the parking lot near Schaefer Avenue and away from residential areas. Section 3.4.1 of the published EA discusses Project landscaping and fencing/barriers associated with the proposed Project, which may act as intervening structures to prevent air pollution and noise impacts from the surrounding community.</p> <p>The FONSI contains a commitment from DDOT to create a fact sheet of protective measures required for project construction. The fact sheet will be</p>	Letter	Environmental Justice

Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
			<p>residents can call if contractors are not following required practices and distribute the factsheet to the surrounding community.</p> <ul style="list-style-type: none"> <li>The EA includes several measures to reduce impacts from the project on the surrounding community, such as directing lighting downward toward the site (page 38) and use of occupancy sensors in exterior parking and site lighting systems to reduce lighting levels when no motion is detected (page 41). Include all such protective measures as commitments in the decision document to help ensure implementation.</li> </ul>	<p>distributed to members of the community prior to and during construction and will include a number that they can call if contractors are not following outlined practices.</p> <p>DDOT is committed to implementing the mitigation outlined in the EA. These commitments are in Appendix D of the FONSI.</p>		
USEPA-5	3/2/23	Kathleen Kowal for Kathy Triantafillou, United States Environmental Protection Agency (USEPA)	<p><b>Air Quality</b></p> <p>Thank you for committing to direct contractors to follow USEPA’s Construction Emission Control Checklist to reduce air pollution. The Council on Environmental Quality’s NEPA Implementation Regulations at 40 CFR Part 1501.5 states that an EA shall discuss the environmental impacts of the proposed action and alternatives. The proposed project would release air pollution during demolition, construction, and operations. The EA explains that the proposed project is within the approved Transportation Improvement Program and Long Range Transportation Plan, and therefore does pose a concern for conformity under 40 CFR Part 93 or attainment of the National Ambient Air Quality Standards. The EA does not appear to discuss localized air quality impacts to workers and adjacent residents.</p> <p>Recommendations for the EA:</p> <ul style="list-style-type: none"> <li>Consider sensitive receptors (i.e., on-site workers, residents just north of the intersection of Ward Ave. and Intervale St., and residents adjacent to the southern boundary of the site) who may be impacted by air pollution from the proposed project. Discuss whether construction or</li> </ul>	<p>See responses to USEPA recommendations, below.</p> <p>As described in the published EA, DDOT will commit to communicating with neighborhoods and businesses before and during construction. The Project contractor would implement construction best management practices for erosion and dust control. DDOT has implemented an extensive outreach program within the community, and outreach will continue through the end of the NEPA process, as well as during construction.</p>	Letter	Air Quality



Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
			<p>operational activities would or would not create localized air quality concerns for these groups.</p> <ul style="list-style-type: none"> <li>Assess measures to reduce air pollution beyond those already committed to in USEPA’s Construction Emission Control Checklist. For example, consider (1) staging construction equipment away from neighboring residences, and (2) during the operational period, maintaining enforceable restrictions on bus idle time.</li> <li>If an assessment of air pollution determines that operation of Coolidge Terminal could elevate local air pollution levels, then evaluate incorporating vegetative barriers into site design. Vegetative barriers are strategically planted evergreen trees (for year-round foliage) and shrubs that can reduce air and noise pollution exposures. For guidance, see The Morton Arboretum’s Vegetation Barrier Toolkit, which was developed in collaboration with USEPA.1 Conceptual site plans already include trees; using the Toolkit could inform species selection and optimize benefits from plantings. Shade from evergreens may have consequences on winter ice formation, impacting safety, that should also be considered when assessing tradeoffs.</li> </ul>	<p>Regarding air quality impacts during demolition, the selected demolition contractor will be required to comply with all the requirements set forth in the demolition plans and technical specifications. This has been included as a commitment in the FONSI.</p> <p>Regarding air quality impacts during construction, the proposed Project would refer to the USEPA’s Construction Control Checklist and other USEPA guidance for best practices to control dust and particulate matter during construction. Consultation with EGLE would occur to determine if air quality modeling is required for the proposed Project’s construction phase and what methodologies and assumptions would be used if modeling is required. Information on the best practices to be implemented to control temporary construction-related air quality will be shared with the public prior to and during construction. This information has been included in Section 4.2.13 and 4.2.15 of the published EA as well as the FONSI.</p> <p>Regarding air quality impact during operation phases of the proposed Project, some of the 143 buses will be in service at various points throughout the day, as DDOT runs 24 hour bus service (see Figure 11 in the published EA). Section 3.4.1 discusses Project landscaping and fencing/barriers associated with the proposed Project. The Coolidge Terminal Conceptual Site Plan (Figure 3 in the published EA) shows vegetation along the perimeter of the site and a solid masonry or pre-cast concrete wall along the south edge of the proposed Project area.</p>		
USEPA-6	3/2/23	Kathleen Kowal for Kathy Triantafillou, United States Environmental Protection Agency (USEPA)	<p><b>Noise Impacts</b></p> <p>USEPA recognizes that DDOT used FTA’s noise guidance to determine screening distances. In line with the Council on Environmental Quality’s NEPA Implementation Regulations at 40 CFR Part 1501.5, it is important for the EA to disclose and assess noise impacts from demolition, construction, and operation. With the screening distances used, the area screened does not cover the entire proposed project property, nor does it include residences that are directly adjacent to the proposed project property. It’s unclear whether residents just north of the intersection of Ward Ave. and Intervale St., and residents adjacent to the</p>	<p>The EA followed the procedures outlined in the FTA manual for assessing noise from demolition, construction, and operations. Table 8 in the EA indicates that the resulting noise for the nearest residential receptor was lower than the applicable residential land use dBA criteria; therefore, significant adverse impacts from construction noise are not anticipated at the nearest residential receptor. The EA goes on to say that a more detailed assessment of construction noise may be warranted if there are significant changes to the construction equipment, if noise sources are operated for prolonged periods close to receptors, or if construction activities occur during nighttime hours. Construction activities would be conducted in accordance with City, State, and Federal guidelines, and would use best practices to limit noise, such as limiting construction activities to normal daytime working</p>	Letter	Noise

Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
			<p>southern boundary of the site, would experience noise impacts.</p> <p>Recommendations for the EA:</p> <ul style="list-style-type: none"> <li>• Disclose noise impacts that would result from maintenance activities in the northeast corner of the site by the building labeled “fleet maintenance.” These activities do not appear to be fully within the area screened for noise impacts.</li> <li>• Clarify whether or not residents just north of the intersection of Ward Ave. and Intervale St. and residents adjacent to the southern boundary of the site would experience noise impacts.</li> <li>• If residents would experience noise impacts, then consider measures that would reduce noise levels, such as sound-proofing insulation, the use of vegetation, and noise walls, if appropriate.</li> <li>• Figure 27 on page 79 includes a proposed noise wall. While USEPA appreciates any mitigation to reduce impacts, we recommend discussing the wall (1) to inform the public of its benefits, and (2) to disclose considerations that DDOT will use to determine whether the wall will be included in the final design.</li> </ul> <p>Request for Discussion with USEPA:</p> <p>The EA explains that FTA’s noise guidance for stationary projects includes buffers of 225 and 350 feet from the center of the site. This buffer does not include the whole proposed project site or the adjacent residences. Maintenance activities in the northeast corner of the site, which may be louder than other on-site activities, are not fully in the screening area, nor</p>	<p>hours, limiting idling equipment, and additional preventative actions as the construction plan is finalized.</p> <p>See responses to USEPA recommendations, below.</p> <p>The center of the site was selected as the origin for the noise screening radius based on FTA guidance on page 34, Option C – Small Stationary Facilities (FTA, 2018). The use of the center of the site is reasonable, appropriate, and consistent with the text and intent of the 2018 FTA guidelines.</p> <p>Using the FTA Manual, the project type was selected and the corresponding screening distance for unobstructed line of sight or the presence of intervening buildings was applied. The assessment used the “Bus Storage and Maintenance” project type and applied both the intervening and unobstructed screening distances of 125 feet and 350 feet, respectively. FTA’s noise screening guidance says to apply the screening distance(s) from the center of the site for stationary sources. FTA Table 4-13 (General Noise Assessment) says that bus storage and bus O&amp;M facilities are stationary sources. Therefore, the center of the project site was used as the origin of the (operations) noise screening distances. There were no noise-sensitive receivers identified within the noise screening distances.</p> <p>As shown in Figure 9 of the published EA, a screening wall along the south side of the site, and a privacy fence along the east side of the site are included in the design plans, as well as vegetation. These walls, fences and vegetation may have some benefit for noise reduction but are intended for privacy and security reasons.</p> <p>FTA is open to such discussions.</p>		

Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
			are the residents that could potentially be affected. USEPA is concerned with this being an issue for future, more impactful, projects and would like to discuss the policy with FTA.			
EGLE-WRD-1	2/23/23	John Skubinna, Environmental Quality Analyst Water Resources Division (WRD) of EGLE	The WRD can offer the following comments regarding statutes administered by our program:  a) Review of available information from EGLE wetland inventories, FEMA Flood Hazard Maps, and other GIS data sets, this proposed project will not impact any stream, lakes, floodplains, or wetlands regulated under Part 31, Floodplain Regulatory Authority of Part 31, Water Resources, Part 301, Inland Lakes and Streams, or Part 303, Wetlands protection of the Natural Resources and Environmental Protection Act, PA 451, as amended.	Thank you for your review and comments.	Letter	Water resources
EGLE-WRD-2	2/23/23	John Skubinna, Environmental Quality Analyst Water Resources Division of EGLE	b) A review of our database indicates potential State and/or Federal Threatened and Endangered species Indiana Bat ( <i>Myotis sodalis</i> ), Northern Long eared Bat ( <i>Myotis septentrionalis</i> ), It recommended that this proposed project be screened using the U.S. Fish and Wildlife Service’s on-line Threatened and Endangered species screening tool, iPAC. And necessary clearances for those 2 species be obtained through this on-line process.	DDOT has formally consulted with USFWS through the iPAC system. On March 13, 2023, the project received a “No Effect” determination letter for all of the threatened or endangered species currently listed; a “May Affect” for the candidate Monarch Butterfly ( <i>Danaus plexippus</i> ), and a “Not Likely to Adversely Affect” determination for the Eastern Massasauga rattlesnake (EMR) ( <i>Sistrurus catenatus</i> ) as its reach extends into this area of Michigan.  The letter outlines conservation measures for the EMR, which including using wildlife-friendly erosion control and site restoration materials and raising contractor awareness of the EMR.  DDOT is committed to implementing the mitigation outlined in the EA. These commitments are in Appendix D of this FONSI. Further phone and email correspondence with the USFWS Michigan Ecological Services Field Office on March 14, 2023, confirmed these determinations and concluded consultation.	Letter	Threatened and Endangered Species



**Table B-2: Public Comment Log**

Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
PUBLIC-1	2/16/23	Salvador Sancen	Do you guys know who the construction manager or general contractor is going to be for this project or are you guys still waiting, doing bids for (contractors for) this project? Are there Davis –Bacon prevailing wages involved with this project?	Brinker/Christman Construction Group was selected as the construction manager (CM) for this project. This is also a Davis-Bacon federal wage project.	Public Hearing - Court Reporter Transcript	Contractors
PUBLIC-2	2/16/23	Salvador Sancen	Is there federal money involved? Is it a Davis- Bacon prevailing project? Are union contractors involved? Union contractors hire city of Detroit residents, and it would be nice for all Detroiters to be involved in (the) construction build.	The Federal Transit Administration (FTA) is helping to fund the project. Davis-Bacon prevailing wage provisions will also apply to this project. The local company Brinker/Christman has been brought in as the construction manager.	Public Hearing comment card	Contractors
PUBLIC-3	2/16/23	Cassandra Sims	I’m pretty sure and I’m hoping that there will be some availability for local people to be hired into the facility. I’m assuming there’s going to be maintenance, there’s going to probably be a little restaurant, or a snack bar, something where the public and local people around may possibly be able to be hired and part of the development of the community, those kinds of things.	DDOT is always looking for folks to be either drivers or mechanics, or other positions like customer service. In terms of surrounding businesses, there are not any initial plans involving restaurants or snack bars as mentioned. However, we do believe that the new facility will also help revitalize the area and possibly bring in business to the area and we’re hoping that's a great ancillary effect to the Project.	Public Hearing – Court Reporter Transcript	Local opportunity
PUBLIC-4	2/16/23	Stephen Boyle	I just want to say that I thought this meeting went very well. Thank you for the presentation. As a person that’s worked on environmental justice issues, I have a number of projects throughout the city. It’s a really long project. It’s a long time to consider the impacts. Thank you.	Thank you. Noted.	Public Hearing – Court Reporter Transcript	Support

Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
PUBLIC-5	2/16/23	Robert Pawlowski	So, I just wanted to call in support of the facility. I've been at the front end of this process ever since you guys started the public engagement and I'm very impressed to see how far we've come since October, when the last public hearing was held. One thing that really sticks out is the environmental aspect and the safety for me. You guys are going to be able to have more safety with this new facility and for the people that are driving and have routes based out of this new terminal, they'll have safety and security and, you know, you'll have transit police on site but also, most of all, you guys are using a lot of funds towards environmental aspects, and that's what we really need. You know, a lot of people have been saying, let's keep Detroit green. You know, you guys are doing that just with the start of this project utilizing open spaces, and you know, revitalizing them with this new facility, but also finding ways to keep things green in and out of the facility. So, I just wanted to call in and give my full support on this facility. You guys did a really well-done job, and I give credits to your planner and everyone on staff that, you know, constructed this project from the ground up. So, you know, I look forward to seeing the future of this project going forward, and loo always, keep up the good work, and look forward to talking with you guys soon. Thanks.	Thank you. Noted.	Public Hearing- Court Reporter Transcript	Support
PUBLIC-6	2/16/23	Ms. Margarite	What is coming of the East Warren building?	Central Heavy repair and processes will remain at the Warren / Central Facility.	Public Hearing- Court Reporter Transcript	East Warren aka Central Terminal

Comment Number	Date	Commenter	Comment	Response	Source	Topic Area
PUBLIC-7	3/2/23	Bethany Howard	<p>My name's Bethany and I am the project manager for <a href="#">City Walls</a>, a mural program within the General Services Department.</p> <p>If DDOT is interested in having a mural, City Walls would love to partner with you to beautify the Coolidge Terminal space!</p> <p>Let me know if that is of interest and we could meet about to discuss!</p> <p>Also, checkout our <a href="#">interactive map</a> to see the murals that have been painted in the last 4 years.</p>	Thank you. Noted.	Email	Mural
PUBLIC-8	3/1/23	James Puryear	It's the right thing to do, the terminal should have been replaced to make the buses more efficient for the people of Detroit	Thank you. Noted.	Email	Support

## APPENDIX C. MITIGATION COMMITMENTS TABLE

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The mitigation measures and other features of the proposed project that reduce adverse impacts, to which the Federal Transit Administration (FTA) and Detroit Department of Transportation (DDOT) committed in the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI), are summarized in the following table. Implementation of these mitigation commitments is part of the approval and issuance of this FONSI.

This summary of impacts requiring mitigation is provided in the FONSI to facilitate the monitoring of the implementation of the mitigation commitments; however, the EA provides the context and the full description of all mitigation commitments that are included in the proposed project. DDOT will establish a program for monitoring the implementation of the mitigation commitments as part of its project management oversight. FTA will oversee DDOT’s program for monitoring environmental compliance through review meetings or other means specified by FTA. DDOT will report on environmental compliance in the progress reports as required by FTA.

**Appendix C. Mitigation Table**

Resource	Impacts Requiring Mitigation	Mitigation Commitments	Responsible Agency
<p>Transportation (TR) -Section 4.2.1</p>	<p><i>Temporary Impacts during Construction</i></p> <p>Construction would cause temporary vehicular and pedestrian traffic and circulation impacts within and near the construction zone.</p> <p><i>Permanent Impacts</i></p> <p>Pull-out and pull-in times for the routes currently assigned at Gilbert and moved to Coolidge will require adjustment.</p>	<p><i>Temporary Mitigation:</i></p> <p>TR-1. Prior to construction, a Traffic Control Plan (TCP) would be developed and implemented during construction to manage vehicular and pedestrian circulation and access within and near the construction zone to minimize temporary traffic impacts. Both vehicular and pedestrian access to businesses and residences would be maintained during construction in accordance with City of Detroit’s Department of Public Works Standards for construction. DDOT would prohibit construction vehicles from using residential streets to access the site.</p> <p>TR-2. Pedestrian Safety. Pedestrian sidewalks along Schaefer Avenue adjacent to the site and across each site access drive would be maintained. Pedestrian access to the site would be provided separately from the vehicular access points and near the bus stop in front of the site. Fencing and landscaping at each of the site driveways would be designed such that drivers and pedestrians would be able to see each other approaching the intersection. Supplemental signs would be provided to warn pedestrians of the driveway and remind drivers exiting the facility to yield to pedestrians at the stop sign.</p> <p>See COMM-1, COMM-2. Construction Outreach Plan. As part of the Plan, DDOT and the contractor would coordinate with emergency response services, adjacent businesses, and the general public to provide information about any detours.</p> <p>See COMM-3.</p> <p><i>Permanent Mitigation:</i></p> <p>TR-3. After construction is complete and Gilbert-based buses are moved to Coolidge, pull-out and pull-in times for the assigned routes would be adjusted to reflect the new terminal location at Coolidge.</p> <p>TR-4. Intersection Monitoring. All intersections in the study area would operate at acceptable levels in the 2025 Initial Build and 2045 Full Build scenarios. Both the bus driveway and the employee driveway from the facility to Schaefer Highway would operate as a stop-controlled approach to Schaefer Highway in the opening year 2025 Initial Build scenario. DDOT will monitor each of these two intersections to determine if a traffic signal is warranted in the future.</p>	<p>DDOT, Contractor</p> <p>DDOT, Contractor</p> <p>DDOT, Contractor</p> <p>DDOT</p> <p>DDOT</p>
<p>Land Use and Zoning (LU) - Section 4.2.2</p>	<p><i>Temporary Impacts during Construction</i></p> <p>None</p> <p><i>Permanent Impacts</i></p>	<p><i>Permanent Mitigation:</i></p> <p>LU-1. City Approvals. DDOT, DBA and DLBA will comply with the City’s zoning process.</p>	<p>DDOT, DBA AND DLBA</p>

Resource	Impacts Requiring Mitigation	Mitigation Commitments	Responsible Agency
	The residential parcels needed for the proposed Project are owned by the Detroit Land Bank Authority (DLBA) and require re-zoning to the M4 use.		
Neighborhoods and Community Resources (COM-) - Section 4.2.3	<p><i>Temporary Impacts during Construction</i></p> <p>Temporary impacts to the surrounding community may include intermittent noise, vibration, dust, utility disruptions, detours, visual and aesthetic changes from construction, changes in emergency vehicle routing, construction vehicle emissions, and increased truck traffic.</p> <p><i>Permanent Impacts</i></p> <p>None</p>	<p><i>Temporary Mitigation:</i></p> <p>See TR-1, Traffic Control Plan; and TR-3, Pedestrian Safety under Transportation.</p> <p>COMM-1. Construction Outreach Plan. Before construction, DDOT would develop a construction outreach plan to include specific techniques to communicate with neighborhoods, residents, and businesses.</p> <p>COMM-2. DDOT will produce and distribute a fact sheet to the surrounding community prior to construction, describing protective measures required for project construction, such as idle time limits, speed limits for construction trucks, and dust suppression. The fact sheet will include a phone number that residents can call if contractors are not following required practices.</p> <p>COMM-3. DDOT will manage construction stages with the contractor as required to maintain access and provide alternate access to businesses and residences, as necessary. During construction, the Project contractor would implement best management practices (BMPs) including the U.S. Environmental Protection Agency (USEPA) construction emissions control checklist and other USEPA construction/demolition best practices, as well as:</p> <ul style="list-style-type: none"> <li>• maintenance of traffic and access to businesses;</li> <li>• erosion and dust control;</li> <li>• maintenance of equipment; and</li> <li>• noise and vibration monitoring.</li> </ul>	<p>DDOT, Contractor</p> <p>DDOT, Contractor</p> <p>DDOT</p> <p>DDOT, Contractor</p>
Land Acquisitions and Relocations - Section 4.2.4	<p><i>Temporary Impacts during Construction</i></p> <p>None</p> <p><i>Permanent Impacts</i></p> <p>None</p>	No mitigation is required.	N/A
Economics-- Section 4.2.5	<p><i>Temporary Impacts during Construction</i></p> <p>None</p> <p><i>Permanent Impacts</i></p> <p>None</p>	No mitigation is required.	N/A
Visual Resources, Section 4.2.6	<p><i>Temporary Impacts during Construction</i></p> <p>Construction of the proposed Project would result in temporary impacts on the surrounding visual environment</p>	No mitigation is required.	N/A



Resource	Impacts Requiring Mitigation	Mitigation Commitments	Responsible Agency
	<p>because of construction work zones and equipment. Construction would be for a limited duration.</p> <p><i>Permanent Impacts</i></p> <p>None</p>		
<p>Cultural Resources (C-) - Section 4.2.7</p>	<p><i>Temporary Impacts during Construction</i></p> <p>None</p> <p><i>Permanent Impacts</i></p> <p>The Build Alternative would have an adverse effect on one historic property, the Coolidge Terminal.</p>	<p><i>Permanent Mitigation:</i></p> <p>DDOT will implement the stipulations contained in the executed Memorandum of Agreement (MOA) for this proposed Project: CR-4. Each year on July 1 following the date of the execution of this MOA until it expires or is terminated, whichever comes first, DDOT will provide the FTA and the SHPO with a report detailing the work undertaken throughout the previous year pursuant to the stipulations of this MOA. The report will include a description of tasks undertaken relevant to stipulations within this MOA, scheduling changes, problems encountered, and/or any disputes regarding implementation of these stipulated measures.</p> <p>TREATMENT MEASURES</p> <p>A. Prior to any alterations to or demolition of any individual resource within the Coolidge Terminal Complex, the DDOT shall hire a photographer to complete large-format photography in support of the Historic American Building Survey (“HABS”) Documentation Level II (the “HABS Documentation”) for the Coolidge Terminal. Pursuant to 36 C.F.R. Part 61 (the “Standards”), the DDOT shall hire a Secretary of the Interior (“SOI”)-qualified professional in history or architectural history to complete the HABS documentation. The HABS Documentation will adhere to the standards set forth in the <i>Historic American Buildings Survey Guidelines for Historical Reports</i>. The DDOT shall provide the FTA with a draft copy of the HABS Documentation for its review and comments. Once any comments provided by the FTA are addressed, the FTA will submit the HABS Documentation to the SHPO for their review and comment. The SHPO shall have 30 calendar days to review and comment on the draft HABS Documentation. The DDOT and its SOI-qualified professional shall address the SHPO’s comments and finalize the documentation for the submittal of one paper copy and one electronic copy to the SHPO and the Detroit Public Library. The DDOT will coordinate submittal of the final documentation with the FTA. Electronic copies will be provided to the consulting parties at their request.</p> <p>B. The DDOT shall prepare an interpretive sign (the “Sign”) that includes text, photographs, and/or plans focusing on the history and historical significance of the Coolidge Terminal Complex. The Sign will be designed for display adjacent to the Coolidge Terminal Complex fence facing Schaefer Highway near the existing bus shelter. Required maintenance in the vicinity of the Sign will be performed by the DDOT as part of their existing groundskeeping services at the Coolidge Terminal Complex and may include general landscaping activities (e.g. mowing grass) and snow removal to maintain the Sign’s visibility. The Sign shall be designed in consultation with an SOI-qualified professional who meets the Standards and who shall assess the content and presentation to ensure that the Coolidge Terminal Complex’s significant historic associations are incorporated into the Sign. The DDOT shall provide the FTA with the content and plan for the Sign for its review and comment. Once comments provided by the FTA are addressed, the FTA will submit the content and plan for the Sign to the SHPO for a 30 calendar-day review period prior to finalization. The DDOT and its SOI-qualified professional shall address and incorporate the comments from the SHPO into a final version prior to installation of the Sign.</p> <p>C. The DDOT shall prepare a Section 508 of the Rehabilitation Act of 1973, Pub. L. 93-112 as amended, compliant webpage or an ArcGIS Story Map (collectively, the “Webpage”) on the history and significance of the Coolidge Terminal Complex and its role in Detroit’s transit history. The Webpage will be hosted on the DDOT’s public website. The Webpage will include interactive images, history and other materials related to the Coolidge Terminal Complex. The content of the Webpage shall be developed in consultation with a professional who meets the Standards and who shall ensure that the Coolidge Terminal</p>	<p>FTA, DDOT, Contractor</p>

Resource	Impacts Requiring Mitigation	Mitigation Commitments	Responsible Agency
		<p>Complex's significant historic associations are incorporated into the Webpage. The DDOT shall provide a draft version of the Webpage's content and plan to the FTA for its review and comment. After DDOT addresses the FTA's comments, the FTA will submit the updated draft Webpage content and plan to the SHPO who will have 30 calendar days for its review and comments. The DDOT and its SOI-qualified professional shall address and incorporate the comments from the SHPO prior to publication of the Webpage.</p>	
<p>Environmental Justice – Section 4.2.8</p>	<p><i>Temporary Impacts during Construction</i></p> <p>EJ populations in the study area could experience direct temporary impacts related to noise, vibration, dust, and air quality, as noted in Section 4.4, Neighborhood and Community Impacts.</p> <p><i>Permanent Impacts</i></p> <p>None</p>	<p><i>Temporary Mitigation:</i></p> <p>EJ-1. DDOT will continue to reach out to the Happy Homes Block Club, District 7 Council staff members, and the District 7 manager to assist in sharing information to residents, property owners and church members within the study area as defined in the published EA. This outreach will occur prior to and during construction. These outreach efforts will include conducting door to door canvassing in this area to alert residents about upcoming construction activities.</p> <p>See LU-1, Zoning Approvals; COMM-1, Construction Outreach Plan; COMM-2 Fact Sheet; COMM-3, Best Management Practices; HAZ-1 Soils Management Plan and HAZ-12 Due Care Plan; NV-1, Noise and Vibration Specifications; AQ-1, Emissions and Dust Control Plans.</p>	<p>DDOT</p>
<p>Safety and Security (SAF) – Section 4.2.9</p>	<p><i>Temporary Impacts during Construction</i></p> <p>Construction would cause temporary vehicular and pedestrian traffic and circulation impacts within and near the construction zone.</p> <p><i>Permanent Impacts Requiring Mitigation</i></p> <p>Due to the identification of VOCs and SVOCs onsite, potential indoor air quality issues from vapor intrusion could be a concern if elevated concentrations of these contaminants are left in place beneath a building footprint.</p> <p>Upon completion of construction, minor storage and use of petroleum products, solvents, and other materials for maintenance purposes are likely to occur. The new facility may also generate regulated wastes including used oil, antifreeze, etc.</p>	<p><i>Temporary Mitigation:</i></p> <p>See TR-1. Construction Traffic Management Plan and TR-2, Pedestrian Safety under Transportation.</p> <p>SAF-1. The contractor would be required to maintain good housekeeping standards during construction, as outlined in the Occupational Safety and Health Administration standard number 1926.25.</p> <p><i>Permanent Mitigation:</i></p> <p>See HAZ-12, Due Care Plan.</p>	<p>DDOT, Contractor</p> <p>DDOT</p>
<p>Utilities (UT) – Section 4.2.10</p>	<p><i>Temporary Impacts during Construction</i></p> <p>There may be temporary utility disruptions during utility relocations.</p> <p><i>Permanent Impacts</i></p> <p>None</p>	<p>UT-1. Utility Coordination. DDOT will coordinate with utilities during final design to minimize utility conflicts and determine utilities requiring relocation. Utility agreements will be developed to determine relocation criteria and access protocols for facilities that remain in place during and after construction.</p> <p>UT-2. Notifications. The contractor will be required to provide affected utility customers advance notice of any planned utility disruptions.</p> <p>See COMM-1</p>	<p>DDOT, Final Designer, Contractor</p> <p>DDOT, Contractor</p> <p>DDOT</p>

Resource	Impacts Requiring Mitigation	Mitigation Commitments	Responsible Agency
Hazardous Materials (HAZ) - Section 4.2.11	<p><i>Temporary Impacts during Construction</i></p> <p>Demolition of the structures would result in the disturbance of asbestos containing materials and other potentially environmental sensitive materials. In addition, the removal of existing building foundations may result in the disturbance of contaminated soils and/or contaminated groundwater. Contaminants of potential concern currently present onsite include VOCs, SVOCs and heavy metals.</p> <p>The proposed Project requires the removal of the existing paved surfaces, removal of existing utilities, clearing of existing vegetation and other existing site improvements located outside the footprint of the existing buildings. Much of the proposed construction areas are currently paved in asphalt and concrete. As a result, the removal of these impervious surfaces for construction may result in the disturbance of contaminated soils and/or contaminated groundwater, which could lead to contaminant exposure to construction workers, the public and/or the environment.</p> <p>Excavation work required for the construction of the proposed Project building foundations, utilities, stormwater bioswales and associated piping, new pavement, and the overall site grading may result in the disturbance of contaminated soils and/or contaminated groundwater, which could lead to contaminant exposure to construction workers, the public and/or the environment.</p> <p>Construction activities associated with the proposed Project may also have the potential introduce additional environmental impacts through operation of heavy machinery and the resultant releases of fuel during refueling operations, as well as releases of small quantities of greases, oil, or other petroleum-based lubricants or products.</p> <p><i>Permanent Impacts</i></p> <p>Due to the identification of VOCs and SVOCs onsite, potential indoor air quality issues from vapor intrusion could be a concern if elevated concentrations of these contaminants left in place beneath a building footprint.</p>	<p><i>Temporary Mitigation:</i></p> <p>HAZ-1. Due Diligence. DDOT will update the 2021 Phase I ESA prior to any transfer of real estate property.</p> <p>HAZ-2. DDOT will prepare demolition plans and technical specifications that identify the demolition and site clearing performance requirements, asbestos abatement requirements, the removal requirements for Universal Wastes, USTs, oil-water separators, and other potentially environmentally sensitive materials, utility abandonment requirements, and demolition debris disposal requirements.</p> <p>HAZ-3. Prior to demolition, the demolition contractor must have a State of Michigan Accredited Asbestos Inspector complete an asbestos survey of the former Fare Box Building.</p> <p>HAZ-4. Prior to demolition, the demolition contractor is required to dewater the tunnel located between the Main Coolidge Terminal Building and the Former Heating Plant so that the area can be inspected by a State of Michigan Accredited Asbestos Inspector to determine if asbestos is present.</p> <p>HAZ-5. Soil and Water Management Plan (SWMP). DDOT will prepare a SWMP to address the on-site management and/or proper removal, verification sampling, waste characterization sampling, handling and disposal requirements associated with the excavation of known and or potentially contaminated soils and groundwater during the demolition and site clearing activities and then all subsequent construction operations associated with the new Coolidge Terminal. The SWMP will be incorporated into specifications and contract documents and provided to all parties who perform work at the site. The SWMP will specify policies and procedures to be followed during site work.</p> <p>HAZ-6. As part of the implementation of the SWMP, contractors working on-site shall be required to develop a Health and Safety Plan (HASP) to address potential exposure to contaminants that may be encountered during construction and excavation activities associated with each component of the proposed Project. The HASP shall be prepared in accordance with the requirements set forth in 40 CFR 1910.120 and shall establish the specific training requirements for all personnel involved with the construction and excavation activities required for the completion of this proposed Project based on their specific job assignments. The HASP shall be prepared by a qualified Health and Safety Professional.</p> <p>HAZ-7. The contractor will be responsible hiring an independent third-party Environmental Professional who would be responsible for overseeing the implementation of the SWMP. DDOT and their consultants/on-site representatives shall be responsible for overseeing the performance of the SWMP.</p> <p>HAZ-8. DDOT will incorporate measures into the design of the new Coolidge Terminal to reduce the disturbance of contaminated soils, and to minimize the transmission of contaminated materials. Design plans would be reviewed and approved by the Buildings, Safety Engineering, and Environmental Department (BSEED) as well as the Detroit Water and Sewerage Department (DWSD).</p> <p><i>Permanent Mitigation:</i></p> <p>HAZ-9. To eliminate a potential exposure pathway for indoor air quality issues arising from vapor intrusion due to elevated concentrations of VOCs and SVOCs onsite, contaminated soils exceeding the Nonresidential Infinite Source VSIC and Nonresidential GVIAI criteria shall be excavated and removed from within the proposed building footprints and/or a vapor barrier would be designed and incorporated into the construction of the proposed buildings.</p>	<p>DDOT</p> <p>DDOT, Designer</p> <p>Demo Contractor</p> <p>Demo Contractor</p> <p>DDOT, Contractor</p> <p>Contractor, DDOT</p> <p>Contractor, DDOT</p> <p>DDOT, Final Designer</p> <p>Contractor</p>

Resource	Impacts Requiring Mitigation	Mitigation Commitments	Responsible Agency
	Upon completion of construction, minor storage and use of petroleum products, solvents, and other materials for maintenance purposes are likely to occur. The new facility may also generate regulated wastes including used oil, antifreeze, etc.	<p>HAZ-10. The new Coolidge Terminal would continue to operate under a health and safety program that will include provisions for the safe handling, storing, and disposal of regulated materials.</p> <p>HAZ-11. DDOT's Safety Department will complete the Spill Prevention Control and Countermeasures Plan (SPCC) prior to opening.</p> <p>HAZ-12. DDOT will prepare a Due Care Plan for the new Coolidge Terminal, in accordance with Section 20107a of Part 201 of Michigan's Natural Resources Environmental Protection Act, 1994 Public Act 451, as amended (NREPA). This Plan would be reviewed and approved by the BSEED and would outline how the proposed activities at the new Coolidge Terminal would satisfy the requirements of NREPA and associated administrative rules.</p>	<p>DDOT</p> <p>DDOT</p> <p>DDOT</p>
Noise and Vibration (NV) – Section 4.2.12	<p><i>Temporary Impacts during Construction</i></p> <p>Construction noise levels are projected to be below the FTA's recommended construction noise criterion but could increase if there are significant changes to the construction equipment roster, if noise sources are operated for prolonged periods close to receptor buildings, or if construction activities occur during nighttime hours.</p> <p>If impact pile drivers are operated at their upper ranges near the proposed Project site boundaries, potential construction vibration levels could approach or exceed FTA construction vibration criteria posing a risk of damage to non-engineered timber and masonry.</p> <p><i>Permanent Impacts</i></p> <p>None.</p>	<p><i>Temporary Mitigation:</i></p> <p>NV-1. Noise and Vibration Specifications. DDOT will include noise and vibration performance specifications in construction contract documents that are consistent with City of Detroit ordinances and FTA criterion.</p> <p>NV-2. Noise and Vibration Management Plan. Construction contractors will be required to develop a construction noise and vibration management plan. This may be a singular plan or it may be included in a larger environmental management plan for the construction of the proposed project. At a minimum, the plan would include the following:</p> <ul style="list-style-type: none"> <li>○ Identification of the proposed Project's noise control objectives and potential components;</li> <li>○ Summary of noise and vibration-related criteria and local ordinances for construction contractors to abide by;</li> <li>○ Requirement of a pre-construction survey to identify receptors potentially affected by construction noise and vibration and documentation of the pre-construction conditions of particularly susceptible receptors;</li> <li>○ List of potential mitigation measures, a plan to implement mitigation, and an approach for deciding the appropriateness of mitigation by construction activity and receptor;</li> <li>○ Identification of methods to minimize noise impacts on adjacent noise-sensitive stakeholders while maintaining construction progress;</li> <li>○ Plans for coordination with affected project stakeholders to minimize intrusive construction effects; and</li> <li>○ Process to handle and resolve any noise or vibration-related complaints.</li> </ul> <p>See COMM-1, Construction Outreach Plan and COMM-3.</p>	<p>DDOT, Designer</p> <p>DDOT, Contractor</p> <p>DDOT</p>
Air Quality (AQ) – Section 4.2.15	<p><i>Temporary Impacts during Construction</i></p> <p>There could be temporary impacts on air quality during construction, primarily due to fugitive dust and emissions from diesel construction equipment and trucks. Construction and earthmoving activities could result in localized increases in pollutant concentrations that would persist for the duration of the construction activities.</p> <p><i>Permanent Impacts</i></p>	<p><i>Temporary Mitigation:</i></p> <p>AQ-1. Construction Emissions Control Checklist. The contractor will be required to follow USEPA's Construction Emissions Control Checklist.</p> <p>AQ-2. DDOT will consider recommendations from USEPA Sustainable Management of Construction and Demolition Materials webpage in the specifications for demolition and construction.</p> <p>AQ-3. DDOT will consult EGLE to determine if air quality modeling is required for the proposed Project's construction phase and what methodologies and assumptions would be used if modeling is required.</p>	<p>Contractor</p> <p>DDOT, Contractor</p> <p>DDOT, Contractor</p>

Resource	Impacts Requiring Mitigation	Mitigation Commitments	Responsible Agency
	None	See COMM-1 through COMM-3.	
Water Resources (WR) – Section 4.2.15	<p><i>Temporary Impacts during Construction</i></p> <p>There could be temporary impacts on water quality during construction.</p> <p><i>Permanent Impacts</i></p> <p>None</p>	<p><i>Temporary Mitigation:</i></p> <p>WR-1. Prior to construction, an application for a general permit for construction activities under the National Pollutant Discharge Elimination System (NPDES) would be prepared. As part of the permit application to the City of Detroit, a detailed Stormwater Pollution Prevention Plan (SWPPP) would be prepared to control stormwater runoff and erosion at construction sites.</p>	Contractor
Threatened and Endangered Species	<p><i>Temporary Impacts during Construction</i></p> <p>There could be temporary impacts to the Threatened Eastern massasauga rattlesnake (EMR) (<i>Sistrurus catenatus</i>) during construction.</p> <p><i>Permanent Impacts</i></p> <p>None</p>	<p><i>Temporary Mitigation:</i></p> <p>TE-1. DDOT will include specifications for erosion control and site restoration materials that must be wildlife friendly. Contractors are not to use erosion control products containing plastic mesh netting or other similar material that could entangle the EMR.</p> <p>TE-2. To increase human safety and awareness of EMR, those implementing the project must first review the EMR factsheet (available at <a href="https://www.fws.gov/media/eastern-massasauga-rattlesnake-fact-sheet">https://www.fws.gov/media/eastern-massasauga-rattlesnake-fact-sheet</a>) and watch Michigan DNR's "60-Second Snakes: The Eastern Massasauga Rattlesnake" video (available at <a href="https://youtube/~PFnXe_e02w">https://youtube/~PFnXe_e02w</a>).</p> <p>TE-3. During project implementation, DDOT and its contractors will report federally listed species sightings, including EMR, to the USFWS Michigan Ecological Services Field Office within 24 hours.</p>	<p>DDOT, Contractor</p> <p>Contractor</p> <p>DDOT, Contractor</p>
Section 4(f) – Section 5.0	<p><i>Temporary Impacts during Construction</i></p> <p>None.</p> <p><i>Permanent Impacts</i></p> <p>The demolition of the Coolidge Terminal is a permanent incorporation of the property into the proposed Project. As such this adverse effect constitutes a "use" under Section 4(f).</p>	<p><i>Permanent Mitigation:</i></p> <p>See CR-1 thru CR-4 for mitigation as proposed in the executed MOA.</p>	FTA, DDOT

## APPENDIX D. MEMORANDUM OF AGREEMENT

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**MEMORANDUM OF AGREEMENT**  
**BETWEEN**  
**THE FEDERAL TRANSIT ADMINISTRATION,**  
**AND**  
**THE MICHIGAN STATE HISTORIC PRESERVATION OFFICE**  
**REGARDING**  
**THE COOLIDGE TERMINAL REPLACEMENT PROJECT**

**WHEREAS**, the Federal Transit Administration (the “FTA”) may provide funding to the City of Detroit, by and through its Department of Transportation (the “DDOT”) for the Coolidge Terminal Replacement Project (the “Project”) in Wayne County, Michigan, and the FTA has determined that the Project is an undertaking pursuant to 36 Code of Federal Regulations (C.F.R.) Part 800; and

**WHEREAS**, the Project consists of demolishing and clearing the existing buildings and communications facility at the Coolidge Terminal Complex at 14044 Schaefer Highway, Detroit, Wayne County acquisition of vacant and abandoned parcels adjacent to the Coolidge Terminal Complex, and construction of a new bus maintenance, storage, and operations center to accommodate 24-hour operations, increased bus capacity, as well as increased storage and parking; and

**WHEREAS**, the Project is an undertaking subject to review under Section 106 of the National Historic Preservation Act of 1966 (the “NHPA”), as amended, 54 United States Code (U.S.C.) § 306108, and its implementing regulations (36 C.F.R. Part 800) (the NHPA and its implementing regulations, the “Act”); and

**WHEREAS**, the FTA has consulted with the Michigan State Historic Preservation Office (the “SHPO”) in accordance with the Act and shall continue to consult with the SHPO under the terms of this Memorandum of Agreement (“MOA”); and

**WHEREAS**, the FTA, in consultation with the SHPO, has defined the Area of Potential Effects (the “APE”), as shown in Attachment A to this MOA and as the term is defined in 36 C.F.R. § 800.16(d), to be the Coolidge Terminal Complex and one row of parcels deep on the Coolidge Terminal Complex’s north, south, and west sides and two rows of parcels deep on the Coolidge Terminal Complex’s east side. The APE includes any parcels that might be subject to ground-disturbing activities (e.g., construction areas, demolition areas, and temporary staging areas) or acquisition, any parcels that may be affected visually or by noise and vibration from the operation of the buses or construction equipment, and any parcels that may be affected by temporary effects such as construction noise, staging areas, closure of streets, and re-routing of traffic; and

**WHEREAS**, the DDOT, as the Project sponsor, has participated in consultation and has been invited to sign this MOA as an invited signatory; and

**WHEREAS**, in accordance with 36 C.F.R. § 800.4(c), the FTA, through file searches, cultural resources surveys conducted in 2020, photographic updates obtained in 2022, and consultation with the SHPO, has identified the O.H. Frisbie Moving and Storage property and the Coolidge Terminal Complex, as indicated in Attachment B to this MOA, as resources that are eligible for listing in the National Register of Historic Places (the “NRHP”); and

**WHEREAS**, in accordance with 36 C.F.R. § 800.5, the FTA has determined that the Project will have an adverse effect on the Coolidge Terminal Complex, which is eligible for listing in the NRHP, and the SHPO concurred with this adverse effect finding; and

**WHEREAS**, in accordance with 36 C.F.R. § 800.6(a)(1), the FTA notified the Advisory Council on Historic Preservation (the “ACHP”) on July 21, 2022, of its adverse effect determination and invited its participation in consultation, and on July 29, 2022, the ACHP notified the FTA that it is declining to participate in consultation pursuant to 36 C.F.R. § 800.6(a)(1)(iii); and

**WHEREAS**, the FTA recognizes it has a unique legal relationship with Federally recognized Indian tribes (the “Tribes”) set forth in the Constitution of the United States, treaties, statutes, and court decisions, and that consultation with the Tribes must, therefore, recognize the government-to-government relationship between the Federal government and the Tribes; and

**WHEREAS**, in accordance with 36 C.F.R. § 800.2(c)(2)(ii), upon initiation of the Section 106 consultation for the Project, the FTA notified the following Tribes and invited their participation in consultation for the Project: Forest County Potawatomi Community of Wisconsin; Hannahville Indian Community, Michigan; Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin; Little Traverse Bay Bands of Odawa Indians, Michigan; Menominee Indian Tribe of Wisconsin; Miami Tribe of Oklahoma; Pokagon Band of Potawatomi Indians, Michigan and Indiana; Sault Ste. Marie Tribe of Chippewa Indians, Michigan; and Seneca-Cayuga Nation; and

**WHEREAS**, in accordance with 36 C.F.R. § 800.2(c), the FTA and the DDOT also invited 19 additional individuals, organizations, and agencies to participate as consulting parties in the Section 106 process for the Project; and

**WHEREAS**, the SHPO, the Miami Tribe of Oklahoma, the Pokagon Band of Potawatomi Indians, the DDOT, and the Michigan Department of Transportation accepted the FTA’s invitation to join the Section 106 process as consulting parties; and

**WHEREAS**, the FTA, in consultation with the SHPO and other consulting parties, have considered ways to avoid, minimize, and/or mitigate adverse impacts to historic properties while meeting the stated Project purpose and need; and

**NOW, THEREFORE**, the FTA and the SHPO agree that the Project shall be implemented in accordance with the following stipulations in this MOA in order to mitigate the adverse effects of the Project on historic properties.

## **STIPULATIONS**

The FTA shall ensure that the following stipulations of this MOA are carried out by the DDOT, and the FTA shall require, as a condition of any approval of federal funding for the Project, adherence to the stipulations set forth herein:

### **I. TREATMENT MEASURES**

- A.** Prior to any alterations to or demolition of any individual resource within the Coolidge Terminal Complex, the DDOT shall hire a photographer to complete large-format photography in support of the Historic American Building Survey (“HABS”) Documentation Level II (the “HABS Documentation”) for the Coolidge Terminal. Pursuant to 36 C.F.R. Part 61 (the “Standards”), the DDOT shall hire a Secretary of the

Interior (“SOI”)-qualified professional in history or architectural history to complete the HABS documentation. The HABS Documentation will adhere to the standards set forth in the *Historic American Buildings Survey Guidelines for Historical Reports*. The DDOT shall provide the FTA with a draft copy of the HABS Documentation for its review and comments. Once any comments provided by the FTA are addressed, the FTA will submit the HABS Documentation to the SHPO for their review and comment. The SHPO shall have 30 calendar days to review and comment on the draft HABS Documentation. The DDOT and its SOI-qualified professional shall address the SHPO’s comments prior to submitting the final HABS Documentation for archiving. The DDOT and its SOI-qualified professional shall finalize the HABS Documentation for the submittal of one paper copy and one electronic copy to the SHPO and the Detroit Public Library. The DDOT will coordinate submittal of the final documentation with the FTA. Electronic copies will be provided to the consulting parties at their request.

- B.** The DDOT shall prepare an interpretive sign (the “Sign”) that includes text, photographs, and/or plans focusing on the history and historical significance of the Coolidge Terminal Complex. The Sign will be designed for display adjacent to the Coolidge Terminal Complex fence facing Schaefer Highway near the existing bus shelter. Required maintenance in the vicinity of the Sign will be performed by the DDOT as part of their existing groundskeeping services at the Coolidge Terminal Complex and may include general landscaping activities (e.g. mowing grass) and snow removal to maintain the Sign’s visibility. The Sign shall be designed in consultation with an SOI-qualified professional who meets the Standards and who shall assess the content and presentation to ensure that the Coolidge Terminal Complex’s significant historic associations are incorporated into the Sign. The DDOT shall provide the FTA with the content and plan for the Sign for its review and comment. Once comments provided by the FTA are addressed, the FTA will submit the content and plan for the Sign to the SHPO for a 30 calendar-day review period prior to finalization. The DDOT and its SOI-qualified professional shall address and incorporate the comments from the SHPO into a final version prior to installation of the Sign.
- C.** The DDOT shall prepare a Section 508 of the Rehabilitation Act of 1973, Pub. L. 93-112 as amended, compliant webpage or an ArcGIS Story Map (collectively, the “Webpage”) on the history and significance of the Coolidge Terminal Complex and its role in Detroit’s transit history. The Webpage will be hosted on the DDOT’s public website. The Webpage will include interactive images, history and other materials related to the Coolidge Terminal Complex. The content of the Webpage shall be developed in consultation with a professional who meets the Standards and who shall ensure that the Coolidge Terminal Complex’s significant historic associations are incorporated into the Webpage. The DDOT shall provide a draft version of the Webpage’s content and plan to the FTA for its review and comment. After DDOT addresses the FTA’s comments, the FTA will submit the updated draft Webpage content and plan to the SHPO who will have 30 calendar days for its review and comments. The DDOT and its SOI-qualified professional shall address and incorporate the comments from the SHPO prior to publication of the Webpage.

## **II. DURATION**

This MOA will expire if its terms are not carried out within five (5) years from the date this MOA is executed (the “Execution Date”) in accordance with 36 C.F.R. § 800.6(c)(1). Prior to such time, the FTA may consult with the other signatories to reconsider the terms of the MOA and amend it

in accordance with Stipulation VII below.

### **III. MONITORING AND REPORTING**

Following the execution of this MOA, for each year on July 1 (until the expiration or termination of this MOA in accordance with its terms, whichever comes first), the DDOT shall provide the FTA and the SHPO with a report detailing work undertaken pursuant to the stipulations of this MOA. The report will include details on one or more of the following: status of the Project, a description of tasks undertaken relevant to stipulations within this MOA, schedule changes, problems encountered, and/or any disputes, objections received regarding the DDOT's implementation efforts to carry out the terms of the MOA.

### **IV. COORDINATION WITH OTHER FEDERAL REVIEWS**

If the DDOT applies for additional federal funding or approvals for the Project from a federal agency that is not a party to this MOA, the federal agency may remain individually responsible for their undertaking under 36 C.F.R. Part 800. Alternatively, if the undertaking as described herein remains unchanged, such funding or approving federal agency may request in writing to the FTA and the SHPO of their desire to designate the FTA as lead federal agency for the undertaking pursuant to 36 C.F.R. § 800.2(a)(2) and to become a consulting party or an invited signatory to this MOA pursuant to 36 C.F.R. § 800.6(c). Any necessary amendments to this MOA will be coordinated pursuant to Stipulation VII.

### **V. POST-REVIEW DISCOVERIES**

If properties are discovered during the Project that may be historically significant, or unanticipated effects of the Project on historic properties are found, the DDOT shall immediately notify the FTA, who in turn will notify the SHPO. The FTA, the DDOT, and the SHPO will take steps to avoid, minimize, or mitigate adverse effects to such historic properties. The FTA and the SHPO shall be guided by steps established in 36 C.F.R. §800.13(b).

### **VI. DISPUTE RESOLUTION**

Should any signatory to this MOA object in writing at any time to any actions proposed or the manner in which the terms of this MOA are being implemented, the FTA will consult with such signatory to resolve the objection (the "Objection"). If the FTA determines that the Objection cannot be resolved, the FTA will:

- A.** Forward all documentation relevant to the Objection, including the FTA's proposed resolution, to the ACHP. The ACHP will provide the FTA with its opinion on the Objection and the proposed resolution of the Objection within 30 calendar days of receiving adequate documentation.

1. If the ACHP provides its opinion, the FTA will prepare a written response that considers any timely advice or comments from the ACHP or the parties to this MOA regarding the Objection and provide the parties to this MOA with a written copy of the response. The FTA will then proceed according to its final decision.
2. If the ACHP does not provide its opinion regarding the Objection within 30 calendar days, the FTA may make a final decision on the Objection and proceed accordingly. Prior to reaching such a final decision, the FTA will prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA and provide them to the ACHP with a copy of such written response.

- B.** The FTA and DDOT's responsibility to carry out all other actions under the terms of this MOA that are not the subject of the Objection remain unchanged.

## **VII. AMENDMENT**

This MOA may be amended when such amendment is agreed to, in writing, by all signatories. The amendment will be effective on the date a copy is signed by all signatories. An executed copy of the amendment will be filed with the ACHP.

## **VIII. TERMINATION**

- A.** This MOA will terminate five (5) years from the Execution Date or upon completion of its terms, whichever comes first. If the FTA, the SHPO, or the DDOT, or another signatory per Stipulation IV, determines that the terms of this MOA will not or cannot be carried out, that party will immediately consult with the other signatories to attempt to develop an amendment pursuant to Stipulation VII. If within 30 calendar days (or another time period agreed to by all signatories in writing) an amendment cannot be reached, the FTA, the SHPO, or the DDOT may terminate the MOA upon written notification to the other signatories.
- B.** Once this MOA is terminated, and prior to work continuing on the Project, the FTA must either (a) execute a new MOA in accordance with 36 C.F.R. § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7. The FTA shall notify the signatories as to the course of action it will pursue.


## **IX. EXECUTION AND IMPLEMENTATION**

- A.** This MOA may be executed in counterparts, with a separate page for each signatory and delivered by hard copy, facsimile or by electronic mail in pdf format, and in any such circumstances, shall be considered one document and an original for all purposes. This MOA will become effective on the Execution Date, and the FTA will ensure each signatory is provided with a complete copy of the MOA, and that the final MOA, any updates to attachments, and any amendments are filed with the ACHP.
- B.** Execution of this MOA by the FTA and the SHPO and implementation of its terms is evidence that the FTA has taken into account the effects of its undertaking on historic properties and has afforded the SHPO and the ACHP an opportunity to comment pursuant to Section 106 of the NHPA.

**SIGNATURE PAGE**  
**MEMORANDUM OF AGREEMENT**  
**BETWEEN**  
**THE FEDERAL TRANSIT ADMINISTRATION**  
**AND**  
**THE MICHIGAN STATE HISTORIC PRESERVATION OFFICE**  
**REGARDING**  
**THE COOLIDGE TERMINAL REPLACEMENT PROJECT**

**REQUIRED SIGNATORY**

FEDERAL TRANSIT ADMINISTRATION

SIGNED BY: **KELLEY**  
**BROOKINS**  Digitally signed by  
KELLEY BROOKINS  
Date: 2023.04.26 11:04:35  
-05'00' \_\_\_\_\_ Date: April 26, 2023

Kelley Brookins  
Regional Administrator



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**SIGNATURE PAGE**  
**MEMORANDUM OF AGREEMENT**  
**BETWEEN**  
**THE FEDERAL TRANSIT ADMINISTRATION**  
**AND**  
**THE MICHIGAN STATE HISTORIC PRESERVATION OFFICE**  
**REGARDING**  
**THE COOLIDGE TERMINAL REPLACEMENT PROJECT**

**REQUIRED SIGNATORY**

MICHIGAN STATE HISTORIC PRESERVATION OFFICER

SIGNED BY: DocuSigned by: Martha MacFarlane-Faes Date: 4/25/2023  
172C0FD7954D456  
Martha MacFarlane-Faes  
Deputy State Historic Preservation Officer

**SIGNATURE PAGE**  
**MEMORANDUM OF AGREEMENT**  
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**THE MICHIGAN STATE HISTORIC PRESERVATION OFFICE**  
**REGARDING**  
**THE COOLIDGE TERMINAL REPLACEMENT PROJECT**

**INVITED SIGNATORY**

CITY OF DETROIT, by and through its DEPARTMENT OF TRANSPORTATION

SIGNED BY:

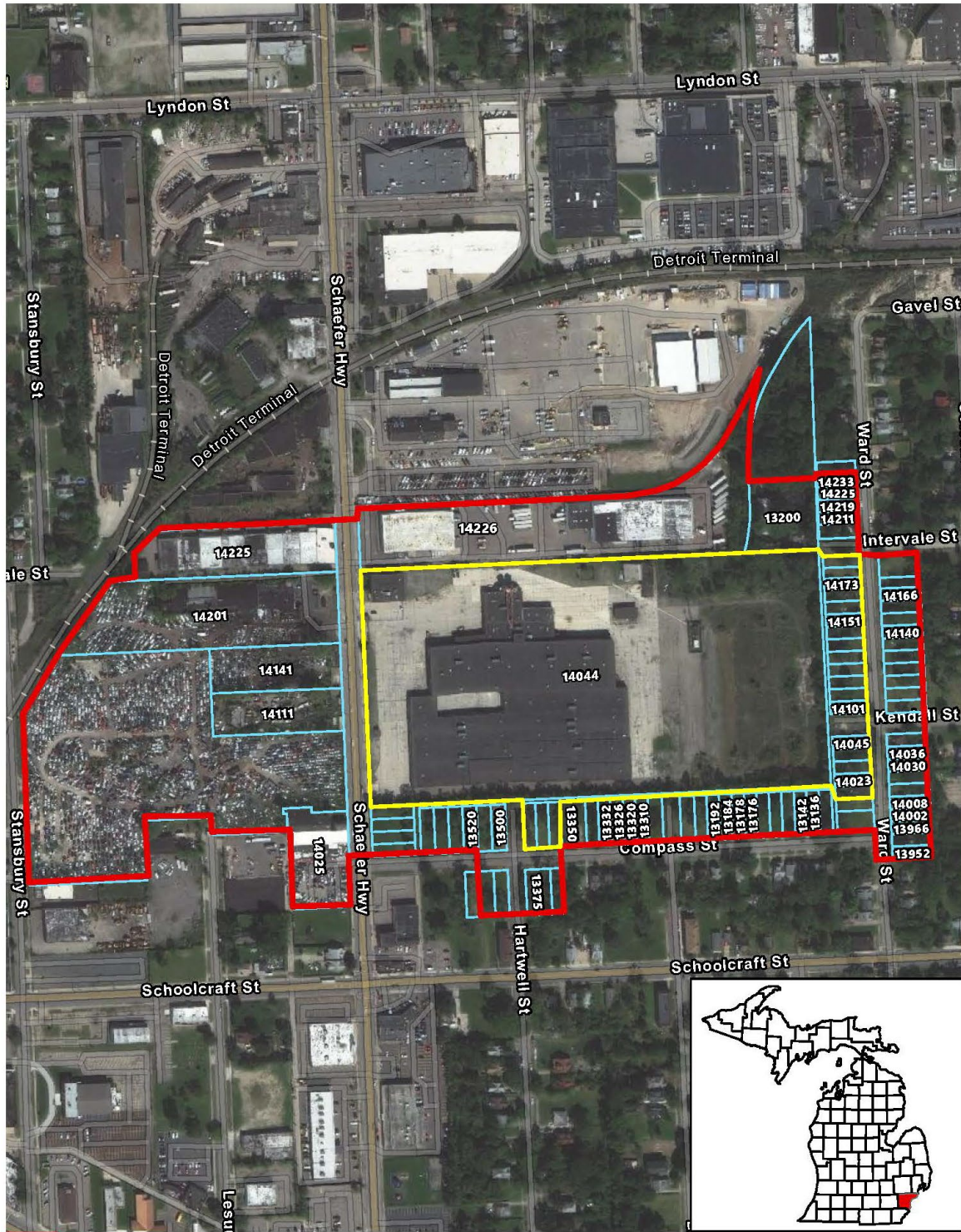
  
C. Mikel Oglesby  
Executive Director of Transit

Date:

4/25/2023

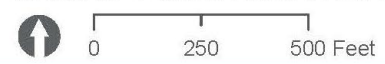
**Attachment A:  
Area of Potential Effects Map**

Figure A-1. Coolidge Terminal Replacement Project Area of Potential Effects






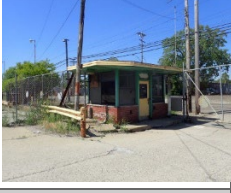

- Project Area
- Area of Potential Effects (APE)
- Parcel Boundary

**AREA OF POTENTIAL EFFECTS**






**Attachment B:  
Historic Properties in the APE**

Attachment B: Historic Properties in the APE

Photograph	Property Name	Address	County	Construction Date	NRHP Status
	Coolidge Terminal Complex	14044 Schaefer Highway, Detroit	Wayne	1948-c.1980	Eligible
	CT-1 – Coolidge Terminal Building	14044 Schaefer Highway, Detroit	Wayne	1948-1950	Eligible as contributing resource to Coolidge Terminal Complex
	CT2 – Coolidge Administrative Building	14044 Schaefer Highway, Detroit	Wayne	1948	Eligible as contributing resource to Coolidge Terminal Complex
	CT2 – Gatehouse	14044 Schaefer Highway, Detroit	Wayne	1948	Eligible as contributing resource to Coolidge Terminal Complex
	CT4 – Heating Plant	14044 Schaefer Highway, Detroit	Wayne	1948; 1970	Eligible as contributing resource to Coolidge Terminal Complex



Attachment B: Historic Properties in the APE

Photograph	Property Name	Address	County	Construction Date	NRHP Status
	CT5 – Fare Box House	14044 Schaefer Highway, Detroit	Wayne	1948	Eligible as contributing resource to Coolidge Terminal Complex
	CT6 – Dispatch House	14044 Schaefer Highway, Detroit	Wayne	c. 1960	Eligible as contributing resource to Coolidge Terminal Complex
	O.H. Frisbie Moving & Storage	14225 Schaefer Highway, Detroit	Wayne	1951	Eligible

## APPENDIX E. AGENCY CORRESPONDENCE

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**From:** [Breiseth, Elizabeth \(FTA\)](#)  
**To:** [Slagor, Scott \(LEO\)](#)  
**Subject:** RE: Confirmation - Michigan SHPO Section 106 Consultation  
**Date:** Monday, November 14, 2022 6:06:00 AM

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Hi Scott,

I transmitted the revised MOA for the Coolidge Terminal Project last week through the online system. If you are satisfied with the changes, please go ahead and have SHPO and your legal review.

Any status update on the letter from your AG's office?

Please reach out if there's anything you'd like to discuss.

Thanks, Elizabeth

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**From:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Sent:** Thursday, October 20, 2022 3:39 PM  
**To:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Subject:** RE: Confirmation - Michigan SHPO Section 106 Consultation

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I am going to ask for our attorneys to spell out their position in a letter, since you're the second agency this week that has expressed concern. The AG's office has been inserting the MSF as a required signatory along side the federal agency and SHPO.



**Scott Slagor** (he/him)  
Cultural Resource Protection Manager  
**State Historic Preservation Office**  
300 N. Washington Square  
Lansing, MI 48913  
Office: 517.335.9840 Direct: 517.285.5120  
[michigan.gov/shpo](http://michigan.gov/shpo)

Get the latest news with the [SHPO](#) and [MEDC Community Development](#) newsletters!

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**From:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Sent:** Thursday, October 20, 2022 11:43 AM  
**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Subject:** RE: Confirmation - Michigan SHPO Section 106 Consultation

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hi Scott,

Thanks for providing these comments. I have reviewed and passed them along to the project team. I anticipate a quick turnaround as they have already been thinking about more specifics for the interpretation element.

I suspect there could be some sticking points for us with the Michigan Strategic Fund being a signatory. But to clarify, do they want to be an invited signatory or could we include them (if need be) as a concurring signatory? We can chat about this further as the MOA moves through review but if it looks like they may need to be included in our MOA, we'll need to loop FTA counsel in sooner rather than later.

Thanks, Elizabeth

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**From:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Sent:** Thursday, October 20, 2022 8:44 AM  
**To:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Subject:** RE: Confirmation - Michigan SHPO Section 106 Consultation

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Hi Elizabeth,

Attached is the draft MOA with my comments. It's a solid first draft, so I don't have many, except for being more specific with interpretative panels. Once you take a look and make edits, the next draft will go to our Deputy SHPO (or hopefully our actual SHPO by then if we can get one appointed), and if it's in pretty good shape, on to our legal team at the AG's office.

FYI- our legal team will likely insert the Michigan Strategic Fund in the agreement as a signatory (it's a long story, but it comes down to the AG's interpretation of how SHPO was transferred to the MSF). It's been a sticking point for us since that's now how the regs work, and has even caused concern with some agencies. That said, we have been moving ahead with agreements including the MSF so as to not stall projects. I left out the MSF language in this draft because I'm hoping we will have that straightened out by the time we are ready to finalize this, but I wanted to give you a heads up if that winds up not the case.

Thanks.

**Scott Slagor** (he/him)  
Cultural Resource Protection Manager  
**State Historic Preservation Office**  
300 N. Washington Square  
Lansing, MI 48913



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**From:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Sent:** Tuesday, October 18, 2022 8:47 AM  
**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Subject:** RE: Confirmation - Michigan SHPO Section 106 Consultation

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Hi Scott,

I wanted to follow up on the documents I sent last week because we have a tight schedule. Is the concept design report sufficient for your office to provide comments on the draft MOA?

Thanks, Elizabeth

---

**From:** Breiseth, Elizabeth (FTA)  
**Sent:** Tuesday, October 11, 2022 9:02 AM  
**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Subject:** RE: Confirmation - Michigan SHPO Section 106 Consultation

Hi Scott,

Thanks for the productive conversation Friday. Attached please find Coolidge's concept design report, which analyzes the programming needs and potential site plans (specifically pgs 38-39). A matrix of the pros and cons analysis of these potential site plans is also attached.

In terms of schedule, the project team is aiming to publish the Environmental Assessment and draft MOA in December in order to meet the CEQ regulations. In order to get FTA legal review of the MOA done in advance of that, we would need all SHPO reviews completed by mid November if possible.

Let me know if you think this schedule is feasible and if there is anything your office would need to facilitate reviews.

Please give me a call if you'd like to discuss further.

Thanks, Elizabeth

**Elizabeth Breiseth** (*She/Her/Hers*)

Federal Historic Preservation Officer/Environmental Protection Specialist

Office of Environmental Programs

Federal Transit Administration | U.S. Department of Transportation

1200 New Jersey Ave, SE | Washington, DC 20590

Email: [elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)

Direct: (312) 353-4315

---

**From:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>

**Sent:** Thursday, September 22, 2022 2:35 PM

**To:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>

**Subject:** RE: Confirmation - Michigan SHPO Section 106 Consultation

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Hi Elizabeth,

We were waiting on the case study showing which alternatives were considered and why the federal agency feels an adverse effect is unavoidable, which I think you said was coming with the 4F documentation. Technically, in 106 the agency must look at alternatives before launching too deep into the MOA development. Also we don't want to have the MOA cemented in stone before Consulting parties have weighed in.



**Scott Slagor** (he/him)

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**From:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>

**Sent:** Monday, September 19, 2022 11:24 AM

**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>

**Subject:** RE: Confirmation - Michigan SHPO Section 106 Consultation

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Hi Scott,

I wanted to follow up and see if you had any comments on the draft MOA for the Coolidge Terminal Replacement Project that we submitted to your office on 8/17. We have not received comments from any other consulting parties. We will also need to coordinate legal review of the draft MOA with your legal department.

The project team anticipates publishing the draft MOA as part of the Environmental Assessment (currently anticipated for December) to get public input. At that time, we will also supply your office with the 4(f) alternatives evaluation.

Thanks, Elizabeth

---

**From:** Breiseth, Elizabeth (FTA)

**Sent:** Thursday, September 1, 2022 11:11 AM

**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>

**Subject:** RE: Confirmation - Michigan SHPO Section 106 Consultation

Hi Scott,

Thanks for reaching out regarding the alternatives. The team is preparing a Section 4f evaluation which discusses and evaluates the alternatives. It is currently in draft form but will be circulated to both your office and the Department of Interior.

Thanks, Elizabeth

---

**From:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>

**Sent:** Thursday, September 1, 2022 11:03 AM

**To:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>

**Subject:** RE: Confirmation - Michigan SHPO Section 106 Consultation

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Hi Elizabeth,

I pulled the file for the project and it looks like we never received a case study of alternatives that demonstrates the adverse effect is unavoidable. That is something which needs to be documented and SHPO concurs with prior to executing an MOA. I know the alternatives were discussed at length during our meeting, but is there written documentation you could provide for that?

Thank you,





**Scott Slagor** (he/him)  
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**State Historic Preservation Office**  
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[michigan.gov/shpo](http://michigan.gov/shpo)

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---

**From:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Sent:** Thursday, September 1, 2022 9:38 AM  
**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Subject:** FW: Confirmation - Michigan SHPO Section 106 Consultation

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Hi Scott,

I'm reaching out to see if you've had an opportunity to look over the draft MOA for the DDOT Coolidge Terminal Replacement Project. We'd be happy to schedule either a full consulting party meeting or a meeting with FTA-SHPO if you have any items you'd like to discuss.

Thanks, Elizabeth

**Elizabeth Breiseth** (*She/Her/Hers*)

Federal Historic Preservation Officer/Environmental Protection Specialist  
Office of Environmental Programs  
Federal Transit Administration | U.S. Department of Transportation  
1200 New Jersey Ave, SE | Washington, DC 20590  
Email: [elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)  
Direct: (312) 353-4315

---

**From:** Smartsheet Forms <[forms@app.smartsheet.com](mailto:forms@app.smartsheet.com)>  
**Sent:** Wednesday, August 17, 2022 9:35 AM  
**To:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Subject:** Confirmation - Michigan SHPO Section 106 Consultation

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Thank you for submitting your additional materials for Section 106 consultation with the Michigan State Historic Preservation Office. A copy is included below for your records.

## Michigan SHPO Section 106 Consultation

**Project ER Number** ER22-338

**Project Name** Coolidge Terminal Replacement Project

**Project County** Wayne

**Project Municipal Unit** Detroit

**Your Name and Agency** Elizabeth Breiseth, Federal Transit Administration

**Your Email Address** [elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)

## File Attachments



**2022-08-15\_DDOT\_CoolidgeTerminal\_MOA\_DRAFT.docx** (655k)

**From:** [Breiseth, Elizabeth \(FTA\)](#)  
**To:** [Slagor, Scott \(LEO\)](#); [Stuckey, Jon \(AG\)](#); [Wright, Austin \(AG\)](#)  
**Cc:** [MacFarlane-Faes, Martha \(LEO\)](#); [Weber, Susan \(FTA\)](#); [Chaudhry, Aruj \(FTA\)](#)  
**Subject:** RE: ER22-338 Coolidge Terminal MOA Draft and SHPO Memo  
**Date:** Wednesday, January 4, 2023 2:06:00 PM  
**Attachments:** [2023-01-03\\_DDOT\\_CoolidgeTerminal\\_MOA\\_FTA\\_Legal.docx](#)

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Hi Scott,

FTA legal has conclude their review and comments are included on the attached document in track changes. Please let me know if you would like this uploaded through the online submission form. I'm attaching it via email due to the schedule sensitivity of this project.

I would also like to reiterate that based on the information provided to the FTA and the regulations at 36 CFR 800, FTA is not inclined to extend interpretation of the required signatories are as fully set forth in 36 CFR 800.6(C)(1) and add additional signatories to the MOA beyond the following:

***Signatories.*** *The signatories have sole authority to execute, amend or terminate the agreement in accordance with this subpart.*

*(i) The agency official and the SHPO/THPO are the signatories to a memorandum of agreement executed pursuant to [paragraph \(b\)\(1\)](#) of this section.*

*(ii) The agency official, the SHPO/THPO, and the Council are the signatories to a memorandum of agreement executed pursuant to [paragraph \(b\)\(2\)](#) of this section.*

*(iii) The agency official and the Council are signatories to a memorandum of agreement executed pursuant to [§ 800.7\(a\)\(2\)](#).*

FTA asks that the MI SHPO/AG Office provide, **in writing**, an explanation of the MSF's responsibilities under this MOA, and the basis for interpreting the regulations to insert the MSF as a required signatory. Lastly, the Memo concludes that the MSF "doesn't have an interest or duty in any of the MOAs, rather it would only be needed for execution of the document as a supervising agency." Please also include an explanation as to whether the MSF can delegate, for the purposes of this MOA, its authority to the MI SHPO to execute this MOA.

Thank you, Elizabeth

---

**From:** Breiseth, Elizabeth (FTA)  
**Sent:** Thursday, December 22, 2022 8:09 AM  
**To:** Slagor, Scott (LEO) <Slagors2@michigan.gov>; Stuckey, Jon (AG) <stuckeyj@michigan.gov>; Wright, Austin (AG) <WrightA27@michigan.gov>  
**Cc:** MacFarlane-Faes, Martha (LEO) <FaesM@michigan.gov>; Weber, Susan (FTA) <susan.weber@dot.gov>; Chaudhry, Aruj (FTA) <aruj.chaudhry@dot.gov>  
**Subject:** RE: ER22-338 Coolidge Terminal MOA Draft and SHPO Memo

Hi all,

Responding to add FTA legal counsel. I will forward the meeting invite to her as well.

Thanks, Elizabeth

---

**From:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Sent:** Thursday, December 22, 2022 7:25 AM  
**To:** Stuckey, Jon (AG) <[stuckeyj@michigan.gov](mailto:stuckeyj@michigan.gov)>; Wright, Austin (AG) <[WrightA27@michigan.gov](mailto:WrightA27@michigan.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>; Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>; Weber, Susan (FTA) <[susan.weber@dot.gov](mailto:susan.weber@dot.gov)>  
**Subject:** FW: ER22-338 Coolidge Terminal MOA Draft and SHPO Memo

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Hello Jon and Austin,

The FTA's legal team has some follow-up questions on MSF's signatory status (see below). I advised that we would likely not be able to address this until the new year, but I want to put it on your radar now.

I've cc'd our FTA contact, Elizabeth Breiseth, and their legal team representative, Susan Weber.

Best,

PS- Happy Holidays!



**Scott Slagor** (he/him)  
Cultural Resource Protection Manager  
**State Historic Preservation Office**  
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---

**From:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Sent:** Thursday, December 22, 2022 8:06 AM  
**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>; Weber, Susan (FTA) <[susan.weber@dot.gov](mailto:susan.weber@dot.gov)>  
**Subject:** RE: ER22-338 Coolidge Terminal MOA Draft and SHPO Memo

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Hi Scott,

To circle back on this issue, our legal counsel has raised some concerns with adding MSF as a signatory. I will include her response below but essentially she needs additional explanation from your AG office. Please pass the below message on to your AG. Knowing many people are likely on leave, is it possible to get an answer early next week?

We intend to publish the draft Environmental Assessment the second week of January and include the draft MOA for public comment. Unless your office has concerns, I think we can publish the draft MOA or at least the substantive mitigation portion without this issue resolved in order to coordinate our public outreach under NEPA and NHPA.

Has the AG office provided any additional comments or a timeframe to complete the review?

Thanks, Elizabeth

*FTA was recently made aware that the Michigan State Historic Preservation Office (MI SHPO) was transferred by way of an Executive Order to another state agency, the Michigan Strategic Fund (MSF). In light of the pending Memorandum of Agreement (MOA) between the FTA and MI SHPO regarding the Coolidge Terminal Replacement Project, the MI SHPO requested FTA to add the MSF as a signatory to the MOA. A memo from the MI Attorney General's Office (Memo) was provided by the MI SHPO in furtherance of this request. The Memo explains the mechanics of the transfer, but is not entirely clear on the responsibilities of the MSF with respect to MOAs. Further, when discussing signatories, the Memo acknowledges that the "MSF doesn't squarely fit any of the parties discussed in the regulations," in reference to 36 CFR Part 800. The Memo then attempts to interpret 36 CFR 800.6(c)(1) and concludes that the MSF, though not an entity clearly delineated in the regulations, should be considered a required signatory, and not an "invited signatory" to the MOA.*

*Based on the information provided to the FTA and the regulations, FTA is not inclined to extend interpretation of the required signatories are as fully set forth in 36 CFR 800.6(C)(1) and add additional signatories to the MOA beyond the following:*

**Signatories.** *The signatories have sole authority to execute, amend or terminate the agreement in accordance with this subpart.*

*(i) The agency official and the SHPO/THPO are the signatories to a memorandum of agreement executed pursuant to [paragraph \(b\)\(1\)](#) of this section.*

*(ii) The agency official, the SHPO/THPO, and the Council are the signatories to a memorandum of agreement executed pursuant to [paragraph \(b\)\(2\)](#) of this section.*

(iii) The agency official and the Council are signatories to a memorandum of agreement executed pursuant to [§ 800.7\(a\)\(2\)](#).

Notwithstanding, FTA asks the MI SHPO to provide, in writing, an explanation of the MSF's responsibilities under this MOA, and the basis for interpreting the regulations to insert the MSF as a required signatory. Lastly, the Memo concludes that the MSF "doesn't have an interest or duty in any of the MOAs, rather it would only be needed for execution of the document as a supervising agency." Please also include an explanation as to whether the MSF can delegate, for the purposes of this MOA, its authority to the MI SHPO to execute this MOA.

---

**From:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Sent:** Thursday, December 15, 2022 9:47 AM  
**To:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>  
**Subject:** RE: ER22-338 Coolidge Terminal MOA Draft and SHPO Memo

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Hi Elizabeth,

I was planning on reaching out to you today. I'm technically home sick, so I'm slow going but still trying to make some progress. Both myself and Martha have reviewed the draft. Martha and I have both completed a review of the draft and have minimal comments- but they mainly concern inserting the MSF. Before I automatically did that to send to the AG's office for review (if I don't do it, they will), I wanted to find out if your legal team has issues with the MSF as a signatory. Otherwise, I will get those call outs inserted and send to our AG's office for review.



**Scott Slagor** (he/him)  
Cultural Resource Protection Manager  
**State Historic Preservation Office**  
300 N. Washington Square  
Lansing, MI 48913  
Office: 517.335.9840 Direct: 517.285.5120  
[michigan.gov/shpo](http://michigan.gov/shpo)

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**From:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Sent:** Thursday, December 15, 2022 10:40 AM  
**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>  
**Subject:** RE: ER22-338 Coolidge Terminal MOA Draft and SHPO Memo

---

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Hi Scott,

FTA counsel is still reviewing the AG memo. I will reach out once that has been completed.

I have a meeting with the project team this morning and was wondering if you can provide an update on the MOA review status?

Thanks so much! – Elizabeth

---

**From:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Sent:** Thursday, December 1, 2022 10:18 AM  
**To:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>  
**Subject:** ER22-338 Coolidge Terminal MOA Draft and SHPO Memo

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Hi Elizabeth,

I reviewed the revised MOA draft and appreciated that all my comments appear to have been addressed. With no additional comments on my end, I forwarded the document to our signatory, Deputy SHPO Martha MacFarlane-Faes for review. After her review, if there are not substantive comments, we will forward to our legal team.

Also, as promised, the AG's office has prepared a memo as to why the MSF is signatory on SHPO's agreements (attached). This is something we are continuing to discuss with the ACHP, but for now, MSF remains on our agreements. If your legal team reviews and has concerns, please let us know.

Thank you.



**Scott Slagor** (he/him)  
Cultural Resource Protection Manager  
**State Historic Preservation Office**  
300 N. Washington Square  
Lansing, MI 48913  
Office: 517.335.9840 Direct: 517.285.5120  
[michigan.gov/shpo](http://michigan.gov/shpo)

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**From:** [Breiseth, Elizabeth \(FTA\)](#)  
**To:** [Slagor, Scott \(LEO\)](#)  
**Cc:** [MacFarlane-Faes, Martha \(LEO\)](#); [Weber, Susan \(FTA\)](#); [Chaudhry, Aruj \(FTA\)](#); [Ciavarella, Jason \(FTA\)](#)  
**Subject:** RE: Coolidge Terminal MOA Revised by AG  
**Date:** Monday, April 3, 2023 6:54:00 AM  
**Attachments:** [2023-03-30 Coolidge Terminal MOA AG comments - FTA comments.docx](#)

---

Hi Scott,

It's great that the MSF signatory issue is resolved for this MOA!

We have reviewed the latest comments from the AG office with our counsel. I have accepted the changes that we are in agreement with. There is still language that we are in disagreement with – please forward the attached to the AG for their review.

I recommend we convene a call with the AG and FTA counsel if the AG office does not agree with our latest revisions.

Thanks! - Elizabeth

---

**From:** Slagor, Scott (LEO) <SlagorS2@michigan.gov>  
**Sent:** Friday, March 24, 2023 2:59 PM  
**To:** Breiseth, Elizabeth (FTA) <elizabeth.breiseth@dot.gov>  
**Cc:** MacFarlane-Faes, Martha (LEO) <FaesM@michigan.gov>  
**Subject:** Coolidge Terminal MOA Revised by AG

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Hi Elizabeth,

The AG's office returned the draft. They have a few comments and responses to your comments. They accepted changes where they could but left the track-changes where there was a disagreement. All final language needs to be agreed on before we can move forward. Also, they tentatively removed references to the MSF, however if the MSF does not approve SHPO's delegation to sign, the language will need to be added back.

Let us know if you have questions. It looks like the Tuesday board meeting link and packet has not been posted yet. I'm keeping an eye out for it.

**Scott Slagor** (he/him)  
Cultural Resource Protection Manager  
**State Historic Preservation Office**  
300 N. Washington Square  
Lansing, MI 48913



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**From:** [Breiseth, Elizabeth \(FTA\)](#)  
**To:** [MacFarlane-Faes, Martha \(LEO\)](#); [Slagor, Scott \(LEO\)](#)  
**Cc:** [Weber, Susan \(FTA\)](#); [McKenzie, Stewart \(FTA\)](#)  
**Subject:** Coolidge Terminal MOA - FINAL  
**Date:** Monday, April 24, 2023 4:19:00 PM  
**Attachments:** [2023-04-24\\_Coolidge Terminal MOA FINAL.pdf](#)  
[MI SHPO Signature Page\\_Coolidge Terminal MOA FINAL-2.pdf](#)

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Martha and Scott,

Thank you both for your continued coordination on developing the MOA.

A final pdf version along with a separate signature page is attached for your review and signature.

Please reach out with any questions.

Thanks, Elizabeth

---

**From:** Breiseth, Elizabeth (FTA)  
**Sent:** Friday, April 21, 2023 9:27 AM  
**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>; Weber, Susan (FTA) <[susan.weber@dot.gov](mailto:susan.weber@dot.gov)>; Chaudhry, Aruj (FTA) <[aruj.chaudhry@dot.gov](mailto:aruj.chaudhry@dot.gov)>; McKenzie, Stewart (FTA) <[Stewart.Mckenzie@dot.gov](mailto:Stewart.Mckenzie@dot.gov)>  
**Subject:** RE: Coolidge Terminal MOA Revised by AG

Hi Scott,

Thank you for providing us with your comments on the AG's recommendations for the draft of the MOA we circulated on April 3<sup>rd</sup>.

FTA has discussed these comments internally. We have decided to keep the property name as is – Coolidge Terminal Complex – rather than providing a new defining term for the property. The MOA deals with mitigation for a single property and we believe a defining term is unnecessary. We will add in “the Objection” as a defined term in the Dispute Resolution stipulation to align with your office's preference.

I am preparing a clean copy and we hope to circulate that for signature next week.

Thanks, Elizabeth

---

**From:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Sent:** Wednesday, April 19, 2023 3:12 PM  
**To:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>; Weber, Susan (FTA)

<[susan.weber@dot.gov](mailto:susan.weber@dot.gov)>; Chaudhry, Aruj (FTA) <[aruj.chaudhry@dot.gov](mailto:aruj.chaudhry@dot.gov)>; McKenzie, Stewart (FTA) <[Stewart.Mckenzie@dot.gov](mailto:Stewart.Mckenzie@dot.gov)>

**Subject:** RE: Coolidge Terminal MOA Revised by AG

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Hi Elizabeth,

Martha and I have had a chance to discuss the results of the AG's final review. They did not offer a new mark-up, but discussed things with us in the meeting. They advised we accept most of the FTA's edits, but had a couple of recommendations for us to consider.

1. They pointed out that somewhere in one of the revisions it looks like the definition for the Coolidge Terminal Complex was taken out. It should be added back in.
2. They still offered concerns for the removal of certain defined terms in Sec. VI Dispute Resolution. I went back and compared it to our other recent MOAs. We usually have a defined term, typically Objection but in this case the AG's office suggested Objecting Signatory- I think that was based on the phrasing. Is there a strong reason FTA is opposed to these defined terms? From reading the clause I understand its intent either way.

Once we have these two areas addressed we can sign the agreement.



**Scott Slagor** (he/him)  
Cultural Resource Protection Manager  
**State Historic Preservation Office**  
300 N. Washington Square  
Lansing, MI 48913  
Office: 517.335.9840 Direct: 517.285.5120  
[michigan.gov/shpo](http://michigan.gov/shpo)

Get the latest news with the [SHPO](#) and [MEDC Community Development](#) newsletters!

---

**From:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>

**Sent:** Wednesday, April 19, 2023 7:24 AM

**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>

**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>; Weber, Susan (FTA) <[susan.weber@dot.gov](mailto:susan.weber@dot.gov)>; Chaudhry, Aruj (FTA) <[aruj.chaudhry@dot.gov](mailto:aruj.chaudhry@dot.gov)>; Stewart.Mckenzie <[Stewart.Mckenzie@dot.gov](mailto:Stewart.Mckenzie@dot.gov)>

**Subject:** RE: Coolidge Terminal MOA Revised by AG

**CAUTION:** This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

Hi Scott,

Have you heard anything from the AG office? Please let us know if we should schedule a call to discuss the outstanding items.

Thanks, Elizabeth

---

**From:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Sent:** Tuesday, April 11, 2023 12:37 PM  
**To:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>; Weber, Susan (FTA) <[susan.weber@dot.gov](mailto:susan.weber@dot.gov)>; Chaudhry, Aruj (FTA) <[aruj.chaudhry@dot.gov](mailto:aruj.chaudhry@dot.gov)>  
**Subject:** RE: Coolidge Terminal MOA Revised by AG

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Yes, they are reviewing now.



**Scott Slagor** (he/him)  
Cultural Resource Protection Manager  
**State Historic Preservation Office**  
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---

**From:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Sent:** Tuesday, April 11, 2023 1:24 PM  
**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>; Weber, Susan (FTA) <[susan.weber@dot.gov](mailto:susan.weber@dot.gov)>; Chaudhry, Aruj (FTA) <[aruj.chaudhry@dot.gov](mailto:aruj.chaudhry@dot.gov)>  
**Subject:** RE: Coolidge Terminal MOA Revised by AG

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hi Scott,

Can you confirm if our comments on the MOA are under review by the AG?

Thanks, Elizabeth

---

**From:** Breiseth, Elizabeth (FTA)  
**Sent:** Monday, April 3, 2023 6:55 AM  
**To:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>; Weber, Susan (FTA) <[susan.weber@dot.gov](mailto:susan.weber@dot.gov)>; Chaudhry, Aruj (FTA) <[aruj.chaudhry@dot.gov](mailto:aruj.chaudhry@dot.gov)>; Ciavarella, Jason (FTA) <[jason.ciavarella@dot.gov](mailto:jason.ciavarella@dot.gov)>  
**Subject:** RE: Coolidge Terminal MOA Revised by AG

Hi Scott,

It's great that the MSF signatory issue is resolved for this MOA!

We have reviewed the latest comments from the AG office with our counsel. I have accepted the changes that we are in agreement with. There is still language that we are in disagreement with – please forward the attached to the AG for their review.

I recommend we convene a call with the AG and FTA counsel if the AG office does not agree with our latest revisions.

Thanks! - Elizabeth

---

**From:** Slagor, Scott (LEO) <[SlagorS2@michigan.gov](mailto:SlagorS2@michigan.gov)>  
**Sent:** Friday, March 24, 2023 2:59 PM  
**To:** Breiseth, Elizabeth (FTA) <[elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)>  
**Cc:** MacFarlane-Faes, Martha (LEO) <[FaesM@michigan.gov](mailto:FaesM@michigan.gov)>  
**Subject:** Coolidge Terminal MOA Revised by AG

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Elizabeth,

The AG's office returned the draft. They have a few comments and responses to your comments. They accepted changes where they could but left the track-changes where there was a disagreement. All final language needs to be agreed on before we can move forward. Also, they tentatively removed references to the MSF, however if the MSF does not approve SHPO's delegation to sign, the language will need to be added back.

Let us know if you have questions. It looks like the Tuesday board meeting link and packet has not been posted yet. I'm keeping an eye out for it.



**Scott Slagor** (he/him)  
Cultural Resource Protection Manager  
**State Historic Preservation Office**  
300 N. Washington Square  
Lansing, MI 48913  
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[michigan.gov/shpo](http://michigan.gov/shpo)

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GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



DANIEL EICHINGER  
ACTING DIRECTOR

February 23, 2023

VIA EMAIL

Ayobami Bell Torrence  
ATTENTION: Coolidge Project Public Comment  
Detroit Department of Transportation  
100 Mack Avenue  
Detroit, Michigan 48201

Dear Ayobami Bell Torrence:

SUBJECT: Early Coordination Review of Proposed Coolidge Terminal Replacement Project; Coolidge Bus Terminal and Maintenance Facility, Detroit, Michigan, Wayne County, T01S R11E Section 20; City of Detroit Michigan Department of Environment, Great Lakes, and Energy (EGLE) Water Resources Division (WRD)

Thank you for your February 1, 2023, early coordination letter regarding the development of an Environmental Assessment (EA) for the Coolidge Terminal Replacement Project, Detroit, Michigan.

The scoping information provided indicates that the Federal Transit Administration, and Detroit Department of Transportation (DDOT) have prepared this EA to assess the potential social, economic, and environmental impact of the proposed Coolidge Terminal Replacement Project. The proposed project will construct an all-new terminal on the Coolidge Terminal site.

The proposed project would be phased to initially accommodate the move of 143 buses from Gilbert Terminal 4 with the capacity to hold 144 buses, and the site is planned to accommodate expansion for a capacity of up to 216 buses in the future. Both 40' buses and 60' articulated buses will be stored and maintained at this facility, with 24-hour operations. The proposed Project would be constructed in two phases – the first phase, initial build for 144 buses, and the second phase, full build to accommodate 216 buses.

The WRD can offer the following comments regarding statutes administered by our program:

- a) Review of available information from EGLE wetland inventories, FEMA Flood Hazard Maps, and other GIS data sets, this project will not impact any stream, lakes, floodplains, or wetlands regulated under Part 31, Floodplain Regulatory Authority of Part 31, Water Resources, Part 301, Inland Lakes and Streams, or Part 303, Wetlands protection of the Natural Resources and Environmental Protection Act, PA 451, as amended.
- b) A review of our database indicates potential State and/or Federal Threatened and Endangered species Indiana Bat (*Myotis sodalis*), Northern Longeared Bat (*Myotis septentrionalis*), It recommended that this project be screened using the U.S. Fish and Wildlife Service's on-line Threatened and Endangered species screening tool, iPAC. And necessary clearances for those 2 species be obtained through this on-line process.

Thank you for the opportunity to comment on this EA. If you have any questions regarding this letter, please contact me at 517-256-1469; SkubinnaJ@Michigan.gov; or EGLE, WRD, Transportation Review Unit, P.O. Box 30458, Lansing, Michigan 48909.

Sincerely,



John Skubinna  
Environmental Quality Analyst  
Water Resources Division



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Michigan Ecological Services Field Office  
2651 Coolidge Road Suite 101  
East Lansing, MI 48823-6360  
Phone: (517) 351-2555 Fax: (517) 351-1443

In Reply Refer To:  
Project Code: 2023-0054423  
Project Name: DDOT Coolidge Terminal EA

March 10, 2023

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

### **Official Species List**

The attached species list identifies any Federally threatened, endangered, proposed and candidate species that may occur within the boundary of your proposed project or may be affected by your proposed project. The list also includes designated critical habitat if present within your proposed project area or affected by your project. This list is provided to you as the initial step of the consultation process required under section 7(c) of the Endangered Species Act, also referred to as Section 7 Consultation.

Under 50 CFR 402.12(e) (the regulations that implement section 7 of the Endangered Species Act), the accuracy of this species list should be verified after 90 days. You may verify the list by visiting the IPaC website (<https://ipac.ecosphere.fws.gov/>) at regular intervals during project planning and implementation. To update an Official Species List in IPaC: from the My Projects page, find the project, expand the row, and click Project Home. In the What's Next box on the Project Home page, there is a Request Updated List button to update your species list. Be sure to select an "official" species list for all projects.

### **Consultation requirements and next steps**

Section 7 of the Endangered Species Act of 1973 requires that actions authorized, funded, or carried out by Federal agencies not jeopardize Federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-Federal representative) must consult with the Fish and Wildlife Service if they determine their project may affect listed species or critical habitat.

There are two approaches to evaluating the effects of a project on listed species.

Approach 1. Use the All-species Michigan determination key in IPaC. This tool can assist you in making determinations for listed species for some projects. In many cases, the determination key

will provide an automated concurrence that completes all or significant parts of the consultation process. Therefore, we strongly recommend screening your project with the **All-Species Michigan Determination Key (Dkey)**. For additional information on using IPaC and available Determination Keys, visit <https://www.fws.gov/media/mifo-ipac-instructions> (and click on the attachment). Please carefully review your Dkey output letter to determine whether additional steps are needed to complete the consultation process.

Approach 2. Evaluate the effects to listed species on your own without utilizing a determination key. Once you obtain your official species list, you are not required to continue in IPaC, although in most cases using a determination key should expedite your review. If the project is a Federal action, you should review our section 7 step-by-step instructions before making your determinations: <https://www.fws.gov/office/midwest-region-headquarters/midwest-section-7-technical-assistance>. If you evaluate the details of your project and conclude “no effect,” document your findings, and your listed species review is complete; you do not need our concurrence on “no effect” determinations. If you cannot conclude “no effect,” you should coordinate/consult with the Michigan Ecological Services Field Office. The preferred method for submitting your project description and effects determination (if concurrence is needed) is electronically to [EastLansing@fws.gov](mailto:EastLansing@fws.gov). Please include a copy of this official species list with your request.

For all **wind energy projects** and **projects that include installing communications towers that use guy wires**, please contact this field office directly for assistance, even if no Federally listed plants, animals or critical habitat are present within your proposed project area or may be affected by your proposed project.

### **Migratory Birds**

Please see the “Migratory Birds” section below for important information regarding incorporating migratory birds into your project planning. Our Migratory Bird Program has developed recommendations, best practices, and other tools to help project proponents voluntarily reduce impacts to birds and their habitats. The Bald and Golden Eagle Protection Act prohibits the take and disturbance of eagles without a permit. If your project is near an eagle nest or winter roost area, see our Eagle Permits website at <https://www.fws.gov/program/eagle-management/eagle-permits> to help you avoid impacting eagles or determine if a permit may be necessary.

Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your consideration of threatened and endangered species during your project

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planning. Please include a copy of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
  - USFWS National Wildlife Refuges and Fish Hatcheries
  - Migratory Birds
  - Wetlands
-

## **OFFICIAL SPECIES LIST**

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Michigan Ecological Services Field Office**

2651 Coolidge Road Suite 101

East Lansing, MI 48823-6360

(517) 351-2555

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## PROJECT SUMMARY

**Project Code:** 2023-0054423  
**Project Name:** DDOT Coolidge Terminal EA  
**Project Type:** Government / Municipal (Non-Military) Construction  
**Project Description:** This project will construct a new bus facility to balance daily bus operations across the City of Detroit and to meet current and future storage, operations, and maintenance needs of DDOT's fleet. To accommodate all requisite facility operations, necessary stormwater management infrastructure, and meet City zoning ordinance and design requirements (such as setbacks, landscaping, and fencing), the construction footprint includes 36 adjacent vacant residential parcels that lie in the Happy Homes Subdivision to the east and south of the Coolidge Terminal site along Ward Avenue and Compass Street, respectively. The project site is north of I-96 Expressway, approximately 1/2 mile north of the intersection of Schaefer Highway and Grand River Avenue. It is nearly 8 miles northwest of downtown Detroit. The proposed Project will be primarily located on the existing Coolidge Terminal site at 14044 Schaefer Highway in Detroit, Michigan, with some adjacent vacant parcels as described above. Construction is anticipated to begin in late 2023, with operations to begin in late 2024.

### Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@42.39015915,-83.17589959215145,14z>



Counties: Wayne County, Michigan

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## ENDANGERED SPECIES ACT SPECIES

There is a total of 8 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 2 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## MAMMALS

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a> General project design guidelines: <a href="https://ipac.ecosphere.fws.gov/project/43SHGKUVGZFEV5FHTG2KGDGHUPO/documents/generated/6982.pdf">https://ipac.ecosphere.fws.gov/project/43SHGKUVGZFEV5FHTG2KGDGHUPO/documents/generated/6982.pdf</a>	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/10515">https://ecos.fws.gov/ecp/species/10515</a>	Proposed Endangered

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## BIRDS

NAME	STATUS
Piping Plover <i>Charadrius melodus</i> Population: [Great Lakes watershed DPS] - Great Lakes, watershed in States of IL, IN, MI, MN, NY, OH, PA, and WI and Canada (Ont.) There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/6039">https://ecos.fws.gov/ecp/species/6039</a>	Endangered
Red Knot <i>Calidris canutus rufa</i> There is <b>proposed</b> critical habitat for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> <li>Only actions that occur along coastal areas during the Red Knot migratory window of MAY 1 - SEPTEMBER 30.</li> </ul> Species profile: <a href="https://ecos.fws.gov/ecp/species/1864">https://ecos.fws.gov/ecp/species/1864</a>	Threatened

## REPTILES

NAME	STATUS
Eastern Massasauga (=rattlesnake) <i>Sistrurus catenatus</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> <li>For all Projects: Project is within EMR Range</li> </ul> Species profile: <a href="https://ecos.fws.gov/ecp/species/2202">https://ecos.fws.gov/ecp/species/2202</a> General project design guidelines: <a href="https://ipac.ecosphere.fws.gov/project/43SHGKUVGZFV5FHTG2KGDGHUPQ/documents/generated/5280.pdf">https://ipac.ecosphere.fws.gov/project/43SHGKUVGZFV5FHTG2KGDGHUPQ/documents/generated/5280.pdf</a>	Threatened

## CLAMS

NAME	STATUS
Northern Riffleshell <i>Epioblasma rangiana</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/527">https://ecos.fws.gov/ecp/species/527</a>	Endangered

## INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

## FLOWERING PLANTS

NAME	STATUS
Eastern Prairie Fringed Orchid <i>Platanthera leucophaea</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/601">https://ecos.fws.gov/ecp/species/601</a>	Threatened

## **CRITICAL HABITATS**

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

## **USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES**

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

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## MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

- 
1. The [Migratory Birds Treaty Act](#) of 1918.
  2. The [Bald and Golden Eagle Protection Act](#) of 1940.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

**The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\) list](#) or warrant special attention in your project location.** To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Canada Warbler <i>Cardellina canadensis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 20 to Aug 10
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere

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NAME	BREEDING SEASON
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31

## PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

### Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

### Survey Effort (|)

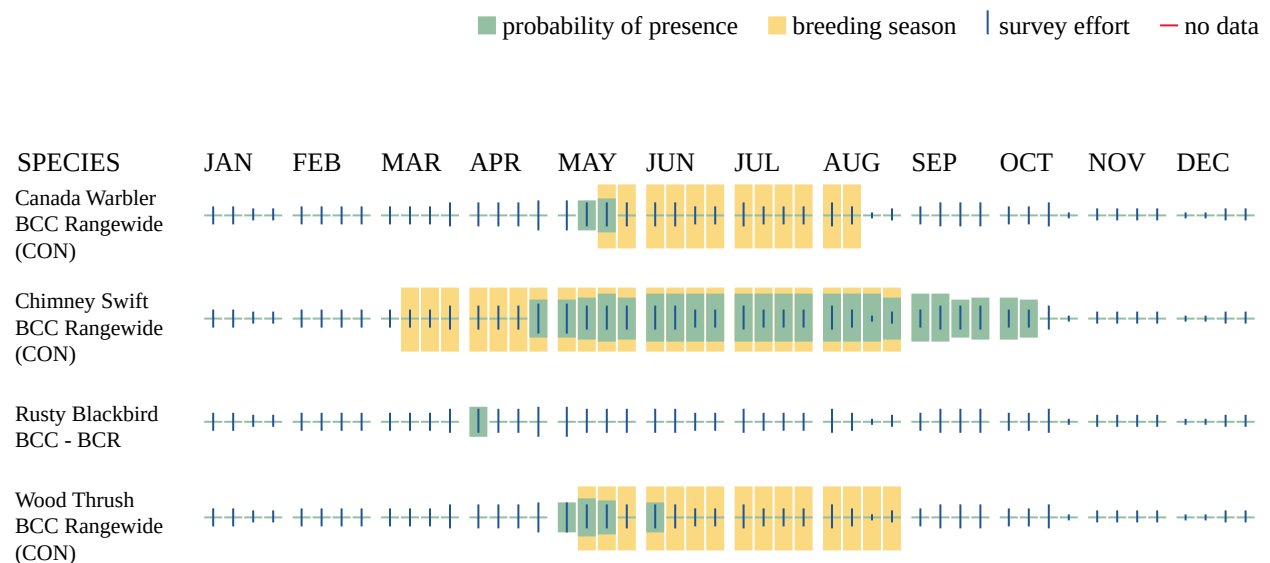
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

## No Data (–)

A week is marked as having no data if there were no survey events for that week.

## Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

## MIGRATORY BIRDS FAQ

**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.



**What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

**What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

**How do I know if a bird is breeding, wintering or migrating in my area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

**What are the levels of concern for migratory birds?**

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
  2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
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3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### **Details about birds that are potentially affected by offshore projects**

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### **What if I have eagles on my list?**

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### **Proper Interpretation and Use of Your Migratory Bird Report**

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell

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me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

## WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

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## **IPAC USER CONTACT INFORMATION**

Agency: HDR  
Name: Hannah Hedinger  
Address: 5201 S Sixth Street  
City: Springfield  
State: IL  
Zip: 62703  
Email: hannah.hedinger@hdrinc.com  
Phone: 2173315882

## **LEAD AGENCY CONTACT INFORMATION**

Lead Agency: Federal Transit Administration

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## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Michigan Ecological Services Field Office  
2651 Coolidge Road Suite 101  
East Lansing, MI 48823-6360  
Phone: (517) 351-2555 Fax: (517) 351-1443

In Reply Refer To:  
Project code: 2023-0054423  
Project Name: DDOT Coolidge Terminal EA

March 13, 2023

Subject: Verification letter for 'DDOT Coolidge Terminal EA' for specified federally threatened and endangered species and designated critical habitat that may occur in your proposed project area consistent with the Michigan Determination Key for project review and guidance for federally listed species (Michigan Dkey).

Dear Hannah Hedinger:

The U.S. Fish and Wildlife Service (Service) received on **March 13, 2023** your effect determination(s) for the 'DDOT Coolidge Terminal EA' (the Action) using the Michigan DKey within the Information for Planning and Consultation (IPaC) system. The Service developed this system in accordance with the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.).

Based on your answers and the assistance in the Service's Michigan DKey, you made the following effect determination(s) for the proposed action.

<b>Species</b>	<b>Listing Status</b>	<b>Determination</b>
Eastern Massasauga (=rattlesnake) ( <i>Sistrurus catenatus</i> )	Threatened	NLAA
Eastern Prairie Fringed Orchid ( <i>Platanthera leucophaea</i> )	Threatened	No effect
Indiana Bat ( <i>Myotis sodalis</i> )	Endangered	No effect
Monarch Butterfly ( <i>Danaus plexippus</i> )	Candidate	May affect
Northern Riffleshell ( <i>Epioblasma rangiana</i> )	Endangered	No effect
Piping Plover ( <i>Charadrius melodus</i> )	Endangered	No effect
Red Knot ( <i>Calidris canutus rufa</i> )	Threatened	No effect
Tricolored Bat ( <i>Perimyotis subflavus</i> )	Proposed Endangered	No effect

The Service will notify you within 30 calendar days if we determine that this proposed Action does not meet the criteria for a "may affect, not likely to adversely affect" (NLAA) determination for Federally listed species in Michigan. If we do not notify you within that timeframe, you may

proceed with the Action under the terms of the NLAA concurrence provided here. This verification period allows the Michigan Ecological Services Field Office to apply local knowledge to evaluation of the Action, as we may identify a small subset of actions having impacts that were unanticipated. In such instances, the Michigan Ecological Services Field Office may request additional information to verify the effects determination reached through the Michigan DKey.

Your agency has met consultation requirements by informing the Service of your “No Effect” determination(s). No consultation for is required for species that you determined will not be affected by the Action.

Please provide sufficient project details on your project homepage in IPaC (Define Project, Project Description) to support your conclusions and the Service’s 30-day review period. Failure to disclose important aspects of your project that would influence the outcome of your effects determinations may negate your determinations and invalidate this letter. If you have site-specific information that leads you to believe a different determination is more appropriate for your project than what the Dkey concludes, you can and should proceed based on the best available information.

The Service recommends that you contact the Service or re-evaluate the project in IPaC if: 1) the scope or location of the proposed Action is changed; 2) new information reveals that the action may affect listed species or designated critical habitat in a manner or to an extent not previously considered; 3) the Action is modified in a manner that causes effects to listed species or designated critical habitat; or 4) a new species is listed or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service should take place before project changes are final or resources committed.

### **Monarch:**

In December 2020, after an extensive status assessment of the monarch butterfly, we determined that listing the monarch under the Endangered Species Act is warranted but precluded by higher priority actions to amend the Lists of Endangered and Threatened Wildlife and Plants. Therefore, the Service added the monarch butterfly to the candidate list. The Service will review its status each year until we are able to begin developing a proposal to list the monarch.

The Endangered Species Act does not establish protections or consultation requirements for candidate species. Some Federal and State agencies may have policy requirements to consider candidate species in planning. We encourage implementing measures that will remove or reduce threats to these species and possibly make listing unnecessary. Please refer to our recommendations in the Monarch and Pollinators section, below.

### **Bald and Golden Eagles:**

Bald eagles, golden eagles, and their nests are protected under the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended, 16 U.S.C. 668a-d) (Eagle Act). The Eagle Act prohibits, except when authorized by an Eagle Act permit, the “taking” of bald and golden eagles and defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” The Eagle Act’s implementing regulations define disturb as “...to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially

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interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”

If the Action may impact bald or golden eagles, additional coordination with the Service under the Eagle Act may be required. For more information on eagles and conducting activities in the vicinity of an eagle nest, please visit <https://www.fws.gov/library/collections/all-about-eagles>. In addition, the Service developed the National Bald Eagle Management Guidelines (May 2007) in order to assist landowners in avoiding the disturbance of bald eagles. The full Guidelines are available at <https://www.fws.gov/media/national-bald-eagle-management-guidelines-0>.

If you have further questions regarding potential impacts to eagles, please contact Chris Mensing, [Chris\\_Mensing@fws.gov](mailto:Chris_Mensing@fws.gov) or 517-351-2555.

### **Monarch butterfly and other pollinators**

In December 2020, after an extensive status assessment of the monarch butterfly, we determined that listing the monarch under the Endangered Species Act is warranted but precluded by higher priority actions to amend the Lists of Endangered and Threatened Wildlife and Plants. Therefore, the Service added the monarch butterfly to the candidate list. The Service will review its status each year until we are able to begin developing a proposal to list the monarch.

The Endangered Species Act does not establish protections or consultation requirements for candidate species. Some Federal and State agencies may have policy requirements to consider candidate species in planning. We encourage implementing measures that will remove or reduce threats to these species and possibly make listing unnecessary.

For all projects, we recommend the following best management practices (BMPs) to benefit monarch and other pollinators.

#### **Monarch and Pollinator BMP Recommendations**

Consider monarch and other pollinators in your project planning when possible. Many pollinators are declining, including species that pollinate key agricultural crops and help maintain natural plant communities. Planting a diverse group of native plant species will help support the nutritional needs of Michigan’s pollinators. We recommend a mix of flowering trees, shrubs, and herbaceous plants so that something is always blooming and pollen is available during the active periods of the pollinators, roughly early spring through fall (mid-March to mid-October). To benefit a wide variety of pollinators, choose a wide range of flowers with diverse colors, heights, structure, and flower shape. It is important to provide host plants for any known butterfly species at your site, including native milkweed for Monarch butterfly. Incorporating a water source (e.g., ephemeral pool or low area) and basking areas (rocks or bare ground) will provide additional resources for pollinators.

Many pollinators need a safe place to build their nests and overwinter. During spring and summer, leave some areas unmowed or minimize the impacts from mowing (e.g., decrease frequency, increase vegetation height). In fall, leave areas unraked and leave plant stems standing. Leave patches of bare soil for ground nesting pollinators.

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Avoid or limit pesticide use. Pesticides can kill more than the target pest. Some pesticide residues can kill pollinators for several days after the pesticide is applied. Pesticides can also kill natural predators, which can lead to even worse pest problems.

Planting native wildflowers can also reduce the need to mow and water, improve bank stabilization by reducing erosion, and improve groundwater recharge and water quality.

Resources:

<https://www.fws.gov/initiative/monarchs>

<https://www.fws.gov/library/collections/pollinators>

**Wetland impacts:**

Section 404 of the Clean Water Act of 1977 (CWA) regulates the discharge of dredged or fill material into waters (including wetlands) of the United States. Regulations require that activities permitted under the CWA (including wetland permits issued by the Michigan Department of Environment, Great Lakes, and Energy (EGLE)) not jeopardize the continued existence of species listed as endangered or threatened. Permits issued by the U.S. Army Corps of Engineers must also consider effects to listed species pursuant to section 7 of the Endangered Species Act. The Service provides comments to the agencies that may include permit conditions to help avoid or minimize impacts to wildlife resources including listed species. For this project, we consider the conservation measures you agreed to in the determination key and/or as part of your proposed action to be non-discretionary. If you apply for a wetland permit, these conservation measures should be explicitly incorporated as permit conditions. Include a copy of this letter in your wetland permit application to streamline the threatened and endangered species review process.

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**Summary of conservation measures for your project** You agreed to the following conservation measures to avoid adverse effects to listed species and our concurrence is only valid if the measures are fully implemented. These must be included as permit conditions if a permit is required and/or included in any contract language.

**Eastern massasauga**

Materials used for erosion control and site restoration must be wildlife-friendly. Do not use erosion control products containing plastic mesh netting or other similar material that could entangle eastern massasauga rattlesnake (EMR). Several products for soil erosion and control exist that do not contain plastic netting including net-less erosion control blankets (for example, made of excelsior), loose mulch, hydraulic mulch, soil binders, unreinforced silt fences, and straw bales. Others are made from natural fibers (such as jute) and loosely woven together in a manner that allows wildlife to wiggle free.

To increase human safety and awareness of EMR, those implementing the project must first review the EMR factsheet (available at <https://www.fws.gov/media/eastern-massasauga-rattlesnake-fact-sheet>), and watch MDNR's "60-Second Snakes: The Eastern Massasauga Rattlesnake" video (available at [https://youtu.be/~PFnXe\\_e02w](https://youtu.be/~PFnXe_e02w)).

During project implementation, report sightings of any federally listed species, including EMR, to the Service within 24 hours.

The project will not result in permanent loss of more than one acre of wetland or conversion of more than 10 acres of EMR upland habitat (uplands associated with high quality wetland habitat) to other land uses.

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## Action Description

You provided to IPaC the following name and description for the subject Action.

### 1. Name

DDOT Coolidge Terminal EA

### 2. Description

The following description was provided for the project 'DDOT Coolidge Terminal EA':

This project will construct a new bus facility to balance daily bus operations across the City of Detroit and to meet current and future storage, operations, and maintenance needs of DDOT's fleet. To accommodate all requisite facility operations, necessary stormwater management infrastructure, and meet City zoning ordinance and design requirements (such as setbacks, landscaping, and fencing), the construction footprint includes 36 adjacent vacant residential parcels that lie in the Happy Homes Subdivision to the east and south of the Coolidge Terminal site along Ward Avenue and Compass Street, respectively. The project site is north of I-96 Expressway, approximately 1/2 mile north of the intersection of Schaefer Highway and Grand River Avenue. It is nearly 8 miles northwest of downtown Detroit. The proposed Project will be primarily located on the existing Coolidge Terminal site at 14044 Schaefer Highway in Detroit, Michigan, with some adjacent vacant parcels as described above. Construction is anticipated to being in late 2023, with operations to begin in late 2024.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@42.39015915,-83.17589959215145,14z>



## QUALIFICATION INTERVIEW

1. Are there any possible effects to any listed species or to designated critical habitat from your project or effects from any other actions or projects subsequently made possible by your project?

Select "Yes" even if the expected effects to the species or critical habitat are expected to be 1) extremely unlikely (discountable), 2) can't meaningfully be measured, detected, or evaluated (insignificant), or 3) wholly beneficial.

Select "No" to confirm that the project details and supporting information allow you to conclude that listed species and their habitats will not be exposed to any effects (including discountable, insignificant, or beneficial effects) and therefore, you have made a "no effect" determination for all species. If you are unsure, select YES to answer additional questions about your project.

*Yes*

2. This determination key is intended to assist the user in the evaluating the effects of their actions on Federally listed species in Michigan. It does not cover other prohibited activities under the Endangered Species Act (e.g., for wildlife: import/export, Interstate or foreign commerce, possession of illegally taken wildlife, purposeful take for scientific purposes or to enhance the survival of a species, etc.; for plants: import/export, reduce to possession, malicious destruction on Federal lands, commercial sale, etc.) or other statutes. Click yes to acknowledge that you must consider other prohibitions of the ESA or other statutes outside of this determination key.

*Yes*

3. Is the action the approval of a long-term (i.e., in effect greater than 10 years) permit, plan, or other action? (e.g., a new or re-issued hydropower license, a land management plan, or other kinds of documents that provide direction for projects or actions that may be conducted over a long term (>10 years) without the need for additional section 7 consultation).

*No*

4. Is the action being funded, authorized, or carried out by a Federal agency?

*Yes*

5. Does the action involve the installation or operation of wind turbines?

*No*

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6. Are there at least 30 days prior to your action occurring? Endangered species consultation must be completed before taking any action that may have effects to listed species. The Service also needs 30 days to review projects before we can verify conclusions in some dkey output letters. For example, if you have already started some components of the project on the ground (e.g., removed vegetation) before completing this key, answer “no” to this question. The only exception is if you have a Michigan Field Office pre-approved emergence survey (i.e., if you have conducted pre-approved emergence surveys for listed bats before tree removal, you can still answer yes to this question).

*Yes*

7. Does the action involve constructing a new communication tower or modifying an existing communications tower?

*No*

8. Does the activity involve aerial or other large-scale application of any chemical (including insecticide, herbicide, etc.)?

*No*

9. Does your project include water withdrawal (ground or surface water) greater than 10,000 gallons/day?

*No*

10. Will your action permanently affect hydrology?

*No*

11. Will your action temporarily affect hydrology?

*No*

12. Will your project have any direct impacts to a stream or river (e.g., Horizontal Directional Drilling (HDD), hydrostatic testing, stream/road crossings, new storm-water outfall discharge, dams, other in-stream work, etc.)?

*No*

13. Does your project have the potential to indirectly impact the stream/river or the riparian zone (e.g., cut and fill, horizontal directional drilling, hydrostatic testing, construction, vegetation removal, discharge, etc.)?

*No*

14. Will your action disturb the ground or existing vegetation? This includes any off road vehicle access, soil compaction, digging, seismic survey, directional drilling, heavy equipment, grading, trenching, placement of fill, pesticide application, vegetation management (including removal or maintenance using equipment or chemicals), cultivation, development, etc.

*Yes*

15. Is the action a utility-scale solar development project?

*No*

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16. [Hidden semantic] Does the action intersect the MOBU AOI?

**Automatically answered**

*Yes*

17. Under the ESA, monarchs remain warranted but precluded by listing actions of higher priority. The monarch is a candidate for listing at this time. The Endangered Species Act does not establish protections or consultation requirements for candidate species. Some Federal and State agencies may have policy requirements to consider candidate species in planning. We encourage implementing measures that will remove or reduce threats to these species and possibly make listing unnecessary. If your project will have no effect on monarch butterflies (for example, if your project won't affect their habitat or individuals), then you can make a "no effect" determination for this project. Are you making a "no effect" determination for monarch?

*No*

18. Is this project funded, authorized, or carried out by the U.S. Fish and Wildlife Service?

*No*

19. [Hidden Semantic] Does the action intersect the Eastern massasauga rattlesnake area of influence?

**Automatically answered**

*Yes*

20. Does your action involve prescribed fire?

*No*

21. Will this action occur entirely in the Eastern massasauga rattlesnake inactive season (October 16 through April 14)?

*No*

22. Will this action occur entirely in the Eastern massasauga rattlesnake active season (April 15 through October 15)?

*No*

23. Will the action result in permanent loss of more than one acre of wetland or conversion of more than 10 acres of uplands of potential Eastern massasauga rattlesnake habitat (uplands associated with high quality wetland habitat) to other land uses?

*No*

24. Will you use [wildlife safe materials](#) for erosion control and site restoration and eliminate the use of erosion control products containing plastic mesh netting or other similar material that could ensnare Eastern massasauga rattlesnake?

*Yes*

25. Will you watch MDNR's ["60-Second Snakes: The Eastern Massasauga Rattlesnake \(EMR\)"](#) video, review the [EMR factsheet](#) or call 517-351-2555 to increase human safety and awareness of EMR?

*Yes*

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26. Will all action personnel report any Eastern massasauga rattlesnake observations, or observation of any other listed threatened or endangered species, during action implementation to the Service within 24 hours?  
*Yes*
27. [Semantic] Does the action area intersect the northern riffelshell area of influence?  
**Automatically answered**  
*Yes*
28. [Hidden Semantic] Does the action area intersect the piping plover area of influence?  
**Automatically answered**  
*Yes*
29. [Hidden Semantic] Does the action area intersect the rufa red knot area of influence?  
**Automatically answered**  
*Yes*
30. [Hidden Semantic] Does the action area intersect the area of influence for Eastern prairie fringed orchid?  
**Automatically answered**  
*Yes*
31. [Hidden Semantic] Does the action area intersect the Indiana bat area of influence?  
**Automatically answered**  
*Yes*
32. The project has the potential to affect federally listed bats. Does the action area contain any known or potential bat hibernacula (natural caves, abandoned mines, or underground quarries)?  
*No*
33. Has a presence/absence bat survey or field-based habitat assessment following the Service's Range-wide [Indiana Bat and Northern Long-eared Bat Summer Survey Guidelines](#) been conducted within the action area?  
*No*
34. Does the action involve removal/modification of a human structure (barn, house or other building) known to contain roosting bats?  
*No*
35. Does the action include removal/modification of an existing bridge or culvert?  
*No*
36. Does the action include herbicide application?  
*No*
37. Does the action include tree cutting/trimming, prescribed fire, and/or pesticide (e.g., insecticide, rodenticide) application?  
*No*
-

38. [Hidden Semantic] Does the action area intersect the Indiana bat AOI?

**Automatically answered**

Yes

39. [Hidden semantic] Does the action intersect the Tricolored bat AOI/SLA/range?

**Automatically answered**

Yes

40. The tricolored bat was proposed for listing as endangered on September 13, 2022. In Michigan, the tricolored bat was rare pre-white nose syndrome (WNS) and is exceedingly rare post-WNS. The species has been observed in 12 Michigan counties to date, largely during the fall or winter. With very few exceptions, the species has not been observed in Michigan in the summer months, and no maternity colonies have been found. During winter, tricolored bats hibernate in caves, abandoned mines, and abandoned tunnels ranging from small to large in size. During spring, summer and fall months, they roost primarily among leaf clusters of live or recently dead deciduous/hardwood trees.

Are you making a no effect determination on this project for the tricolored bat?

Yes

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## **IPAC USER CONTACT INFORMATION**

Agency: HDR  
Name: Hannah Hedinger  
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City: Springfield  
State: IL  
Zip: 62703  
Email: hannah.hedinger@hdrinc.com  
Phone: 2173315882

## **LEAD AGENCY CONTACT INFORMATION**

Lead Agency: Federal Transit Administration

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## Reid, Janice

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**From:** Galloway, Shaughn L <shaughn\_galloway@fws.gov>  
**Sent:** Tuesday, March 14, 2023 1:30 PM  
**To:** Cline, Andrea  
**Cc:** Reid, Janice; Hedinger, Hannah  
**Subject:** Re: [EXTERNAL] DDOT Coolidge Terminal EA

**CAUTION: [EXTERNAL]** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Andrea,

Thanks for sending this over. As we discussed on the phone your MA determination for monarch is fine as it outlines in the letter. You received a Not Likely to Aversely Affect determination for EMR which is also the correct determination for this species. Because of internal constraints of the Dkey system you cannot get a "No Effect" for EMR. Please let me know if you have any additional questions.

Best,

Shaughn Galloway  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
Michigan Ecological Services Field Office  
2651 Coolidge Road  
East Lansing, MI 48823  
(517) 351-8474 (Office)  
(517) 648-5634 (Cell)

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**From:** Cline, Andrea <Andrea.Cline@hdrinc.com>  
**Sent:** Tuesday, March 14, 2023 2:20 PM  
**To:** Galloway, Shaughn L <shaughn\_galloway@fws.gov>  
**Cc:** Reid, Janice <janice.reid@hdrinc.com>; Hedinger, Hannah <Hannah.Hedinger@hdrinc.com>  
**Subject:** [EXTERNAL] DDOT Coolidge Terminal EA

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Shaughn,

Thank you very much for taking the time to talk to me this afternoon. Attached is the letter we received for the Coolidge Project. Please let me know what needs to be done going forward.

Andrea

**Andrea Cline**, PWS, CPESC  
*Senior Environmental Scientist*

**HDR**

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Rosemont, IL 60018  
D 773.380.7937 M 630.862.7476  
[Andrea.Cline@hdrinc.com](mailto:Andrea.Cline@hdrinc.com)

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# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Custom House, Room 244  
200 Chestnut Street  
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

March 16, 2023

4112.1  
ER 23/0044

Jay M. Ciavarella  
Director, Office of Planning and Program Development  
Federal Transit Administration  
200 West Adams Street  
Suite 320  
Chicago, IL 60606-5253

Re: Detroit Department of Transportation Coolidge Terminal Replacement project in Detroit,  
Michigan

Dear Jay Ciavarella,

The Department of the Interior (Department) has reviewed the draft Environmental Assessment (EA) and Section 4(f) Evaluation for the Coolidge Terminal Replacement Project, Detroit, Michigan (Project).

The Federal Transit Administration (FTA), as the lead federal agency, and the Detroit Department of Transportation (DDOT), as the local project sponsor, jointly prepared the document. The document considers effects under the National Environmental Policy Act of 1969 (42 USC§ 4332) and Section 4(f) of the Department of Transportation Act of 1966 (49 USC§ 303 and 23 USC § 138).

### **Background Information**

The Section 4(f) Evaluation identified two properties eligible for listing in the National Register of Historic Places (NRHP) under Criteria A and/or B, in the Project's area of potential effect (APE). The EA states there is no adverse effect to the O.H. Frisbie Moving and Storage building, and therefore, there would be no use under Section 4(f). However, an adverse effect to the Coolidge Terminal was determined, thus there would be a use under Section 4(f).

### **Section 4(f) Comments**

FTA determined that the proposed Project would not use any public parklands, recreational areas, or wildlife and waterfowl refuges that are afforded protection by Section 4(f). Through Section 106 consultation that was undertaken for the proposed Project, FTA identified NRHP-

eligible historic properties within the Project's APE that are also afforded protections under Section 4(f).

### Historic Properties and Assessment of Effect

The FTA determined that the Coolidge Terminal (Terminal) property is eligible for listing in the NRHP under Criterion A. The Terminal is the only historic property within the project area that would be affected by this project. FTA has determined the proposed undertaking would constitute a Section 4(f) use and would result in an adverse effect. The Michigan State Historic Preservation Office (SHPO) concurred with the FTA's eligibility and adverse effect determinations in a letter dated June 21, 2022. The FTA and SHPO have developed a draft Memorandum of Agreement (MOA) with DDOT as an invited signatory, to mitigate the adverse effects due to the demolition of the Terminal.

One no-action alternative and three action alternatives were evaluated in the EA Section 4(f) analysis.

- Re-use of Existing Coolidge Buildings – examined the feasibility of reusing the existing Terminal buildings. However, this action does not meet the purpose and need due to location, compacity, and structural issues
- Hybrid of Constructing New Buildings and Re-use of Existing Buildings – Would meet the purpose and need better than the alternative above, however, it was dismissed from use because it results in unacceptable safety or operational problems.
- Full Replacement of Coolidge Terminal (proposed action) – Was determined to best fit the purpose and need and was considered feasible and prudent. Full demolition of existing buildings and rebuild of three separate buildings with interdependent programs: Operations, Bus Storage, and Fleet Maintenance. Other site improvements include the utility yard, stormwater management, perimeter fencing and landscaping, and improvements to Schaefer Highway to the west of the site.

### Mitigation Measures

A draft Memorandum of Agreement (MOA) between the DDOT, FTA, SHPO, has been developed to document mitigation measures. Under the draft MOA, photographic documentation of the structure will be completed prior to demolition, and a Historic American Building Survey (HABS) documentation Level II will also be completed. In addition, development of an interpretive sign that includes text, photographs, and/or plans focusing on the history and historical significance of the Coolidge Terminal will be installed. The interpretive sign will be designed for display adjacent to the Coolidge Terminal on the fence facing Schaefer Highway near the existing bus shelter. In addition, a 508-compliant webpage or an ArcGIS Story Map on the history and significance of the Coolidge Terminal and its role in Detroit's transit history will be created.

### **Conclusion**

The Department concurs with the determination that the proposed alternative would constitute an adverse effect to this historic property under Section 106 of the National Historic Preservation Act and concurs with FTA's determination that there is no feasible or prudent avoidance alternative to the Section 4(f) use. As the MOA is finalized and mitigation measures are


implemented, the Department encourages continued communication and collaboration with the SHPO.

We have a continuing interest in working with the FTA to ensure impacts to resources of concern are adequately addressed. For issues concerning Section 4(f) resources, please contact Christine Gabriel, NPS Regional Environmental Coordinator (IR 3/4/5), [Christine\\_Gabriel@nps.gov](mailto:Christine_Gabriel@nps.gov).

We appreciate the opportunity to provide these comments.

Sincerely,

JOHN  
NELSON

 Digitally signed by JOHN  
NELSON  
Date: 2023.03.16 10:58:58  
-04'00'

John V. Nelson  
Regional Environmental Officer

Electronic distribution: [DDOTcomments@detroitmi.gov](mailto:DDOTcomments@detroitmi.gov)



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
MICHIGAN STRATEGIC FUND  
STATE HISTORIC PRESERVATION OFFICE

QUENTIN L. MESSER, JR.  
PRESIDENT

March 16, 2023

ELIZABETH BREISETH  
FEDERAL TRANSIT ADMINISTRATION  
200 WEST ADAMS STREET SUITE 320  
CHICAGO IL 60606-5232

RE: ER22-338 Coolidge Terminal Replacement Project, 14044 Schaefer Highway, T1S, R11E, Detroit,  
Wayne County (FTA)

Dear Ms. Breiseth:

We received your consultation letter with an invitation to comment on the Environmental Assessment in compliance with the National Environmental Protection Act and Section 4(f) evaluation in compliance with the Department of Transportation Act of 1966, for the above-cited undertaking at the location noted above. Thank you for the opportunity to comment; however, at this time the State Historic Preservation Office staff do not have comments on the EA or 4(f) evaluation. Thus far we have reviewed and commented on the undertaking and alternatives considered through consultation under Section 106 of the National Historic Preservation Act, as amended. We look forward to continuing consultation through completion of the drafted Memorandum of Agreement and forthcoming mitigation package to address Adverse Effects to the historic Coolidge Terminal.

If you have any questions, please contact Scott Slagor, Cultural Resource Protection Manager, at 517-285-5120 or by email at [slagors2@michigan.gov](mailto:slagors2@michigan.gov). **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

Scott E. Slagor  
Cultural Resource Protection Manager

for Martha MacFarlane-Faes  
Deputy State Historic Preservation Officer

SES





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

December 19, 2022

Elizabeth Breiseth  
Office of Environmental Programs  
Federal Transit Administration  
1200 New Jersey Ave, SE  
Washington, DC 20590

**Re: Comments on the Administrative Draft Environmental Assessment for the Coolidge Terminal Replacement Project, City of Detroit, Wayne County, Michigan**

Dear Ms. Breiseth:

The U.S. Environmental Protection Agency has reviewed the Administrative Draft Environmental Assessment (EA) for the project referenced above. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The Federal Transit Administration (FTA) is the lead agency under NEPA, and the Detroit Department of Transportation (DDOT) is the project sponsor.

The project site is approximately 8 miles northwest of downtown Detroit and includes the existing Coolidge Terminal site as well as adjacent vacant parcels. A 2011 fire destroyed the maintenance garage at Coolidge Terminal, rendering the entire terminal unusable. The site is currently deteriorated and vacant. The proposed project includes construction of an all-new terminal with initial capacity for 144 buses and plans to later expand to accommodate 216 buses. The facility would store and maintain both 40-foot buses and 60-foot articulated buses, with 24-hour operations. DDOT also proposes that Coolidge Terminal be designed to accommodate electric buses. Enclosed, please find EPA's recommendations related to air quality, noise, hazardous materials, and environmental justice.

Thank you for the opportunity to comment and engage in early coordination. When subsequent NEPA materials are available for review, please email them to the lead NEPA reviewer for this project, Jen Tyler, at [Tyler.Jennifer@epa.gov](mailto:Tyler.Jennifer@epa.gov). If you would like to discuss our recommendations, please contact Ms. Tyler by email or telephone at (312) 886-6394.

Sincerely,

KATHY  
TRIANAFILLOU  
Digitally signed by KATHY  
TRIANAFILLOU  
Date: 2022.12.19 09:45:05  
-0600

Kathy Triantafillou  
Acting NEPA Section Supervisor  
Tribal and Multimedia Programs Office  
Office of the Regional Administrator



**Enclosure: Comments on the Administrative Draft Environmental Assessment for the Coolidge Terminal Replacement Project, City of Detroit, Wayne County, Michigan, December 19, 2022**

**Air Quality**

Thank you for committing to direct contractors to follow EPA’s Construction Emission Control Checklist to reduce air pollution. The Council on Environmental Quality’s NEPA Implementation Regulations at 40 CFR Part 1501.5 states that an EA shall discuss the environmental impacts of the proposed action and alternatives. The proposed project would release air pollution during demolition, construction, and operations. Disclosing such impacts within the EA is important for public disclosure, project design decisions, and selection of protective measures.

**Recommendations for the EA:**

- Discuss current air quality, including whether the project area is in attainment status for the National Ambient Air Quality Standards. Discuss localized air pollution sources in the area, such as nearby industrial sources, that may contribute to background pollution levels.
- Disclose expected sources of air pollution from the proposed project and quantify anticipated releases from project demolition, construction, and operational phases. Include dust from demolition, exhaust from trucks hauling materials, use of construction equipment, and bus idling, among other sources. Include details on whether all 143 buses would be at the Coolidge Terminal at any one time, or if a portion of those would be in-service.
- Identify sensitive receptors (i.e., people in nearby homes, on-site workers) who may be impacted by air pollution from the project.
- Assess measures to reduce air pollution beyond those already committed to in EPA’s Construction Emission Control Checklist. For example, consider (1) staging construction equipment away from neighboring residences, (2) when planning the site layout, siting outdoor activities that generate air pollution away from homes, and (3) during the operational period, maintaining enforceable restrictions on bus idle time.
- If an assessment of air pollution determines that operation of Coolidge Terminal could elevate local air pollution levels, then evaluate incorporating vegetative barriers into site design. Vegetative barriers are strategically planted trees and shrubs that can reduce air and noise pollution exposures. Benefits are greatest when used in combination with a solid wall. For guidance, see The Morton Arboretum’s Vegetation Barrier Toolkit, which was developed in collaboration with EPA.<sup>1</sup>

**Noise Impacts**

In line with the Council on Environmental Quality’s NEPA Implementation Regulations at 40 CFR Part 1501.5, it is important for the EA to disclose and assess noise impacts from demolition, construction, and operation. The EA states that, “There were no noise-sensitive receivers identified within the noise screening distances.” Appendix F explains, “Since the Project related noise activities will take place primarily indoors the origin of the screening distances was applied to the center of the Project Area.” With the screening distances used, the area screened does not

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<sup>1</sup> <https://chicagorti.org/resources/vegetation-barrier-toolkit-for-schools-and-communities/>

cover the entire project property, nor does it include residences that are directly adjacent to the project property.

#### **Recommendations for the EA**

- Describe all sources of noise that would be loud enough to potentially bother neighbors. Include where on the property these noises would originate. While text states that noise would take place “primarily” indoors, it’s unclear whether outdoor noisy activities might also occur.
- Select a noise screening boundary that includes the full site and surrounding residences. This is particularly important because the project is sited in a community with environmental justice concerns.
- Consider measures that would reduce noise levels, such as selection of quieter equipment, sound-proofing insulation, the use of vegetation, and noise walls, if appropriate.

#### **Hazardous Materials**

The proposed project would reuse a brownfields site; reuse of such sites has local economic as well as environmental benefits. EPA also appreciates that the EA summarizes findings from a Phase I Environmental Site Assessment (ESA), Phase II ESA, and Report of Asbestos and Universal Waste Survey.

#### **Recommendations for the EA:**

- Consider best practices from EPA’s *Sustainable Management of Construction and Demolition Materials* webpage. While we understand that this is not a residential project, best practices may also be applicable from *EPA’s Large-Scale Residential Demolition* webpage. Use these resources to help: (1) identify environmentally-sensitive activities associated with building removal and (2) develop contract language for bid packages with specific technical requirements to improve environmental results from demolition.
- Discuss practices that would be employed to control dust during demolition, which is critical for this project due to the presence of asbestos, lead, and other hazardous materials and the proximity of neighboring homes. Discuss use of temporary building enclosure tarps.

#### **Request for Discussion with EPA:**

- The EA reports metals including arsenic, chromium, mercury, and selenium were detected in soil above Drinking Water Protection and/or Groundwater Surface Water Interface Protection (GSIP) Criteria at a sample location along Ward Avenue associated with the Detroit Land Bank’s residential parcels adjoining the Coolidge Terminal to the east that would be transferred to DDOT for the project. Are these contaminants associated with past activities at Coolidge Terminal? Are the City and State aware of these elevated levels? Might further action be warranted to test other homes in the area?

#### **Environmental Justice**

Demographic information provided in the EA demonstrates the community surrounding the proposed project has higher percentages of minority and low-income residents than the overall

City of Detroit and State of Michigan. In addition, the neighboring industrial corridor likely contributes to the cumulative pollution burden for residents. Environmental justice concerns in the project area further warrants the need for meaningful community engagement and commitments to protective measures. EPA appreciates that Appendix H documents public involvement to date, including door-to-door canvassing, and provides a summary of comments received by residents at public meetings.

**Recommendations for the EA:**

- Consider cumulative disproportionate environmental burdens faced by residents living near the industrial corridor when deciding on appropriate project mitigation measures. As discussed above, further mitigation opportunities may be available related to air pollution, noise, and risks of hazardous material exposure.
- Create a factsheet of all protective measures required for project construction, such as idle time limits, speed limits for construction trucks, and dust suppression. Include a phone number residents can call if contractors are not following required practices and distribute the factsheet to the surrounding community.
- The EA includes several measures to reduce impacts from the project on the surrounding community, such as directing lighting downward toward the site (page 38) and use of occupancy sensors in exterior parking and site lighting systems to reduce lighting levels when no motion is detected (page 41). Include all such protective measures as commitments in the decision document to help ensure implementation.



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

March 2, 2023

Elizabeth Breiseth  
Office of Environmental Programs  
Federal Transit Administration  
1200 New Jersey Ave, SE  
Washington, DC 20590

**Re: Comments on the Draft Environmental Assessment for the Coolidge Terminal Replacement Project, City of Detroit, Wayne County, Michigan**

Dear Ms. Breiseth:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Assessment (EA) for the project referenced above. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The Federal Transit Administration (FTA) is the lead agency under NEPA, and the Detroit Department of Transportation (DDOT) is the project sponsor.

The project site is approximately 8 miles northwest of downtown Detroit and includes the existing Coolidge Terminal site as well as adjacent vacant parcels. A 2011 fire destroyed the maintenance garage at Coolidge Terminal, rendering the entire terminal unusable. The site is currently deteriorated and vacant. The proposed project includes construction of an all-new terminal with initial capacity for 144 buses and plans to later expand to accommodate 216 buses. The facility would store and maintain both 40-foot buses and 60-foot articulated buses, with 24-hour operations. DDOT also proposes that Coolidge Terminal be designed to accommodate electric buses. EPA provided comments on the Administrative EA on December 19, 2022. Thank you for addressing our comments related to environmental justice and for committing to inform the community of protective measures for air quality prior to construction. We also appreciate FTA's and DDOT's commitment to use EPA's Construction Emission Control Checklist. In the enclosed Detailed Comments, we continue to offer recommendations related to air quality and noise.

Thank you for the opportunity to comment. When subsequent NEPA materials are available for review, please email them Kathy Kowal, NEPA reviewer, at [Kowal.Kathleen@epa.gov](mailto:Kowal.Kathleen@epa.gov). If you

would like to discuss our recommendations, please contact Jen Tyler, lead reviewer for this project, at [Tyler.Jennifer@epa.gov](mailto:Tyler.Jennifer@epa.gov) or (312) 886-6394.

Sincerely,

**Kowal, Kathleen**  Digitally signed by Kowal,  
Kathleen  
Date: 2023.03.02 12:01:01 -06'00'

Kathy Kowal signing for:

Kathy Triantafillou  
Acting NEPA Section Supervisor  
Tribal and Multimedia Programs Office  
Office of the Regional Administrator

**Enclosure: Comments on the Draft Environmental Assessment for the Coolidge Terminal Replacement Project, City of Detroit, Wayne County, Michigan, March 2, 2023**

**Air Quality**

Thank you for committing to direct contractors to follow EPA’s Construction Emission Control Checklist to reduce air pollution. The Council on Environmental Quality’s NEPA Implementation Regulations at 40 CFR Part 1501.5 states that an EA shall discuss the environmental impacts of the proposed action and alternatives. The proposed project would release air pollution during demolition, construction, and operations. The EA explains that the proposed project is within the approved Transportation Improvement Program and Long Range Transportation Plan, and therefore does pose a concern for conformity under 40 CFR Part 93 or attainment of the National Ambient Air Quality Standards. The EA does not appear to discuss localized air quality impacts to workers and adjacent residents.

**Recommendations for the EA:**

- Consider sensitive receptors (i.e., on-site workers, residents just north of the intersection of Ward Ave. and Intervale St., and residents adjacent to the southern boundary of the site) who may be impacted by air pollution from the project. Discuss whether construction or operational activities would or would not create *localized* air quality concerns for these groups.
- Assess measures to reduce air pollution beyond those already committed to in EPA’s Construction Emission Control Checklist. For example, consider (1) staging construction equipment away from neighboring residences, and (2) during the operational period, maintaining enforceable restrictions on bus idle time.
- If an assessment of air pollution determines that operation of Coolidge Terminal could elevate *local* air pollution levels, then evaluate incorporating vegetative barriers into site design. Vegetative barriers are strategically planted evergreen trees (for year-round foliage) and shrubs that can reduce air and noise pollution exposures. For guidance, see The Morton Arboretum’s Vegetation Barrier Toolkit, which was developed in collaboration with EPA.<sup>1</sup> Conceptual site plans already include trees; using the Toolkit could inform species selection and optimize benefits from plantings. Shade from evergreens may have consequences on winter ice formation, impacting safety, that should also be considered when assessing tradeoffs.

**Noise Impacts**

EPA recognizes that DDOT used FTA’s noise guidance to determine screening distances. In line with the Council on Environmental Quality’s NEPA Implementation Regulations at 40 CFR Part 1501.5, it is important for the EA to disclose and assess noise impacts from demolition, construction, and operation. With the screening distances used, the area screened does not cover the entire project property, nor does it include residences that are directly adjacent to the project property. It’s unclear whether residents just north of the intersection of Ward Ave. and Intervale St., and residents adjacent to the southern boundary of the site, would experience noise impacts.

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<sup>1</sup> <https://chicagorti.org/resources/vegetation-barrier-toolkit-for-schools-and-communities/>

**Recommendations for the EA**

- Disclose noise impacts that would result from maintenance activities in the northeast corner of the site by the building labeled “fleet maintenance.” These activities do not appear to be fully within the area screened for noise impacts.
- Clarify whether or not residents just north of the intersection of Ward Ave. and Intervale St. and residents adjacent to the southern boundary of the site would experience noise impacts.
- If residents would experience noise impacts, then consider measures that would reduce noise levels, such as sound-proofing insulation, the use of vegetation, and noise walls, if appropriate.
- Figure 27 on page 79 includes a proposed noise wall. While EPA appreciates any mitigation to reduce impacts, we recommend discussing the wall (1) to inform the public of its benefits, and (2) to disclose considerations that DDOT will use to determine whether the wall will be included in the final design.

**Request for Discussion with EPA:**

The EA explains that FTA’s noise guidance for stationary projects includes buffers of 225 and 350 feet from the center of the site. This buffer does not include the whole project site or the adjacent residences. Maintenance activities in the northeast corner of the site, which may be louder than other on-site activities, are not fully in the screening area, nor are the residents that could potentially be affected. EPA is concerned with this being an issue for future, more impactful, projects and would like to discuss the policy with FTA.



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION V  
Illinois, Indiana,  
Michigan, Minnesota,  
Ohio, Wisconsin

200 West Adams Street  
Suite 320  
Chicago, IL 60606-5253  
312-353-2789  
312-886-0351 (fax)

April 25, 2023

Acting NEPA Section Supervisor  
United States Environmental Protection Agency, Region 5  
77 W. Jackson Boulevard  
Chicago, IL 50504-3590

Transmitted via E-mail: [r5nepa@epa.gov](mailto:r5nepa@epa.gov)

**Re: FTA Responses to EPA Comments on the Environmental Assessment for the  
Coolidge Terminal Replacement Project, City of Detroit, Wayne County, Michigan**

Acting NEPA Section Supervisor:

Thank you for your team's review of and recommendations on the November 2022 Administrative Draft Environmental Assessment (EA) for the Coolidge Terminal Replacement Project contained in your letter dated December 19, 2022 and on the January 2023 EA contained in your letter dated March 2, 2023, pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The Federal Transit Administration (FTA) is the lead agency under NEPA, and the Detroit Department of Transportation (DDOT) is the project sponsor.

This response letter is intended to provide information in response to the comments and recommendations provided by the EPA that focus on impacts to air quality and noise as required by 23 C.F.R SS 771.119(g) and will be incorporated into the administrative record. FTA's response to comments and recommendations are included in the enclosure to this letter.

We hope this additional information is useful and provides background information for how the EPA's recommendations are being addressed by the project design team. The NEPA decision document is anticipated in April 2023.



Re: FTA Responses to EPA Comments on the Environmental Assessment for the Coolidge Terminal Replacement Project, City of Detroit, Wayne County, Michigan

If you require additional assistance, please contact Susan Weber at (312) 353-3888 or [Susan.Weber@dot.gov](mailto:Susan.Weber@dot.gov). Thank you for your consideration on this project.

Sincerely,

**ROBERT S MCKENZIE** Digitally signed by ROBERT S MCKENZIE  
Date: 2023.04.25 13:43:43 -05'00'

R. Stewart McKenzie, AICP  
Director of Financial Management & Program Oversight

ecc: E. Breiseth, FTA  
S. Weber, FTA  
M. Oglesby, DDOT  
R. Yamakura, DDOT  
J. Reid, HDR

Enclosures: EPA Comments and FTA Responses to USEPA Letter dated December 19, 2022  
EPA Comments and FTA Responses to USEPA Letter dated March 2, 2023

## **EPA Comments and FTA Responses to USEPA Letter dated December 19, 2022**

### **Air Quality**

#### EPA Recommendations:

- Discuss current air quality, including whether the project area is in attainment status for the National Ambient Air Quality Standards. Discuss localized air pollution sources in the area, such as nearby industrial sources, that may contribute to background pollution levels.
- Disclose expected sources of air pollution from the proposed project and quantify anticipated releases from project demolition, construction, and operational phases. Include dust from demolition, exhaust from trucks hauling materials, use of construction equipment, and bus idling, among other sources. Include details on whether all 143 buses would be at the Coolidge Terminal at any one time, or if a portion of those would be in-service.
- Identify sensitive receptors (i.e., people in nearby homes, on-site workers) who may be impacted by air pollution from the project.
- Assess measures to reduce air pollution beyond those already committed to in EPA's Construction Emission Control Checklist. For example, consider (1) staging construction equipment away from neighboring residences, (2) when planning the site layout, siting outdoor activities that generate air pollution away from homes, and (3) during the operational period, maintaining enforceable restrictions on bus idle time.
- If an assessment of air pollution determines that operation of Coolidge Terminal could elevate local air pollution levels, then evaluate incorporating vegetative barriers into site design. Vegetative barriers are strategically planted trees and shrubs that can reduce air and noise pollution exposures. Benefits are greatest when used in combination with a solid wall. For guidance, see The Morton Arboretum's Vegetation Barrier Toolkit, which was developed in collaboration with EPA<sup>1</sup>.

#### FTA Response:

- The proposed Project is included in the conformed FY 2020-2023 Transportation Improvement Program approved by SEMCOG on July 25, 2019, as well as the 2045 Long Range Transportation Plan. As this is not a capacity-adding project, this Project is exempt under *40 CFR Part 93.126, mass transit projects reconstruction or renovation of transit buildings and structures*; therefore, there are no air quality impacts and no further analysis is required.
- Regarding air quality impacts during demolition, the selected demolition contractor will be required to comply with all the requirements set forth in the demolition plans and technical specifications. This has been included as a commitment in the FONSI.

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<sup>1</sup><https://chicagorti.org/resources/vegetation-barrier-toolkit-for-schools-and-communities/>

- Regarding air quality impacts during construction, the proposed Project would refer to the USEPA's Construction Control Checklist and other USEPA guidance for best practices to control dust and particulate matter during construction. Consultation with EGLE would occur to determine if air quality modeling is required for the proposed Project's construction phase and what

methodologies and assumptions would be used if modeling is required. Information on the best practices to be implemented to control temporary construction-related air quality will be shared with the public prior to and during construction. This information has been included in Section 4.2.13 and 4.2.15 of the published EA as well as the FONSI.

- Regarding air quality impact during operation phases of the proposed Project, some of the 143 buses will be in service at various points throughout the day, as DDOT runs 24 hour bus service (see Figure 11 in the published EA). Section 3.4.1 of the published EA discusses Project landscaping and fencing/barriers associated with the proposed Project. The Coolidge Terminal Conceptual Site Plan (Figure 3 in the published EA) shows vegetation along the perimeter of the site and a solid masonry or pre-cast concrete wall along the south edge of the proposed Project area.
- DDOT will commit to communicating with neighborhoods and businesses before and during construction. The Project contractor will implement construction best management practices for erosion and dust control. DDOT has implemented an extensive outreach program within the community, and outreach will continue through the end of the NEPA process, as well as during construction. This has been included as a commitment in the FONSI.
- The Coolidge Terminal Conceptual Site Plan (Figure 3 in the published EA) shows vegetation along the perimeter of the site and a solid masonry or pre-cast concrete wall along the south edge of the proposed Project area.

### **Noise Impacts**

#### EPA Recommendations:

- Describe all sources of noise that would be loud enough to potentially bother neighbors. Include where on the property these noises would originate. While text states that noise would take place “primarily” indoors, it’s unclear whether outdoor noisy activities might also occur.
- Select a noise screening boundary that includes the full site and surrounding residences. This is particularly important because the project is sited in a community with environmental justice concerns.
- Consider measures that would reduce noise levels, such as selection of quieter equipment, sound-proofing insulation, the use of vegetation, and noise walls, if appropriate.

#### FTA Response:

- As described in the published EA, the center of the site was selected as the origin for the noise screening radius based on FTA guidance on page 34, Option C – Small Stationary Facilities (FTA, 2018). The use of the center of the site is reasonable, appropriate, and consistent with the text and intent of the 2018 FTA guidelines.
- Construction activities would be conducted in accordance with City, State, and Federal guidelines, and would use best practices to limit noise, such as limiting construction activities to normal daytime working hours, limiting idling equipment, and additional preventative actions as the construction plan is finalized. This is discussed in Section 4.2.12 of the published EA.
- Most maintenance work will be done within the facility which would reduce noise levels outside of the facility from bus maintenance activities. Additional measures such as a wall on the south edge of the proposed Project area and landscaping around the proposed Project perimeter may further reduce noise levels.

### **Hazardous Materials**

#### EPA Recommendations:

- Consider best practices from EPA's Sustainable Management of Construction and Demolition Materials webpage. While we understand that this is not a residential project, best practices may also be applicable from EPA's Large-Scale Residential Demolition webpage. Use these resources to help: (1) identify environmentally-sensitive activities associated with building removal and (2) develop contract language for bid packages with specific technical requirements to improve environmental results from demolition.
- Discuss practices that would be employed to control dust during demolition, which is critical for this project due to the presence of asbestos, lead, and other hazardous materials and the proximity of neighboring homes. Discuss use of temporary building enclosure tarps.

#### FTA Response:

- Per Section 4.2.11 of the published EA – Measures to Avoid and Minimize Harm, DDOT would prepare demolition plans and technical specifications that identify the demolition and site clearing performance requirements, asbestos abatement requirements, the removal requirements for Universal Wastes, USTs, oil-water separators, and other potentially environmentally sensitive materials, utility abandonment requirements, and demolition debris disposal requirements. These are also included in the FONSI as mitigation commitments. Also as described in Section 4.2.11, the selected demolition contractor will be required to comply with all the requirements set forth in the demolition plans and technical specifications including but not be limited to the following:
  - A State of Michigan Accredited Asbestos Inspector will complete an asbestos survey of the former Fare Box Building and tunnel
  - Abatement of regulated ACMs prior to demolition
  - All universal wastes will be removed prior to demolition
  - Removal, handling, transport, and proper disposal of all materials in accordance with local, state, and federal guidelines

The published EA further states that, DDOT would prepare a Soil and Water Management Plan (SWMP) to address the on-site management and/or proper removal, verification sampling, waste characterization sampling, handling and disposal requirements associated with the excavation of known and or potentially contaminated soils and groundwater during the demolition and site clearing activities and then all subsequent construction operations associated with the new Coolidge Terminal. The SWMP would be incorporated into specifications and contract documents that would be provided to all parties who perform work at the site and would specify policies and procedures to be followed during site work. Contractors working on-site shall be required to develop a Health and Safety Plan (HASP) to address potential exposure to contaminants that may be encountered during construction and excavation activities associated with each component of the proposed Project. The Contractor would be responsible for hiring an independent third-party Environmental Professional who would be responsible for overseeing the implementation of the SWMP. DDOT and their consultants/on-site representatives shall be responsible for overseeing the performance of the SWMP.

- Sections 4.2.13 and 4.2.15 of the published EA specifies that the proposed Project specifications would refer to the US Environmental Protection Agency's (USEPA) Construction Control Checklist and other USEPA guidance for best practices to control dust and particulate matter during construction. Information on the best practices to be implemented

to control temporary construction-related air quality will be shared with the public prior to and during construction.

Request for Discussion with EPA:

- The EA reports metals including arsenic, chromium, mercury, and selenium were detected in soil above Drinking Water Protection and/or Groundwater Surface Water Interface Protection (GSIP) Criteria at a sample location along Ward Avenue associated with the Detroit Land Bank's residential parcels adjoining the Coolidge Terminal to the east that would be transferred to DDOT for the project. Are these contaminants associated with past activities at Coolidge Terminal? Are the City and State aware of these elevated levels? Might further action be warranted to test other homes in the area?

FTA Response:

- The City of Detroit Buildings, Safety Engineering and Environmental Department (BSEED) and State of Michigan Department of Environment, Great Lakes and Energy (EGLE) are generally aware of elevated concentrations of metals found in soil throughout much of Southeast Michigan including within the City of Detroit. The City of Detroit BSEED has reviewed all environmental reports produced for the Coolidge Terminal. The contaminants found on residential parcels adjoining the Coolidge Terminal are likely related to fill material historically placed across much of Detroit, or are naturally occurring, and there is no obvious evidence that the metals concentrations observed on adjoining parcels are related to past site activity at the Coolidge Terminal. Due to the pervasive nature of these metals throughout the City of Detroit, and since no concentrations were detected in soil above applicable EGLE Part 201 Residential Direct Contact or Volatilization to Indoor Air Pathway Screening Criteria, no additional sampling of residential parcels in the vicinity of the Coolidge Terminal appears to be warranted at this time. The City of Detroit will be in contact with the USEPA directly regarding the Request for Discussion on this matter.

### **Environmental Justice**

EPA Recommendations:

- Consider cumulative disproportionate environmental burdens faced by residents living near the industrial corridor when deciding on appropriate project mitigation measures. As discussed above, further mitigation opportunities may be available related to air pollution, noise, and risks of hazardous material exposure.
- Create a factsheet of all protective measures required for project construction, such as idle time limits, speed limits for construction trucks, and dust suppression. Include a phone number residents can call if contractors are not following required practices and distribute the factsheet to the surrounding community.
- The EA includes several measures to reduce impacts from the project on the surrounding community, such as directing lighting downward toward the site (page 38) and use of occupancy sensors in exterior parking and site lighting systems to reduce lighting levels when no motion is detected (page 41). Include all such protective measures as commitments in the decision document to help ensure implementation.

FTA Response:

- As discussed in the published EA, DDOT would consult with EGLE to determine if the proposed Project would require air quality monitoring during the construction phase. The proposed Project has been designed to minimize noise impacts to the extent practicable by locating noise-producing operations inside the facility itself; and by locating the parking lot near Schaefer Avenue and away from residential areas. Section 3.4.1 of the published EA discusses Project landscaping and fencing/barriers associated with the proposed Project, which may act as intervening structures to prevent air pollution and noise impacts from the surrounding community.
- The FONSI contains a commitment from DDOT to create a fact sheet of protective measures required for project construction. The fact sheet will be distributed to members of the community prior to and during construction and will include a number that they can call if contractors are not following outlined practices.
- DDOT is committed to implementing the mitigation outlined in the EA. These commitments are in Appendix D of the FONSI.

## **EPA Comments and FTA Responses to USEPA Letter dated March 2, 2023**

### **Air Quality**

#### EPA Recommendations:

- Consider sensitive receptors (i.e., on-site workers, residents just north of the intersection of Ward Ave. and Intervale St., and residents adjacent to the southern boundary of the site) who may be impacted by air pollution from the project. Discuss whether construction or operational activities would or would not create localized air quality concerns for these groups.
- Assess measures to reduce air pollution beyond those already committed to in EPA's Construction Emission Control Checklist. For example, consider (1) staging construction equipment away from neighboring residences, and (2) during the operational period, maintaining enforceable restrictions on bus idle time.
- If an assessment of air pollution determines that operation of Coolidge Terminal could elevate local air pollution levels, then evaluate incorporating vegetative barriers into site design. Vegetative barriers are strategically planted evergreen trees (for year-round foliage) and shrubs that can reduce air and noise pollution exposures. For guidance, see The Morton Arboretum's Vegetation Barrier Toolkit, which was developed in collaboration with EPA<sup>1</sup>. Conceptual site plans already include trees; using the Toolkit could inform species selection and optimize benefits from plantings. Shade from evergreens may have consequences on winter ice formation, impacting safety, that should also be considered when assessing tradeoffs.

#### FTA Response:

- As described in the published EA, DDOT will commit to communicating with neighborhoods and businesses before and during construction. The Project contractor would implement construction best management practices for erosion and dust control. DDOT has implemented an extensive outreach program within the community, and outreach will continue through the end of the NEPA process, as well as during construction.
- Regarding air quality impacts during demolition, the selected demolition contractor will be required to comply with all the requirements set forth in the demolition plans and technical specifications. This has been included as a commitment in the FONSI. Regarding air quality impacts during construction, the proposed Project would refer to the USEPA's Construction Control Checklist and other USEPA guidance for best practices to control dust and particulate matter during construction. Consultation with EGLE would occur to determine if air quality modeling is required for the proposed Project's construction phase and what methodologies and assumptions would be used if modeling is required. Information on the best practices to be implemented to control temporary construction-related air quality will be shared with the public prior to and during construction. This information has been included in Section 4.2.13 and 4.2.15 of the published EA as well as the FONSI.
- Regarding air quality impact during operation phases of the proposed Project, some of the 143 buses will be in service at various points throughout the day, as DDOT runs 24 hour bus service (see Figure 11 in the published EA). Section 3.4.1 discusses Project landscaping and fencing/barriers associated with the proposed Project. The Coolidge Terminal Conceptual Site Plan (Figure 3 in the

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<sup>1</sup> <https://chicagorti.org/resources/vegetation-barrier-toolkit-for-schools-and-communities/>

published EA) shows vegetation along the perimeter of the site and a solid masonry or pre-cast concrete wall along the south edge of the proposed Project area.

### **Noise Impacts**

#### EPA Recommendations:

- Disclose noise impacts that would result from maintenance activities in the northeast corner of the site by the building labeled “fleet maintenance.” These activities do not appear to be fully within the area screened for noise impacts.
- Clarify whether or not residents just north of the intersection of Ward Ave. and Intervale St. and residents adjacent to the southern boundary of the site would experience noise impacts.
- If residents would experience noise impacts, then consider measures that would reduce noise levels, such as sound-proofing insulation, the use of vegetation, and noise walls, if appropriate.
- Figure 27 on page 79 includes a proposed noise wall. While EPA appreciates any mitigation to reduce impacts, we recommend discussing the wall (1) to inform the public of its benefits, and (2) to disclose considerations that DDOT will use to determine whether the wall will be included in the final design.

#### FTA Response:

- The center of the site was selected as the origin for the noise screening radius based on FTA guidance on page 34, Option C – Small Stationary Facilities (FTA, 2018). The use of the center of the site is reasonable, appropriate, and consistent with the text and intent of the 2018 FTA guidelines.
- Using the FTA Manual, the project type was selected and the corresponding screening distance for unobstructed line of sight or the presence of intervening buildings was applied. The assessment used the “Bus Storage and Maintenance” project type and applied both the intervening and unobstructed screening distances of 125 feet and 350 feet, respectively. FTA’s noise screening guidance says to apply the screening distance(s) from the center of the site for stationary sources. FTA Table 4-13 (General Noise Assessment) says that bus storage and bus O&M facilities are stationary sources. Therefore, the center of the project site was used as the origin of the (operations) noise screening distances. There were no noise-sensitive receivers identified within the noise screening distances.
- As shown in Figure 9 of the published EA, a screening wall along the south side of the site, and a privacy fence along the east side of the site are included in the design plans, as well as vegetation. These walls, fences and vegetation may have some benefit for noise reduction but are intended for privacy and security reasons.

#### Request for Discussion with EPA:

The EA explains that FTA’s noise guidance for stationary projects includes buffers of 225 and 350 feet from the center of the site. This buffer does not include the whole project site or the adjacent residences. Maintenance activities in the northeast corner of the site, which may be louder than other on-site activities, are not fully in the screening area, nor are the residents that could potentially be affected. EPA is concerned with this being an issue for future, more impactful, projects and would like to discuss the policy with FTA.

#### FTA Response:

FTA is open to such discussions.