

Appendix J

Cultural and Archeological Resources  
and SHPO/ACHP Correspondence

**NOTICE**

The information contained in this Appendix was developed strictly for the purpose of evaluating the environmental impacts associated with the Ambassador Bridge Enhancement Project and responding to the regulatory requirements applicable to this proposal. Use of this information for other purposes is not intended, and any such use is at the risk of the user.

TIMELINE: SECTION 106 CONSULTATION

April 5, 2006	Coast Guard letter to SHPO and other state and local agencies as introduction and invitation to attend a scoping meeting on May 4, 2006 for the Ambassador Bridge Enhancement Project (ABEP).
May 4, 2006	Letter from SHPO advising that they could not attend meeting, that the existing Ambassador Bridge "appears to meet the criteria for listing in the NRHP", that any alteration to characteristics that qualify it for the listing would likely result in an adverse effect determination. Stated that consultants and contractors are not recognized as federally-delegated authorities, and requested that an application be submitted with future project submissions.
May 25, 2006	Applicant mailed two copies of March 2006 scoping document to SHPO for review.
November 20, 2006	DIBC and consultant, Elisabeth Knibbe of Quinn Evans Architect, with Coast Guard participation by teleconference, provided initial presentation to SHPO at SHPO offices on project and preliminary evaluation of potential impacts to historic properties.
February 8, 2007	<b>Date of application to SHPO</b> , including graphics, designation of APE, consultant reports identifying historic properties in the project area, and "no adverse effect determination" by applicant. Application acknowledges that there is a potential visual effect, but states that the proposal is in compliance with Standards 3, 9, and 10 of the Secretary of Interior's Standards for Rehabilitation. Application listed Coast Guard as Federal agency contact.
March 26, 2007	SHPO letter advising of "adverse effect" based on visual impacts. "Specifically, the undertaking will result in:  The introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historical features. Specifically, with its size and scale and its location immediately adjacent to the existing structure, the proposed bridge will become an overwhelming visual distraction, diminishing the integrity of the historic bridge." Letter also cited potential impacts to archaeological resources and requested additional survey. Letter also stated 'Bridge was determined eligible for the NRHP . . . . . on June 6, 1986.'" Letter also advised of potential archaeological concerns and request to perform additional mechanized testing at the proposed pier locations to test for fill deposits.
April 16, 2007	Follow-up teleconference between applicant/consultants, Coast Guard, and SHPO, following adverse effect letter. SHPO requested additional information on project purposes and alternatives considered.
April 21, 2007	DIBC sent additional information requested by SHPO regarding project purpose and alternatives.
April 24, 2007	CG issued Draft Environmental Assessment (Draft EA) for comment.
May 2, 2007	Coast Guard letter to Advisory Council advising of SHPO adverse effect determination and establishing Coast Guard as the lead federal agency of record for the project.
May 22, 2007	Advisory Council letter acknowledging receipt of Coast Guard of adverse effect determination and participation in the Section 106 process, citing Appendix A of 36 CFR 800. Additional information was requested by ACHP. Letter also sent to Secretary, Department of Homeland Security, to advise of ACHP participation.
May 23, 2007	Applicant consultant meeting with Dean Anderson, Historical Archaeologist Michigan Historical Center, SHPO offices, to discuss Scope of Service document for additional Phase I survey.

TIMELINE: SECTION 106 CONSULTATION

June 12, 2007	Applicant/consultant meeting with ACHP in Washington, DC.
June 15, 2007	Email letter between applicant/consultant and Dean Anderson of SHPO Historical Archaeologist tentatively approving Scope of Service for Phase I survey.
June 26, 2007	Coast Guard letter responding to ACHP letter of May 22, 2007, providing additional information requested by ACHP.
June 29, 2007	Letter from law firm Olson, Bzdok & Howard, representing Gateways Communities Development Collaborative (GCDC), requesting GCDC be included as consulting party for Section 106 process.
July 11, 2007	Coast Guard letter to Olson, Bzdok & Howard inviting GCDC representative to be consulting party.
July 13, 2007	SHPO letter providing comments to the Draft EA and request for additional information.
July 17, 2007	SHPO letter to Quinn Evans Architects, consultants for the applicant, approving Scope of Service document for the Phase I Archaeological Reconnaissance Survey for the project.
August 6, 2007	ACHP letter to Coast Guard advising of letters received by public stakeholders in the project. [Coast Guard already received the letters provided in response to the Draft EA.]
August 7, 2007	Coast Guard letter to SHPO responding to SHPO letter dated July 13, 2007. Provided requested response for additional information, including a copy of the latest re-evaluation of the Environmental Assessment for the I-75 Ambassador Bridge/Gateway Project.
August 9, 2007	Meeting at SHPO offices between Coast Guard, applicant and consultants, SHPO, ACHP, and GCDC. Applicant presented design alternatives to address adverse effect. Consultant that performed the Phase I archaeological study discussed their findings and submitted report. All responses to Draft EA were provided by Coast Guard to SHPO. SHPO stated they would provide copies to ACHP and GCDC representative. SHPO and ACHP requested additional information regarding purpose of the project, alternatives, and expansion of the APE for the visual adverse effect and other environmental effects.
September 4, 2007	Coast Guard letter to SHPO addressing outstanding issues from the August 9, 2007 meeting, to include confirmation that the Section 106 process was previously initiated as designated in 36 CFR 800.8, <i>Coordination With the National Environmental Policy Act</i> .
October 25, 2007	Coast Guard letter to SHPO providing the following proposed timeline: <b>November 5, 2007</b> - SHPO provides to USCG response to USCG letter dated September 4, 2007 and timeline submitted in this letter. To complete USCG documentation requirements under 800.11(e), SHPO also provides USCG with qualification information that makes the Ambassador Bridge eligible for listing on the National Register of Historic Places. <b>November 14, 2007</b> - USCG provides preliminary determination of potential negative impacts of undertaking on historic resources to include traffic, noise, air quality, economic, visual, structural stability of existing structure, and socioeconomics. <b>November 14, 2007</b> - USCG provides alternatives investigated. <b>Week of December 4, 2007</b> - USCG to hold meeting with consulting parties (GCDC, ACHP, SHPO, Tribal Groups) and the general public to seek public input on the potential negative impacts on historic resources and on potential mitigation. <b>December 18, 2007</b> - USCG circulates draft MOA to SHPO for review. <b>Early January 2008</b> - USCG meeting with SHPO/ACHP and applicant to

TIMELINE: SECTION 106 CONSULTATION

	discuss MOA and any other outstanding issues.
November 14, 2007	Coast Guard letter to SHPO requesting SHPO participation in the scheduled December 6, 2007 public meeting in Detroit, Michigan. Copies of the letter were also sent to ACHP and GCDC. The letter requested SHPO provide comments to the consultation thus far by November 23, 2007 in preparation for the meeting.
December 6, 2007	Coast Guard held Public Meeting in Detroit, MI to provide the public opportunity to ask questions on all aspects of the proposed second span at the Ambassador Bridge and to solicit comments from the public on the design of the bridge as part of the Section 106 consultation.
December 12, 2007	Coast Guard email to Ms. Kelly Kavanaugh, GCDC representative (consulting party), to provide her with an overview of the Public Meeting held on December 6, 2007. She was not in attendance.
January 18, 2008	SHPO letter to Coast Guard in response to CG letter dated September 4, 2007. <b>Letter confirmed that the Section 106 process was initiated when the SHPO received the project application and documentation in February, 2007.</b>
March 21, 2008	Sent advance copy of the FIRST DRAFT MOA to signatory and consulting parties in preparation for meeting on March 26, 2008
March 26, 2008	Meeting held at Sector Detroit between all signatory and consulting parties to discuss the FIRST DRAFT MOA circulated by the Coast Guard on March 21, 2008. Items discussed included the issues raised by SHPO letter dated January 18, 2008.
May 14, 2008	Teleconference to discuss SHPO/ACHP edits to MOA with signatory and consulting parties. <b>Coast Guard identified that they do not have authority to enforce bridge maintenance beyond keeping it serviceable so it does not become a hazard to navigation.</b>
June 24, 2008	Teleconference to discuss MOA with signatory and consulting parties.
July 1, 2008	Teleconference to discuss MOA with signatory and consulting parties.
July 28, 2008	Teleconference between the USCG, SHPO and ACHP to discuss continued development of an MOA for the Ambassador Bridge Enhancement Project (ABEP).
July 29, 2008	Teleconference between the USCG, SHPO and ACHP to discuss continued development of an MOA for the Ambassador Bridge Enhancement Project (ABEP). Continuation of July 28, 2008 teleconference.
September 8, 2008	USCG and DHS legal met with ACHP. Agreed to try and sign a final MOA for the ABEP by November 17, 2008.
September 25, 2008	Teleconference to discuss September 23, 2008 version of MOA with signatory and consulting parties
October 3, 2008	Coast Guard distributes final version of MOA to signatory and consulting parties.
October 23, 2008	Teleconference to discuss October 3, 2008 version of MOA with signatory and consulting parties. Draft Preservation Agreement was distributed to all parties during this conference call.
December 8, 2008	Preservation Agreement between DIBC and SHPO signed.
December 11, 2008	MOA between USCG, SHPO, ACHP and DIBC signed.

Section 106

Review Form

**STATE HISTORIC PRESERVATION OFFICE**  
**Application for Section 106 Review**

SHPO Use Only					
<input type="checkbox"/>	IN	Received Date	_____ / _____ / _____	Log In Date	_____ / _____ / _____
<input type="checkbox"/>	OUT	Response Date	_____ / _____ / _____	Log Out Date	_____ / _____ / _____
		Sent Date	_____ / _____ / _____		

Submit one copy for each project for which review is requested. This application is required. Please type. Applications must be complete for review to begin. Incomplete applications will be sent back to the applicant without comment. Send only the information and attachments requested on this application. Materials submitted for review cannot be returned. Due to limited resources we are unable to accept this application electronically.

**I. GENERAL INFORMATION**

- THIS IS A NEW SUBMITTAL     THIS IS MORE INFORMATION RELATING TO ER#
- Funding Notice
  - Survey
  - MOA or PA
  - Other:

- a. Project Name: Ambassador Bridge Enhancement Project
- b. Project Address (if available):
- c. Municipal Unit: Detroit, Michigan County: Wayne
- d. Federal Agency and Contact (If you do not know the federal agency involved in your project please contact the party requiring you to apply for Section 106 review, not the SHPO, for this information.): Robert Bloom, U.S. Coast Guard, 1240 E. Ninth St., Cleveland, OH (216) 902-6085.
- e. State Agency and Contact (if applicable): Martha MacFarmane-Faes, Michigan State Historic Preservation Office, Michigan Historical Center, P.O. Box 30740, 702 W. Kalamazoo St., Lansing, MI 48909-8240, (517) 373-1630.
- f. Consultant or Applicant Contact Information (if applicable): Elisabeth Knibbe, Quinn Evans Architect, 219 1/2 North Main, Ann Arbor, MI 48104 734-663-5888.

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**II. GROUND DISTURBING ACTIVITY (INCLUDING EXCAVATION, GRADING, TREE REMOVALS, UTILITY INSTALLATION, ETC.)**

DOES THIS PROJECT INVOLVE GROUND-DISTURBING ACTIVITY?  YES  NO (If no, proceed to section III.)

Exact project location must be submitted on a USGS Quad map (portions, photocopies of portions, and electronic USGS maps are acceptable as long as the location is clearly marked).

- a. USGS Quad Map Name: Detroit
  - b. Township: 25 Range: 11E Section: 4
  - c. Description of width, length and depth of proposed ground disturbing activity: The area of proposed disturbance for the construction of the new span parallels that of the original construction. Four new piers will be 100' wide (perpendicular to the centerline of the bridge by 20' long (parallel to the centerline of the bridge) by 10' deep supported on pile or drilled shafts to rock about 120' below existing grade. In addition, a single tower pier will be 12' wide (perpendicular to the centerline of the bridge) by 80' long (parallel to the centerline of the bridge) by 20' deep supported on drilled shafts to rock about 120' below the existing grade. The new piers will not disturb areas that were not already disturbed during the construction of the historic bridge.
  - d. Previous land use and disturbances: Yes. Construction of the historic Ambassador Bridge in 1929 significantly disturbed the soils in the direct vicinity of the proposed new disturbance.
  - e. Current land use and conditions: Public park with grass lawns, parking areas and side walks. Park has been closed to the public for security reasons.
  - f. Does the landowner know of any archaeological resources found on the property? NO  
Please describe: Because the existing piers were excavated to a depth of about 120' to bedrock, it is presumed that any potential archeological resources were destroyed during the construction of the original bridge.
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### III. PROJECT WORK DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)

**Note: Every project has an APE.**

- a. Provide a detailed written description of the project (plans, specifications, Environmental Impact Statements (EIS), Environmental Assessments (EA), etc. **cannot** be substituted for the written description): See Attachment IIIa.
- b. Provide a localized map indicating the location of the project; road names must be included and legible.
- c. On the above-mentioned map, identify the APE.
- d. Provide a written description of the APE (physical, visual, auditory, and sociocultural), the steps taken to identify the APE, and the justification for the boundaries chosen. See Attachment III d.

#### IV. IDENTIFICATION OF HISTORIC PROPERTIES

- a. List and date **all** properties 50 years of age or older located in the APE. If the property is located within a National Register eligible, listed or local district it is only necessary to identify the district: See Attachment IV.
  - b. Describe the steps taken to identify whether or not any **historic** properties exist in the APE and include the level of effort made to carry out such steps: See Attachment IV.
  - c. Based on the information contained in "b", please choose one:
    - Historic Properties Present in the APE
    - No Historic Properties Present in the APE
  - d. Describe the condition, previous disturbance to, and history of any historic properties located in the APE: See Attachment IV.
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#### V. PHOTOGRAPHS

**Note: All photographs must be keyed to a localized map, and should be included as an attachment to this application.**

- a. Provide photographs of the site itself.
  - b. Provide photographs of all properties 50 years of age or older located in the APE (faxed or photocopied photographs are not acceptable).
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#### VI. DETERMINATION OF EFFECT

- No historic properties affected based on [36 CFR § 800.4(d)(1)], please provide the basis for this determination.
- No Adverse Effect [36 CFR § 800.5(b)] on historic properties, explain why the criteria of adverse effect, 36 CFR Part 800.5(a)(1), were found not applicable.

The criteria for adverse effect is that the undertaking may alter any of the characteristics of a historic property that qualify the property for inclusion in the Nation Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. The construction of the second span will alter the views to the bridge. However, the alteration meets the Secretary of the Interior's Standards for Rehabilitation as follows.

Standard 3 requires that each property be recognized as a physical record of its time, place and use and that changes that create a false sense of historical development not be undertaken. The new span is clearly differentiated from the historic span.

Standard 9 requires that new additions, exterior alteration, or related new construction not destroy historic material that characterize the property and that the new work be differentiated from the old and be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property. The new work does not touch the historic span. The new span is parallels the height and general arc of the original span, but, like the original span did at the time of its construction, the new span uses state of the art engineering clearly differentiating the design of the new span from that of the old.

Standard 10 requires that new additions or related new construction be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. The new span could be removed without impacting the historic span.

Therefore, although the new span does have a visual impact, the impact meet accepted historic preservation standards for the new construction adjacent to a historic resource.

- Adverse Effect [36 CFR § 800.5(d)(2)] on historic properties, explain why the criteria of adverse effect, [36 CFR Part 800.5(a)(1)], were found applicable.

***Please print and mail completed form and required information to:***  
*State Historic Preservation Office, Environmental Review Office, Michigan Historical Center, 702*  
*W. Kalamazoo Street, P.O. Box 30740, Lansing, MI 48909-8240*

Section 106

Attachment Text

February 8, 2007  
Section 106 Review  
Ambassador Bridge Enhancement Project

## **Attachment IIIa**

### **Project Description**

The Ambassador Bridge spans from the United States to Canada over the Detroit River. A second span will be constructed directly west (downriver) of the existing span.

The construction of Ambassador Bridge was completed in 1929. It was constructed by McClintock-Marshall Company and designed by Jonathan Jones, one of its engineers. At the time of its construction its design represented the state of the art in bridge engineering. Upon completion it was the longest free span bridge in the world at 1850 feet. The bridge spans from a pylon located on land on the Detroit side to a second pylon located in the river on the Canadian side.

The historic significance of the Ambassador Bridge was officially recognized in 1980 when it was listed in the National Register of Historic Places (Structure - #80004793).

The Ambassador Bridge Enhancement Project will construct a second span directly west of the existing bridge. The second span will be a cable-stay bridge. This bridge will span from a pylon located adjacent to the existing pylon on the Detroit side to a pylon set on land on the Canadian side resulting in an approximately 500 feet longer span for a total span of approximately 2250 feet. The location of the second pylon on land rather than in the river like the existing bridge will avoid damage to aquatic life due to the construction process and will minimize interference with river traffic.

In summary the new project will have the following characteristics

- Project length approximately 6200 ft (1890 m) of new 6 lane structure
- An approximately 2250 ft (685 m) cable stay span over the river
- No piers will be placed in the river
- 152 ft (46 m) vertical clearance above the river (same as the existing bridge)
- Structure will tie directly into the current plaza projects
- No changes will be made to the existing roads and streets in the US and Canada

The plazas on both sides of the river as designed and approved will accommodate the proposed new span with no changes to the existing street systems in the US or Canada.

Upon completion of the new span the condition of the existing span will be thoroughly evaluated. Necessary repairs will be made to repair the bridge. The bridge will be retained by the Detroit International Bridge Company (DIBC). It will be used for limited vehicular traffic by the DIBC, to carry standard traffic if the new span is incapacitated, and for pedestrian/bicycle traffic if DIBC works out an agreement with appropriate agencies and organizations to manage the non-vehicular use of the bridge.

See Graphics: Attachment IIIa – Graphic 1: Historic Photograph  
Attachment IIIa – Graphic 2: Historic Photograph  
Attachment IIIa – Graphic 3: Historic Photograph  
Attachment IIIa – Graphic 4: Historic Photograph  
Attachment IIIa – Graphic 5: Historic Photograph

Attachment IIIa – Graphic 6: Project Plan and Section  
Attachment IIIa – Graphic 7: Aerial View Looking South  
Attachment IIIa – Graphic 8: Aerial View of both Spans  
Attachment IIIa – Graphic 9: View of both Spans Looking East  
Attachment IIIa – Graphic 10: View of Pylon on Canadian Side

February 2, 2007

Section 106 Review  
Ambassador Bridge Enhancement Project

## **Attachments IIIb and IIIc**

### **Attachment IIIb – Project Location and Area of Potential Effect Map**

Attachment IIIb – Graphic 11: Project Location and Area of Potential Effect

This area was identified as the primary view shed of the bridge and the area that is most directly effected by its physical presence. The area is bounded on the north and east by a major railroad line, on the south by the Detroit River, and to the west by Grand Boulevard and the Hubbard Farms Historic District.

### **Attachment IIIc – Analysis of Area of Potential Effect**

#### **A. Physical**

The proposed design will have minimal physical effect on the Area of Potential Effect.

The new span will connect directly to previously planned and approved improvements to the customs and security plaza on the Detroit side of the bridge. The improvements to the plaza will be completed before the new span. They are currently scheduled for completion in 2009. These improvements have gone through a Section 106 historic review process and have been found to have no adverse effect. (See attached letter dated November 7, 1996 from Kathryn Eckert, State Historic Preservation Officer to Nancy Ford Demeter.)

The new span will require the addition of a pier in the open space area adjacent to the existing pier. The new span will throw additional shadow on the open space adjacent to the existing bridge. It must be noted that this open space has been closed to the public to protect the security of the bridge and is never expected to the public again. The bridge is high enough that the shadow is not expected to effect on the growth of landscape materials within the open space.

No changes will be required to the design of streets feeding to and from the plaza.

#### **B. Visual**

The existing bridge is visible from the adjacent neighborhoods, downtown Detroit, and along the river front. The view will be changed with the construction of the new span.

The new span is designed to meet the Secretary of the Interior Standards for Rehabilitation 3, 9 and 10.

Standard 3 states that each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

The proposed design meets this standard by not replicating suspension cable design of the original bridge.

Standard 9 states that new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

The proposed design meets this standard. The existing span will not be physically effected by the new span. In fact, the existence of the new span will extent the life of the existing span through the removal of heavy truck traffic that adversely effects on the structural integrity of the existing span.

The new work is differentiated from the old in that it incorporates state of the art engineering. The new span will be of cable stay construction in contrast to the suspension cable design of the original bridge. The new span will be constructed primarily of concrete – permitting a clean design that will provide a visual contrast with the intricate exposed steel structure of the existing span.

The new span will be wider than the existing span, but will roughly parallel its course and will match its height and the line of its arc over the river.

Standard 10 states that new additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed design meets this standard. The two spans will be structurally independent of each other.

Attachment IIIb – Graphic 12: Area of Potential Effect – View

See also Graphics 6 – 10 for plan, section and renderings of proposed new span.

### **C. Auditory**

A study will be conducted to determine the auditory effect of the new bridge. Copies will be provided to the State Historic Preservation Office upon completion.

### **D. Air Pollution**

A study will be conducted to determine the effect on air quality in the vicinity of the new bridge. Copies will be provided to the State Historic Preservation Office upon completion. The effect is expected to be positive due to the reduction of idling time for preapproved trucks unnecessarily waiting in line with the trucks that must go through customs.

### **E. Sociocultural**

The new span will improve the existing link between Canada and the United States, thereby facilitating continued trade, tourism and other connections between the two countries consistent with the historic purpose of the Ambassador Bridge.

**F. Traffic**

The new span will have no effect on area traffic. The traffic capacity of the river crossing system is determined by the plazas at either end. The construction of the new span will not increase the capacity of the crossing beyond that already approved through the environmental review process previously completed for the plaza enhancement.

January 7, 2007

Section 106 Review  
Ambassador Bridge Enhancement Project

## **Attachment IV**

### **IV. Identification of Historic Properties**

Several steps were taken to identify historic resources in the Area of Potential Effect. First, local and national historic sites were identified. Second, the City of Detroit was contacted to determine if they had identified other potential historic districts or sites. Third, the State Historic Preservation Office was contacted to see if they had surveys or other information identifying potential historic sites. Fourth, the effect assessment for the Gateway Enhancements was reviewed for its evaluation of historic sites. Lastly, a qualified historic preservation architect conducted a windshield survey of the area.

#### *Historically Designated Resources*

Graphic 13 locates the designated historic resources within the Area of Potential Effect. These are:

Hubbard Farms Historic District (Local and National Register Historic Districts)  
St. Anne's Church Complex (National Register Listed District)

Other historically designated resources within the vicinity of the Area of Potential Effect are also shown on Graphic 13. They are:

Penn Central Station (National Register Historic District)  
Cork Town (Local and National Register Historic Districts)  
Ralph J. Bunche Birthplace (National Register Historic District)  
Detroit Copper and Brass Rolling Mill (National Register Historic District)  
Fort Wayne (National Register Historic District)

#### *Other Identified Resources*

Neither the City of Detroit nor the State Historic Preservation Office has identified other potential districts or individual historic resources, except for a potential expansion of the Hubbard Farms district as noted below.

#### *Other Buildings Older than 50 Years*

A windshield survey was undertaken by a qualified historic preservation architect within the Area of Potential Effect to identify other potentially historic resources and districts. Photographs of streetscapes were taken in areas that may have potential as historic districts. Photographs were also taken of buildings that may be individually significant. A disk containing the photographs and a set of key maps are attached.

The following paragraphs briefly summarize the results of these findings:

Graphic 15 divides the Area of Potential Effect into 7 areas. They are each described briefly below. The associated graphics show the area and representative photographs from each area. Copies of all the photographs taken are keyed to Key Maps and included on a CD attached to this application.

### *Area 1*

Area 1 is located generally to the west of the existing bridge. The area under and directly west of the bridge is a public park. The area under the bridge has been closed to the public for security reasons. The park has no noticeable historic features.

Most of the remaining buildings appear to be over fifty years old. The area contains primarily industrial buildings. Many are architecturally altered. A few residential buildings remain at the south end of West Grand Boulevard. A few commercial buildings are located at the intersection of Fort Streets and West Grand Boulevard. In general the amount of alteration to individual buildings and number of demolitions significantly comprises the historic integrity of this area. It does not appear to meet the criteria for listing on the National Register of Historic Places.

The one exception is the Postal Ferry Building. This building and its immediate site retain much of their historic character. The historic significance of the site as the postal ferry terminal might meet the National Register criteria A for listing as a resource associated with event that have made a significant contribution to the broad patterns of our history.

See Graphics 16, 17 and 18.

### *Area 2*

Area 2 is the area between the I-75 South Service Drive and the Hubbard Farms Historic District. This area is a traditional neighborhood with a mix of single-family houses, apartment buildings, churches, and neighborhood commercial buildings that are almost all over 50 years old. The area also contains a c1960 elementary school. This area was previously identified by the State Historic Preservation Office as a potential extension of the Hubbard Farms Historic District.

See Graphics 19 and 20.

### *Area 3*

Area 3 is located north between West Vernor Highway and the railroad tracks. It contains a few houses, many vacant lots, a few industrial buildings and a few commercial buildings. A former police station dating from c1935 could meet criteria A for listing on the National Register as a resource associated with event that have made a significant contribution to the broad patterns of our history, and criteria C as a resource that embodies distinctive characteristics of period of construction. An unusual industrial building might merit additional research to determine its history. The remainder of the area has lost its historic integrity due to alterations to individual buildings and the loss of buildings.

See Graphics 21, 22 and 23.

### *Area 4*

Area 4 is the neighborhood located north of St. Anne's Church complex. The blocks along the western edge of this area abut the service plaza. These blocks are a traditional neighborhood with a mix of single family houses and some commercial buildings. These blocks may retain enough integrity for listing on the National Register. Most of the rest of this area consists of vacant land and new construction.

See Graphics 24 and 25.

### *Area 5*

Area 5 is located on the far eastern edge of the Area of Potential Effect. It is primarily industrial with a mix of industrial building types, some that are more than 50 years old. None appear to be of sufficient architectural significance to merit listing on the National Register. Their historic significance is not known.

See Graphics 26, 27 and 28

#### *Area 6*

Area 6 consists of the buildings facing Fort Street running from the railroad tracks west to the bridge. Fort Street was once a major commercial street running west from downtown along the river front. Remaining buildings include small commercial buildings dating from before 1900 and larger industrial buildings dating from the first decades of the 1900s. A notable number of buildings have been demolished. Others are in very poor condition. Although the buildings along this stretch of road are interesting, the loss of buildings, their poor conditions and inappropriate alterations compromise the historic integrity of the streetscape sufficiently to make it ineligible for listing on the National Register. Nevertheless, some of the buildings may merit individual listing based on their historic significance.

See Graphics 29, 30 and 31

#### *Area 7*

Area 7 is a traditional neighborhood commercial area dating from the late 1800s and early 1900s. The commercial district was split in half when I-75 was constructed. The western half consists of two blocks of one and two story masonry commercial buildings. Most of the buildings remain in tact. The eastern half of the district retains a number of similar commercial buildings, but many more vacant lots where buildings were demolished. Many of the buildings have been altered to reflect the Mexican ethnicity of the area. These alterations probably make the area ineligible for listing on the National Register, although as they age their transformation of the area into Mexicantown will gain its own historic significance.

See Graphics 32 and 33

#### *Resources Related to Tribal Nations*

Letters will go out to representatives of Tribal Nations describing the proposed project and requesting review of potential impacts resulting from the project on any known Native American sites or land that may be located near and/or impacted by the proposed project.

It is expected that letters will be sent to:

Bay Mills Indian Community  
12214 W. Lakeshore Drive  
Brimley, Michigan 49715

Saginaw Chippewa Indian Tribe of Michigan  
6650 E. Broadway Road  
Mt. Pleasant, Michigan 48858

Pokagon Band of Potawatomi  
212 ½ High Street  
Dowagiac, Michigan 49047

Match-e-be-nash-shee-wish Band of Potawatomi Indians  
658 128th Avenue  
Shelbyville, Michigan 49344

Little Traverse Bay Band of Odawa  
7500 Odawa Circle  
Harbor Springs, Michigan 49740

Little River Band of Ottawa  
Planning Department  
375 River Street  
Manistee, Michigan 49660

Lac Vieux Desert Band of Lake Superior Chippewa Indians  
P.O. Box 249  
Watersmeet, Michigan 49969

Keweennaw Bay Indian Community  
107 Beartown Road  
Baraga, Michigan 49908

Hannahville Potawatomi Indian Community  
14911 Hannahville B-1 Road  
Bark River, Michigan 49896

Grand Traverse Band of Ottawa and Chippewa Indians  
2605 NW Bayshore Drive  
Peshawbetown, Michigan 49682

Grand River Band of Ottawa Indians  
549 Lydia Street NE  
Grand Rapids, Michigan 49503

Burt Lake Band of Ottawa and Chippewa Indians  
P.O. Box 206  
Brutus, Michigan 49716

Sault Ste. Marie Tribe of Chippewa  
206 Greenough Street  
Sault Ste. Marie, Michigan 49783

The SHPO office will be notified on any response that indicate a potential for impact on archeological sites of concern to the tribal nations.

Section 106  
Attachment Graphics

# Attachment IIIa – Graphic 1 Historical Photograph

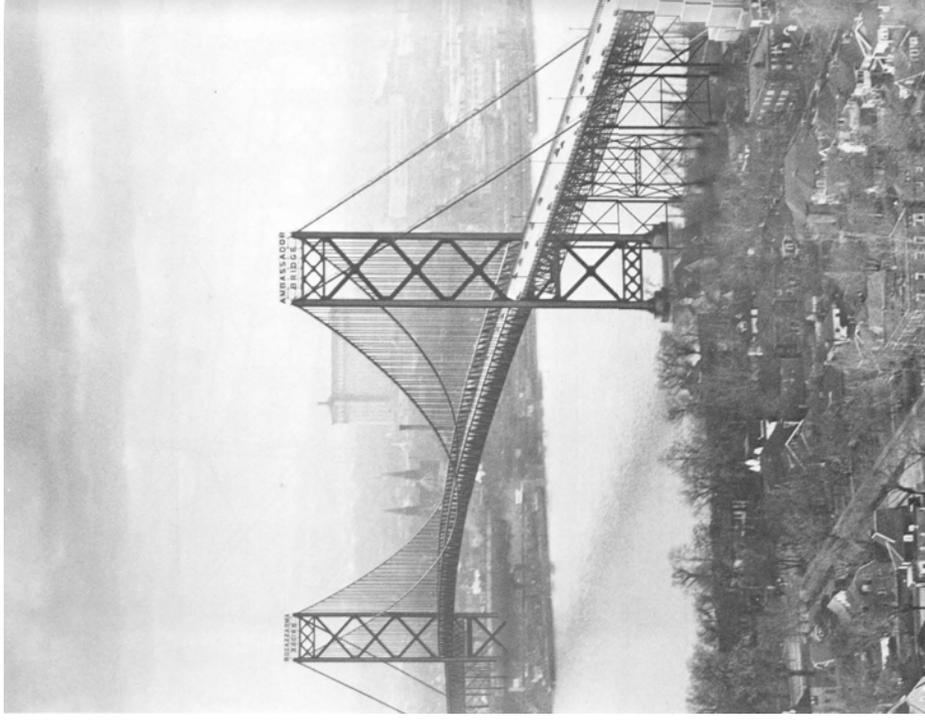
## Existing Bridge Constructed in 1929



# Attachment IIIa – Graphic 2

## Historical Photograph

Longest clear-span  
structure in the world at  
the time of completion –  
1,750' long



# Attachment IIIa – Graphic 3 Historical Photograph

Designer: Jonathan  
Jones, Engineer  
employed by  
McClintock-Marshall  
Company



# Attachment IIIa – Graphic 4 Historical Photograph

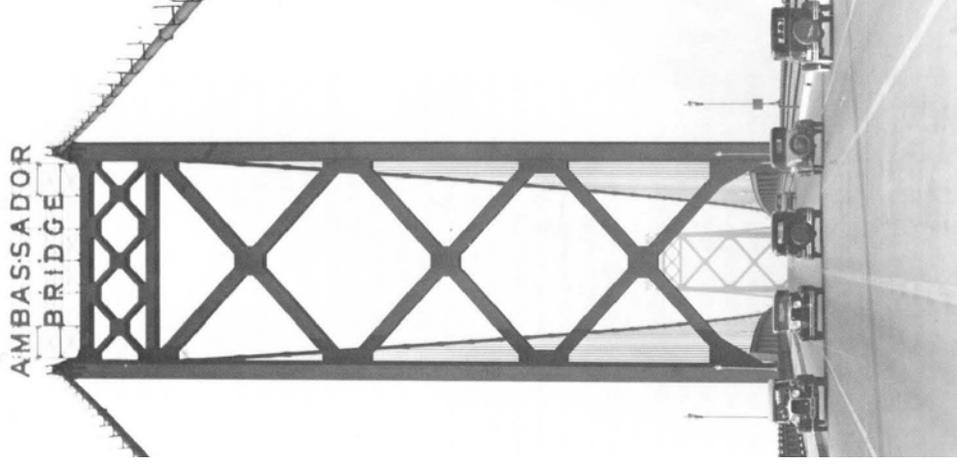
## State of the Art Engineering



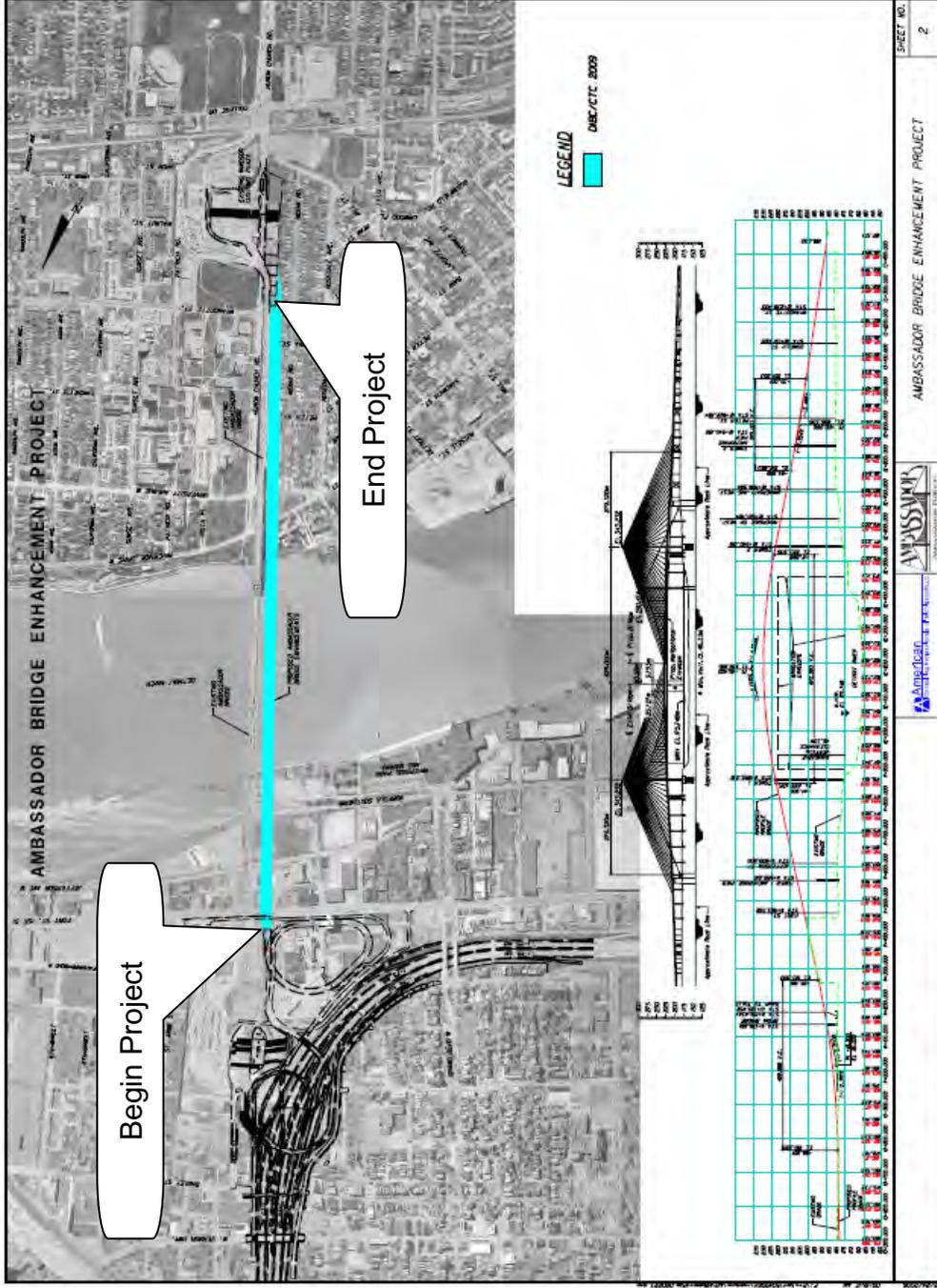
# Attachment IIIa – Graphic 5 Historical Photograph

Listed on National  
Register of Historic  
Places in 1980

(Structure - #80004793)

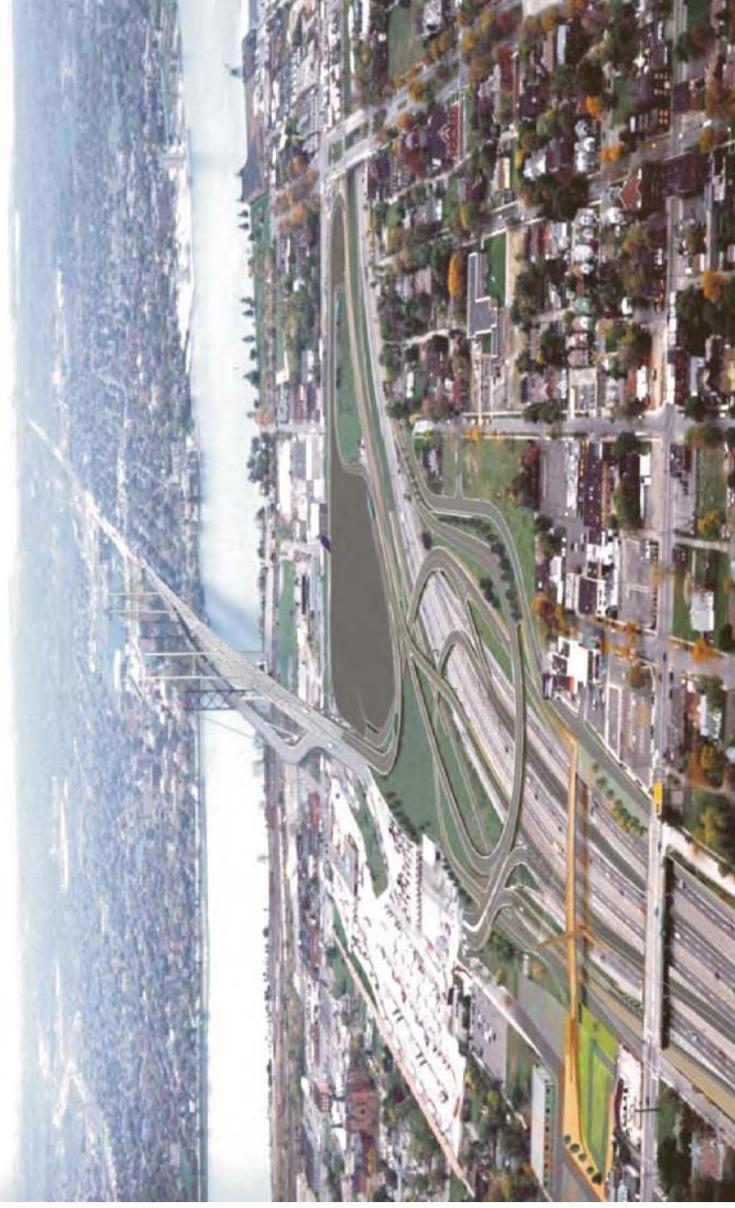


# Attachment IIIa – Graphic 6 Project Plan and Section



## Attachment IIIa – Graphic 7 Aerial View Looking South

- New span will parallel the existing span.



## Attachment IIIa– Graphic 8 Aerial View of both Spans

- New span will be located west (downriver) of the existing span.



## Attachment IIIa – Graphic 9

### View of both spans looking east

- New span will closely follow the arch of the existing span.



## Attachment IIIa – Graphic 10 View of Pylon on Canadian Side

- Both pylons will be located outside of the Detroit River.



# Attachment IIIb – Graphic 11

## Location and Area of Potential Effect



Attachment IIIId – Graphic 12  
Area of Potential Effect - View



# Attachment IV – Graphic 13

## Designated Historic Districts



# Attachment IIIb – Graphic 14 Neighborhood Commercial Districts

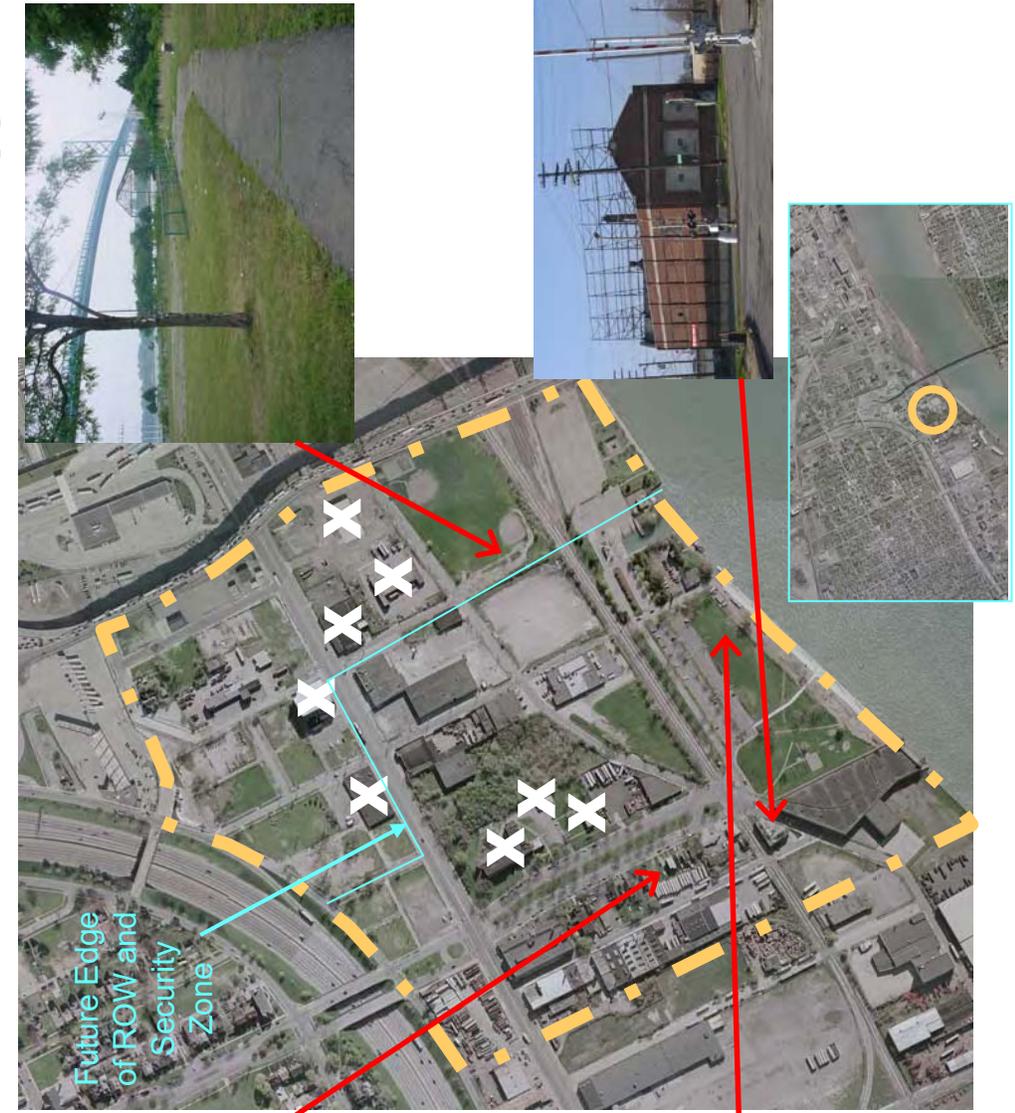


# Attachment IV – Graphic 15

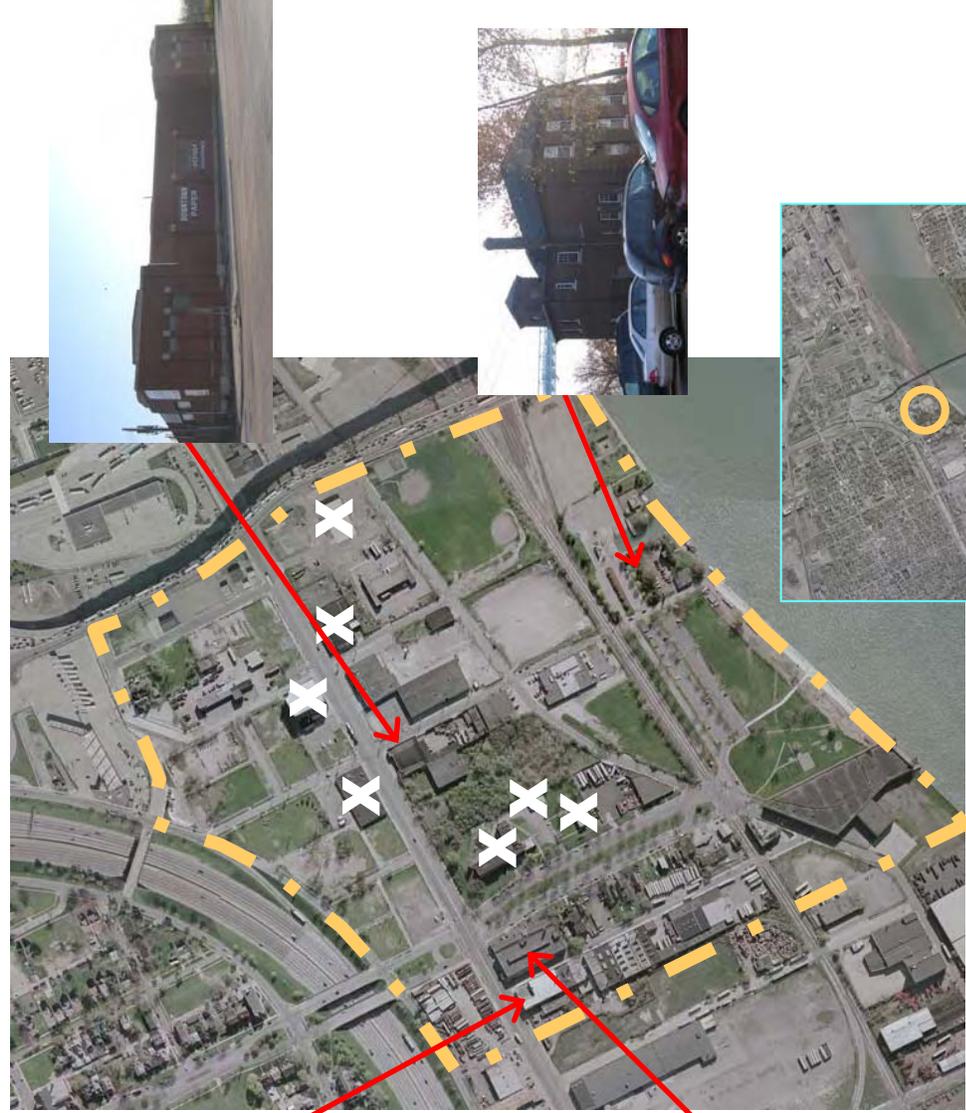
## Areas of Potential Impact



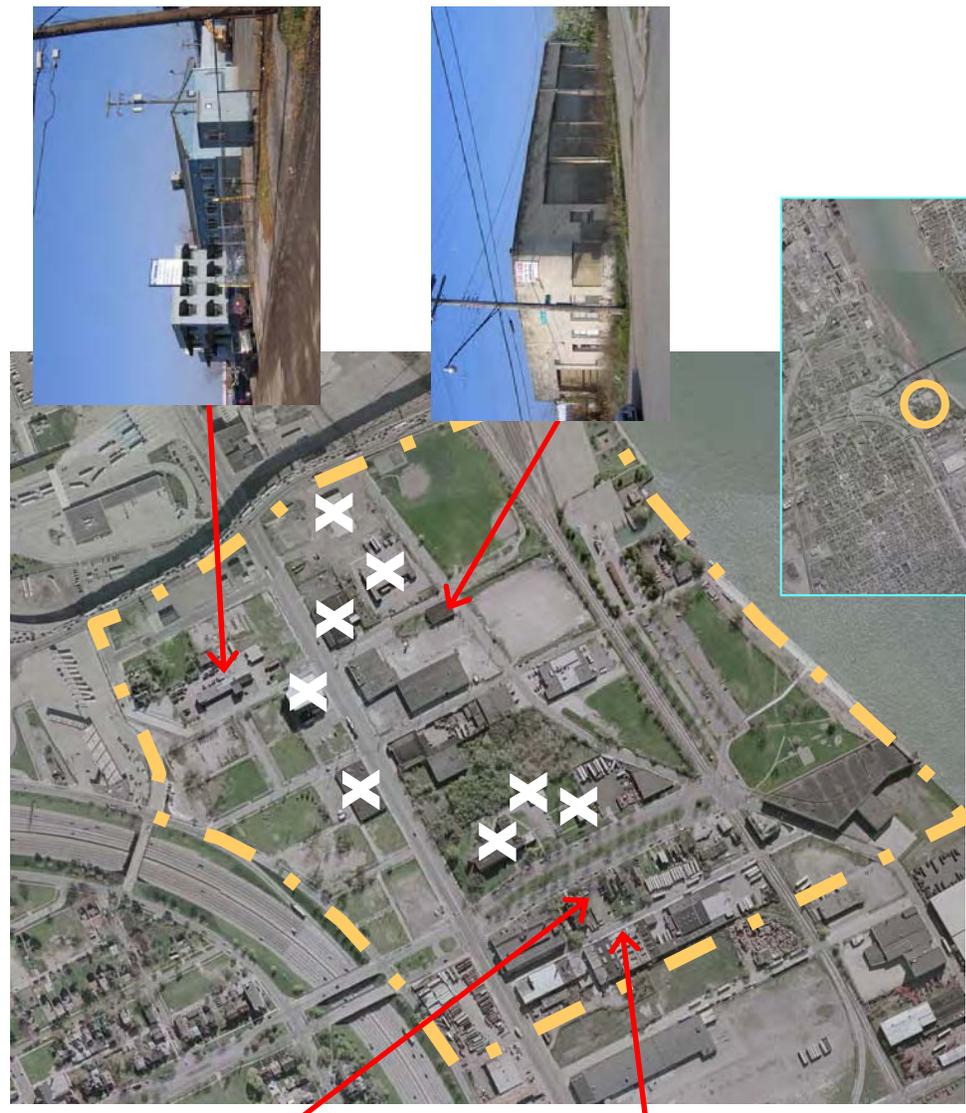
# Attachment IV – Graphic 16 Area 1



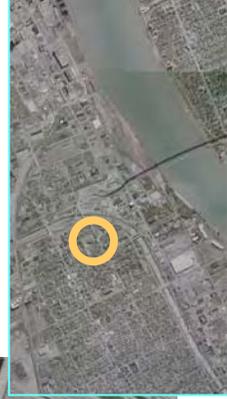
# Attachment IV – Graphic 17 Area 1



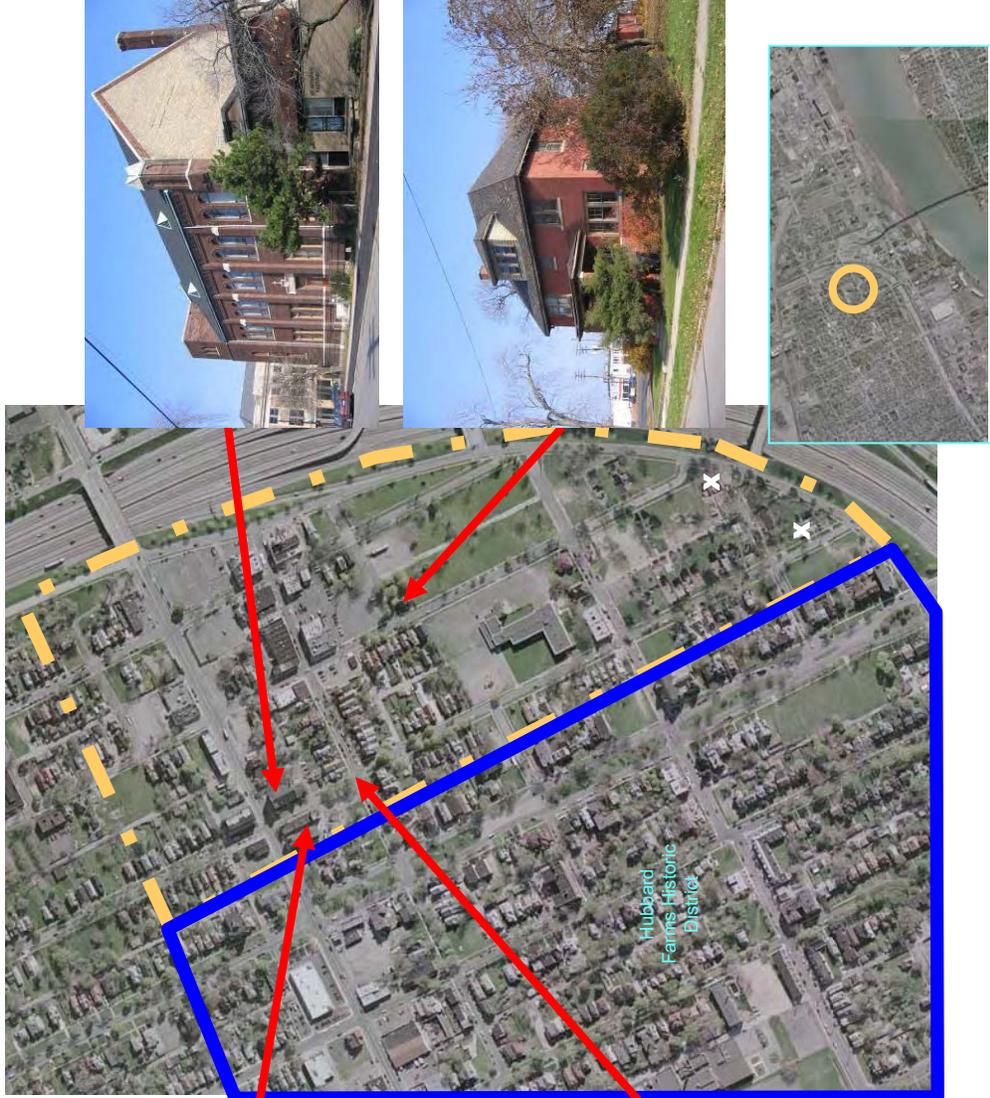
# Attachment IV – Graphic 18 Area 1



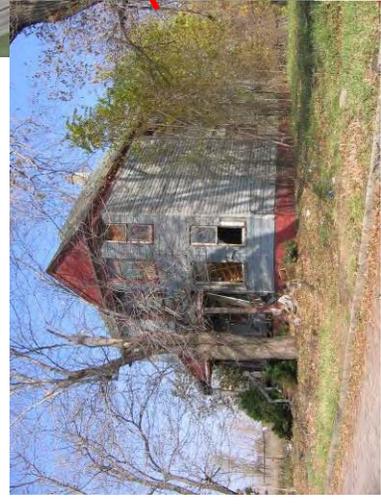
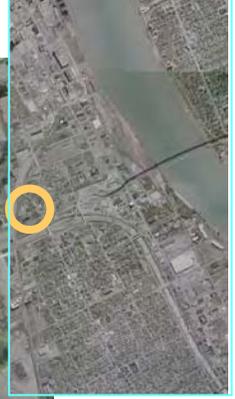
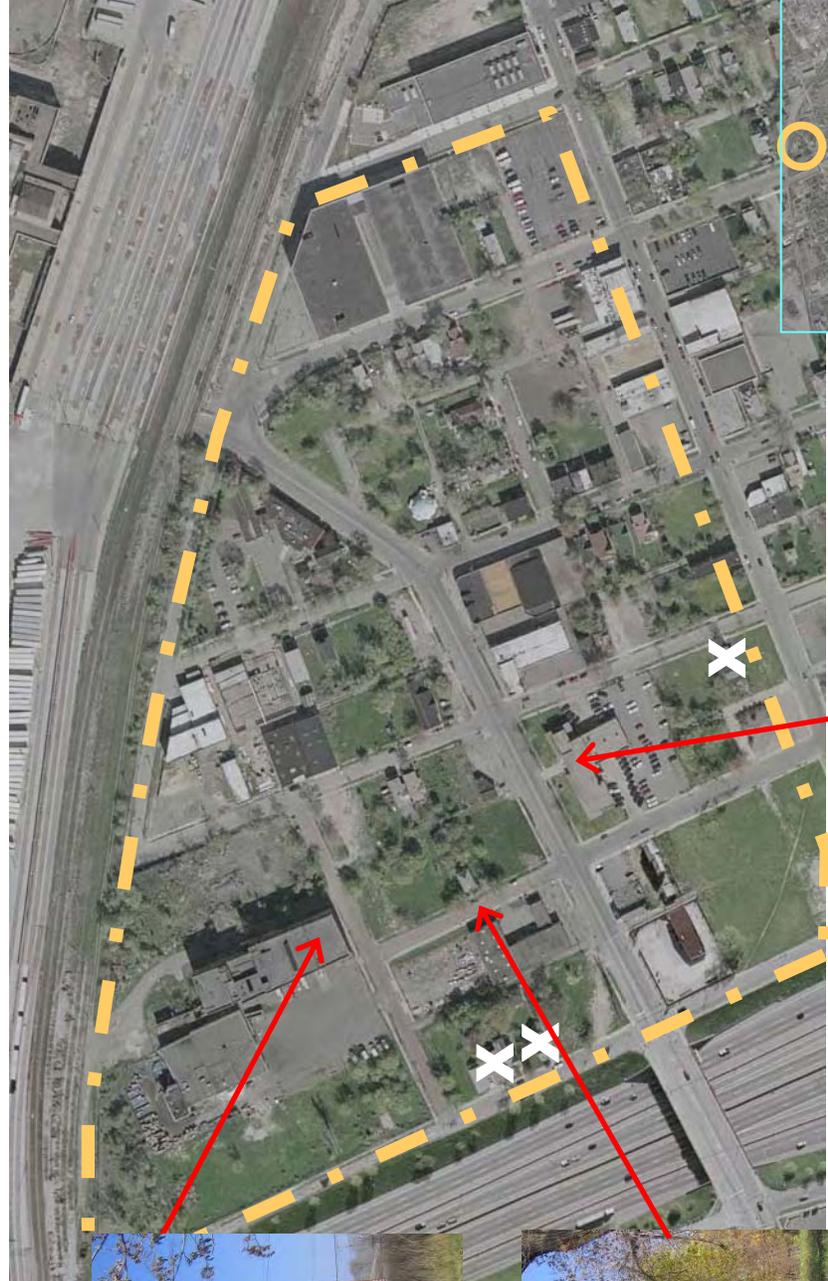
# Attachment IV – Graphic 19 Area 2



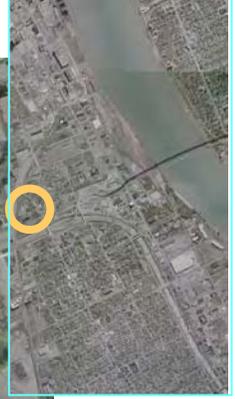
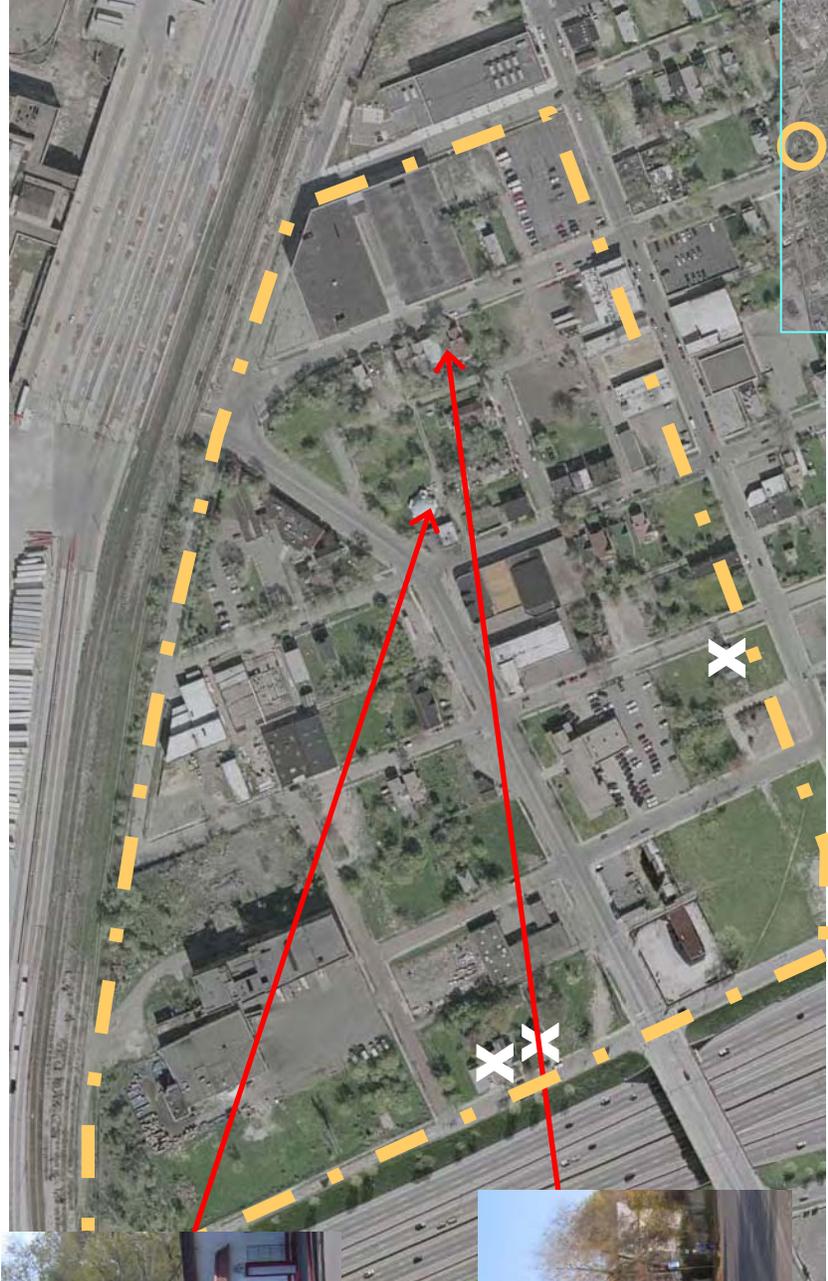
# Attachment IV – Graphic 20 Area 2



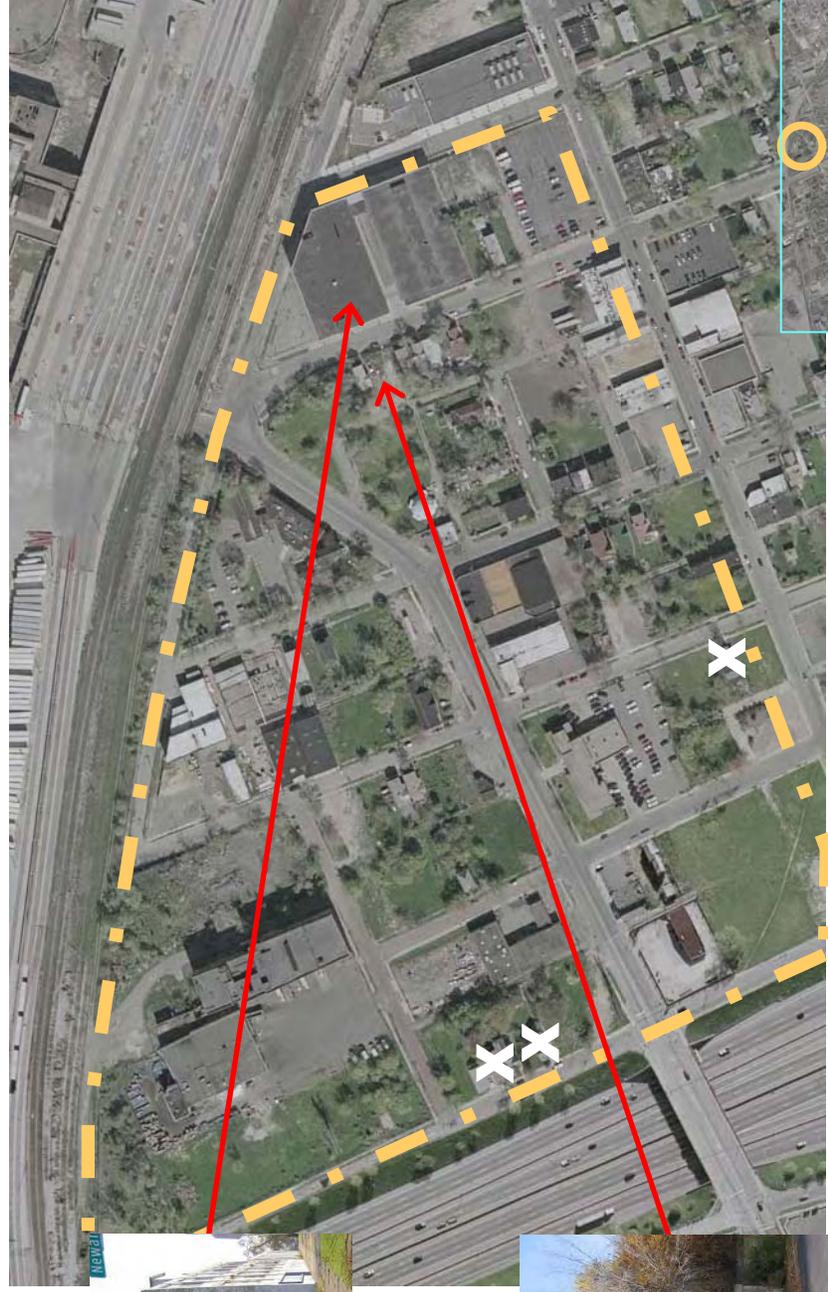
# Attachment IV – Graphic 21 Area 3



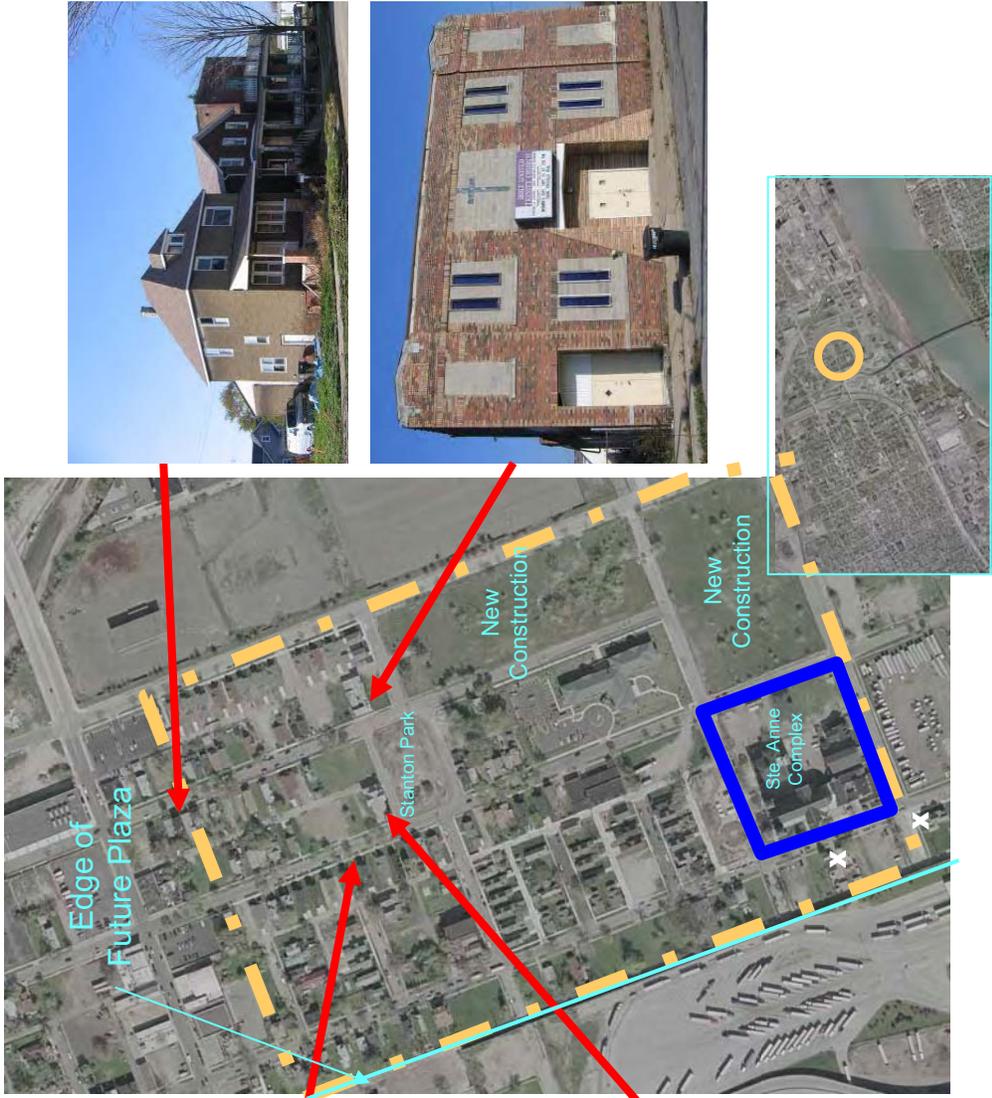
# Attachment IV – Graphic 22 Area 3



# Attachment IV – Graphic 23 Area 3



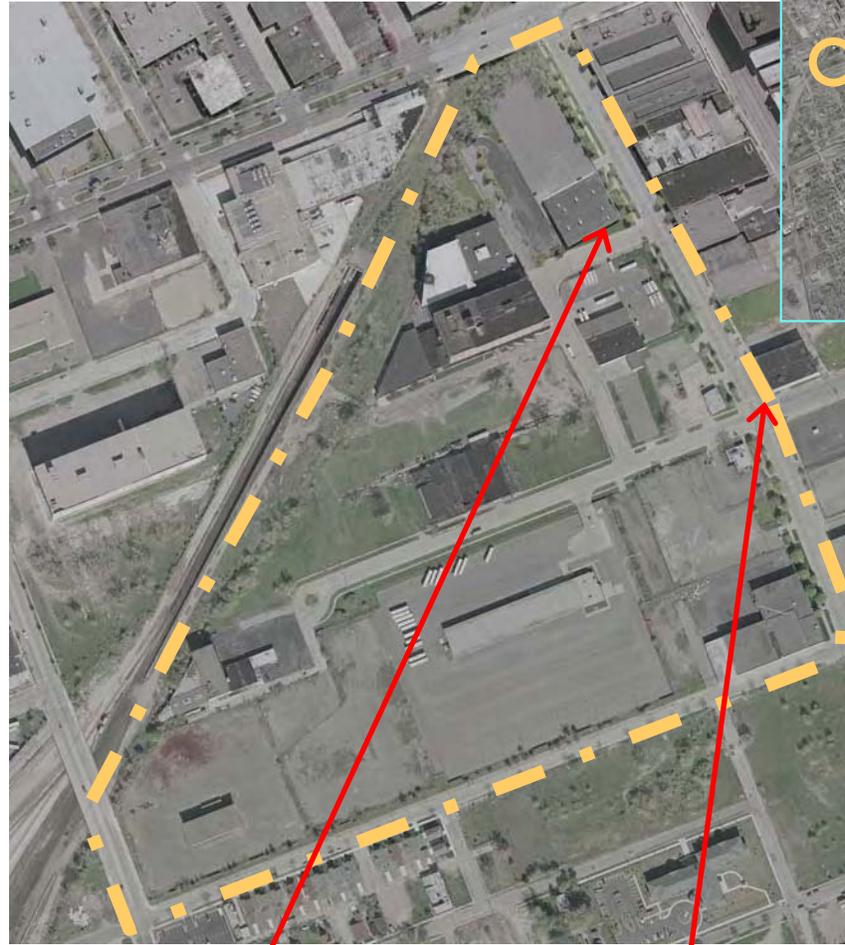
# Attachment IV – Graphic 24 Area 4



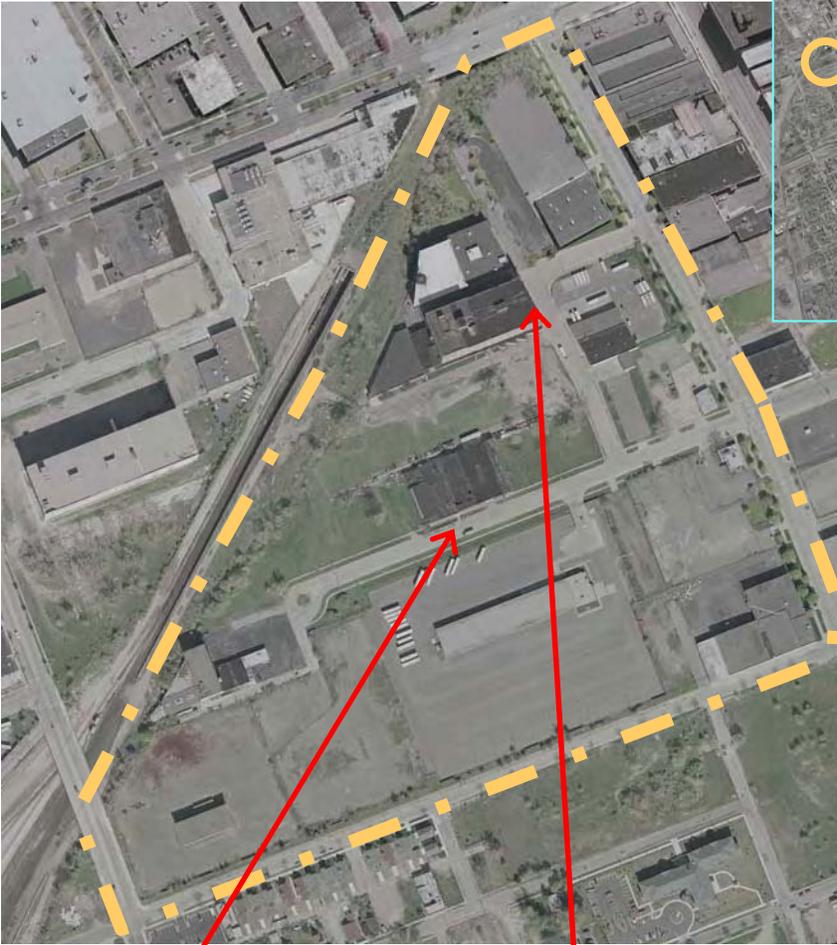
# Attachment IV – Graphic 25 Area 4



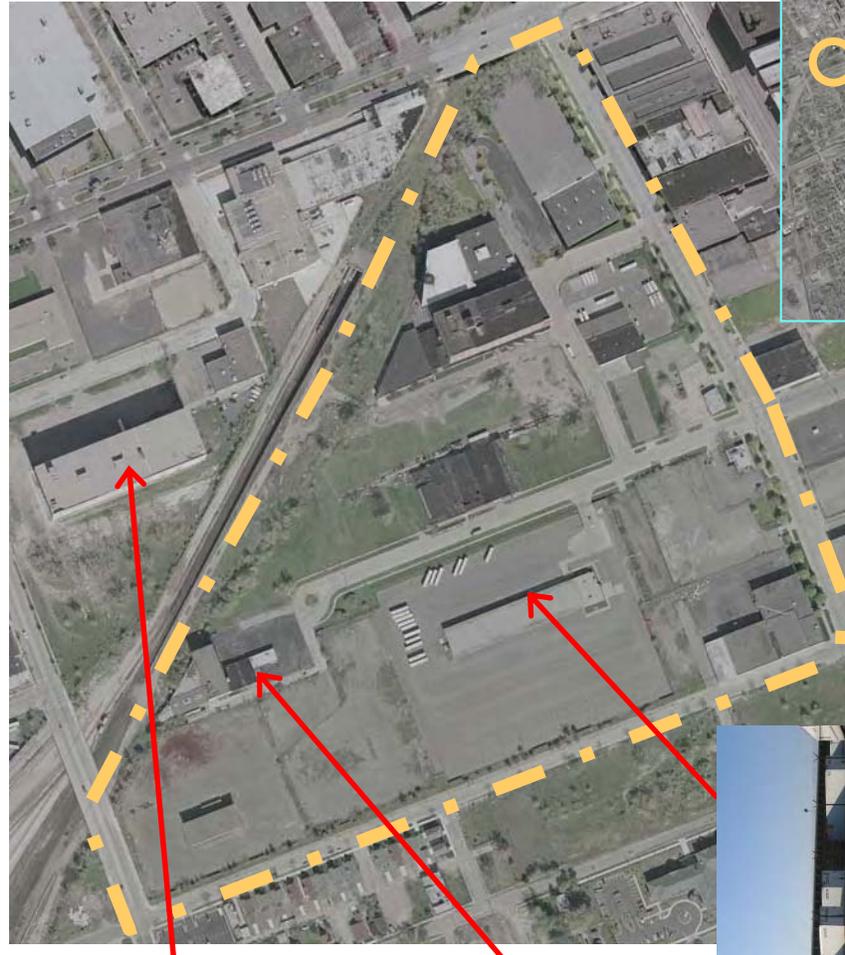
# Attachment IV – Graphic 26 Area 5



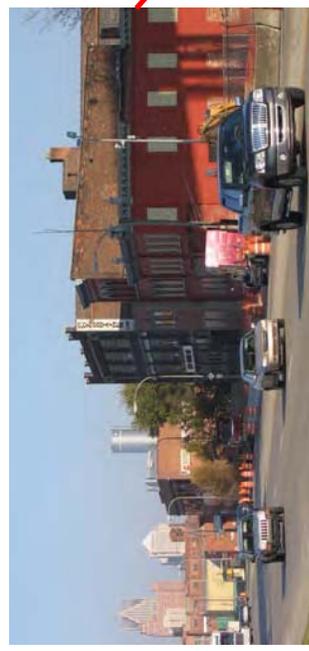
Attachment IIIb – Graphic 27  
Area 5



Attachment IV – Graphic 28  
Area 5



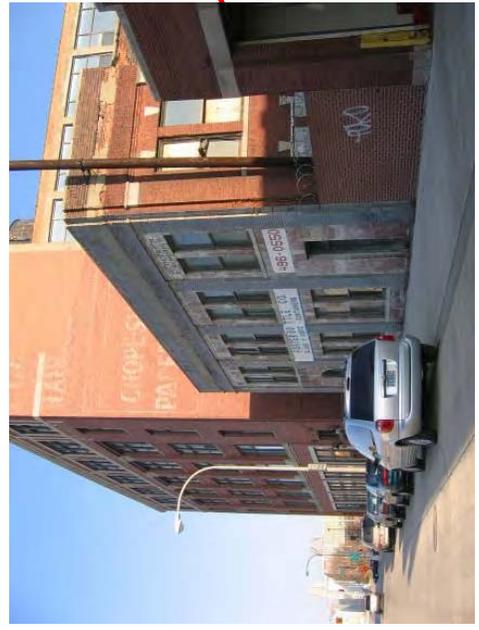
# Attachment IV – Graphic 29 Area 6



# Attachment IV – Graphic 30 Area 6



# Attachment IV – Graphic 31 Area 6

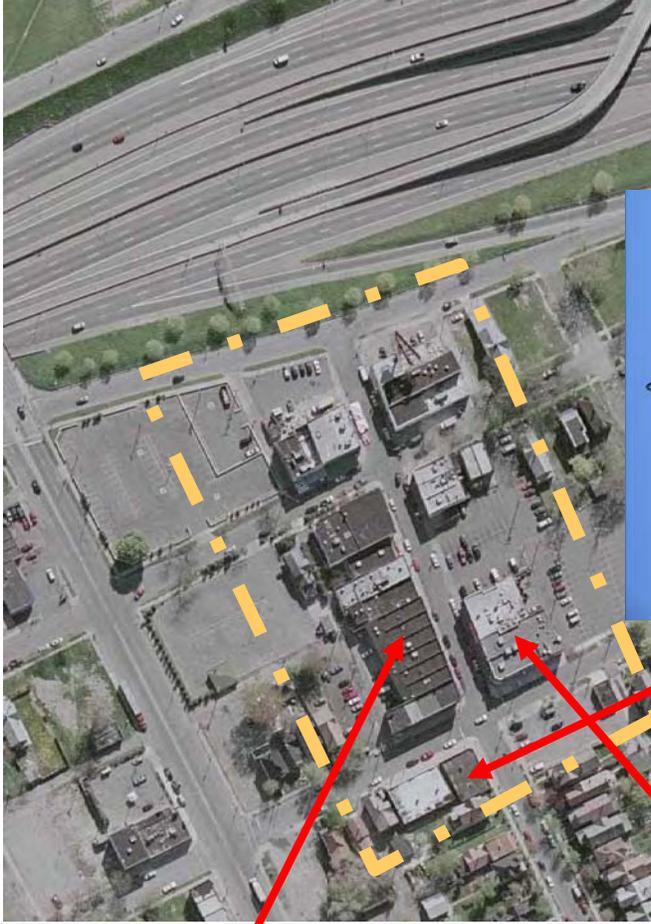


# Attachment IV – Graphic 32 Area 7 - East



# Attachment IV – Graphic 33

## Area 7 - West



Section 106  
Correspondence



## MICHIGAN DEPARTMENT OF STATE

Candice S. Miller, Secretary of State

Lansing, Michigan 48918-0001

## STATE HISTORIC PRESERVATION OFFICE

Michigan Historical Center  
717 West Allegan Street  
Lansing, Michigan 48918-1800

FILE COPY

November 7, 1996

NANCY FORD DEMETER  
DIRECTOR OF ADMINISTRATIVE AND TECHNICAL SERVICES  
COMMONWEALTH CULTURAL RESOURCES GROUP INC  
2530 SPRING ARBOR RD  
JACKSON MI 49203-3602

RE: ER96-317      Ambassador Bridge/Gateway Project, Detroit, Wayne County (MDOT)

Dear Ms. Demeter:

Under the authority of the National Historic Preservation Act of 1966, as amended, we have reviewed the revised plans for the above-cited project. The planned service drive improvements will not change the setting of the proposed Mexicantown Commercial Historic District or the proposed Hubbard-Richard West Historic District, and will have no adverse effect (federal regulation 36 CFR Part 800.9[c]) on the proposed Mexicantown Historic District and the proposed Hubbard-Richard West Historic District, which appear to be eligible for listing in the National Register of Historic Places.

We have considered the information provided in the survey report, the project plans, the revised project plans, a brief site visit, and additional information provided by CCRG and other interested parties for the above referenced project.

In our September 25, 1996, letter we gave the opinion that the proposed Hubbard-Richard West Historic District boundaries should only extend as far north as Porter Street. After examining the additional information we have developed revised boundaries. The potential district is bounded by the service drive on the south, the backs of the properties of West Grand Boulevard on the west, and the alley south of Bagley on the north. The eastern boundary begins at the intersection of the centerlines of the alley south of Bagley and 24th Street and runs south down the centerline of 24th Street to Porter where it runs east along the centerline of Porter to the I-75 service drive. It then turns south down the I-75 service drive until it meets the western boundary. This revised boundary encompasses the dense residential areas but excludes areas no longer retaining enough integrity due to the loss of a large number of buildings.

A second potential district comprised of commercial buildings is located on both sides of Bagley from West Grand to the I-75 service drive. This district may encompass buildings on Vernor but since it is outside the project study area we do not have sufficient information to determine the exact northern and western boundary lines. We have temporarily named this potential district the Mexicantown Commercial Historic District.

As currently designed it appears that the service drive will come approximately ten feet closer to LaGloria Bakery. This structure has always been in an urban, commercial setting with no setbacks from the street. Moving the service drive closer to the building will not adversely effect the building or its setting.

Michigan Historical Center  
State Historic Preservation Office

Page 2

The house at 1614 23rd Street is outside the boundaries of the potential historic district and does not appear to be eligible for listing individually.

The revised plans submitted to us from the Corradino Group for the service drive behind 1250 and 1256 24th Street show no change from the existing alignment. Therefore there is no adverse effect to 1250 and 1256 24th Street or the Hubbard-Richard West Historic District.

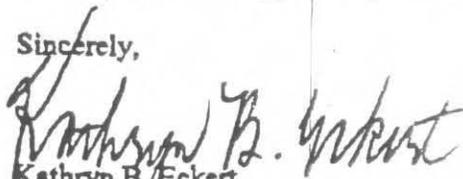
Please note that, with a finding of no adverse effect, the Section 106 review process will not be completed until the Federal Highway Administration has submitted the project documentation to, and received the formal comments of, the Advisory Council on Historic Preservation (36 CFR 800.5[d]). Send the documentation to the Advisory Council on Historic Preservation, 1100 Pennsylvania Avenue, NW, Suite 809, Washington D.C. 20004. The project documentation required (36 CFR 800.8[a]) is similar to the materials submitted to this office, including at minimum:

- 1) A description of the undertaking, including photographs, maps, and drawings, as necessary;
- 2) A description of historic properties that may be affected by this undertaking;
- 3) A description of the efforts used to identify historic properties;
- 4) A statement of how and why the criteria of adverse effect were found inapplicable; and
- 5) The views of the State Historic Preservation Officer, affected local governments, Indian tribes, Federal agencies, and the public, if any were provided, as well as a description of the means employed to solicit those views.

Please note that the Section 106 review process will not be complete until the formal comments of the Advisory Council on Historic Preservation have been received. A copy of this letter submitted to the Advisory Council without supporting documentation is not sufficient to obtain formal comments. If you have any questions or require further assistance, please contact Kristine Kidorf, Environmental Review Coordinator, at (517) 335-2721.

Thank you for the opportunity to comment, and for your cooperation.

Sincerely,

  
Kathryn B. Eckert  
State Historic Preservation Officer

KBE:ROC:BDC:KMK

cc: Advisory Council on Historic Preservation  
Margaret Baroncress

EXECUTIVE OFFICE OF THE PRESIDENT  
COUNCIL ON ENVIRONMENTAL QUALITY  
WASHINGTON, D.C. 20503

CHAIRMAN

May 12, 2003

The Honorable Norman Y. Mineta  
Secretary, Department of Transportation  
400 Seventh St., S.W., Room 10200  
Washington, D.C. 20590

Dear Secretary Mineta:

I write in response to your letter of May 6, 2003, asking for the Council on Environmental Quality's (CEQ) guidance on the issue of "purpose and need" in the context of compliance with CEQ's regulations implementing the procedural provisions of NEPA. Your letter refers to the fact that the Interagency Transportation Infrastructure Streamlining Task Force has identified "purpose and need" as a priority issue in need of clarification. Specifically, you ask for guidance on the appropriate exercise of authority by lead and cooperating agencies in determining the purpose and need.

The requirement for a discussion of "purpose and need" in an environmental impact statement under the CEQ regulations is to "briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." 40 C.F.R. §1502.13. This discussion, typically one or two paragraphs long, is important for general context and understanding as well as to provide the framework in which "reasonable alternatives" to the proposed action will be identified.

The lead agency -- the federal agency proposing to take an action -- has the authority for and responsibility to define the "purpose and need" for purposes of NEPA analysis. This is consistent with the lead agency's responsibilities throughout the NEPA process for the "scope, objectivity, and content of the entire statement or of any other responsibility" under NEPA. 42 U.S.C. §4332(D); see also, 40 C.F.R. §§1501.5, 1506.5.

Federal courts generally have been deferential in their review of a lead agency's "purpose and need" statements, absent a finding that an agency acted in an arbitrary or capricious manner. They have recognized that federal agencies should respect the role of local and state authorities in the transportation planning process and appropriately reflect the results of that process in the federal agency's NEPA analysis of purpose and need. *North Buckhead Civic Assoc. v. Skinner*, 903 F.2d 1533 (11th Cir. 1990). Courts have cautioned agencies not to put forward a purpose and need statement that is so narrow as to "define competing 'reasonable alternatives' out of consideration (and even out of existence)", *Simmons v. U.S Army Corps of Engineers*, 120 F.3d 664 (7th Cir. 1997); (see also, *Alaska Wilderness Recreation and Tourism Association v. Morrison*, 67 F.3d 723 (9th Cir. 1995).

In situations involving two or more agencies that have a decision to make for the same proposed action and responsibility to comply with NEPA or a similar statute, it is prudent to jointly develop a purpose and need statement that can be utilized by both agencies. An agreed-upon purpose and need statement at this stage can prevent problems later that may delay completion of the NEPA process. As Congress stated in the Federal Aid Highway Act of 1973, "It is the national policy that to the maximum extent possible the procedures to be utilized by the Secretary and all other affected heads of Federal departments, agencies, and instrumentalities for carrying out this title and any other provision of law relating to the Federal highway programs shall encourage the substantial minimization of paperwork and interagency decision procedures and the best use of available manpower and funds so as to prevent needless duplication and unnecessary delays at all levels of government", 23 U.S.C. §101(e); see also, CEQ's regulations implementing NEPA at 40 C.F.R. §§1500.4, 1500.5.

In the case of a proposal intended to address transportation needs, joint lead or cooperating agencies should afford substantial deference to the DOT agency's articulation of purpose and need. 49 U.S.C. §101(b)(5). This deference reflects CEQ's expectation and experience in other settings where an agency has the primary substantive expertise and program responsibility. If a cooperating or joint lead agency identifies substantive or procedural problems with the purpose and need statement, including an omission of factors, important to that agency's independent legal responsibilities, the agency should raise those issues immediately and, if necessary, elevate those issues to higher level decisionmakers in the region and at headquarters for resolution. Thoughtful resolution of the purpose and need statement at the beginning of the process will contribute to a rational environmental review process and save considerable delay and frustration later in the decisionmaking process.

Please let me know if you have any further questions regarding this issue. Thank you for your leadership and I commend your department officials for the work they are undertaking in fulfilling the President's direction.

Sincerely,

[Original signed by]

James L. Connaughton



**United States Department of State**

*Bureau of Western Hemisphere Affairs  
Washington, D.C. 20520-6258*

August 3, 2005

David H. Coburn, Esq.  
Steptoe & Johnson, LLP  
1330 Connecticut Ave., N.W.  
Washington, D.C. 20036

Re: Detroit International Bridge Company

Dear Mr. Coburn:

This is in response to your question on behalf of the Detroit International Bridge Company (DIBC) as to whether the DIBC is required to obtain a Presidential Permit to construct a second span for the Ambassador Bridge, which crosses the Detroit River between Detroit, Michigan and Windsor, Ontario. In connection with your question, you have also provided the Office of the Legal Adviser with several pieces of correspondence concerning this matter. Based on the information available to us (including the information you have provided), we have determined that the DIBC does not require a Presidential permit to expand (or twin) the existing bridge at that location.

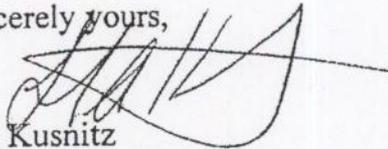
The Ambassador Bridge was constructed pursuant to a 1921 congressional statute that authorized the "American Transit Company, its successors and assigns, to construct, maintain, and operate a bridge and approaches thereto across the Detroit River at a point suitable to the interests of navigation, within or near the city limits of Detroit, Wayne County, Michigan, in accordance with the provisions" of the 1906 Bridge Act, provided that the necessary authority for construction was obtained from the Canadian Government and that construction was commenced within three years and completed within seven years. Although the time periods within which the bridge could be constructed and completed were extended by Congress several times, it is our understanding that the bridge was built after Canadian approval was eventually obtained. You have further furnished us with information indicating that DIBC is the assignee of the American Transit Company, having acquired the bridge and the authority to operate it in 1927, pursuant to the 1921 congressional authorization.

In 1972, Congress enacted the International Bridge Act, which effectively ratified the Presidential permit process (delegated to the Department of State in 1968 under Executive Order 11423) that had been in operation for some time. In passing the 1972 statute, Congress made clear that activities conducted pursuant to prior congressional statutory authorizations would not be affected by the new law. Specifically, the House Report provides that the International Bridge Act "should not be construed to adversely affect the rights of those operating bridges previously authorized by Congress to repair, replace or enlarge existing bridges." H.R. Rep. No. 92-1303, 92d Cong., 2d Sess. 3-4 (1972). Further, as your letters note, in a number of prior instances, the Department has advised that the replacement or expansion of existing bridges authorized by Congress prior to passage of the 1972 International Bridge Act did not require a Presidential Permit. However, if expansion of the Ambassador Bridge Detroit were to require an agreement between the State of Michigan (or a subdivision or instrumentality of the State) and the Canadian government, a Canadian province or a subdivision or instrumentality of either, approval of such an agreement by the Secretary of State would be required under section 3 of the 1972 Act.

Therefore, based on our understanding that the DIBC is the assignee of the American Transit Company authorized by Congress to maintain and operate the Ambassador Bridge Detroit and that the DIBC is only seeking to expand (or twin) the operation of that bridge at that location, the DIBC does not require a Presidential permit under E.O. 11423, as amended. The fact that a Presidential permit is not required in this instance does not, however, exempt the DIBC from any other requirements under U.S. law, such as the requirement of advance approval of any plans for modification of the existing bridge by the Secretary of Homeland Security or his delegate under the 1906 Bridge Act.

I hope that you find this information helpful.

Sincerely yours,



Len Kusnitz  
Acting Director  
Office of Canadian Affairs

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander (dpw-3)  
Ninth Coast Guard District  
1240 E. Ninth Street, Room 2019  
Cleveland, OH 44199-2060

Phone: (216) 902-6084  
FAX: (216) 902-6088

16590  
B-038/sms  
April 5, 2006

Mr. Brian D. Conway  
State Historical Preservation Officer  
Michigan Historical Center  
P.O. Box 30740  
702 West Kalamazoo Street  
Lansing, Michigan 48909-8240

Dear Mr. Conway,

I am writing to extend an invitation to you or your representative to attend a meeting to discuss and evaluate a proposal to construct a companion structure to the Ambassador Bridge over Detroit River. A proposal has been submitted to the Coast Guard from the Detroit International Bridge Company in Detroit and your agency may have review or permitting requirements associated with this proposed project. Your attendance will help the Coast Guard, a federal permitting agency, to determine potential environmental impacts related to the proposed project.

The meeting will take place at 10:00 a.m. on Thursday, May 4, 2006, at the CENTRA Headquarters in Warren, Michigan. The address is: 12225 Stephens Road, Warren, Michigan, 48089. A location map is attached.

Please contact Scot Striffler of this staff to advise whether you or your representative can attend this meeting. He may be reached by calling (216) 902-6087. Thank you in advance for your attention to this matter.

Sincerely,

ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

Copy: U.S. Environmental Protection Agency, Chicago, Illinois  
International Joint Commission, Washington, D.C.  
U.S. Federal Highway Administration, Lansing, Michigan  
U.S. Fish and Wildlife Service, East Lansing, Michigan

Copy: Michigan Department of Natural Resources – Wildlife Division  
Michigan Department of Environmental Quality – LWMD, Lansing, Michigan  
Southeast Michigan Council of Governments, Detroit, Michigan  
Michigan DOT – Bureau of Transportation Planning, Lansing, Michigan  
City of Detroit, Historic District Commission, Detroit, Michigan



JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

DR. WILLIAM ANDERSON  
DIRECTOR

May 4, 2006

ROBERT W BLOOM JR  
U S COAST GUARD  
1240 EAST NINTH STREET ROOM 2019  
CLEVELAND OH 44199-2060

Dear Mr. Bloom:

The State Historic Preservation Officer (SHPO) received your preliminary coordination notification and meeting invitation to discuss the proposed construction of a companion structure to the Ambassador Bridge over the Detroit River. Although we were not able to attend this meeting, we look forward to future consultation under Section 106 of the National Historic Preservation Act of 1966, as amended. Please note that the SHPO has determined that the Ambassador Bridge appears to meet the criteria for listing in the National Register of Historic Places. Furthermore, any undertaking submitted under Section 106 of the National Historic Preservation Act of 1966 that would alter any of the characteristics of the property that qualify it for inclusion in the National Register would likely result in an adverse effect determination by our office.

The Section 106 regulations specify what is required for a Section 106 review [36 CFR § 800.11]. Section 106 requires federal agencies to take into account the effect of their undertakings on historic properties. It is the responsibility of the federal agency, *not the SHPO*, to fulfill the requirements of Section 106. In some instances, the federal agency may delegate legal responsibility to a state, local, or tribal government. Consultants or designees contracted to prepare information, analyses, or recommendations, are *not* recognized as federally-delegated authorities. For your reference, a complete version of the Section 106 regulations can be found at [www.achp.gov/regs.html](http://www.achp.gov/regs.html).

The mandatory application form and instructions for submitting projects for review under Section 106 may be downloaded in MS Word format from our website at [www.michigan.gov/shpo](http://www.michigan.gov/shpo). Please read each requirement carefully in its respective field, and respond in full. In addition, please ensure that future project submissions will utilize the application form. Incomplete applications and projects not submitted on the application forms will be sent back to the applicant without comment.

Thank you for your cooperation.

Sincerely,

Brian G. Grennell  
Environmental Review Specialist

for Brian D. Conway  
State Historic Preservation Officer



American Consulting Engineers of Florida, LLC

4111 Land O' Lakes Boulevard, Suite 210  
Land O' Lakes, Florida 34639  
Tel 813.996.2800 • Fax 813.996.1908  
american@ace-fla.com • www.ace-fla.com

May 25, 2006

Brian Grennell  
Environmental Review  
Michigan State Historic Preservation Office  
702 West Kalamazoo Street  
Lansing, MI 48909-8240

Re: Ambassador Bridge Enhancement Project

Dear Brian Grennell:

Thanks for talking with me on May 25 about the Ambassador Bridge Enhancement Project. Again, the project consists of building additional lanes of traffic over the Detroit River adjacent to the existing Ambassador Bridge. The proposed bridge would be a cable-stayed bridge and would line up with the existing bridge.

Please find attached a copy of the Type 2 Categorical Exclusion documentation. We realize this does not satisfy the requirements of Section 106, however, it is a good introduction to the project. We are interested in setting up a meeting with your office to discuss the Section 106 process and ways to avoid impacts to the existing Ambassador Bridge at your earliest convenience. The meeting will include 1-2 representatives from the Detroit International Bridge Company (the proponent), and 2 representatives from American Consulting Engineers, including myself (the consulting firm hired by the proponent). Please let me know when you are available to meet and if possible, please provide a few dates to choose from, so that more people can attend. Feel free to contact me if you have any further questions or need additional copies of the documentation.

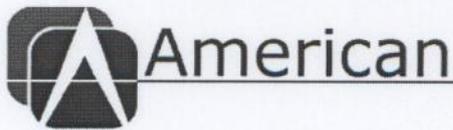
Sincerely,  
American Consulting Engineers of Florida, LLC

A handwritten signature in blue ink that reads 'Anna Peterfreund'.

Anna Peterfreund  
Environmental Scientist

cc: File, Dan Stamper, Craig Stamper, David Coburn

F:\Project\5049964\File Cabinet\B. Correspondence\B.04 INTERNAL TEAM CORRESPONDENCE OUT\060525 LET APeterfreund to SHPO for meeting.doc



Consulting Professionals of New York, PLLC

70 Niagara Square, Suite 410, Buffalo, New York 14202

Tel 716.362.1116 • Fax 716.362.1166

american@acp-ny.com • www.acp-ny.com

February 19, 2007

Ms. Sharon Teeple, Executive Director  
Inter-Tribal Council of Michigan, Inc.  
2956 Ashmun Street  
Sault Ste Marie, Michigan 49783

**Re: Ambassador Bridge Enhancement Project**

Dear Ms. Teeple:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

If at any time during the course of this project artifacts or other archeologically significant remains are discovered, work will be stopped immediately. You as well as the appropriate representative of SHPO, Mr. Brian D. Conway, will be notified to provide direction as to how to proceed. In the case that human remains are discovered, the police will also be contacted.

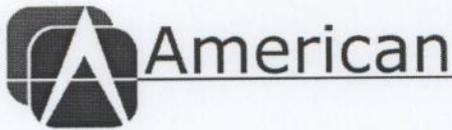
We welcome the opportunity to meet with you to discuss the project in greater detail. Should your committee have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter. If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

Donald V. Kolb  
Urban Planner/GIS Specialist  
American Consulting Professionals of New York, PLLC

Enclosure: Project Location Map

F:\Project\5049964\_Detroit\E\_Environmental\E.37 Indian Affairs\Correspondence\Consultation\_06022007\_2<sup>nd</sup>\_Draft\_dvk.doc



Consulting Professionals of New York, PLLC

70 Niagara Square, Suite 410, Buffalo, New York 14202  
Tel 716.362.1116 • Fax 716.362.1166  
american@acp-ny.com • www.acp-ny.com

February 19, 2007

Summer Sky Cohen  
Keweenaw Bay Indian Community  
16429 Beartown Road  
Baraga, Michigan 49908

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Cohen:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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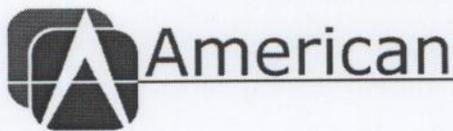
We welcome the opportunity to meet with you to discuss the project in greater detail. Should you have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter. If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

Donald V. Kolb  
Urban Planner/GIS Specialist  
American Consulting Professionals of New York, PLLC

Enclosure: Project Location Map

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american@acp-ny.com • www.acp-ny.com

February 19, 2007

Ms. Laura Spurr, Chairperson  
Huron Potawatomi, Inc.  
2221 - 1 1/2 Mile Rd  
Fulton, Michigan 49052

**Re: Ambassador Bridge Enhancement Project**

Dear Ms. Spurr:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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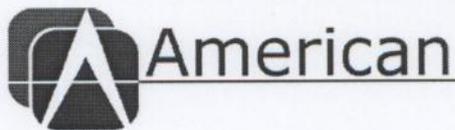
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February 19, 2007

Mr. Kenneth Meshiguad, Chairperson  
Hannahville Indian Community Council  
N14911 Hannahville B1 Rd.  
Wilson, Michigan 49896-9728

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Meshiguad:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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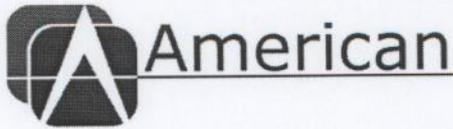
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February 19, 2007

Ronald Yob, Chairperson  
Grand River Bands of Ottawa Indians  
1251 Plainfield, N.E., Suite B  
Grand Rapids, Michigan 49501

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Yob:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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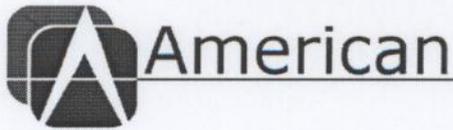
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February 19, 2007

Winnay Wemigwase  
Little Traverse Bay Band of Odawa  
7500 Odawa Circle  
Harbor Springs, Michigan 49740

**Re: Ambassador Bridge Enhancement Project**

Dear Ms. Wemigwase:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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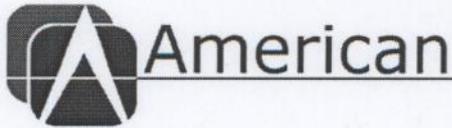
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February 19, 2007

Dan Shepard  
Little River Band of Ottawa, Planning Department  
375 River Street  
Manistee, Michigan 49660

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Shepard:

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The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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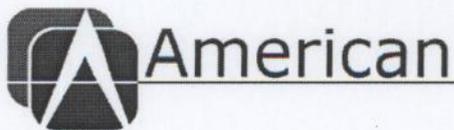
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February 19, 2007

D.K. Sprague, Tribal Chairman  
Match-E-Be-Nash-She-Wish Band of Potawatomi Indians, Gun Lake Tribe  
P.O. Box 218  
Dorr, Michigan 49323

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Sprague:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

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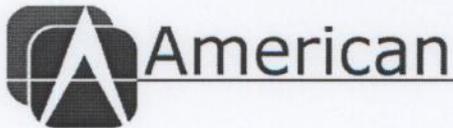
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February 19, 2007

Gerald F. Parish, Superintendent  
Michigan Agency  
2901.5 I-75 Business Spur  
Sault Ste. Marie, Michigan 49783

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Parish:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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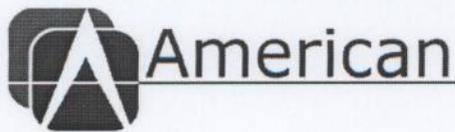
We welcome the opportunity to meet with you to discuss the project in greater detail. Should your agency have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter. If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

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February 19, 2007

Mr. Charles Todd, Chief  
Ottawa Tribe of Oklahoma  
811 Third Avenue NE, P.O. Box 110  
Miami, Oklahoma 74355

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Todd:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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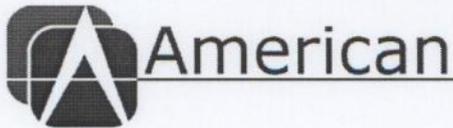
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February 19, 2007

Mr. Tom Topash  
Pokagon Band of Potawatomi  
58620 Sink Rd, P.O. Box 180  
Dowagiac, Michigan 49047

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Topash:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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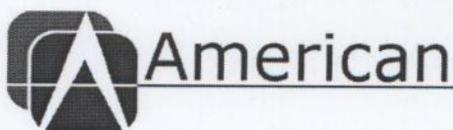
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February 19, 2007

William Johnson  
Saginaw Chippewa Indian Tribe of Michigan  
6650 E. Broadway Road  
Mt. Pleasant, Michigan 48858

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Johnson:

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The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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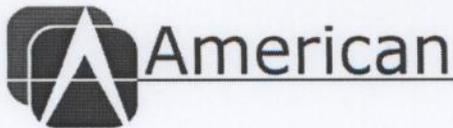
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February 19, 2007

Cecil E. Pavlat Sr.  
Sault Ste. Marie Tribe of Chippewa  
523 Ashmun Street  
Sault Ste. Marie, Michigan 49783

**Re: Ambassador Bridge Enhancement Project**

Dear Ms. Pavlat Sr.:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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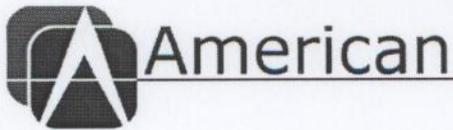
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February 19, 2007

Ms. Wanda Perron, History Department  
Bay Mills Indian Community  
12099 W. Lakeshore Drive  
Brimley, Michigan 49715

**Re: Ambassador Bridge Enhancement Project**

Dear Ms. Perron:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

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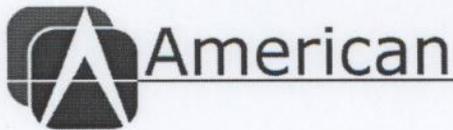
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February 19, 2007

Mr. Curtis Chambers, Tribal Chair  
Burt Lake Band of Ottawa and Chippewa Indians  
6461 Brutus Rd  
Brutus, Michigan 49716

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Chambers:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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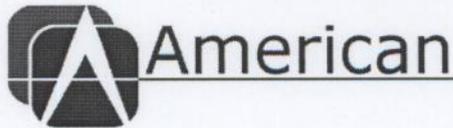
We welcome the opportunity to meet with you to discuss the project in greater detail. Should your committee have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter. If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

Donald V. Kolb  
Urban Planner/GIS Specialist  
American Consulting Professionals of New York, PLLC

Enclosure: Project Location Map

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Consulting Professionals of New York, PLLC

70 Niagara Square, Suite 410, Buffalo, New York 14202  
Tel 716.362.1116 • Fax 716.362.1166  
american@acp-ny.com • www.acp-ny.com

February 19, 2007

Mr. Giiwegiizhigookway  
Lac Vieux Desert Band of Lake Superior Chippewa Indians  
P.O. Box 249  
Watersmeet, Michigan 49969

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Giiwegiizhigookway:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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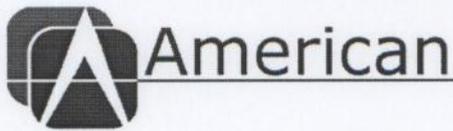
We welcome the opportunity to meet with you to discuss the project in greater detail. Should you have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter. If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

Donald V. Kolb  
Urban Planner/GIS Specialist  
American Consulting Professionals of New York, PLLC

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February 19, 2007

Harold G. Frank, Chairperson  
Forest County Potawatomi Community of Wisconsin  
P.O. Box 340  
Crandon, Wisconsin 54520

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Frank:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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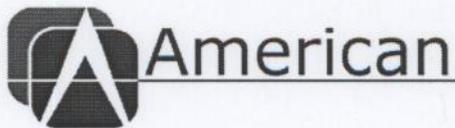
We welcome the opportunity to meet with you to discuss the project in greater detail. Should your committee have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter. If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

Donald V. Kolb  
Urban Planner/GIS Specialist  
American Consulting Professionals of New York, PLLC

Enclosure: Project Location Map

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February 19, 2007

Ms. Clarice M. Werle, NAGPRA Contact  
Forest County Potawatomi Community of Wisconsin  
P.O. Box 340  
Crandon, Wisconsin 54520

**Re: Ambassador Bridge Enhancement Project**

Dear Ms. Werle:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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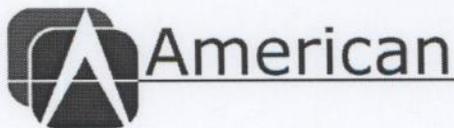
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Sincerely,

Donald V. Kolb  
Urban Planner/GIS Specialist  
American Consulting Professionals of New York, PLLC

Enclosure: Project Location Map

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February 19, 2007

Robert Kewaygoshkum  
Grand Traverse Band of Ottawa and Chippewa Indians  
2605 NW Bayshore Drive  
Peshawbetown, Michigan 49682

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Kewaygoshkum:

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites.

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

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We welcome the opportunity to meet with you to discuss the project in greater detail. Should you have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter. If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

Donald V. Kolb  
Urban Planner/GIS Specialist  
American Consulting Professionals of New York, PLLC

Enclosure: Project Location Map

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*Little Traverse Bay Bands of Odawa Indians  
Archives, Records and Cultural Preservation Department  
7500 Odawa Circle, Harbor Springs, Michigan 49740  
(231) 242-1450 phone (231) 242-1455 fax*

February 22, 2007

Mr. Donald Kolb, Urban Planner/GIS Specialist  
American Consulting Professionals of New York, PLLC  
70 Niagara Square, Suite 410  
Buffalo, New York 14202

Re: Ambassador Bridge Enhancement Project.

Dear Mr. Kolb:

At this time, we do not have any information concerning the presence of any Indian Traditional Cultural Properties, Sacred Sites, or Other Significant Properties in the designated area of the proposed construction site in Detroit, Michigan. This is not to say that such a site does not exist, just this office does not have any available information indicating that a site is present using our current documentation of the area.

However, this office would be more than willing to assist, if in the future or during construction, there is an inadvertent discovery of Native American human remains or burial objects. I have enclosed a Site Reference Form that our office uses in the event of a discovery in order to speed the process. Please contact me if you have any further questions or requests. I can be reached at (231) 242-1453.

We thank you for including our tribe in your plans.

Miigwetch (thank you)

*Winnay Wemigwase*  
Winnay Wemigwase  
Director  
Archives/Records and Cultural Preservation  
Little Traverse Bay Band of Odawa Indians

# Site Reference Form



Date of Discovery: \_\_\_\_\_ Today's Date: \_\_\_\_\_

Owner/Site Representative: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Location: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

## Site Information:

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Location and Circumstance of Discovery: \_\_\_\_\_ Time of Discovery: \_\_\_\_\_ am/pm

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## Contacts Made:

Law Enforcement Department: \_\_\_\_\_

Investigating Officer: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Date of police report: \_\_\_\_\_ Time on report: \_\_\_\_\_ am/pm

Other contacts (w/phone #): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Native American Burial (please circle) yes \_\_\_\_\_ no \_\_\_\_\_

Confirmed by: \_\_\_\_\_ Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Release Status: \_\_\_\_\_

## Little Traverse Bay Bands of Odawa Indians Tribal NAGPRA Contacts:

Leonard J. Mitchell

Cultural Preservation Coordinator

(231) 242-1451ph / jmitchell@ltbbodawa.org

Winnay Wemigwase

Director, Archives/Records & Cultural Preservation

(231) 242-1453ph/ wwemigwase@ltbbodawa.org

7500 Odawa Circle, Harbor Springs, Michigan 49740



# United States Department of the Interior

## BUREAU OF INDIAN AFFAIRS

Michigan Agency

2901.5 I-75 Business Spur

Sault Ste. Marie, Michigan 49783-3519

(906) 632-6809 Phone (906) 632-0689 Fax

877-659-5028 TOLL FREE

IN REPLY REFER TO:

Administration

February 23, 2007

Donald V. Kolb  
Urban Planner/GIS Specialist  
American Consulting Professionals of New York, PLLC  
70 Niagara Square, Suite 410  
Buffalo, New York 14202

Dear Mr. Kolb:

We are unable to conduct a review of the Ambassador Bridge Enhancement Project for potential impacts to known native religious sites because we have no records which pertain to the area. Our responsibility is only for lands which are held in trust for the twelve federally recognized tribes in the Michigan service area. As such, our land records are restricted to those lands. There are no trust lands within the project site.

Unless the State Historical Preservation Office is able to respond, your only course of action may be to proceed subject to the possible discovery of artifacts or other archeologically significant remains that may be discovered.

Thank you for your cooperation in notifying us of your intent.

Sincerely,

Gerald F. Parish  
Superintendent

TAKE PRIDE  
IN AMERICA 



## ZIIBIWING CENTER

of Anishinabe Culture & Lifeways

THE SAGINAW CHIPPEWA INDIAN TRIBE  
6650 E. Broadway • Mt. Pleasant, Michigan 48858

March 7, 2007

Donald V. Kolb, Urban Planner/GIS Specialist  
American Consulting Professionals of New York, PLLC  
70 Niagra Square, Suite 410  
Buffalo, New York 14202

RE: Ambassador Bridge Enhancement Project

Dear Donald V. Kolb,

This letter is in response to the above referenced project(s).

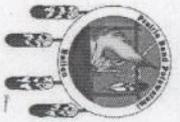
At this time we do not have any information concerning the presence of any Indian Traditional Cultural Properties, Sacred Sites, or other Significant Properties to the projected project area(s). This is not to say that such a site may not exist, just that this office does not have any available information of the area(s) at this time.

This office would be willing to assist if in the future or during the construction there is a discovery of Native American human remains or burial objects. Feel free to call my office if you have any questions or requests at 989-775-4730.

Thank you for including this Tribe in your plans.

Sincerely,

William Johnson  
Curator/Historic Preservation Contact



Prairie Band Potawatomi Nation  
Government Center

AUG 20 2007

August 13, 2007

Attn: Anna Peterfreund  
Consulting Professionals of New York, PLLC  
70 Niagara Square, Suite 410  
Buffalo, NY 14202

Dear Ms. Peterfreund:

I am writing to inform you that I am in receipt of your recent National Historic Preservation Act (NHPA), Section 106 and Section 110 correspondence.

After reviewing the contents of your recent mailing we would like to inform that we have no objections to the following project(s):

**Project(s): Ambassador Bridge Enhancement**

At this time we are unaware of any historical cultural resources in the proposed development area. However, we do request to be immediately contacted if any inadvertent discoveries are uncovered at anytime throughout the various phases of the project.

Please feel free to call me at (785) 966-4007 or additional information can be faxed to (785) 966-4009. We look forward to working with you.

Respectfully,

FOR  
Rey Kitchukanne  
Acting Tribal Chair  
NAGPRA Representative  
Prairie Band Potawatomi Nation

RK/ssh



Prairie Band Potawatomi Nation  
 Office of the Tribal Chair  
 NACPRA Representative  
 16281 Q Road  
 Mayetta, KS 66509

AUG 20 2007



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Attn: Anna Peterfreund  
 Consulting Professionals of New York, PLLC  
 70 Niagara Square, Suite 410  
 Buffalo, NY 14202

14202+3323-70 C030





STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

JENNIFER GRANHOLM  
GOVERNOR

DR. WILLIAM ANDERSON  
DIRECTOR

March 26, 2007

ROBERT W BLOOM JR  
U S COAST GUARD  
1240 EAST NINTH STREET ROOM 2019  
CLEVELAND OH 44199-2060

Rec'd  
obr  
3 April 2007

RE: ER05-422 Ambassador Bridge Enhancement Project, Section 4, T2S, R11E, Detroit,  
Wayne County (USCG)

Dear Mr. Bloom:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the above-cited undertaking at the location noted above. Based on the information provided for our review, it is the opinion of the State Historic Preservation Officer (SHPO) that the proposed undertaking will have an **adverse effect** on the Ambassador Bridge, which was determined eligible for the National Register of Historic Places by the Keeper of the National Register on June 6, 1986.

Spanning the Detroit River, connecting Detroit, Michigan with Windsor, Canada, the Ambassador Bridge is significant as the busiest international commercial crossing in North America. At the time of its completion in November of 1929, the Ambassador Bridge was the longest suspension bridge in the world. Its unique towers featuring distinctive diagonal cross-members and the name of the bridge mounted on top have become a visual landmark in the Detroit skyline.

This undertaking meets the criteria of adverse effect because: *the undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association [36 CFR § 800.5(a)(1)]* Specifically, the undertaking will result in:

- The introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features. Specifically, with its size and scale and its location immediately adjacent to the existing structure, the proposed new bridge will become an overwhelming visual distraction, diminishing the integrity of the historic bridge.

In addition, the State Archaeologist, Dr. John Halsey, notes that archaeological resources may be affected at the project site; therefore, an archaeological survey should be conducted and submitted to this office so that we may complete our review, prior to any site clearance or construction activity.

**Archaeological Concerns:**

The specific area of concern for potential effect to archaeological resources is the proposed location of piers 2, 3, and 4, in the area between Fort Street and Jefferson Avenue. A report entitled *An Archaeological Evaluation of the West Riverfront Study Area*, prepared in 1984 by C. Stephen Demeter of Commonwealth Associates Inc., contains information about this location. Demeter states that this area

was part of Private Claim 20, which was granted to Robert Navarre by the Potawatomi on May 26<sup>th</sup>, 1771. At that time, the Potawatomi asked that Navarre look after their dead. Years later, burials were exposed by grading operations south and west of the project area, near the intersection of Jefferson Avenue and 24<sup>th</sup> Street. In 1779, a man named Brevoort was identified as the head of household on a parcel of land that comprised a portion of the original Navarre tract. Members of the Brevoort family continued to own and occupy property in this vicinity through most of the 19<sup>th</sup> century. On pp. 68-69 of the report, at the end of his discussion of Private Claim 20, Demeter states that, "As it presently stands, this property (the Brevoort farm) represents one of the more critical farm frontages of the old Detroit settlement, and should be considered as requiring more detailed investigation for the grounds lying between Fort Street and the original riverbank in the event of future development."

The information in Demeter's report raises the possibility that archaeological remains relating to 18<sup>th</sup> and 19<sup>th</sup> century settlement in Detroit could be present in the project area. Since this is an urban environment, we are aware of the possibility that development and construction may have disturbed or destroyed any archaeological deposits. However, it has been our experience that it is not uncommon for archaeological deposits to survive in urban settings, especially in areas where an original ground surface has been covered by fill. It is a distinct possibility that there may be archaeological deposits relating to early Euro-American settlement – or Native American occupation – buried beneath fill material in the vicinity of the proposed pier locations.

Based on aerial photos, it appears that part or all of the proposed location of piers 2, 3, and 4 is paved. Given this situation, plus the likely presence of fill deposits, archaeological investigation of the project area will probably require mechanized testing to determine the depth of fill, and ascertain whether any intact archaeological deposits exist beneath the fill. Appropriate field methodology to successfully test the area can be discussed with an archaeological consultant. Enclosed, for your convenience, is a list of archaeologists who have been found to meet or exceed the professional requirements for archaeologists.

### **Compliance Process:**

The finding of adverse effect will prompt the U. S. Coast Guard, hereinafter referred to as "Agency", to consult further to resolve the adverse effect pursuant to 36 CFR § 800.6 by proceeding with the following steps:

- (1) Per 36 CFR § 800.6(a), the Agency shall continue consultation with the SHPO and other consulting parties to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties. The Agency shall submit a case study outlining these efforts for review by the SHPO.
- (2) In accordance with 36 CFR § 800.6(a)(4), the Agency shall make information regarding this finding available to the public, providing the public with an opportunity to express their views on resolving adverse effects of the undertaking. Pursuant to 36 CFR § 800.11(e), copies or summaries of any views provided by consulting parties and the public shall be made available to the SHPO as part of the case study outlined in (1).
- (3) The Agency shall immediately notify the Advisory Council on Historic Preservation (Advisory Council), Old Post Office Building, 1100 Pennsylvania Avenue, NW, Suite 809, Washington, D.C.

20004, of the adverse effect finding per 36 CFR § 800.6 (a)(1). The notification to the Advisory Council should be similar to the project information submitted to this office and should include the following documentation as outlined in 36 CFR § 800.11(e).

- A description of the undertaking, specifying the federal involvement, and its area of potential effects, including photographs, maps and drawings, as necessary.
- A description of the steps taken to identify historic properties.
- A description of the affected historic properties, including information on the characteristics that qualify them for inclusion in the National Register of Historic Places.
- A description of the undertaking's effects on historic properties.
- An explanation of why the criteria of adverse effect were found applicable or inapplicable, including any conditions or future actions to avoid, minimize or mitigate adverse effects.
- Copies or summaries of any views provided by consulting parties and the public.

(4) The Agency shall invite the Advisory Council to participate in consultation if the undertaking will affect a National Historic Landmark, if a Programmatic Agreement will be developed as a result of the finding of adverse effect, or if the Agency wants the Advisory Council to participate in consultation. The Advisory Council will advise of its decision to participate in consultation within fifteen (15) days of receipt of this notification or other request. If the Advisory Council chooses not to participate in consultation, the Agency shall resolve the adverse effect without Advisory Council participation and pursuant to 36 CFR § 800.6(b)(1).

(5) If the Agency, the SHPO and, if applicable, the Advisory Council agree on how the adverse effects will be resolved, they shall execute a Memorandum of Agreement (MOA) pursuant to 36 CFR § 800.6(c).

(6) If the Agency and the SHPO fail to agree on the terms of the MOA, the Agency shall request the Advisory Council to join the consultation. If the Advisory Council decides to join the consultation, the Agency shall proceed in accordance with 36 CFR § 800.6(b)(2). If the Advisory Council decides not to join the consultation, the Advisory Council will notify the Agency and proceed to comment in accordance with 36 CFR § 800.7.

The views of the public are essential to informed decision making in the Section 106 process. Federal Agency Officials or their delegated authorities must plan to involve the public in a manner that reflects the nature and complexity of the undertaking, its effects on historic properties and other provisions per 36 CFR § 800.2(d). We remind you that Federal Agency Officials or their delegated authorities are required to consult with the appropriate Indian tribe and/or Tribal Historic Preservation Officer (THPO) when the undertaking may occur on or affect any historic properties on tribal lands. **In all cases**, whether the project occurs on tribal lands or not, Federal Agency Officials or their delegated authorities are also required to make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties per 36 CFR § 800.2(c).

Please note that the Section 106 process will not conclude according to 36 CFR § 800.6 "Resolution of Adverse Effects" until the consultation process is complete, an MOA is developed, executed and implemented, and, if applicable, the formal comments of the Advisory Council have been received.

The State Historic Preservation Office is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

If you have any questions, please contact Martha MacFarlane Faes, Environmental Review Coordinator, at (517) 335-2720 or by email at ER@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,



Brian D. Conway  
State Historic Preservation Officer

BDC:DLA:ROC:mmf

Enclosure

copy: Advisory Council on Historic Preservation  
Lis Knibbe, Quinn Evans Architects

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander (dpb)  
Ninth Coast Guard District  
1240 E. Ninth Street, Room 2019  
Cleveland, OH 44199-2060

Phone: (216) 902-6085  
FAX: (216) 902-6088

16590  
B-043/sms  
May 2, 2007

Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 809  
Washington, D.C. 20004

Dear Mr. Sir or Madam,

In accordance with 36 CFR 800.6(a)(1), I am writing to advise you of an adverse effect determination made by the Michigan State Historic Preservation Officer (MI-SHPO) for the proposed Ambassador Bridge Enhancement Project in Detroit, Michigan. A copy of the March 26, 2007, MI-SHPO letter is enclosed. The U.S. Coast Guard is the federal agency of record for this proposed project.

A subsequent phone conference was conducted on April 16, 2007 among the applicant, U.S. Coast Guard, and MI-SHPO. The phone conference resulted in MI-SHPO requesting additional information from the applicant regarding the purpose of the project and possible alternatives. The MI-SHPO has requested this information, along with additional archeological studies, to complete their review of the project. The applicant will perform the additional studies and supply the requested data. Additionally, a public workshop has been scheduled for May 24, 2007 to expand public involvement in the process. An announcement has been published in the Detroit Free Press and Detroit News regarding this workshop.

The applicant has also released a Draft Environmental Assessment (EA) for the project, including a description of the project and efforts taken so far to address historical and cultural impacts. The portions of the EA that describe these efforts are enclosed. The Coast Guard has also issued a press release to the same Detroit newspapers announcing the adverse effect determination made by SHPO, and to request additional comments from the public.

The Coast Guard will continue coordination and consultation with the applicant and MI-SHPO to satisfy the requirements of Section 106 of the National Historic Preservation Act.

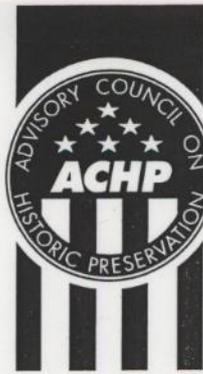
Please contact me at (216) 902-6085 if you have any questions or require additional information. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Robert W. Bloom, Jr." with a stylized flourish at the end.

ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

Copy: Detroit Ambassador Bridge Company, Detroit, Michigan  
Michigan State Historical Preservation Officer, Lansing, Michigan



Preserving America's Heritage

May 22, 2007

Mr. Robert W. Bloom, Jr.  
Chief, Bridge Branch  
Ninth Coast Guard District  
U.S. Coast Guard  
1240 East Ninth Street, Room 2019  
Cleveland, OH 44199-2060

REF: *Proposed Ambassador Bridge Enhancement Project*  
*Detroit, Wayne County, Michigan*

Dear Mr. Bloom:

On May 7, 2007, the Advisory Council on Historic Preservation (ACHP) received notification of the U.S. Coast Guard's (Coast Guard) determination that the referenced undertaking may adversely affect the Ambassador Bridge, a property determined eligible for listing in the National Register of Historic Places by the Keeper of the National Register, as well as other historic properties. In accordance with 36 CFR §800.6(a)(1) of the ACHP's regulations, "Protection of Historic Properties," the ACHP has concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of the regulations apply to this undertaking. The ACHP, therefore, will participate in this consultation. We have provided notice of our decision (enclosed) to the Secretary of Homeland Security as required by 36 CFR §800.6(a)(1)(iii).

As we prepare to participate in the Section 106 consultation for this undertaking, we would appreciate receiving additional information regarding planning activities for the proposal to date, including the following:

1. What is the Coast Guard permit program that is responsible for issuance of the permit for the project?
2. What is the Area of Potential Effect (APE) for the proposed undertaking?
3. What is the status of the archaeological survey requested by the Michigan State Historic Preservation Officer (SHPO) in his letter of March 26, 2007?
4. What consulting parties has the Coast Guard identified for purposes of Section 106?
5. What alternatives has the Coast Guard considered in consultation with the Michigan SHPO to avoid the adverse effect of the project as proposed?

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 809 • Washington, DC 20004  
Phone: 202-606-8503 • Fax: 202-606-8647 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)

We look forward to consulting with the Coast Guard, the Michigan SHPO, and others, including the interested public, to resolve potential adverse effects of this undertaking. If you have any questions or wish to discuss this matter further, please contact Martha Catlin at (202) 606-8529, or via e-mail at [mcatlin@achp.gov](mailto:mcatlin@achp.gov).

Sincerely,

A handwritten signature in black ink that reads "Charlene Dwin Vaughn". The signature is written in a cursive style with a long horizontal flourish at the end.

Charlene Dwin Vaughn, AICP  
Assistant Director  
Office of Federal Agency Programs  
Federal Permitting, Licensing, and Assistance Section

Enclosure

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander (dpb)  
Ninth Coast Guard District  
1240 E. Ninth Street, Room 2019  
Cleveland, OH 44199-2060

Phone: (216) 902-6085  
FAX: (216) 902-6088

16590  
B-060/sms  
June 26, 2007

Charlene Dwin Vaughn, AICP  
Assistant Director – Office of Federal Agency Programs  
Federal Permitting, Licensing, and Assistance Section  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue, NW, Suite 809  
Washington, D.C. 20004

**Re: Proposed Ambassador Bridge Enhancement Project – Detroit, Wayne County, Michigan**

Dear Ms. Vaughn,

I am responding to your letter of May, 22, 2007 regarding the referenced project and your decision to participate in this consultation with U.S. Coast Guard (USCG), Michigan State Historic Preservation Officer (MI-SHPO), and the Detroit International Bridge Company (DIBC).

Since the date of your letter, additional communications have occurred between David Coburn, representing DIBC, and Martha Catlin of your office to provide additional information on the project. This office has been compiling the additional information that you have requested. Responses to your specific questions are outlined below:

**1. What is the Coast Guard permit program that is responsible for issuance of the permit for the project?**

The Coast Guard Bridge Administration Program is responsible for the issuance of Bridge Permits for construction, reconstruction, or alteration of bridges across navigable waters of the United States. The laws relating generally to the protection, preservation and safety of the Nation's navigable waterways are found in Section 9 of the Act of March 3, 1899, as amended, 33 U.S.C. 401; the Act of March 23, 1906, as amended, 33 U.S.C. 491; the Act of June 21, 1940, as amended (Truman-Hobbs Act) 33 U.S.C. 511-523; the General Bridge Act of 1946, as amended, 33 U.S.C. 525; and the International Bridge Act of 1972, 33 U.S.C. 535. The Code of Federal Regulations for Bridge Administration and permit processing are found in 33 CFR 114-118.

**2. What is the Area of Potential Effect (APE) for the proposed undertaking?**

The APE is the same as the area illustrated in Graphic 11 of the package that was included in our May 2, 2007 letter. This graphic is included as enclosure (1) of this letter.

**3. What is the status of the archaeological survey requested by the Michigan State Historic Preservation Officer (SHPO) in his letter of March 26, 2007?**

The Phase I archaeological survey requested by MI-SHPO is still being organized, and has been tentatively scheduled to be completed before July 13, 2007. Once that survey has been completed we will schedule further meetings with MI-SHPO and ACHP to continue coordination. DIBC has indicated that there is an opportunity to shift the proposed location of the bridge piers in the event that any historical

**Re: Proposed Ambassador Bridge Enhancement Project – Detroit, Wayne County, Michigan**

resources are found during the survey. However, the location of the new span relative to the old span, however, is not a matter to which there are any prudent and feasible alternatives to the project as presented by DIBC.

**4. What consulting parties has the Coast Guard identified for purposes of Section 106?**

There are several community groups in the area that have expressed interest in this project, including the Southwest Detroit Business Association, the Mexicantown Business Association, and the Bagley Housing group. To date, DIBC has made an effort to contact these groups and others, and has enlisted the help of MI-SHPO to identify consulting parties and include them in the process.

DIBC sent nineteen letters to Native American groups requesting review of potential impacts and comments related to the proposed project. DIBC has received two direct responses to these letters from Native American groups, both stating that they have no information concerning the presence of properties in the project area. The Bureau of Indian Affairs Michigan Agency also responded stating they have no trust lands within the project area. Copies of this correspondence are included in the Draft EA with no additional correspondence since the Draft EA was issued. The SHPO adverse effect letter specifically listed concern for potential effect to archaeological resources between Fort Street and the riverbank in the vicinity of a known area of former Potawatomi presence. Although this Native American group has been contacted by correspondence, they have not provided a response to the letters. Potawatomi groups will be directly contacted again for possible comments.

The MI-SHPO, subsequent to their March 26, 2007 letter, requested additional information from the applicant regarding project alternatives. This information has been provided to MI-SHPO, a consulting party in this undertaking, by DIBC.

On May 24, 2007 a public meeting was conducted at a local elementary school to solicit comments in regards to Section 106 issues and to provide the opportunity for member of the local community to comment on design options for the new bridge. Attendees were presented with a number of artist's renderings for bridge design considerations and asked to submit their preferences. The meeting was attended by approximately twenty-five members of the general public. Eighteen submissions were received with individual preferences for tower configuration, texture and color, railings and roadway lighting, and overall bridge lighting.

A copy of the announcement for the meeting, and one sample of the design options presented, are included as enclosures (2) and (3) to this letter. These options continue to be posted on the DIBC website at [www.ambassadorbridge.com](http://www.ambassadorbridge.com) with opportunity for additional public input.

**5. What alternatives have the Coast Guard considered in consultation with Michigan SHPO to avoid the adverse effect of the project as proposed?**

As of this date, DIBC has indicated that they are prepared to discuss design alternatives with MI-SHPO to minimize or mitigate any adverse effects of the project. However, a date for those discussions has not been identified. It is our intention to propose a meeting with MI-SHPO in the last half of July 2007, after the archaeological survey has been completed.

The Coast Guard will continue coordination and consultation with the applicant, MI-SHPO, and your office to satisfy the requirements of Section 106 of the National Historic Preservation Act. We will contact your office when the next meeting with MI-SHPO is scheduled.

**Re: Proposed Ambassador Bridge Enhancement Project – Detroit, Wayne County, Michigan**

Please contact me at (216) 902-6085 if you have any questions or require additional information. Thank you.

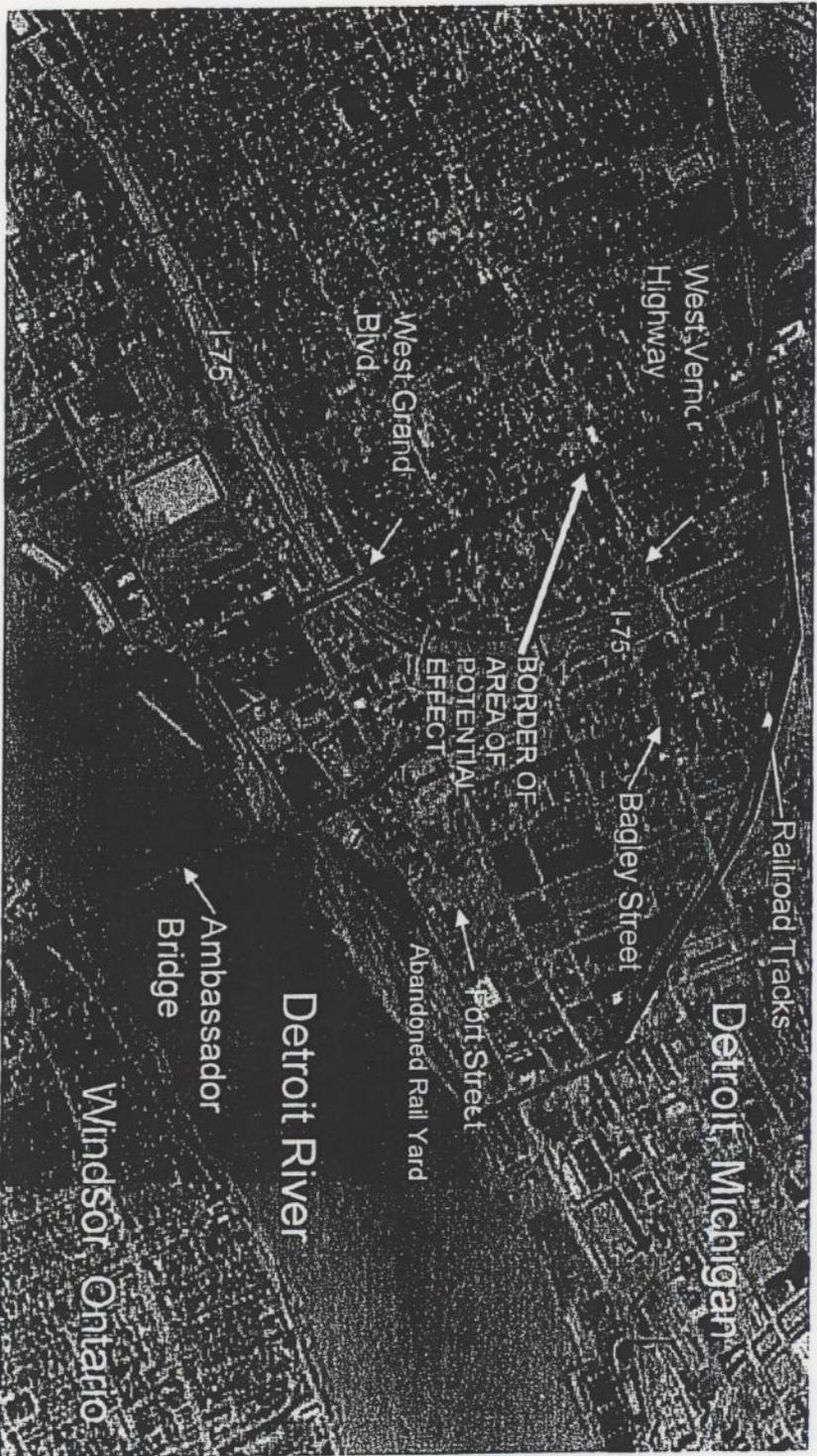
Sincerely,

A handwritten signature in black ink, appearing to read "R. W. Bloom, Jr.", followed by a horizontal line and the word "for" written in a cursive style.

ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

Copy: Detroit Ambassador Bridge Company, Detroit, Michigan  
Michigan State Historical Preservation Officer, Lansing, Michigan

# Attachment IIIb – Graphic 11 Location and Area of Potential Effect



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**Classifieds** 1-1 of 1 Classified

The Ambassador Bridge Enhancement Project Public Workshop Notice TAKE NOTICE that the Detroit International Bridge Company (DIBC) will hold a Public Workshop on Thursday, May 24th, 2007, at 6:30 p.m. at Earhart Middle School located at 1000 Scotten Street, Detroit, Michigan 48209. The workshop will be an open design charrette to solicit public input on alternative project designs. The U.S. Coast Guard is serving as the lead agency for the Environmental Assessment review process. At this workshop, information will be provided and comments will be received on alternative designs within the Proposed Ambassador Bridge Enhancement Project. In part, comments will be received to provide public input as part of the Section 106 consultation process currently taking place. The Section 106 process is being conducted by the Michigan State Historic Preservation Office. PROJECT BACKGROUND: DIBC is proposing to construct a 6-lane cable stayed bridge over the Detroit River, just west of the existing Ambassador Bridge. The new bridge will connect directly into the existing plazas in both Detroit and Windsor. The new structure will be 102.5 feet wide and 6,200 feet long, with approximately 2,200 feet traversing the Detroit River. Supporting structures (piers and towers) will be not placed in the Detroit River or its floodplain. The bridge will be a minimum of 152 feet above the ordinary high water mark, to meet the minimum navigational clearance requirements for deep draft vessels. No dredge or fill activities are proposed in the river with this project. Once the new structure is completed, the existing Ambassador Bridge will be taken out of service in order to evaluate and make repairs deemed necessary and economically feasible. The project is located in T2S, R11E, Section 4, City of Detroit, Wayne County, Michigan. Additional Information is available at the following locations: DIBC - Detroit Office 2000 Howard Street Detroit, Michigan 48226 (313) 965-1184 DIBC - Warren Office 12225 Stephens Warren, Michigan 48089 (586) 939-7000 DIBC Website www.ambassadorbridge.com

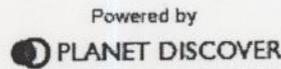
Categories: General Classified

**1-1 of 1 Classified**

**Advance**

Keywords:

Category:



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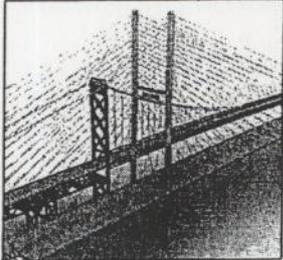
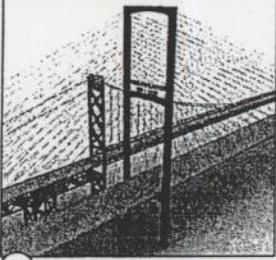
USA Today USA Weekend Gannett Co. Inc. Gannett Foundation

ENCLOSURE 121

# THE AMBASSADOR BRIDGE ENHANCEMENT PROJECT

# DESIGN CHARRETTE

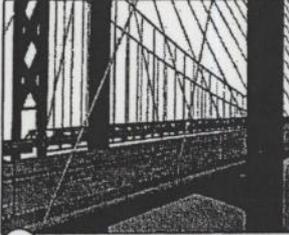
**Options For Tower Configuration Concepts** (please select your preferred tower option)

			
<input checked="" type="radio"/> Dual Columns	<input type="radio"/> Center Pylon	<input type="radio"/> Rectangle	<input type="radio"/> Diamond

IN YOUR OPINION, RATE THE IMPORTANCE OF THE TOWER CONFIGURATION:

1	2	3	4	5	6	7	8	9	10
LEAST			MODERATE				MOST		

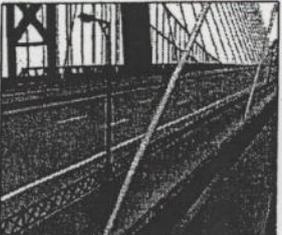
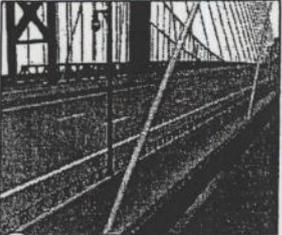
**Options for Tower Texture and Color** (please select your preferred tower texture and color option)

			
<input checked="" type="radio"/> Concrete	<input type="radio"/> Pattern	<input type="radio"/> Ornate	<input type="radio"/> Smooth

IN YOUR OPINION, RATE THE IMPORTANCE OF THE TEXTURE AND COLOR:

1	2	3	4	5	6	7	8	9	10
LEAST			MODERATE				MOST		

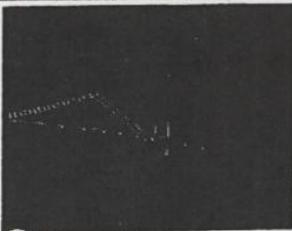
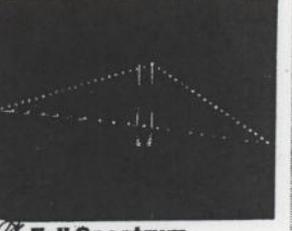
**Options For Railings and Roadway Lighting** (please select your preferred railings and roadway lighting option)

			
<input type="radio"/> Conventional	<input type="radio"/> Traditional	<input type="radio"/> Gothic	<input checked="" type="radio"/> Art Deco

IN YOUR OPINION, RATE THE IMPORTANCE OF THE RAILINGS AND LIGHTING:

1	2	3	4	5	6	7	8	9	10
LEAST			MODERATE				MOST		

**Options For Overall Bridge Lighting** (please select your preferred bridge lighting option)

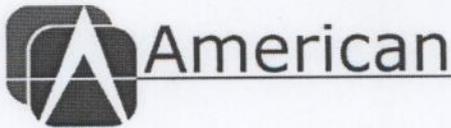
			
<input type="radio"/> Tower Lighting	<input checked="" type="radio"/> Cable Lighting	<input type="radio"/> String of Pearls	<input checked="" type="radio"/> Full Spectrum

IN YOUR OPINION, RATE THE IMPORTANCE OF THE OVERALL LIGHTING:

1	2	3	4	5	6	7	8	9	10
LEAST			MODERATE				MOST		

ADDITIONAL COMMENTS:

PEWABIC TILES  
 Can the cable lighting be configured to slowly rotate or move across the bridge? (w/it be animated?)



Consulting Professionals of New York, PLLC

70 Niagara Square, Suite 410, Buffalo, New York 14202

Tel 716.362.1116 • Fax 716.362.1166

american@acp-ny.com • www.acp-ny.com

June 28, 2007

Mr. Tom Topash  
Pokagon Band of Potawatomi  
58620 Sink Rd, P.O. Box 180  
Dowagiac, Michigan 49047

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Topash:

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites. We initially sent you a letter regarding the project in February of 2007. Since we have not yet heard back from you, we wanted to contact you a second time to make sure you did not have any concerns over the project. If you feel it necessary, we would welcome the opportunity to meet with you to discuss the project in greater detail. Should your committee have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter.

If at any time during the course of this project artifacts or other archeologically significant remains are discovered, work will be stopped immediately. You as well as the appropriate representative of SHPO, Mr. Brian D. Conway, will be notified to provide direction as to how to proceed. In the case that human remains are discovered, the police will also be contacted.

If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

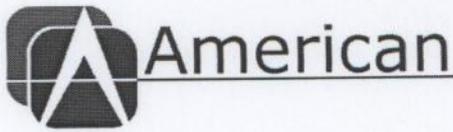
A handwritten signature in cursive script that reads 'Anna Peterfreund'.

Anna Peterfreund  
Environmental Scientist

Enclosure: Project Location Map

cc: USCG, File, Dan Stamper, Craig Stamper, Scott Korpi,

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Tel 716.362.1116 • Fax 716.362.1166  
american@acp-ny.com • www.acp-ny.com

June 28, 2007

Ms. Clarice M. Werle, NAGPRA Contact  
Forest County Potawatomi Community of Wisconsin  
P.O. Box 340  
Crandon, Wisconsin 54520

**Re: Ambassador Bridge Enhancement Project**

Dear Ms. Werle:

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites. We initially sent you a letter regarding the project in February of 2007. Since we have not yet heard back from you, we wanted to contact you a second time to make sure you did not have any concerns over the project. If you feel it necessary, we would welcome the opportunity to meet with you to discuss the project in greater detail. Should your committee have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter.

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If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

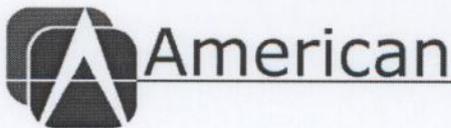
A handwritten signature in cursive script that reads 'Anna Peterfreund'.

Anna Peterfreund  
Environmental Scientist

Enclosure: Project Location Map

cc: USCG, File, Dan Stamper, Craig Stamper, Scott Korpi,

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american@acp-ny.com • www.acp-ny.com

June 28, 2007

Harold G. Frank, Chairperson  
Forest County Potawatomi Community of Wisconsin  
P.O. Box 340  
Crandon, Wisconsin 54520

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Frank:

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites. We initially sent you a letter regarding the project in February of 2007. Since we have not yet heard back from you, we wanted to contact you a second time to make sure you did not have any concerns over the project. If you feel it necessary, we would welcome the opportunity to meet with you to discuss the project in greater detail. Should your committee have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter.

If at any time during the course of this project artifacts or other archeologically significant remains are discovered, work will be stopped immediately. You as well as the appropriate representative of SHPO, Mr. Brian D. Conway, will be notified to provide direction as to how to proceed. In the case that human remains are discovered, the police will also be contacted.

If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

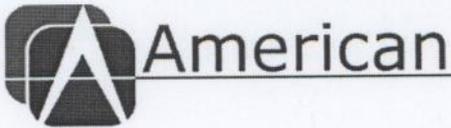
A handwritten signature in cursive script that reads 'Anna Peterfreund'.

Anna Peterfreund  
Environmental Scientist

Enclosure: Project Location Map

cc: USCG, File, Dan Stamper, Craig Stamper, Scott Korpi,

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Consulting Professionals of New York, PLLC

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Tel 716.362.1116 • Fax 716.362.1166  
american@acp-ny.com • www.acp-ny.com

June 28, 2007

D.K. Sprague, Tribal Chairman  
Match-E-Be-Nash-She-Wish Band of Potawatomi Indians, Gun Lake Tribe  
P.O. Box 218  
Dorr, Michigan 49323

**Re: Ambassador Bridge Enhancement Project**

Dear Mr. Sprague:

The Detroit International Bridge Company and Canadian Transit Company propose to construct and operate a new six-lane cable-stayed bridge across the Detroit River between the City of Detroit, Wayne County, Michigan, United States and the City of Windsor, Ontario, Canada. The proposed project, located in the same corridor as the Ambassador Bridge, would tie into the existing plazas without modification to their currently permitted configurations. The project site has been highlighted on the portion of the Detroit, Michigan USGS 7.5 Minute Quadrangle Sheet (enclosed) for your review.

This letter serves as a request for a review for potential impacts resulting from the above-referenced project on any known native religious sites. We initially sent you a letter regarding the project in February of 2007. Since we have not yet heard back from you, we wanted to contact you a second time to make sure you did not have any concerns over the project. If you feel it necessary, we would welcome the opportunity to meet with you to discuss the project in greater detail. Should your committee have any objection to the commencement of this project, please notify me within 30 days of the issuance of this letter.

If at any time during the course of this project artifacts or other archeologically significant remains are discovered, work will be stopped immediately. You as well as the appropriate representative of SHPO, Mr. Brian D. Conway, will be notified to provide direction as to how to proceed. In the case that human remains are discovered, the police will also be contacted.

If you have are interested in arranging a meeting or have further questions or comments, please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in cursive script that reads 'Anna Peterfreund'.

Anna Peterfreund  
Environmental Scientist

Enclosure: Project Location Map

cc: USCG, File, Dan Stamper, Craig Stamper, Scott Korpi,

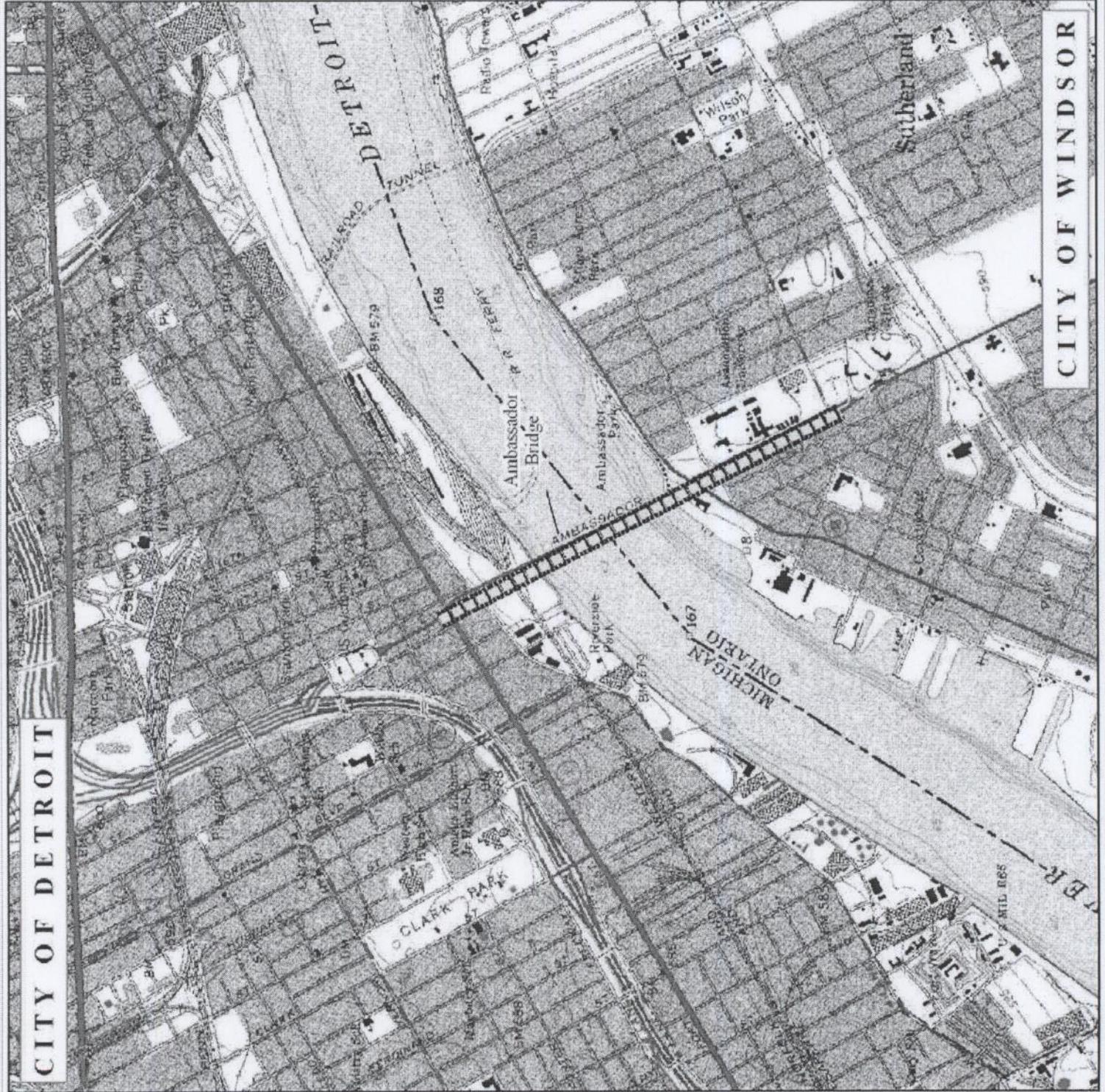
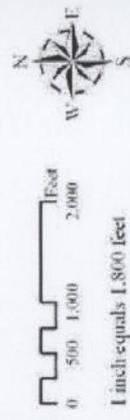
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# Project Location

## Legend

 Proposed Alignment

Source: USGS 7.5 Minute Quadrangle, 1981  
Detroit Michigan



LAW OFFICES OF  
**OLSON, BZDOK & HOWARD**  
A Professional Corporation

James M. Olson \*  
Christopher M. Bzdok  
Scott W. Howard  
Tracy J. "TJ" Andrews ‡  
Jeffrey L. Jocks  
Michael C. Grant  
William Rastetter, Of Counsel ◊

420 East Front Street  
Traverse City, MI 49686  
Telephone: (231) 946-0044  
Facsimile: (231) 946-4807  
www.envlaw.com

June 29, 2007

\* Admitted in Colorado  
‡ Admitted in Texas  
◊ Admitted in Indiana

Mr. Bob Bloom  
Commander, Ninth Coast Guard District (dpb)  
1240 East 9th Street  
Cleveland, OH 44199-2060

**Via Fax No. (216) 902-6088**

Re: Request for Consulting Party Status in Section 106 Process for Proposed Twinning  
of the Ambassador Bridge  
Our File No. 5550.00

Dear Mr. Bloom:

Our firm represents the Gateway Communities Development Collaborative (GCDC). We are submitting this request on behalf of GCDC to request that, in your review of the proposed twinning of the Ambassador Bridge project, GCDC be recognized as a Consulting Party under Section 106 of the National Historic Preservation Act.

#### **BACKGROUND AND LEGAL CONTEXT**

The Detroit International Bridge Company (DIBC) submitted an application to the United States Coast Guard (USCG) for authorization to build a new bridge between Windsor, Canada, and Detroit, Michigan. The new bridge is proposed as a "twin" of the historic Ambassador Bridge: it would be located immediately adjacent to the west of the existing Ambassador Bridge.

As part of USCG's navigational permitting process, you are presently reviewing the proposed new twin bridge under both the National Environmental Protection Act (NEPA) and also under the Section 106 of the National Historic Preservation Act (NHPA).<sup>1</sup> Under NEPA, DIBC submitted a proposed Draft Environmental Assessment (EA) document to USCG, which USCG has adopted and published for public comment. While we will certainly provide timely comments on the draft EA, this letter addresses the Section 106 process.

The Advisory Council on Historic Preservation (ACHP) regulations for implementing Section 106 identifies several consulting parties that the federal agency is to include in the Section 106 process, including:

---

<sup>1</sup>Section 4(f) of the Department of Transportation Act (49 USC § 303) also applies to this project. When the USCG was transferred from the Department of Transport (DOT) to the Department of Homeland Security (DHS), Congress made clear that it was transferring all of the USCG duties that it had while it was housed under DOT, which includes its Section 4(f) duties. See 6 USC § 468(b). Further, the USCG regulations acknowledge that Section 4(f) is a relevant and potentially applicable statute in USCG bridge permitting determinations, even though the USGC is housed in the DHS. See 33 CFR 1.01-60(a)(1)(ii).

Mr. Bob Bloom  
Commander, Ninth Coast Guard District  
June 29, 2007  
Page 2

Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.

36 CFR 800.2(c)(5). GCDC seeks recognition as a Consulting Party under this provision.

#### GCDC'S AND ITS MEMBERS' INTERESTS

GCDC was established in 1999 as an association of community-based non-profit organizations involved in the planning and development of housing and economic development projects in Southwest Detroit. GCDC's mission is to act as a collective voice for its member organizations and enhance their individual development initiative through joint planning, advocacy, and marketing. Its members include:

- Bagley Housing Association
- Bridging Communities
- Greater Corktown Development Corporation
- Mexicantown Community Development Corporation
- Michigan Avenue Business Association
- Neighborhood Centers, Inc.
- Southwest Detroit Business Association
- Southwest Detroit Environmental Vision
- Southwest Solutions/Southwest Housing Corporation

Attached as Exhibit A is a list of each member's address.

The mission of GCDC and its member organizations includes revitalizing and preserving the cultural, economic, and historical interests of the neighborhoods that lie around the Detroit-side base of the Ambassador Bridge, which are among the oldest neighborhoods in Detroit. Our members represent the people that live in the shadow of the Ambassador Bridge, and the mission of our member organizations is to promote these neighborhoods in various ways. We work on a variety of community projects, including undertaking historic housing redevelopment projects, providing redevelopment grants in historic neighborhoods, providing low income loans to encourage people to move to these neighborhoods, and promoting commerce and development in these historic regions.

Mr. Bob Bloom  
Commander, Ninth Coast Guard District  
June 29, 2007  
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By way of example only, the Bagley Housing Association (BHA) works in the historic districts located just east of the Ambassador Bridge, between West Grand Boulevard and Clark Park with Vernor Highway representing as its main street. Among other projects, BHA has worked with the local community that lives around historic Saint Anne's Catholic Church (founded in 1701) on a neighborhood revitalization project. Southwest Solutions/Southwest Housing Corporation has been building and rehabilitating hundreds of housing options in the area, as well as helping people buy houses and relocate to this area.

Historic Corktown, which is just north of the Ambassador Bridge, is the oldest surviving neighborhood in Detroit. The Greater Corktown Development Corporation works to preserve and revitalize this historic neighborhood by providing low-income home purchase loans, home repair grants, and many other projects to promote the residential and commercial development of the historic neighborhood.

Mexicantown is another historic neighborhood just a block north of the Ambassador Bridge, near Porter and Bagley Streets. Mexicantown CDC works to promote small business development in Mexicantown, and to promote and celebrate the cultural and historic values of the neighborhood.

Mexicantown and Corktown are both leaders in the cultural tourism movement: an economic development tool based on promoting the historical aspects of the community. Tours of these communities necessarily include discussion of the Ambassador Bridge, which is an integral part of the communities' historic landscape.

New housing developments in these historic neighborhoods are being designed to fit the historic character of the neighborhoods, and several projects, including projects by Southwest Detroit Business Association and Southwest Solutions, have received historic tax credits for their historic preservation projects.

The communities around the Ambassador Bridge are rich in history, and GCDC and its members are actively working to preserve that history and revitalize these neighborhoods. The Ambassador Bridge is a key visual and historic icon and an important economic landmark in these neighborhoods. As such, the bridge is part of the neighboring communities' history.

The proposal to twin the historic bridge with a new, bigger modern bridge directly next to the historic Ambassador Bridge will destroy the historic visual value of the bridge, and thus also harm the historic and redeveloping neighborhoods around the bridge. The photographs included in DIBC's Visual Quality and Aesthetics Report (Appendix F to the proposed Environmental Assessment) amply demonstrates this: the new bridge would literally dwarf and swallow the historic bridge. The new bridge will bring more traffic through the neighborhoods, increase the levels noise in the neighborhoods, add air pollution to the neighborhoods, and fundamentally alter the historic view and landscape of the neighborhoods.

In sum, the historic value of neighborhoods around the Ambassador Bridge will be significantly and negatively impacted by the proposed twin bridge project.

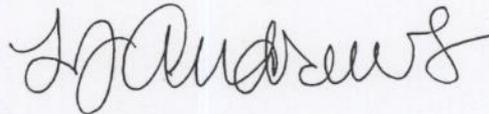
Mr. Bob Bloom  
Commander, Ninth Coast Guard District  
June 29, 2007  
Page 4

CONCLUSION

Because GCDC and its members have a demonstrated economic and legal interest in preserving, enhancing, and promoting the historic neighborhoods around the Ambassador Bridge, which interests will be significantly impacted by the proposed twinning project, we request that GCDC be recognized as a Consulting Party under Section 106 of the NHPA.

Please contact me if you have questions or concerns about this request or our member organizations. Thank you in advance for your consideration, I look forward to hearing from you.

Sincerely,



Tracy J. "TJ" Andrews  
[TJ@envlaw.com](mailto:TJ@envlaw.com)

TJA:mnm  
Enclosure: Exhibit A

xc: Gateway Community Development Cooperative (via email: [alison\\_swdev@flash.net](mailto:alison_swdev@flash.net))  
Michigan Historic Preservation Office (via fax: (517) 335-0348))  
Advisory Council on Historic Preservation (via fax: (202) 606-8647))  
US Dept of Transportation, Federal Highway Administration (via fax: (517) 377-1804))  
Michigan Department of Transportation (via fax: (517) 373-8841))  
The Detroit International Bridge Company (via fax: (586) 755-4899))  
Detroit Historic Designation Advisory Board (via fax: (313) 224-6110))  
Detroit International Bridge Company (via fax: (586) 755-4899))  
Rep. Steve Tobocman (via email: [stevetobocman@house.mi.gov](mailto:stevetobocman@house.mi.gov))  
Sen. Carl Levin (via fax: (313) 226-6948))

## Members of Gateway Communities Development Collaborative

Bagley Housing Association  
2715 Bagley  
Detroit, Michigan 48216

Bridging Communities  
6900 McGraw  
Detroit, Michigan 48210

Greater Corktown Development Corporation  
2411 14th Street  
Suite 200  
Detroit, Michigan 48216

Mexicantown Community Development Corporation  
2810 Bagley  
Detroit, Michigan 48216

Michigan Avenue Business Association  
7012 Michigan Avenue  
Detroit, Michigan 48210

Neighborhood Centers, Inc.  
8300 Longworth  
Detroit, Michigan 48209

Southwest Detroit Business Association (also use for GCDC address)  
7752 W. Vernor  
Detroit, Michigan 48209

Southwest Detroit Environmental Vision  
PO Box 9400  
Detroit, Michigan 48209

Southwest Housing Corporation  
3627 W. Vernor  
Detroit, Michigan 48209

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander (dpb)  
Ninth Coast Guard District  
1240 E. Ninth Street, Room 2025  
Cleveland, OH 44199-2060

Phone: (216) 902-6085  
FAX: (216) 902-6088

16590  
B-065/sms  
July 11, 2007

Ms. Tracy J. Andrews  
Law Offices of Olson, Bzdok & Howard  
420 Front Street  
Traverse City, Michigan 49686

Dear Ms. Andrews:

I am responding to your letter dated June 29, 2007, on behalf of your client, Gateway Communities Development Collaborative (GCDC), and your request for that organization to be included as a Consulting Party in the Section 106 process conducted by this office regarding the proposed Ambassador Bridge Enhancement Project in Detroit, Michigan.

We would welcome representatives of GCDC to participate as a consulting party in the Section 106 process for this proposed project. We would appreciate the designation of representatives, or a single representative, directly from the GCDC membership. Please provide the name(s) and contact information for GCDC representatives.

Within your letter you state that you will be providing comments regarding the Draft EA that is currently available for public comment. Please submit these comments under separate letter. The coordination in which GCDC is invited to participate will be to address the adverse effect as outlined in Michigan State Historic Preservation Officer letter dated March 26, 2007. We look forward to constructive participation in this process.

If you have questions, please contact Scot Striffler of this staff at (216) 902-6087. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Robert W. Bloom, Jr." with a stylized flourish at the end.

ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

Copy: Michigan State Historical Preservation Office (via fax: (517) 335-0348)  
Advisory Council on Historic Preservation (via fax: (202) 606-8647)  
Federal Highway Administration (via fax: (517) 377-1804)  
Michigan Department of Transportation (via fax: (517) 373-8841)  
Detroit Historic Designation Advisory Board (via fax: (313) 224-6110)  
Sen. Carl Levin (via fax: (313) 226-6948)  
Rep. Steve Tobocman (via email: [stevetobocman@house.mi.gov](mailto:stevetobocman@house.mi.gov))



JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

DR. WILLIAM ANDERSON  
DIRECTOR

July 13, 2007

ROBERT W BLOOM JR  
U S COAST GUARD  
1240 EAST NINTH STREET ROOM 2019  
CLEVELAND OH 44199-2060

RE: ER05-422 Ambassador Bridge Enhancement Project Draft Environmental Assessment,  
Section 4, T2S, R11E, Detroit, Wayne County (USCG)

Dear Mr. Bloom:

Under the authority of Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, we have reviewed the Draft Environmental Assessment (EA) for the above-cited undertaking at the location noted above. Our review of this document in accordance with the National Environmental Policy Act (NEPA) is concurrent with our Section 106 review (per 36 CFR Part 800.8(c)), and information contained in this document is being considered as the case study of alternatives required under 36 CFR Part 800, the regulations implementing Section 106.

Before we proceed with comments on the EA itself, we request your clarification on a few legal matters pertaining to this project.

On June 26, the U.S. Coast Guard (USCG) responded via letter to a question from the Advisory Council on Historic Preservation (ACHP) regarding the USCG's authority for this project. Your response stated that *"The Coast Guard Bridge Administration Program is responsible for the issuance of Bridge Permits for construction, reconstruction, or alteration of bridges across navigable waters for the United States. The laws relating generally to the protection, preservation, and safety of the navigable waterways are found in Section 9 of the Act of March 3, 1899, as amended, 33 U.S.C. 401; the Act of March 23, 1906, as amended, 33 U.S.C. 491; the Act of June 21, 1940, as amended (Truman-Hobbs Act) 33 U.S.C. 511-523; the General Bridge Act of 1946, as amended, 33 U.S.C. 525; and the International Bridge Act of 1972, 33 U.S.C. 535. The Code of Federal Regulations for Bridge Administration and permit processing are found in 33 CFR 114-118."*

Upon our own analysis of these acts, we find that Congress specifically granted these authorities (in all instances which we could find) to the U. S. Secretary of Transportation. The United States Code does not specifically mention the USCG in these acts. Granted, the USCG was formerly under the Secretary of Transportation, which delegated these responsibilities to the USCG, and the USCG has traditionally maintained the role of issuing bridge permits. In addition, the regulations you refer to in your statement to the ACHP (33 CFR 114-118) do indeed provide the USCG with administrative procedures for processing bridge permits. However, the USCG no longer operates under the Secretary of Transportation but is now a part of the Department of Homeland Security (DHS). The question therefore remains as to when and how authority for issuing bridge permits was transferred from the Secretary of Transportation to the DHS, and therefore authorizes the USCG to continue issuing these permits. Please provide us with a copy of or reference to the appropriate statute(s).

Furthermore, the EA contains a frontispiece letter from American Consulting Engineers of Florida dated April 23, 2007. The letter notes that the Department of State "has confirmed that a Presidential Permit is

not needed for the construction of the second span.” Please provide the SHPO with a copy of this referenced letter from the Department of State. Should we infer from this statement that this project is in fact exempt from the International Bridge Act of 1972 (33 U.S.C. 535)? If so, for what reason(s)?

Finally, the SHPO, as a cultural agency, has some concern with how this project will impact cultural resources in general, whether within our jurisdiction or not. We remind you of the USCG’s responsibilities under Section 402 of the NHPA (16 U.S.C. 470a-2), which states, “*Prior to the approval of any federal undertaking outside the United States which may directly and adversely affect a property which is on the World Heritage List or on the applicable country’s equivalent of the National Register, the head of a Federal agency having direct or indirect jurisdiction over such undertaking shall take into account the effect of the undertaking on such property for purposes of avoiding or mitigating adverse effects.*” While we acknowledge that Canadian cultural resources are beyond our purview, we request that you provide us with evidence that the USCG has fully complied with this portion of the NHPA.

## **Comments on the EA**

### **Section 1.0, Project Description**

Our first comments concern the *Project Description* (Section 1.0) of the EA. Our office has studied hundreds of environmental assessments from various federal agencies. It is our understanding of the NEPA process that the purpose of this effort is to assess a problem or set of problems in order to establish the need for a potential project to address those problems. A rigorous analysis of several reasonable alternatives/solutions follows before finally identifying a preferred alternative/solution to the problem(s) based on numerous factors. In this case of this document, however, an inverted tactic seems to be taken. More specifically, the document sets out from the assertion (page 1) that “The project identified as the Ambassador Bridge Enhancement Project” [ABEP] or “Proposed Project” described in this document consists of the construction of an adjacent span to the Ambassador Bridge, just west of the existing span....The second span will be a new state-of-the-art cable stayed bridge that will connect directly to the Canadian and U.S. plazas owned by the DIBC/CTC.” It seems to us entirely premature to announce not only the preferred alternative, but also the very design of the project on page one of the document before even the slightest argument has been made to support this alternative over the many other possibilities. By setting this tone at the outset, the remainder of the EA appears intent upon supporting the singular conclusion of a new bridge, rather than a sincere assessment of project alternatives.

In light of this concern and our comments on this document to follow, we believe a far more rigorous standard of analysis must be upheld in this EA. In fact, in the enclosed May 12, 2003 letter from James Connaughton of the Council on Environmental Quality to then Secretary of Transportation Norman Mineta, Connaughton writes, “*Courts have cautioned agencies not to put forward a purpose and need statement that is so narrow as to “define competing ‘reasonable alternatives’ out of consideration (and even out of existence)”*”, (citing *Simmons v. US Army Corps of Engineers*, 120 F.3<sup>rd</sup> 664(7<sup>th</sup> Cir. 1997) and *Alaska Wilderness Recreation and Tourism Association v. Morrison*, 67 F.3<sup>rd</sup> 723 (9<sup>th</sup> Cir. 1995).

Indeed, other than the construction of a new bridge, it is not exactly clear to us what the purpose, let alone the need for the project, is from this section. Section 1.1.1 addresses *National Interest and Security Considerations* and Section 1.1.3 concerns *Trade Considerations*, both of which are issues of major public importance and may indeed reflect the ultimate need for this project (although a great deal more

data is needed to support the broad assertions made in either section – in the very least, footnotes or references to the data studies in the appendices would be helpful). However, how is a potential new crossing by the Detroit International Bridge Company (DIBC) the *best way* to meet this need, given the fact that alternatives vary from doing nothing, continuing use of the existing Ambassador Bridge, constructing a tunnel, or the proposed Detroit River International Crossing (DRIC) project proposed by the Federal Highway Administration (FHWA) and the Michigan Department of Transportation (MDOT)? This document does not make a strong argument for its case.

Regarding Section 1.1.2, *Support for the Project*, we will be interested to review the results of further public comment gathered for the both the NEPA and Section 106 processes. We question why this section does not present a more balanced viewpoint of public views on the project, and why, in a document of this nature, *only* letters of “support” for the project were included (Appendix A). It has not been our impression, based on what we have observed in the media and heard from community groups, that this is an accurate portrayal of public sentiment toward this project. We find it unlikely that there are no countering opinions on this project. Moreover, the letters in Appendix A bear certain remarkable similarities among them which suggest that these responses may have been prompted. Finally, we note that many of these letters support the DIBC in general (for its jobs creation, charitable donations, local investment, border security, etc.) but they do not consistently and specifically support the construction of a new Ambassador Bridge.

We question the statement, also made on page 1, Section 1.1, that this project is not part of other contiguous concurring projects such as the FHWA/MDOT “Gateway Project”. Surely the addition of a new bridge at this location will impact circulatory patterns and traffic congestion, among other potential impacts. The argument that appears to be made in this section is that since the FHWA approved an EA for the Gateway Project in 1997 which considered “construction of a new deck that will accommodate a future second span bridge to Canada”, the Gateway Project EA effectively addressed the environmental concerns associated with secondary impacts in the area of the bridge approaches. Notably, the SHPO issued an opinion of *no adverse effect* for the Gateway Project on November 7, 1996 (enclosed in Appendix H of this EA). From our standpoint, the fact that this EA references a statement concerning the interconnectivity between the Gateway Project and a new bridge span from the 1997 Gateway Project EA is strong evidence that the two projects form a common utility. A new span would not be under consideration were it not for the Gateway Project. Moreover, the passage of more than a decade since our comments on the Gateway Project signals the need for updated consideration of this geographic area in the EA for the Ambassador Bridge project.

In light of the potential cumulative and secondary impacts to surrounding areas, we want to have a greater understanding of how the USCG established the Area of Potential Effects (APE) presented to the SHPO on February 9, 2007 in the initial Section 106 consultation documentation for this project (see Appendix H of EA). In their June 29, 2007 request for Section 106 consulting party status, the Gateway Communities Development Collaborative (GCDC), though their counsel Tracy Andrews, asserts that *“The proposal to twin the historic bridge with a new, bigger modern bridge directly next to the historic Ambassador Bridge will destroy the historic visual value of the bridge, and thus also harm the historic and redeveloping neighborhoods around the bridge.....The new bridge will bring more traffic through the neighborhoods, increase the levels noise [sic] in the neighborhoods, add air pollution to the neighborhoods, and fundamentally alter the historic view and landscape of the neighborhoods.”* The GCDC will have an important role as we consider impacts of the project within the surrounding area. It is very possible that we will need to consider expansion of this project’s APE.

## Section 2.0. Alternatives Analysis

As we indicated in our comments concerning Section 1, the EA document presents the construction of a new bridge span as a foregone conclusion. Moreover, the document provides sweeping claims of how this alternative will provide every benefit from increased jobs to reduced air pollution without any substantial data to support these claims (for example, Section 1.1.2, *Support for the Project* and Section 1.1.4, *Spin-off Benefits and Interrelated Projects*). The same trend continues in this section concerning alternatives analysis in which reasonable project alternatives are summarily dismissed for being too expensive or having too many environmental impacts, again without adequate data to support these claims. Any applicable data that is tucked away in an appendix should be brought forth into the main document.

We were rather confused by this section of the document, because it does not appear to flow in a logical manner towards an assessment of alternatives. In our experience, for example, it is customary for the alternatives analysis to begin with the “no-build” alternative. The fact that this section begins with the “build” alternative and “no-build” is not discussed until Section 2.2, further reinforces our opinion that the new bridge is dangerously close to being considered a foregone conclusion in this EA. Section 2.1.2 furthermore refers to the new bridge as the “preferred alternative”, once again before any analysis has been provided to bring the reader to that same conclusion. The USCG appears to consider two basic alternatives: a “no-build” alternative (i.e. keep and rehabilitate the existing bridge) and a “built alternative”, with the latter choice encompassing either another adjacent bridge of varying design/alignment, a complete replacement of the existing bridge, or a tunnel. We therefore count about nine alternatives/project variants under consideration.

Our comments will address each of the alternatives in the following order: no build; construction of a tunnel; construction of a new bridge (any alignment); and design of a new bridge.

### **No-Build**

The discussion of the no-build alternative (section 2.2) provides probably the most compelling case in this document of the need for a new or modified crossing on the Detroit River. In fact, much of the information here should be in the initial purpose and need statement. This document attempts to make the case for the need for a safe, efficient and effective mode of transportation across the Detroit River and that the current Ambassador Bridge is approaching structural obsolescence for these purposes. However, this section does not provide any cost estimates for the rehabilitation of the bridge, nor does it explore what type of rehabilitation would need to occur for this bridge to remain functional. What will be the impacts to the bridge if this is done? Notably, Section 2.7 claims that “Higher traffic volumes are not anticipated as a result of this project and the purpose of the project is not to add capacity.” If this is the case, then why wouldn’t a careful rehabilitation of the existing bridge meet this need? This information must be assessed before we will be prepared to rule out the possibility of a no-build alternative. Finally, since this section is intended to be an analysis of a no-build alternative, the statement on pages 15-16 regarding the addition of a second span has no place here.

### **Construction of a Tunnel**

The possibility that a tunnel might be an effective alternative crossing to the bridge is addressed in Section 2.4.2.3. While the tunnel may eliminate impacts to the Ambassador Bridge, immediately this analysis turns to the disadvantages of this alternative, ranging from higher construction costs, decreased functionality, engineering challenges and greater security concerns. We would expect that for a project of this magnitude, this section would be replete with studies of this alternative to support these claims. However, there is virtually no supporting data. What are the costs to construct a tunnel? What exactly are the environmental impacts? Do you have statements from resource agencies to support the assertion that “environmental impacts of a tunnel are greater than those associated with bridge alternatives”? What are the specific security concerns that a tunnel would create? How do all of these factors compare to the bridge analysis? The analysis of this alternative is not sufficient.

### **Construction of a New Bridge**

The SHPO has already acknowledged that the construction of a new bridge, whether on an alignment adjacent to the existing bridge or entirely replacing the existing bridge will have the most negative consequences on the national register-eligible Ambassador Bridge (SHPO letter of *Adverse Effect*, March 26, 2007). While we have noted in our correspondence that these impacts would be visual, it has also come to our attention through review of the EA that we must also consider impacts to the existing bridge that may result from construction of a new bridge (such as impacts from construction vibrations and debris) but also from the unknown fate facing the existing bridge.

The EA quite openly states the intent to retain the existing Ambassador Bridge. Section 1.1 (page 1) announces, “By constructing a new state of the art span across the Detroit River, the existing span will be freed up to allow it to be rehabilitated and to then serve as a backup, redundant resource in case of an emergency or another impediment against the free flow of people and goods across the new span as well as serve as a pedestrian and bicycle facility.” This essential claim was made in the initial Section 106 documentation presented to our office, and several times throughout the EA.

While we commend the DIBC in its desire to retain and rehabilitate the existing bridge, we question if this will in fact be the case. Other than the word of the DIBC, there are no statements from the USCG, U.S. Customs and Border Patrol, or other relevant agencies in support of retaining the historic bridge. Indeed, such a structure, if not used to its fullest capacity, could be viewed as a navigational hazard, financial burden, and/or a threat to homeland security, therefore leading to pressures calling for its eventual demolition.

This section of the EA must provide information as to the potential physical impacts of nearby construction on the bridge. In addition, what are the proposed plans and specifications for rehabilitation of the bridge? What assurance is there that there will not be future requirements for the demolition of the historic bridge stemming either directly or indirectly from the construction of a new bridge?

The potential loss of such a significant historic bridge and Michigan landmark is not an option the SHPO believes can be effectively mitigated through the Section 106 process. Given this potential scenario, it is crucial to our analysis of the EA that all alternatives to avoid adverse effects be considered in their entirety – even those not within the control of the DIBC. We therefore regret that the EA appears to

downplay impacts by claiming that the ABEP “*simply modifies* the existing crossing by replacing the lanes of an aging bridge structure that connect to existing plazas in the U.S. and Canada.” (Section 2.3, *Corridors under Consideration*) This same section goes on to say, “As such, other alternative corridors are not being considered as they are beyond the scope of this project and would not meet the purpose and need and they would have substantial human and environmental impacts.” This latter remark is in specific reference to the DRIC project.

It is our contention that this EA must give greater consideration to the DRIC project as an alternative to avoid adverse effects to the existing Ambassador Bridge. In the first place, we cannot follow the argument that the DRIC project does not meet the purpose and need of this EA because, as we have already stated elsewhere, this EA does not establish a clear purpose and need for the project. Moreover, the claim that the DRIC project would have “substantial human and environmental impacts” is unsubstantiated in this document. If the DRIC project would result in fewer impacts to cultural resources, particularly those as significant as the Ambassador Bridge, then it should be considered as a viable alternative to this project, even if it is outside of the control of the DIBC. We remind you that the Section 106 regulations require federal agencies and consulting parties to “develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties” (36 CFR Part 800.6 (a)). The regulations do not place limits on what alternatives may be considered.

### **Design of New Bridge**

We are very surprised that the new bridge, as the “preferred alternative,” is already in the design phase when the EA is only in draft form (Section 2.1.6) and a preferred alternative has not been finalized. Of the three types of structures considered in Section 2.4.2 *Structural Alternatives*, the document indicates the Cable Stayed Bridge was the preferred alternative. Through our opinion of *adverse effect*, the SHPO has already asserted that the proposed new bridge will become an overwhelming visual distraction and will diminish the integrity of the historic bridge. Therefore, the design for the new structure is important, and all options that would minimize the visual impacts on the historic bridge should be closely evaluated. If the new bridge is indeed the preferred alternative, the SHPO will want to work closely with the consulting parties to develop an acceptable design.

Section 2.4.2.1 addresses the potential for a “Twin” Suspension Bridge and asserts that this design would result in numerous environmental impacts, higher construction costs, and would be considered undesirable from a navigational perspective. Moreover, prior conversations with the DIBC and project consultants have led us to believe that suspension bridges are no longer constructed. However, we have now learned, through examples such as the 2003 Carquinez Straits Bridge near Vallejo, California, that this is certainly not the case. Therefore, the EA should be revised to include specific information regarding the costs, navigational problems and environmental impacts that could result from the construction of a suspension bridge. Similar information should be provided for cable-stayed bridges as points of comparison.

### Other Comments

The rankings of various alternatives listed near the end of Section 2 are confusing. Why are cultural resources not considered in this evaluation? Who made these rankings, with what data and on what basis? How much public comment went into these rankings?

We are electing to reserve our comments on certain portions of this EA pending further discussion with the consulting parties for this project and further consideration of the project's APE. These sections, which also pertain to our Section 106 review, include comments related to impacts to cultural resources and *Visual Quality and Aesthetics* described in Section 3, as well as *Mitigation of Impacts* outlined in Section 4.

### Summary

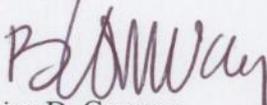
In summary, certain legal questions must be settled, as outlined in the beginning of this letter, and further information provided before the SHPO will be able to proceed in the Section 106 process. We must explore whether the APE should be revised and consider potential impacts within those geographic areas accordingly. It is our impression that the EA does not provide a rigorous analysis of many issues and we do not have a clear understanding of the purpose and need for this project. Construction of a new span, does not, in and of itself appear to us to be a valid purpose and need under NEPA (rather, this is a project alternative). When it comes to consideration of alternatives, the EA does not analyze in any depth the impacts, total costs, or other factors such as environmental impacts of the different alternatives. Furthermore, all of these alternatives should be given equal weight until it becomes clearer to the reader why one alternative predominates. Given that the future of the existing bridge has become a primary concern to the SHPO, we want to have a very clear understanding of the possible outcomes. In our considered opinion, eventual removal of the historic bridge would be an unacceptable outcome of this project and would cause the SHPO to consider petitioning for an Environmental Impact Statement (EIS) for this project due to the fact that the ABEP would result in significant impacts to the human environment.

Public comment and the contributions of the consulting parties will be crucial to the outcome of the Section 106 consultation process. We await the comments gathered for the Section 106 process and we expect to see a more balanced quality in the public comment than has been presented here. In the spirit of openness, future meetings regarding Section 106 consultation should involve all consulting parties to the project. In the same vein, we suggest that the USCG convene a meeting of all federal, state, and even international agencies who have expressed concern or interest in the ABEP to discuss the EA and address concerns and questions about this project.

The State Historic Preservation Office is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

If you have any questions, please contact Martha MacFarlane Faes, Environmental Review Coordinator, at (517) 335-2720 or by email at ER@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,



Brian D. Conway  
State Historic Preservation Officer

BDC:DLA:ROC:MMF

Enclosure

copy: Tracy Andrews, Olson, Bzdok and Howard, Traverse City, MI  
Geraldyn Ayers, MDOT  
Martha Catlin, Advisory Council on Historic Preservation  
David Coburn, Steptoe and Johnson, Washington, D.C.  
Sherry Kamke, USEPA, Chicago  
James Kirschensteiner, FHWA, Lansing  
Scott Korpi, American Consulting Engineers  
Lis Knibbe, Quinn Evans Architects  
Thomas McMahon, Canadian Transit Company  
Dan Stamper, DIBC  
David Williams, FHWA, Lansing



JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

DR. WILLIAM ANDERSON  
DIRECTOR

July 17, 2007

LIS KNIBBE  
QUINN EVANS ARCHITECTS  
219 1/2 N MAIN STREET  
ANN ARBOR MI 48104

RE: ER05-422 Ambassador Bridge Enhancement Project, Section 4, T2S, R11E, Detroit,  
Wayne County (USCG)

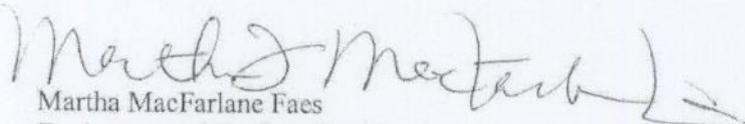
Dear Ms. Knibbe:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed and approve the Scope of Service document for the Phase I Archaeological Reconnaissance Survey of the Ambassador Bridge Enhancement Project, based on the revised version included in the e-mail dated June 1, 2007.

The State Historic Preservation Office (SHPO) is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

If you have any questions, please contact Brian Grennell, Environmental Review Specialist, at (517) 335-2721 or by email at ER@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.

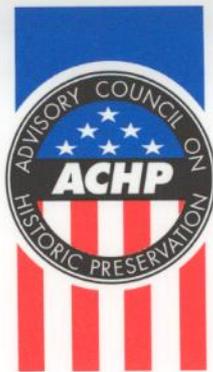
Sincerely,

  
Martha MacFarlane Faes  
Environmental Review Coordinator

for Brian D. Conway  
State Historic Preservation Officer

MMF:DLA:bgg





Preserving America's Heritage

August 6, 2007

Mr. Robert W. Bloom, Jr.  
U.S. Coast Guard  
1240 East Ninth Street – Room 2019  
Cleveland, OH 44199-2060

REF: *Proposed Ambassador Bridge Enhancement Project*  
*Detroit, Wayne County, Michigan*

Dear Mr. Bloom:

Thank you for your letter, dated June 26, 2007, in reply to the Advisory Council on Historic Preservation's (ACHP) recent letter notifying the U.S. Coast Guard (Coast Guard) that the ACHP will participate in Section 106 consultation to resolve adverse effects of the referenced project on historic properties, including the Ambassador Bridge, a property eligible for listing in the National Register of Historic Places.

We appreciate your responses to our questions about the proposed undertaking and the status of Section 106 review. We have also received a copy of a letter, dated July 13, 2007, addressed to you from the Michigan State Historic Preservation Officer (SHPO). In addition, we received copies of correspondence from the following stakeholders:

Greater Corktown Development Corporation (dated July 16, 2007)  
Southwest Detroit Business Association (dated July 16, 2007)  
Gateway Communities Development Collaborative (dated June 29, 2007)

Based on our review of your letter and the letters referenced above, the ACHP recognizes that the Section 106 consultation process for this undertaking is in its early stages. In particular, the Coast Guard has yet to identify and formally invite consulting parties and plan for their involvement in the Section 106 consultation process. We understand from Mr. Scot Striffler of your staff that the Coast Guard has proposed a meeting in Lansing on August 9, 2007, to which the ACHP is invited, to begin the Section 106 consultation process. We recommend that the meeting address the requirements of Section 800.3 of the ACHP's regulations, "Protection of Historic Properties" (36 CFR Part 800). As conveyed via e-mail to Mr. Striffler, the ACHP will be available to participate in the meeting by telephone. We will not travel to attend such meetings until the issues of initiating Section 106 have been addressed and consulting parties are afforded an opportunity to participate in the consultation process. When scheduling future meetings, we encourage the Coast Guard to consider holding meetings in Detroit, if possible, in order to be accessible to the majority of consulting parties and to facilitate needed site visits, as appropriate.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004  
Phone: 202-606-8503 • Fax: 202-606-8647 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)

We look forward to consulting with the Coast Guard, the Michigan SHPO, and others, to resolve potential adverse effects of this undertaking. If you have any questions or wish to discuss this matter further, please contact Martha Catlin at (202) 606-8529, or via e-mail at [mcatlin@achp.gov](mailto:mcatlin@achp.gov).

Sincerely,

A handwritten signature in cursive script that reads "Charlene Dwin Vaughn". The signature is written in dark ink and is positioned above the typed name.

Charlene Dwin Vaughn, AICP  
Assistant Director  
Office of Federal Agency Programs

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander (dpb)  
Ninth Coast Guard District  
1240 E. Ninth Street, Room 2019  
Cleveland, OH 44199-2060

Phone: (216) 902-6085  
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16590  
B-072/sms  
August 7, 2007

Mr. Brian D. Conway  
State Historical Preservation Officer  
Michigan Historical Center  
P.O. Box 30740  
702 West Kalamazoo Street  
Lansing, Michigan 48909-8240

**Re: Proposed Ambassador Bridge Enhancement Project – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

Dear Mr. Conway:

Thank you for your July 13, 2007 letter and comments on the Draft Environmental Assessment (Draft EA) for the Ambassador Bridge Enhancement Project (ABEP). Your comments will be fully considered, as will all comments received in response to the Draft EA, as we work with the project applicant, Detroit International Bridge Company (DIBC), to prepare the Final EA. In addition, we look forward to working with you on the Section 106 process. In order to continue the dialogue, we wanted to provide a preliminary response to some of your comments in advance of our meeting on August 9, 2007. We will provide copies of all responses to the Draft EA at this meeting.

#### **I. USCG Authority/Federal Permits**

In response to your letter question regarding the Coast Guard's (USCG) permit issuing authority for this project: Section 888(b) and 1512(d) of the Homeland Security Act of 2002 transferred all Secretary of Transportation statutory authorities to the Secretary of Homeland Security. The Secretary of Homeland Security issued Delegation Number 0170.1 on June 20, 2003, for all Coast Guard functions that had been performed under the Department of Transportation. All former Bridge Administration authorities that the Coast Guard held under the Department of Transportation were maintained and transferred through these actions.

Your letter also requests clarification on the statement within the Draft EA regarding Department of State approval for the project. The Department of State letter dated August 3, 2005 is attached and will be included in the Final EA. Since the original bridge permit and subsequent amendments were initially authorized by Congress and executed by the Secretary of War, the agency responsible for bridge administration at the time, the ABEP proposal will be executed by the Coast Guard as another amendment to the previous instruments of permit. The Department of State letter should clarify any questions regarding the application of the 1972 International Bridge Act and its treatment in this project.

#### **II. Canadian Cultural Resources, Impacts, and Documentation**

Your letter notes that the NHPA requires the USCG to take account of any impacts on World Heritage or national historic register sites in Canada. We are advised that there are no World Heritage sites in the vicinity of the existing Ambassador Bridge in either the U.S. or Canada. The Coast Guard will ensure

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that all applicable laws involving documentation and consideration of potential environmental impacts in Canada resulting from the ABEP, including *CEQ Guidance on NEPA Analysis for Transboundary Impacts* and *Section 402 of the National Historic Preservation Act*, will be complied with. The Draft EA includes discussion and details of potential impacts in Canada throughout the document. The Final EA will present these findings and analysis in a cohesive format.

In addition to the application and process that DIBC is engaged in with the Coast Guard for permitting on the U.S. side, they will also be pursuing an application with Transport Canada for construction of the second span, and are subject to the applicable laws of Canada. The project will be reviewed and processed by Canadian authorities under the Canadian Environmental Assessment Act, the analogue of NEPA in the United States. The Draft Guidelines that have been issued by Transport Canada include a requirement that heritage and archeological sites in the area be described in the environmental impact study (EIS) that is being prepared, and that potential impacts of the proposed ABEP on these resources also be addressed in the EIS.

The processes to address potential environmental impacts in both the U.S. and Canada are being performed separately by each respective responsible agency for this proposal. This process differs from the joint process underway in the Detroit River International Crossing (DRIC) study. In both the ABEP and DRIC study, the applicable laws and processes of both countries will be complied with.

### **III. Project Description**

Your letter expresses concern and surprise that the applicant, DIBC, stated that the preferred alternative and preferred design at the very beginning of the Draft EA, and that the Section discussing *Support of the Project* appears to be imbalanced. While the Draft EA is not formatted and presented in precisely the same way as some other environmental documents you have reviewed, the document presents the applicant's desired goal and design at the beginning of the document. This should be viewed more as a stylistic choice rather than an attempt to prejudice the reader from the onset. It was the intention of the applicant to provide a section in the Draft EA, and the information in Section 1.1.2 and Appendix A, to illustrate that various interests have expressed support for the DIBC. Also, it was noted in Section 1.1.2 that concerns had been raised from other interests. I am fully aware that the ABEP, and the DIBC, has its critics and detractors, and the Final EA will include discussion and responses to all comments received by my office from the public and involved agencies. As noted above, I will provide you copies of all responses received by the Coast Guard in response to the Draft EA.

### **IV. Purpose of Project and Relationship to Gateway and DRIC**

The purpose of the ABEP, as stated by the applicant, is to construct an additional structure on an already approved and permitted corridor and crossing. There are numerous similar types of highway improvement projects that are reviewed and permitted by the Coast Guard every year. In the case of the ABEP, the second bridge, if permitted and constructed, is viewed as a related project to the Gateway EA. As the Gateway Project EA makes numerous references to the anticipated construction of a second bridge, including designing the Gateway to accommodate the second span, the Gateway EA would naturally be discussed and referenced. However, I do not agree with your assertion that; "A new span would not be under consideration were it not for the Gateway Project." Each project has been analyzed under separate NEPA processes. The Coast Guard has not participated as a consulting party in the Gateway EA and holds no permitting authority for that project. The work on the Gateway has proceeded, after extensive NEPA coordination, including consultation with your office, as you noted, without a

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finalized determination on the second span. The latest re-evaluation of the 1997 Gateway EA and Finding of No Significant Impact (FONSI) is dated April 4, 2007, and was initiated by MDOT and approved by Federal Highway Administration (FHWA). The Coast Guard was not involved, or required to be involved, in the re-confirmation of that NEPA document. A copy of this latest re-evaluation is also enclosed with this letter.

Your letter refers to the DRIC study in various places, including your contention that the DRIC should be considered as an alternative to the ABEP. In fact, the DRIC study is an entirely separate proposal, and one in which this office is a participating agency. The role of the Coast Guard in the DRIC study is different from the ABEP. In the DRIC study, the project is sponsored by Michigan Department of Transportation, with FHWA fulfilling the role of lead federal agency for NEPA. The Coast Guard is a consulting party for NEPA in the DRIC study, but the Coast Guard would also be a permitting agency for that proposal since any proposed structure would cross the Detroit River. The primary purpose and involvement of this office with the DRIC is to provide expertise on navigational impacts, including preservation of minimum navigational clearances and consideration of placement of piers in the river. If a final NEPA document is issued for the DRIC, FHWA will have primary responsibility to ensure that NEPA is satisfied. It is significant to note that the ABEP and DRIC are not competing proposals that the Coast Guard must choose from. Each proposal could be approved and permitted by the Coast Guard if each meets the essential needs of NEPA and navigation requirements.

**V. Alternatives**

We will be carefully reviewing the comments received by this office in response to the Draft EA regarding the format and extent of analysis addressing alternatives. We intend to pursue a more thorough review and analysis prior to issuance of the Final EA. Your comments, and the comments of other agencies regarding alternatives, will be incorporated into our ongoing coordination with the applicant.

**VI. APE and Public Comments**

In your letter, you discuss the possible need to expand the APE. We will look forward to discussing this issue at greater length with you at our August 9, 2007, meeting. Also, as noted above, we will provide copies of all comments received by this office in response to the Draft EA, and the public workshops conducted by the applicant, at our August 9 meeting.

**VII. Status and Future of the Existing Bridge**

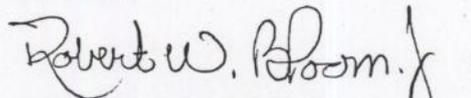
Your letter describes concerns regarding the intended use of the existing bridge, impacts to the existing bridge during construction, and procedures if the existing bridge is ever considered for removal. The applicant has set forth in the Draft EA their intention to retain the existing bridge, perform maintenance, and continue to use the bridge for transportation purposes. All of the stated contentions of the applicant fall within the statutes and policies of the Bridge Administration Program. It appears the greatest concern involves the procedures that would apply if the existing bridge is proposed to be removed. The applicant has been advised by this office that if in the future the bridge owner wanted to demolish the bridge it would be another amendment to the existing permit, and that all NEPA processes would have to be satisfied. More specifically, an Environmental Impact Statement (EIS) would need to be prepared to remove a bridge that is listed, or eligible for listing, on the National Register. The applicant has also been advised that the existing bridge must be maintained to ensure that the bridge does not become a hazard to navigation. If the bridge was ever deemed a hazard due to neglect, the existing statutes that relate to

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hazards to navigation (including civil penalties) and for bridges no longer used for transportation would become effective. This information alleviates these concerns.

I hope that this information provides greater understanding of the authorities vested in the Coast Guard and the processes under which we function. We look forward to continuing coordination with your office and would be pleased to provide further clarification at our August 9, 2007, meeting. As always, please contact me at (216) 902-6085 if you have any questions or require additional information. Thank you.

Sincerely,



ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

Copy: Detroit Ambassador Bridge Company, Detroit, Michigan  
Michigan State Historical Preservation Officer, Lansing, Michigan – fax (517) 335-0348  
Advisory Council on Historic Preservation, Washington, D.C. – fax (202) 606-8647

Enclosures: (1) United States Department of State letter dated August 3, 2005  
(2) Federal Highways Administration letter dated April 4, 2007, re-evaluation of the Environmental Assessment for the I-75 Ambassador Bridge/Gateway Project



**HANNAHVILLE**  
INDIAN COMMUNITY  
N14911 HANNAHVILLE B1 RD.  
WILSON, MICHIGAN 49896-9728

Administration: (906) 466-2932 Fax: (906) 466-2933  
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August 9, 2007

American Consulting  
Anna Peterfreund  
70 Niagara Square, Suite 410  
Buffalo, NY 14202

RE: Ambassador Bridge

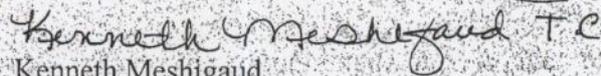
Dear Ms. Peterfreund:

On behalf of the Hannahville Indian Community I would like to thank American for your inquiry as to whether your above cited project may come into conflict with the National Environmental Policy Act (NEPA), Native American Graves Protection and Repatriation Act, 25 U.S.C. 3001 et seq., and the applicable regulations at 47 CFR § 1.1307. The burial grounds and artifacts of our ancestors are very dear to our community and we take all construction projects that may affect our ancestors and tribal history very seriously.

After a review of the specifications of your project, it is the belief of my staff and myself that your project does not affect any Indian religious site or burial ground of the Hannahville Indian Community and would not offend any federal law in place. We do ask that your firm give the tribe notice if any burial ground or artifacts are uncovered during the construction process.

If you have any other questions please do not hesitate to call me at (906) 466-2934. Once again I would like to thank you for taking to time to contact my office on this matter.

Sincerely,

  
Kenneth Meshigaud  
Tribal Chairperson

**KENNETH MESHIGAUD**  
Tribal Chairperson

**ELAINE MESHIGAUD**  
Vice Chairperson

**ANN SABOO**  
Secretary

**LISA MESHIGAUD**  
Treasurer

**Council Members:** Robin Halfaday, John Meshigaud, Henry Philemon, Jr., Lois Tovar,  
Loretta Wandahsega, Earl Meshigaud, Anna Larson, Henry Williams

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander (dpb)  
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1240 E. Ninth Street, Room 2025  
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Phone: (216) 902-6085  
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16590  
B-085/sms  
September 4, 2007

Mr. Brian D. Conway  
State Historical Preservation Officer  
Michigan Historical Center  
P.O. Box 30740  
702 West Kalamazoo Street  
Lansing, Michigan 48909-8240

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

Dear Mr. Conway:

Thank you for hosting the August 9, 2007 meeting between U.S. Coast Guard officials, Detroit International Bridge Company (DIBC) representatives and consultants, Advisory Council on Historic Preservation (ACHP), Gateway Community Development Collaborative (GCDC) representative, Kelli Kavanaugh, and representatives from your office. Clearly, the meeting was beneficial in providing additional information regarding the proposed Ambassador Bridge Enhancement Project (ABEP), and for the Coast Guard, as the lead Federal agency, and the applicant to receive additional comments to advance the Section 106 process.

I have compiled a detailed timeline of coordination to date, and documentation presented in our consultation so far, to provide a comprehensive overview of the project and evidence of the consideration of potential impacts to historic properties in the project area in accordance with Section 106 processes. I believe our consultation would benefit at this time from a single document that summarizes the Section 106 process for this project, including plans and recommendations for the next steps in our consultation. Additionally, I am providing an overview of particular points that have thus far been presented in the documentation that demonstrate efforts to identify consulting parties and notify the public of the project, define the undertaking, establish Area of Potential Effect (APE), identify and evaluate historic properties, solicit comments for the project and potential effects on historic properties, and consider project alternatives that avoid, minimize, or mitigate the adverse effect to the existing Ambassador Bridge.

There are comments in the Advisory Council on Historic Preservation (ACHP) letter dated August 6, 2007, and during the August 9 meeting, suggesting the Section 106 process has not been formally initiated by the Coast Guard. For the record, on April 5, 2006 I mailed letters inviting various federal, state, and local agencies, including Michigan SHPO, to participate in the May 4, 2006 scoping meeting at the applicant's business office for this project. The Coast Guard identified itself as a permitting agency and the lead agency for this project. The applicant requested a meeting in your offices on November 20, 2006 to provide initial details of the project

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

and introduce the consultants. My office participated in this meeting by teleconference. The applicant's consultant submitted a Michigan State Historic Preservation Office Application for Section 106 Review to your office, as required, on February 8, 2007. The application identified the Coast Guard as the *Federal Agency contact*, and Quinn Evans Architect as the contact in the *Consultant or Applicant Contact Information* entry. Your March 26, 2007 adverse effect letter was the response to the February 8, 2007 application submitted by the consultant and was addressed to my office. I believe that the invitation letter for the scoping meeting, the meeting in your office on November 20, 2006, the submitted Section 106 application, and your adverse effect letter, were all consistent with the Section 106 process and evidence that the process has been initiated. To avoid any misunderstanding on this point, however, this letter underscores our intention that the Section 106 process proceed forward.

The participation of the applicant and their consultants is consistent with the provisions of 36 CFR 800.2(a)(3) and 800.2(c)(4). Although you or your staff could not attend the scoping meeting on May 4, 2006, you sent a response letter dated May 4, 2006 stating "Consultants or designees contracted to prepare information, analyses, or recommendations, are *not* recognized as federally-delegated authorities." There has never been a delegation of the federal authorities or responsibilities of the Coast Guard for complying with Section 106.

The Coast Guard is a Federal permitting agency utilizing Council on Environmental Quality (CEQ) approved implementing instructions to apply the National Environmental Policy Act (NEPA). The ABEP will require the issuance of a Coast Guard Bridge Permit. By virtue of the permit requirement, the ABEP is a Federal undertaking under the definitions of 36 CFR 800.16(y). The applicant is a private entity committed to using private funds for the proposed project. There will be no federal money expended for this undertaking. The use of private funds, and the Coast Guard Bridge Permit requirement, requires the Coast Guard to assume the duties of lead federal agency for NEPA and National Historic Preservation Act purposes. I have provided in previous correspondence a copy of the legislation that transferred Coast Guard Bridge Administration functions from the Department of Transportation to the Department of Homeland Security in 2003. All the information provided, and this formal declaration, should satisfy the provisions of 36 CFR 800.3(a) – *Establish Undertaking*.

Again, by this letter, I am confirming that the Section 106 process has been initiated and is proceeding, and I am formally requesting you to be a consulting party for the project in accordance with 36 CFR 800.3(c). The Coast Guard is the lead Federal agency for Section 106. The Coast Guard also intends to utilize the Section 106 processes designated in 36 CFR 800.8, *Coordination With the National Environmental Policy Act*. Your July 13, 2007 letter providing comments to the Draft EA acknowledged that your review was concurrent with the provisions of 36 CFR 800.8(c). At this point, based on the analyses and documentation processed to date, it does not appear that the Coast Guard will require the preparation of an Environmental Impact Statement (EIS) for the project.

The applicant, Detroit International Bridge Company, and their consultants, are authorized by the Coast Guard under the provisions of 36 CFR 800.2(a)(3) and 800.2(c)(4) to initiate and

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

participate in consultation, and to prepare information, analyses, and recommendations for this project.

**IDENTIFYING CONSULTING PARTIES AND PUBLIC OUTREACH**

The ACHP letter dated August 6, 2007 and comments received during the August 9, 2007 meeting suggested that the Coast Guard has yet to identify and formally invite consulting and interested parties for this undertaking. The applicant and consultant have attempted to contact known tribal groups that may have interest or concern with the project, especially the Potawatomie Tribe. The first round of letters was sent February 21, 2007. This was before the adverse effect determination by SHPO on March 26, 2007. The March 26, 2007 SHPO letter specifically identified possible archaeological remains related to the Potawatomie. Since this date, a second round of letters was sent to known Potawatomie groups and archaeological surveys have been conducted. The results are dated July 19, 2007, and were provided to you by the applicant's consultant, ASC Group, Inc., and discussed at the August 9, 2007 meeting. The survey appears to confirm that there are no tribal or cultural artifacts likely to occur in the project area. This office has also since received a letter dated August 9, 2007 from the Hannahville Indian Community (Potawatomie) advising that they believe the project would not affect any Indian religious sites or burial grounds, and most recently, a reply letter from Prairie Band Potawatomie Nation on August 13, 2007 stating no objections to the project. To date, there has been no request from any tribal groups to participate as a consulting party. **With this letter I am formally requesting your acceptance of the conclusions of the archaeological survey dated July 19, 2007.** The applicant will be required to comply with standard SHPO procedures should artifacts or remains be discovered during construction

The Coast Guard received a request dated June 29, 2007 from the law firm, Olson, Bzdok, and Howard, the legal representatives of Gateways Communities Development Collaborative (GCDC), requesting the organization be recognized as a consulting party in the Section 106 process for the ABEP. I responded to this request on July 11, 2007 welcoming GCDC as a consulting party and requested the contact information for the GCDC designee. The law firm responded by letter dated July 31, 2007, and listed Ms. Kelli Kavanaugh as the representative for GCDC. Ms. Kavanaugh attended the August 9, 2007 meeting in your offices. She will receive a copy of this letter and all subsequent documentation as we proceed in the Section 106 process.

On April 5, 2006, the Coast Guard invited SHPO and the Detroit City Historic Commission to attend a scoping meeting scheduled for May 4, 2006 at the applicant's offices. Ms. Marla Collum, Historical Review Officer, City of Detroit Planning and Development Division, attended the scoping meeting. SHPO responded to the invitation letter on May 4, 2006, and the Detroit Historic Commission sent a representative to the scoping meeting. The applicant and consultants made presentations to City of Detroit Council on September 14, 2006, and then to City of Detroit Deputy Mayor, Anthony Adams, on March 22, 2007. The City of Detroit has been included in all public notice announcements advising that a bridge permit process and Section 106 process are underway. This office also contacted Detroit City Historic District Commission and Planning and Development offices directly by phone on July 11, 2007. I was advised that the

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

city reviewed the ABEP and determined that no additional City of Detroit historic properties would be affected.

The Coast Guard has issued Public Notices, consistent with Coast Guard NEPA Implementing Instructions, the Coast Guard Bridge Administration Manual, and the provisions of 36 CFR 800.2(d), advising the public of the proposed project and requesting comments on the adverse effect determination by SHPO. The first Public Notice issued was dated July 28, 2006 and advised the public and agencies that an application to construct a new span to the Ambassador Bridge had been received by the Coast Guard and that the preliminary NEPA document was a Categorical Exclusion. The applicant was later directed to prepare an Environmental Assessment (EA).

On May 1, 2007 my office issued a press release advising the public of the release of the Draft EA and SHPO adverse effect determination. The second Public Notice was issued May 10, 2007 announcing the release of the Draft EA, the adverse effect determination by SHPO, and request for comments from the public regarding the design of the bridge. Additionally, the applicant and their consultants have published notices advising the public of the adverse effect determination and invitations to provide comments in person at the Public Workshop/Design Charette conducted on May 24, 2007 at a setting in the vicinity of the bridge and surrounding neighborhoods, and through their company web-site: [www.ambassadorbridge.com](http://www.ambassadorbridge.com). Twenty-seven persons from the general public attended the Design Charette/Public Workshop and eighteen forms showing preferred options for bridge tower configuration, bridge tower texture and color, railings and roadway lighting, and overall bridge lighting, were submitted by the general public. As of August 30, 2007 there have been eleven comments received on the Ambassador Bridge Web-site. The Coast Guard has received twenty-five letters from the general public and eleven letters from agencies and legislative representatives in response to the Draft EA. All of the responses that we received were provided to you at the August 9 meeting. I have received three additional letters since August 9, including the two letters received recently from two Potawatomie tribal groups.

Your office made a determination of adverse effect by letter dated March 26, 2007. A subsequent teleconference was held with the applicant/consultants, Coast Guard, and SHPO on April 16, 2007. During that teleconference you requested additional information regarding project purpose and alternatives considered. This information was subsequently provided by the applicant/consultant, on April 21, 2007. I advised ACHP of Coast Guard status as the lead federal agency of record for the project and of your adverse effect determination by letter dated May 2, 2007 and included the portions of the Draft EA that described the project, historic properties identified, applicant/consultant's Section 106 application to SHPO, letters to and responses from various tribal groups, and a detailed Visual Impact Statement to specifically address the "visual adverse impact" described in your March 26 letter. The Visual Impact Statement identified the methodology used to conduct the study and offered the basis for possible mitigation alternatives. ACHP responded on May 22, 2007 advising that they had chosen to participate in the Section 106 process, and requesting additional information. I responded in writing to ACHP on June 26, 2007 to address their specific questions.

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I am also advising the applicant to arrange for another community meeting to include the neighborhoods represented by Gateway Communities Development Collaborative. I will advise all consulting parties when this meeting is scheduled.

I believe that the consultation with involved agencies, and notification to the public of the project and adverse visual effects on the Ambassador Bridge, have been thorough and consistent with the provisions of 36 CFR 800.2(c) and (d), 800.3(f), and Coast Guard program requirements. In fact, the low number of persons attending the advertised Public Workshop, and the lack of comments to the proposed design of the second bridge in response to the Public Notices and Draft EA, appears to signify that the level of public interest and concern for the declared adverse effect based on visual or aesthetic impacts is not significant. The issue of adverse visual impacts also was not significant in the responses the Coast Guard received to the first Public Notice I issued on July 28, 2006.

**IDENTIFICATION OF HISTORIC PROPERTIES AND ESTABLISHMENT OF AREA OF POTENTIAL EFFECT (APE)**

The applicant and its consultants made a presentation at SHPO offices on November 20, 2006 to provide initial details of the project and identification of historic properties in the project area for the undertaking. The applicant/consultant later submitted a Michigan State Historic Preservation Office Application for Section 106 on February 8, 2007. The application identified the methods used to identify historic properties and the APE. The applicant/consultant provided a detailed graphic illustration of the project, all known historic properties, Designated Historical Districts, and Designated Commercial Districts. All of these documents are included in the Draft EA in Appendix's G and H.

The APE was developed, in large part, based on the studies and determinations performed for the I-75 Ambassador Bridge/Gateway Environmental Analysis (EA) and Finding of No Significant Impact (FONSI), initially approved by the Federal Highway Administration (FHWA) in January 1997, and later re-authorized in 1999, 2004, and most recently in April 2007. The I-75 Ambassador Bridge/Gateway Project (ABGP) was an extensive undertaking involving the modification of the facilities on the United States side of the Ambassador Bridge International Crossing and the routing of traffic within those facilities to the connecting highway system nearby. The project, of which the ABEP is an extension, was promulgated to alleviate traffic delays and the routing of traffic onto local roads, move traffic more efficiently within the Gateway, and improve direct connection between the Gateway and Interstate connections, thereby keeping International Crossing traffic within a system that does not adversely impact local traffic. The project was managed by FHWA and Michigan Department of Transportation. The documentation in the ABGP EA applying to Historic and Cultural Impacts is directly applicable to the evaluation and documentation for the ABEP and this Section 106 process. I believe the consideration of this analysis is consistent with 36 CFR 800.3(b) 800.4(b), and 800.11(b). The impacts of the ABGP included business and residential relocations,

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modifications to numerous local roadways and neighborhoods, and the encroachment on designated Historical Districts around the Gateway area. Your office participated in this undertaking, ultimately issuing a “*no adverse effect*” letter on November 7, 1996. A Memorandum of Agreement was not required and ACHP did not participate in the undertaking.

As the ABGP was developed to improve the overall efficiency of the Ambassador International Crossing as a complete system, which obviously includes any bridge structure crossing Detroit River connecting the plazas that process traffic leaving the bridge, the data and analyses used to determine potential impacts, including the historical and cultural analyses, applies to the ABEP and this consultation. The sum of all the documentation performed in the Gateway EA and the additional analyses performed in this undertaking, along with the low expectation of additional impacts expected by constructing a second bridge in a location already designed in the Gateway EA to accommodate it, suggests that the only affect to historical properties caused by the ABEP is the visual adverse effect to the existing bridge. I also believe that there is adequate coverage of the project area, and actually a redundancy of coverage of the area, to determine that the designated APE will adequately encompass the project area and the potential for impacts to historic properties directly connected with the ABEP. The findings reported in the documentation for this undertaking either confirm and strengthen the analyses performed for the Gateway EA or it suggests a possible need to re-visit those findings. I feel that both projects have been adequately documented.

The applicant, in response to the adverse effect determination, included a Visual Impacts Study in the Draft EA – Section 3.4 and Appendix F – with detailed description of the visual impacts to the existing bridge, including methodology used. During the August 9, 2007 meeting the applicant/consultant gave a presentation describing the purpose and need of the project and multiple alternatives considered for the location of the second bridge, along with suggested design alternatives to address the visual adverse effect. The consultant explained the limitations placed on design engineers for the type and length of different structures considered. I believe this presentation presents well-considered options to address the visual adverse effect, and should be the basis for our continued consultation.

I believe the undertaking has been diligent and thorough in seeking and gathering information to identify and consider historic properties that are located in the vicinity of the project. The ABEP does not appear to affect any other historic properties that have not already been analyzed through the process to approve the I-75 Ambassador Bridge/Gateway Project. The applicant has conducted additional analysis covering the same project area. Your determination that the ABEP would result in an adverse effect to the existing Ambassador Bridge was expected by the Coast Guard and the applicant. The applicant subsequently provided documentation to address the visual adverse effect in the Draft EA to provide a basis for discussions to resolve the adverse effect. The Coast Guard has received very few responses related to the visual impact to the Ambassador Bridge from all the public notices and outreach efforts conducted for this undertaking. Your office was contacted during the planning stages of the project and requested to help identify historic properties and interested groups. The City of Detroit was contacted directly by the applicant, through Coast Guard Public Notices, and direct invitation to scoping

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

meetings. They have not requested to be a consulting party in the Section 106 process. One party (GCDC, representing nine community groups in the vicinity of the existing bridge) has requested to become a consulting party. This request was granted, and I intend to conduct another community meeting with the groups that comprise the GCDC to discuss the project and visual impacts to the existing Ambassador Bridge. I discussed the efforts to assess possible tribal impacts in the preceding section on identifying and contacting consulting parties and public notification. In sum, I believe that the provisions of 36 CFR 800.4 have been conscientiously applied and satisfied.

**PURPOSE AND NEED; ALTERNATIVES**

The applicant/consultant has provided documentation in the Draft EA (Section 1.0) that discusses the purpose and need for the project. The I-75 Ambassador Bridge/Gateway Project (ABGP) is referenced in the Draft EA under this section, specifically, the Environmental Assessment and subsequent Finding of No Significant Impact (FONSI) issued by Federal Highway Administration for the ABGP. The Coast Guard considers the application of the ABGP EA and FONSI as pertinent documentation for the ABEP, and all consulting parties should be familiar with the documentation for the ABGP to ensure full understanding of the ABEP and the analyses that has already been performed.

The ABGP describes the function of the Ambassador International Crossing, including the plazas, bridge, and connecting roadway. The international crossing should be viewed as a system made up of individual components. (This same description of international crossings is found in Section 4 of the Planning/Need and Feasibility Study Summary Report issued by the Canada-United States-Ontario-Michigan Border Transportation Partnership, the precursor to the Detroit River International Crossing (DRIC), in their February 2004 report.) The ABGP was initiated in 1995 by Michigan Department of Transportation to explore engineering and environmental studies. The project, as described on Page 1-1 of the Environmental Assessment and Programmatic Section 4(f) Evaluation dated January 1997, was designed to:

- Improve access between Ambassador Bridge and the Michigan trunkline system in Wayne County, including Clark and Fort Streets,
- Address long-term congestion mitigation,
- Accommodate future border crossing capacity needs and a potential future second span of the Ambassador Bridge located west of and adjacent to the existing bridge,
- Accommodate access to a separate project, the proposed Travel Information Center/Retail Complex on the U.S. side of the Ambassador Bridge; north of the end of the bridge and east of I-75.

The design of the ABGP provided for a direct link at the eastern limit of the Gateway to accommodate a second bridge. The layout of the plaza and “hub” where the second bridge would be located immediately west of the existing bridge has been graphically illustrated in the

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

documentation provided, and again in the presentation provided at your offices on August 9, 2007. The Coast Guard accepts the ABEP as an integral part of the international crossing infrastructure as a whole, and one of the components of the system in place to carry, process, and distribute traffic crossing the border at the Ambassador Crossing. The ABEP will not impose additional significant impacts that have not already been considered for the ABGP.

The applicant has provided analyses of project alternatives in the Draft EA under Section 2.0. The analysis included build and no-build alternatives, as well as analysis for alignment, tunnel, design, and other corridor options. The applicant, as a private entity holding permits for the existing bridge in an already approved corridor, owns the bridge and connecting plazas on both sides of the international border. The construction of a second bridge across Detroit River in a location other than the Ambassador Crossing would potentially result in considerable environmental impacts and disruptions to neighborhoods on both sides of the border in order to construct additional plaza facilities and new connections to the highway systems on both sides, respectively. The ABEP utilizes existing infrastructure that has been in place for 80 years, with improvements to the connecting roadways already analyzed and approved in the ABGP. Additionally, the ABEP, as proposed by the applicant, is consistent with the Coast Guard Bridge Administration Program to construct an additional structure in an already approved crossing/corridor.

The presentation by the applicant/consultant on August 9, 2007 provided twelve design options to address the visual adverse effect determination by your office. It was suggested during this meeting that the "No Build" alternative should be strongly considered to avoid the visual adverse effect. The applicant is responding to the stated need to improve efficiency of traffic using the Ambassador Crossing as stated in the EA and FONSI for the ABGP, as well as creating an updated and modern structure that will carry traffic and extend the life of the existing Ambassador Bridge by taking virtually all traffic, including heavy truck traffic off the older bridge. It was also suggested during the meeting that measures should be taken to preserve the historic existing bridge. The proposed ABEP helps to accomplish that goal. The continuation of traffic across the existing bridge would result in the further degradation of the structure and/or cause significant slowdowns of traffic due to closing of lanes, and possibly the entire structure, to perform continual maintenance. The bridge would have to reach that point at some time in the future if current and projected traffic continues across the existing structure. Also, the suggestion by SHPO and ACHP to include a "Maintenance Condition" for the existing historical bridge in a possible Memorandum of Agreement on this undertaking was well received by the applicant. I understand from the applicant that additional coordination along these lines would be welcome.

I believe that the applicant has demonstrated that reasonable and feasible alternatives have been considered for the project overall, and specifically for the design of the bridge to address the visual adverse effect. The applicant proposes to use private funds to add an additional structure to its already permitted structure that feeds directly into established infrastructure that has been thoroughly analyzed for environmental impacts in neighborhoods that have experienced border traffic for 80 years. To construct another structure across the river in a different location would require the acquisition of additional property, the displacement of businesses and residents to

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

accommodate additional plazas, and new connections to the highway system. The stated purposes and needs of the applicant for the ABEP, including the future uses of the both the existing and proposed bridges, are consistent with federal bridge statutes and Coast Guard program requirements, and will not require the expenditure of public funds.

Further, I understand that the applicant is preparing and will shortly submit to your office a further discussion of purpose and need for the ABEP, as agreed at our August 9 meeting.

**DOCUMENTATION**

The proposed ABEP requires the use of only a small area that is just outside the designated boundary of the Gateway plaza. This area extends from the eastern limit of the Gateway to the Detroit River shoreline. The eastern limit of the Gateway includes a planned connection for the addition of a second bridge structure immediately to the west of the existing Ambassador Bridge. The Gateway Project EA and FONSI included extensive documentation of the potential cultural and historic impacts in the area around the Ambassador Bridge and Gateway. The applicant for the ABEP has performed additional analyses of the same area and submitted the documentation to you through their Section 106 application. You requested a Phase I archaeological survey at the proposed pier locations and this was conducted by the applicant/consultant. SHPO, and ACHP, have requested additional documentation and statements through correspondence and meetings. The Coast Guard and applicant/consultant have provided responses to all requests for additional information. With this letter, I am enclosing copies of all documentation (including power point presentations) that have been referenced in this letter and submitted in this undertaking and consultation. I believe that the documentation is complete and that it has been gathered and analyzed in accordance with 36 CFR 800.8 and 800.11, with the exception of descriptions of the Ambassador Bridge and the characteristics that qualify it for the National Register. I request that you provide any information and documentation that you may possess on the Ambassador Bridge, especially the qualifying characteristics that make it eligible for listing in the National Register of Historic Places. I believe this would enhance and complete the documentation for the undertaking to date.

**SUMMARY**

As I stated at the outset, I believe that all consulting parties in this undertaking would be served by having all the documentation that applies to this project collected in one document at this point in our consultation. This letter is designed to facilitate that goal.

In addition, I have included a full timeline of all significant actions for easy reference. I believe it will help to summarize for all consulting parties the extent of coordination performed for this undertaking. I will encourage all involved parties to review all the enclosed documentation again to help ensure that the basis for this undertaking is made clear in our continued consultation.

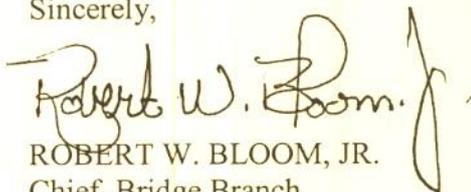
I believe that the project, as submitted by the applicant, will not result in any other adverse effects to historic properties other than the adverse effect, based on visual aesthetic impacts,

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

determined by your office on March 26, 2007. I have confirmed that the applicant and its consultants are prepared to work with all consulting parties to mitigate the visual adverse effect and discuss adequate mitigation plans for consideration. The archaeological study requested by your office appeared to indicate that no cultural or historical artifacts are likely to be found in the project area. The applicant will comply with all standard requirements for actions to be taken if artifacts or remains are found during construction. In response to comments between consulting parties at the August 9, 2007 meeting regarding the maintenance and upkeep of the existing Ambassador Bridge, and the possible inclusion of an agreed Maintenance Plan in a potential Memorandum of Agreement, it appears that there is a basis for agreement on this item. Indeed, I believe there is basis for satisfactorily mitigating the visual adverse effect to the historic Ambassador Bridge through continued consultation. Finally, I intend to conduct a community meeting with the community groups in the vicinity of the Ambassador Bridge and Gateway to solicit additional public input on the project and suggested design options to address the Section 106 adverse effect.

I look forward to discussing these matters further with you as we consider the next steps in our consultation. Please feel free to contact me at any time at (216) 902-6085. I look forward to your response.

Sincerely,



ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

- Enclosures:
- (1) Timeline of Documentation and Consultation for Section 106 Process
  - (2) Environmental Assessment and FONSI for I-75 Ambassador Bridge/Gateway Project, including 1999 and 2004 re-authorization by FHWA (CD)
  - (3) April 4, 2007 EA and FONSI re-authorization by FHWA
  - (4) Applicant/consultant presentation from November 20, 2006
  - (5) Applicant/consultant Section 106 Application – February 8, 2007
  - (6) Ambassador Bridge Enhancement Project Draft EA (Copy for Gateway Communities Development Collaborative – Copies previously sent to all others. May download full copy at [www.ambassadorbridge.com](http://www.ambassadorbridge.com))
  - (7) All responses to Draft EA
  - (8) All Section 106 correspondence
  - (9) All Public Notices, supplemental mailing lists, Sign-in sheets for May 4, 2006 scoping meeting and May 24, 2007 Public Workshop/Design Charette
  - (10) All responses to the Public Workshop/Design Charette and Web-site, May 24, 2007
  - (11) Applicant/consultant presentation to City of Detroit on June 4, 2007
  - (12) Phase I Archaeological Survey Results – July 19, 2007

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

(13) Applicant/consultant presentation from August 9, 2007, meeting (CD)

Copy: Advisory Council on Historic Preservation, Washington, D.C.  
Gateway Communities Development Collaborative consultant, Kelli Kavanaugh  
David H. Coburn, Counsel to Detroit International Bridge Company

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander (dpb)  
Ninth Coast Guard District  
1240 E. Ninth Street, Room 2019  
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Phone: (216) 902-6085  
FAX: (216) 902-6088

16590  
B-100/sms  
September 27, 2007

Charlene Dwin Vaughn, AICP  
Assistant Director – Office of Federal Agency Programs  
Federal Permitting, Licensing, and Assistance Section  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue, NW, Suite 809  
Washington, D.C. 20004

**Re: Proposed Ambassador Bridge Enhancement Project – Detroit, Wayne County,  
Michigan**

Dear Ms. Vaughn,

Thank you for your August 6, 2007 letter regarding the Ambassador Bridge Enhancement Project (ABEP). Similarly, we appreciate Ms. Martha Catlin's participation by teleconference in the meeting at Michigan State Preservation Officer (SHPO) offices in Lansing, Michigan, on August 9, 2007.

You should be in receipt of my latest letter to SHPO dated September 4, 2007 that summarizes all Section 106 consultation performed so far. In addition, I have enclosed copies of the final two comment letters received by this office in response to the Draft Environmental Assessment. All consulting parties will receive copies of these two letters.

I wish to clarify a couple of items noted in your August 6, 2007 letter. You advised us that you had received correspondence from Greater Corktown Development Corporation (GC), Southwest Detroit Business Association (SDBS), and Gateway Communities Development Collaborative (GCDC). In fact, my office was already in receipt of the letters you identified, and they are included in the case file for the project. You may not be aware of the relationship among these three groups, but GCDC and SDBA are two of nine organizations that make up Gateway Communities Development Collaborative. The GCDC letter of June 29, 2007, was actually a letter from their legal representative, Olson, Bzdok, and Howard, requesting GCDC be recognized as a consulting party in the Section 106 process. We responded to that letter on July 11, 2007 welcoming GCDC as a consulting party. This information was referred to you by Mr. Scot Striffler of this staff by email on August 6, 2007. A representative from GCDC, Kelli Kavanaugh, was invited (and attended) the August 9 meeting at SHPO's office in Lansing, MI. The GCDC is the only group that has requested inclusion as a consulting party in the Section 106 process for this project.

The GC letter did not make any references to the historic qualities of the bridge or the Section 106 process. The SDBS letter expressed curiosity "... as to the fate of the existing bridge. No concrete information is available. It is a national historic landmark, and little has been said regarding its future." I believe that the Draft EA does discuss future uses and disposition of the

**Re: Proposed Ambassador Bridge Enhancement Project – Detroit, Wayne County, Michigan**

existing bridge in detail. My office has further clarified the authority of the Coast Guard in our August 7, 2007 letter to SHPO and yourself, and explained that the bridge owner would continue to be subject to requirements that would prevent the bridge from falling into disrepair, and that they would require permission from the Coast Guard to remove the bridge, which involves further Section 106 review. It was suggested during the August 9, 2007 meeting in Lansing that the maintenance of the existing bridge is a matter that could be addressed through a possible Memorandum of Agreement.

The Coast Guard has extended an invitation to the only group that has expressed interest to participate as consulting party and, as a reminder, the GCDC represents nine individual organizations who claim a vested interest in the proposed project. As you may have noticed in our September 4, 2007 letter to Michigan SHPO, we intend to organize a community meeting with the neighborhoods in the vicinity of the bridge to discuss the project and solicit additional input on the visual adverse effect to the existing Ambassador Bridge. I will also contact SHPO and request their guidance or suggestions to include additional parties.

I formally ask you to identify which provisions of Appendix A of 36 CFR 800 that you believe are applicable in this undertaking, and which you refer to in your letter of May 22, 2007.

We also look forward to continuing consultation and coordination on this project. Please contact me at (216) 902-6085 if you have any questions or require additional information. Thank you.

Sincerely,



ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

Copy: Detroit Ambassador Bridge Company, Detroit, Michigan  
Michigan State Historical Preservation Officer, Lansing, Michigan  
Gateways Communities Development Collaborative, Kelli Kavanaugh  
Mr. David Reese, Department of Homeland Security, Washington, D.C.

U.S. Department of  
Homeland Security

United States  
Coast Guard



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16590  
B-114/sms  
October 25, 2007

Mr. Brian D. Conway  
State Historical Preservation Officer  
Michigan Historical Center  
P.O. Box 30740  
702 West Kalamazoo Street  
Lansing, Michigan 48909-8240

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

Dear Mr. Conway:

I am writing to provide a schedule, or timeline, to be applied in our consultation for the proposed Ambassador Bridge Enhancement Project. The submission of a schedule was discussed in our August 9, 2007 meeting in your offices. I propose the following schedule:

**October 1, 2007** – Applicant mailed requested Purpose and Need statement.

**November 5, 2007** – SHPO provides to USCG response to USCG letter dated September 4, 2007 and any views on the timeline submitted in this letter. To complete USCG documentation requirements under 800.11(e), SHPO also provides USCG with qualification information that makes the Ambassador Bridge eligible for listing on the National Register of Historic Places.

**November 14, 2007** – USCG provides preliminary determination of potential negative impacts of undertaking on historic resources to include traffic, noise, air quality, economic, visual, structural stability of existing structure, and socioeconomics.

**November 14, 2007** – USCG provides alternatives investigated to include:

- A. No-Build
- B. Build Elsewhere
- C. Parallel Suspension Bridge with Pier in the River
- D. Parallel Suspension Bridge with no Pier in the Water
  - 1. Three Lanes East of Existing Span
  - 2. Three Lanes West of Existing Span
  - 3. Six Lanes East of Existing Span
  - 4. Six Lanes West of Existing Span
- E. Cable Stay Bridge
  - 1. Three Lanes East of Existing Span
  - 2. Three Lanes West of Existing Span
  - 3. Six Lanes East of Existing Span

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

4. Six Lanes West of Existing Span
- F. Tunnel
  1. Three Lanes East of Existing Span
  2. Three Lanes West of Existing Span
  3. Three Lanes East and Three Lanes West of Existing Span
- G. Selection of Preferred Alternative
  1. Rational for Selection
  2. Evaluation of Impact on Historic Span of Preferred Alternative

**Week of December 4, 2007** – USCG to hold meeting with consulting parties (GCDC, ACHP, SHPO, Tribal Groups) and the general public. The meeting will describe the ABEP and the APE, and seek public input on the potential negative impacts on historic resources and seek public input on potential mitigation.

**December 18, 2007** – USCG circulates draft MOA to SHPO and ACHP for review.

**Early January 2008** – USCG meeting with SHPO/ACHP and applicant to discuss MOA and any other outstanding issues.

**TBD** – Submit Section 106 Final Report and Final EA with MOA

Please feel free to contact me at any time at (216) 902-6085 to discuss this project.

Sincerely,



ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

Copy: Charlene Dwin Vaughn, Advisory Council on Historic Preservation, Washington, D.C.  
Gateway Communities Development Collaborative consultant, Kelli Kavanaugh  
David H. Coburn, Counsel to Detroit International Bridge Company  
Mr. David Reese, Department of Homeland Security, Washington, D.C.

U.S. Department of  
Homeland Security

United States  
Coast Guard



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16590  
B-123/sms  
November 26, 2007

Mr. Brian D. Conway  
State Historical Preservation Officer  
Michigan Historical Center  
P.O. Box 30740  
702 West Kalamazoo Street  
Lansing, Michigan 48909-8240

**Re: Proposed Ambassador Bridge Enhancement Project (ABEP) – Detroit, Wayne County, Michigan (SHPO Project ER05-422).**

Dear Mr. Conway:

I am writing to request your participation in the scheduled December 6, 2007 public meeting in Detroit, Michigan, to solicit additional input from the public regarding the design of the proposed second bridge structure at the Ambassador Bridge crossing in Detroit. This letter also serves as invitation to the other consulting parties that have participated in our Section 106 consultation so far. The Public Workshop will be held on Thursday, December 6th, 2007, at 6:00 p.m. at Earhart Middle School located at 1000 Scotten Street, Detroit, Michigan 48209. I am also requesting that you provide comments relative to the consultation so far, including recommendations for mitigating the visual adverse effect determination made by your office for this project. In order to further the Section 106 process, allow the applicant adequate time to prepare materials for the presentation, and provide possible options under consideration to the public, I request you provide your comments by December 3, 2007.

I am also writing to provide the materials discussed in the timeline provided in my October 25, 2007 letter. I have enclosed a statement from the applicant/consultant providing analysis of potential impacts of the undertaking on historic resources and investigated alternatives.

Please feel free to contact Scot Striffler at any time at (216) 902-6087 to discuss this project.

Sincerely,

A handwritten signature in black ink that reads "Robert W. Bloom, Jr." with a stylized flourish at the end.

ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

Copy: Charlene Dwin Vaughn, Advisory Council on Historic Preservation, Washington, D.C.  
Gateway Communities Development Collaborative consultant, Kelli Kavanaugh  
David H. Coburn, Counsel to Detroit International Bridge Company  
Mr. David Reese, Department of Homeland Security, Washington, D.C.



JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

DR. WILLIAM ANDERSON  
DIRECTOR

January 18, 2008

ROBERT W BLOOM JR  
U S COAST GUARD  
1240 EAST NINTH STREET ROOM 2019  
CLEVELAND OH 44199-2060

RE: ER05-422 Ambassador Bridge Enhancement Project Draft Environmental Assessment,  
Section 4, T2S, R11E, Detroit, Wayne County (USCG)

Dear Mr. Bloom:

Under the authority of Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, we have reviewed the additional information submitted regarding the above-cited undertaking at the location noted above.

According to our files, the SHPO received preliminary project information on May 15, 2005. We received the official Section 106 application on February 09, 2007 initiating the Section 106 review process. We responded on March 26, 2007 with a determination that, based on the information provided, the proposed project would have an **adverse effect** on the Ambassador Bridge, which was determined eligible for the National Register of Historic Places by the Keeper. In addition, we requested that an archaeological survey be performed for the project area to determine potential effects on archaeological sites. We received a copy of the draft EA on April 23, 2007. The SHPO sent comments on the draft EA in a letter dated July 13, 2007 in which we detailed specific concerns we had with the EA.

On August 9, the USCG held a meeting with SHPO, ACHP & other consulting parties at the Michigan Historical Center in Lansing. On September 12, 2007, we received a letter from USCG, which appears to have been prepared in response to the SHPO comments to the draft EA as well as the August 9 meeting. The SHPO has continued to receive information to consider from the USCG since receiving their September 12 correspondence, including the requested archaeological survey and a case study of alternatives. In response to the USCG letter and all of the subsequent information we have received to this date, we have the following comments:

**Confirmation of the Initiation of Section 106** – During the August 9 meeting, Martha Catlin at the ACHP pointed out that the Section 106 regulations require that the federal agency plan how and when it will involve the public the outset of the Section 106 review. She asserted that, the USCG had not yet followed each of the steps specified in 36CFR 800.2a(4) *Consultation* in planning and identifying consulting parties, or 36CFR 800.3 *Initiation of the Section 106 process*. The ACHP and the SHPO agree that initiation of the Section 106 process with the SHPO did occur when the project application and documentation were first submitted in February 2007. The decision by the ACHP to enter into consultation is confirmation that the Section 106 process had been initiated with the ACHP. Based on our discussions with Ms. Catlin, the purpose of the ACHP's comment was to encourage the USCG to complete the remaining steps in Section 800.2 and 800.3, not to invalidate the USCG's initiation of Section 106 with the SHPO and the ACHP.

**Archaeological Survey** – In our letter dated March 26, 2007, in which we determined that the project would have an adverse effect on the Ambassador Bridge, we also requested that an archaeological survey be performed for the project area to determine potential effects on archaeological sites. On November 14, 2007, we received a copy of the report entitled “*Phase I Archaeological Survey for the Ambassador Bridge Enhancement Project, City of Detroit, Wayne County, Michigan*”. The report was reviewed by the Office of the State Archaeologist (OSA) in consultation with the SHPO, and we concur with the conclusions of the archaeological survey. Therefore, based on the survey and the information contained in the report, it is the determination of the SHPO that no historic archaeological properties are affected within the area of potential effects of this undertaking.

**Purpose & Need** – In our opinion, the revised purpose and need statement more thoughtfully addresses the larger issues or problems the project seeks rather than focusing on a desired alternative, and likewise, what alternatives may actually be considered. Therefore, we accept the revised purpose and need statement for this project.

**APE /Impacts /ID Historic Properties** – In our letter dated July 13, 2007 commenting on the draft EA, and through the course of discussion in the meeting on August 7, the SHPO suggested that the APE for the project be re-evaluated to include potential cumulative and secondary impacts to surrounding area such as increased traffic, noise levels, air pollution, etc. The SHPO also suggested that the USCG get input from the Gateway Communities Development Collaborative (GCDC) to consider impacts of the project within the surrounding area. Your letter indicates that the APE was developed based on the studies and determinations for the I-75 Ambassador Bridge Gateway Project in 1997, and therefore, any consideration of the APE to include adjacent neighborhoods, etc. was already completed with the Gateway project. Review of our files regarding the Gateway Project supports the USCG’s argument that the Gateway project was undertaken in anticipation of the addition of a second span to the Ambassador Bridge.

Your letter persists on the notion that the only impacts are visual, since that is what we mentioned in our determination of *adverse effect*. Please note that our determination was based on the information that was provided to us at that time. However, we feel that there may be other potential effects as well, including structural impacts (we haven’t received a structural analysis of the old bridge & how construction of a new bridge might impact it) or effects as a result of the abandonment of the existing span. Your letter indicates that the DIBC seems interested in a maintenance plan for old bridge as part of mitigation, which we encourage, but we would like to see more definite plans for the preservation of the historic bridge included in any potential mitigation.

**Public Comment** - It concerns us that it appears that the majority of public meetings held thus far have focused narrowly on public comment for the design of new a bridge, with no opportunity to comment on potential impacts of the overall project. 36 CFR Part 800 provides for public participation throughout the Section 106 review process, not exclusively on the final design. This concern should be addressed and the results included in the final EA.

**SHPO Documentation** – The USCG has requested any and all information and documentation in the SHPO files regarding the eligibility of the Ambassador Bridge. As stated previously, the Keeper of the National Register determined the bridge eligible for listing on the National Register of Historic Places on June 6, 1986. This occurred as the result of a survey of bridges in Michigan, conducted by the Michigan

Department of Transportation (MDOT) at the request of the SHPO. Enclosed is a copy of the portions of that survey that pertain to the Ambassador Bridge and the criteria for determining eligibility.

According to the National Register nomination conducted at the time of the survey, the Ambassador Bridge meets 5 of the 6 criteria that were established for the survey. A more comprehensive statement of significance follows:

Approval for the Ambassador Bridge was granted by acts of both the Congress of the United States and Canada's Parliament. The bridge construction started in 1927, and was completed in 1929. It is one of only two suspension bridges built in Michigan, and at the time it was completed, was the longest suspension bridge in the world, exceeding the Philadelphia-Camden Bridge completed in 1926 by 100 feet. The chief engineer was Johnathan Jones from the McClintic-Marshall Company of Pittsburgh, Pennsylvania the prime contractor. The construction of this bridge involved several significant achievements, including the replacement of all the wire cables after they had been strung and the stiffening trusses already suspended. Spanning the Detroit River to connect Detroit, Michigan with Windsor, Canada, it is also significant as North America's busiest international border crossing.

The bridge is styled in an interesting functional architectural design, with some Gothic architectural elements. It is made primarily out of steel; however, the two main towers on each side of the river are made of a steel-silicon alloy, and rise up from concrete piers. It has a stiffening truss system that is above the deck like a pony truss, unlike the Mackinac Bridge, whose stiffening truss is all below the bridge like a deck truss. The Ambassador Bridge does feature deck truss spans as an approach to the span. It is unique because the section of bridge between the anchorages and the main towers is not suspended.

The Ambassador Bridge meets criteria A and C of the National Register of Historic Places at the national level in the areas of transportation and engineering.

**EA Analysis** - We still have concerns with the level of data provided to support the claims made in the EA. The USCG still has not provided in-depth analysis to support claims regarding total costs, or other factors such as environmental impacts of the different alternatives. Such information should be included in the final EA.

The NEPA guidelines dictate that for major federal actions that could significantly affect the human environment, an Environmental Impact statement (EIS) must be completed. The SHPO feels that the USCG should require that an EIS be prepared to thoroughly assess the environmental impacts of this undertaking.

**Conclusion** - Based on the information we have received to this date, we accept the need for this project under the provisions of the Section 106 process, and we accept the preferred alternative of the six-lane, cable stay bridge to be constructed on the west alignment. In order to complete the Section 106 process, we will continue to participate in consultation regarding how to mitigate the adverse effect and to develop a Memorandum of Agreement (MOA) for this undertaking.

The State Historic Preservation Office is not the office of record for this undertaking. You are therefore

asked to maintain a copy of this letter with your environmental review record for this undertaking. If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

If you have any questions, please contact Martha MacFarlane Faes, Environmental Review Coordinator, at (517) 335-2720 or by email at ER@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,



Brian D. Conway  
State Historic Preservation Officer

BDC:DLA:ROC:BGG

copy: Tracy Andrews, Olson, Bzdok and Howard, Traverse City, MI  
Geraldyn Ayers, MDOT  
Martha Catlin, Advisory Council on Historic Preservation  
David Coburn, Steptoe and Johnson, Washington, D.C.  
Sherry Kamke, USEPA, Chicago  
Scott Korpi, American Consulting Engineers  
Lis Knibbe, Quinn Evans Architects  
Thomas McMahon, Canadian Transit Company  
Dan Stamper, DIBC  
David Williams, FHWA, Lansing

## Striffler, Scot

---

**From:** Melissa@envlaw.com on behalf of Melissa Moss [Melissa@envlaw.com]  
**Sent:** Wednesday, April 30, 2008 3:40 PM  
**To:** Bloom, Robert  
**Cc:** kellibkav@gmail.com; lisa\_swdev@flash.net; Striffler, Scot; Carlson, Kurt; mcatlin@achp.gov; FaesM@michigan.gov; GrennellB@michigan.gov; ConwayBD@michigan.gov; dan@ambassadorbridge.com; SKorpi@ACE-FLA.com; BMirson@ACE-FLA.com; Anna.Peterfreund@acp-ga.com; T.J. Andrews; Chris Bzdok; Melissa Moss  
**Subject:** Section 106 Process for "Ambassador Bridge Enhancement Project"  
**Attachments:** Blank Bkgrd.gif; 5550.00 04-30-08 ltr to consulting parties.PDF



Blank Bkgrd.gif (380 5550.00 04-30-08  
B) ltr to consul...

Dear Mr. Bloom:

Our firm represents the Gateway Community Development Collaborative (GCDC) and its members, and this letter is sent on their behalf. (Please see attachment.)

Sincerely,  
Melissa Moss

Melissa Moss, Legal Assistant  
Olson, Bzdok & Howard, P.C.  
420 East Front Street  
Traverse City, MI 49686  
231/946-0044 (Ph)  
231/946-4807 (Fax)  
melissa@envlaw.com

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LAW OFFICES OF  
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Christopher M. Bzdok  
Scott W. Howard  
Tracy J. "TJ" Andrews ‡  
Jeffrey L. Jocks  
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William Rastetter, Of Counsel ◦  
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\* Admitted in Colorado  
‡ Admitted in Texas  
◦ Admitted in Indiana

April 30, 2008

Robert W. Bloom, Jr.  
United States Coast Guard  
1240 East 9<sup>th</sup> St. Room 2019  
Cleveland, OH 44199-2060

*Via e-mail (Robert.W.Bloom@uscg.mil) and US Mail*

Re: Section 106 Process for "Ambassador Bridge Enhancement Project"  
Our File N<sup>o</sup>: 5550.00

Dear Mr. Bloom:

Our firm represents the Gateway Community Development Collaborative (GCDC) and its members, and this letter is sent on their behalf. As requested, this letter provides suggestions from GCDC and its members for ways to potentially mitigate the adverse impacts of the "Ambassador Bridge Enhancement Project" (ABEP).

While you are familiar with the relevant background, we reiterate some things here to preserve the context of this letter.

The Detroit International Bridge Company (DIBC) has proposed constructing a new bridge immediately adjacent to the existing Ambassador Bridge. The stated purpose of the new bridge is "to retain — and more efficiently and safely service — the traffic now being handled at the Ambassador Bridge."<sup>1</sup> The ABEP would create 4 new lanes (2 in each direction) for regular traffic and 2 new lanes (1 in each direction) dedicated to FAST and NEXUS commercial truck traffic. According to DIBC, FAST and NEXUS allow participants certain "pre-clearance measures" to avoid waiting behind non-participating trucks awaiting Customs inspections. The historic 4-lane bridge would be maintained for commercial and other traffic.

The Michigan State Historic Preservation Office (SHPO) reviewed the ABEP, as required by Section 106 of the National Historic Preservation Act (NHPA), and concluded the project would create an "overwhelming visual distraction" to the Ambassador Bridge, which is eligible for listing on the National Register of Historic Places. Because the ABEP will adversely affect a structure protected by the NHPA, Section 106 of that Act requires the Coast Guard to consult with relevant parties and seek ways to "avoid, minimize or mitigate" these adverse effects on the historic bridge.<sup>2</sup>

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<sup>1</sup>David H. Coburn, "Statement of Purpose and Need for Ambassador Bridge Enhancement Project," p. 2 (Sept. 28, 2007).

<sup>2</sup>36 CFR 800.1(a).

Robert W. Bloom, Jr.

4/30/2008

2

Apparently, DIBC, the Coast Guard, and SHPO reviewed some alternatives, including a "no build" alternative, and concluded the preferred alternative to meet the stated need of the project is the construction of a six-lane cable-stay bridge constructed on the west alignment with the current bridge. As required by Section 106, the next step is for the participating parties to consult about ways to mitigate the adverse effects of the ABEP and develop a Memorandum of Agreement (MOA) for the project. At a meeting on March 26, the Coast Guard and other participants specifically requested GCDC provide specific mitigation suggestions on behalf of its membership.

It is GCDC's position that the parties have not explored alternatives that meet ABEP's stated purpose (increased efficiency for existing traffic flows) and avoid the adverse effects of the proposed 6-lane adjacent twin bridge. Since there may be ways to *avoid* the adverse effects to the historic Bridge, it is inappropriate under Section 106 to focus instead on ways to *mitigate* the effects of the ABEP. Rather than explore all options to determine what is the best alternative to meet the stated purpose of increased efficiency and safety for existing traffic across the Ambassador Bridge, it appears the parties have instead sought ways to justify a proposed new span. For example, MDOT's Ambassador Bridge/Gateway Project, which will not be complete until probably 2010, is intended to improve bridge-crossing efficiency. There has been no discussion that we have seen considering how improvements resulting from that \$230 million project may result in more efficient crossings, and hence minimize the necessity for a new span. Further, a fundamental premise of the Gateway project is the fact that access and customs delays are the major sources of crossing inefficiency; not lack of bridge capacity. Nor have we seen any analysis about dedicating existing lanes to FAST and/or NEXUS, whether the historic bridge may be widened, how DIBC's new customs inspection booths and truck inspection areas may improve efficiency, how a new bridge downriver may impact traffic flows (change in number or type of vehicles using the Ambassador Bridge), nor countless other factors that may influence the scope of alternatives to meet the stated purpose while avoiding the "overwhelming visual distraction" to the historic bridge.

The failure to delve into all the various factors impacting the "no build" alternative means there is no data allowing parties to evaluate, for example: Will the new bridge in fact be more efficient than the existing bridge? If so, how much more efficient (seconds or hours?), and how many vehicles will benefit? What are the comparative air, noise, and other impacts of the new span versus the existing bridge, when taking into account the efficiencies anticipated by customs plaza, inspections, and access improvements underway? Will the new bridge, with increased capacity and efficiency, result in more traffic? How much more traffic, and what are the direct and indirect results of that increase? Is there a documented safety problem on the bridge, what is it, and how would a new span resolve it? And so on.

In sum, GCDC is not aware of data or analysis supporting the conclusion that a second bridge span is the preferred way to retain, and efficiently and safely service, traffic crossing the Ambassador Bridge. The corollary is that there may be ways enhance the Ambassador Bridge that *avoid* the adverse impacts.

Nevertheless, you requested suggestions from GCDC for ways to mitigate adverse impacts of the proposed new twin span on the local neighborhoods. In responding to your request, GCDC does not concede its position that discussing mitigation measures is entirely academic, inappropriate, and contrary to the mandate of Section 106, when there are likely ways to avoid the adverse impacts of the proposal that have not been considered.<sup>3</sup> With that firm caveat, we provide the following suggestions (in addition to those already proposed by the parties):

1. **Invest in making all (or at least a significant width of) the historic Ambassador Bridge a pedestrian- and bicycle-friendly greenway connection between Detroit and Windsor.**

This would include, for example, closing the bridge to most traffic (already proposed); creating stations for breaks, bathrooms, and other necessities; installing aesthetic improvements for pedestrian and bicycle users such as public art and landscaping; and providing safe pedestrian/bicycle access to the Bridge (preferably interconnected with the existing greenway project described below). This project would mitigate some of the adverse impacts of the new bridge project, which would leave the historic Ambassador Bridge largely underused and likely result in increased traffic. Providing pedestrian and bicycle access would, among other benefits, provide functional public access to the Bridge; create a new recreational and tourist attraction to the area; and perpetuate the purpose of the historic Bridge, *i.e.*, connecting Detroit and Windsor, albeit to a different audience (recreational users, athletes, commuting professionals, etc). To implement this project, the MOA should create a committee of representatives from DIBC, SHPO, stakeholder community groups, and others, and fund an endowment to implement the project.

2. **Ensure access to the riverfront west of downtown for public use.**

The current Ambassador Bridge is the proposed western end of the Detroit International RiverFront. Appropriate pedestrian and bicycle ingress and egress at both the U.S. and Canadian ends of the historic Bridge would permit access to the Detroit International RiverFront, which proceeds east to the Belle Isle Bridge. This already existing asset connects residents and visitors alike along the Detroit River's edge, or along a proposed greenway up into the southwest Detroit neighborhood west into Dearborn and the Rouge River corridor, or east into Mexicantown and Corktown, on into the Central Business District. Landscaping and a pathway from the bridge could connect the community west of the bridge to the water. To implement this project, the MOU should create a committee of representatives from DIBC, SHPO, stakeholder community groups, and others, and fund an endowment to implement the project.

3. **Support the local greenway connections.**

Design plans for the Corktown-Mexicantown Greenlink, which connects the West Riverfront and Greater Corktown, Mexicantown, and the Hubbard communities, have been completed. These connections are in turn part of a much larger greenway connection in Southeast Michigan. At this time, funding for construction and maintenance of the Southwest Detroit components of the greenway system is not complete. This project would ensure implementation of the local greenway connections and an endowment fund for ongoing

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<sup>3</sup>We also reference and reiterate all the procedural and substantive inadequacies related to the ABEP that GCDC outlined in its August 31, 2007, comments on the draft Environmental Assessment, as well as prior and subsequent correspondence with the Coast Guard.

Robert W. Bloom, Jr.  
4/30/2008  
4

maintenance. This project would mitigate some of the adverse impacts of the new bridge project by providing alternative access to the communities and connecting the communities with the greater region. Some of the adverse impacts of the new bridge project include likely increased traffic and destruction of a visible attraction to the communities. The greenways project would provide an alternative access to the riverfront and for those seeking a non-motorized means of travel to Canada. To implement this project, the MOA should create a committee of representatives from DIBC, SHPO, stakeholder community groups, and others, and fund an endowment to implement the project.

To reiterate: GCDC does not accept that the new span is the preferred alternative to achieve DIBC's stated goal. Properly evaluating all the factors involved in various no-build alternatives would likely confirm the adverse impacts of the new span can be entirely avoided.

Sincerely,

  
for Tracy J. "TJ" Andrews

TJA:mnm

cc: Kelli Kavanaugh, Gateway Communities Development Collaborative  
([kellibkav@gmail.com](mailto:kellibkav@gmail.com))  
Lisa Goldstein, Gateway Communities Development Collaborative  
([lisa\\_swdev@flash.net](mailto:lisa_swdev@flash.net))  
Scott Strifler, United States Coast Guard ([Scot.M.Striffler@uscg.mil](mailto:Scot.M.Striffler@uscg.mil))  
Kurt Carlson, United States Coast Guard ([Kurt.A.Carlson@uscg.mil](mailto:Kurt.A.Carlson@uscg.mil))  
Martha Catlin, National Historic Preservation Office ([mcattlin@achp.gov](mailto:mcattlin@achp.gov))  
Martha MacFarlane-Faes, Michigan State Historic Preservation Office  
([FaesM@michigan.gov](mailto:FaesM@michigan.gov))  
Brian Grennell, Michigan State Historic Preservation Office ([GrennellB@michigan.gov](mailto:GrennellB@michigan.gov))  
Brian Conway, Michigan State Historic Preservation Office ([ConwayBD@michigan.gov](mailto:ConwayBD@michigan.gov))  
Dan Stamper, Detroit International Bridge Company ([dan@ambassadorbridge.com](mailto:dan@ambassadorbridge.com))  
Scott Korpi, American Consulting Professionals, LLC ([SKorpi@ACE-FLA.com](mailto:SKorpi@ACE-FLA.com))  
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([Anna.Peterfreund@acp-ga.com](mailto:Anna.Peterfreund@acp-ga.com))

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander (dpb)  
Ninth Coast Guard District  
1240 E. Ninth Street, Room 2025  
Cleveland, OH 44199-2060

Phone: (216) 902-6085  
FAX: (216) 902-6088

16590  
B-042/sms  
May 7, 2008

Ms. Tracy J. Andrews  
Law Offices of Olson, Bzdok & Howard  
420 Front Street  
Traverse City, Michigan 49686

Dear Ms. Andrews:

I am responding to your letter dated April 30, 2008 on behalf of your client, Gateway Communities Development Collaborative (GCDC), and your comments regarding the Section 106 process for the proposed Ambassador Bridge Enhancement Project (ABEP) in Detroit, Michigan.

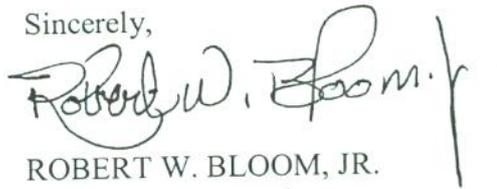
During the March 26, 2008 meeting in Detroit, MI, GCDC was asked to provide suggestions from its members on the design options presented by DIBC representatives. It was agreed that GCDC would ask community members for their feedback on tower shape, lighting, and other design features and would report the community feedback to the consulting parties by April 30, 2008. Your letter emphasizes GCDC's position on the evaluated and approved project alternatives for the ABEP. The comments previously submitted by GCDC in response to the Draft EA, dated August 31, 2007, addressed your position on project alternatives and all aspects of the project, and have been included by the Coast Guard as part of the record for the project. The Coast Guard will respond to your comments, along with all comments received, in the Final EA.

Regarding your three specific suggestions for our continued consultation, the first suggestion of "making the historic Ambassador Bridge a pedestrian-friendly connection between Detroit and Windsor" is not feasible given the jurisdictional oversight of other U.S. federal agencies and the restrictions at the international border crossing. Additionally, any suggestions for widening or modifying the existing Ambassador Bridge are not reasonably feasible options. The remaining two suggestions can be discussed in future meetings.

At the conclusion of the March 26 meeting it was suggested that the next meeting occur in Detroit on May 14, 2008, to review the community feedback from GCDC and to review suggested language for a Draft Memorandum of Agreement (DMOA), as prepared by MI-SHPO and ACHP. The DMOA has been provided by MI-SHPO for all parties to review. At this time the Coast Guard believes that a teleconference call would be appropriate instead of a meeting to discuss the suggestions in your letter and review the DMOA. I am suggesting a teleconference call be scheduled for May 14, 2008 at 10:00 a.m. The Coast Guard would make arrangements for the conference call. Please advise me of your availability for that date and time.

If you have questions, please contact Scot Striffler of this staff at (216) 902-6087. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Robert W. Bloom, Jr." with a stylized flourish at the end.

ROBERT W. BLOOM, JR.  
Chief, Bridge Branch  
By direction of Commander,  
Ninth Coast Guard District

Copy: Michigan State Historical Preservation Office  
Advisory Council on Historic Preservation

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commandant  
United States Coast Guard

2100 Second Street, S.W.  
Washington, DC 20593-0001  
Staff Symbol: CG-5  
Phone: (202) 372-1511  
Fax: (202) 372-1914

16590

NOV 10 2008

Don Klima, Director  
Office of Federal Agency Programs  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue, NW, Suite 809  
Washington, DC 20004

Dear Mr. Klima,

During the meeting between the Department of Homeland Security (DHS) and the Advisory Council on Historic Preservation (ACHP) on September 8, 2008 regarding Detroit's Ambassador Bridge, the DHS indicated its goal was to have a signed Memorandum of Agreement (MOA) among all signatories, which includes the United States Coast Guard, the Michigan State Historic Preservation Officer (SHPO), the ACHP, and the Detroit International Bridge Company (DIBC), with concurrence by the Gateway Communities Development Collaborative (GCDC), by November 17, 2008. Pursuant to the National Historic Preservation Act (NHPA) and its implementing regulations at 36 C.F.R. § 800.6(c)(1)(ii), attached is the final version of the MOA for signature by all involved parties. The Coast Guard has already executed the MOA (enclosure 1).

I appreciate the historic preservation efforts of the ACHP and the Michigan SHPO regarding DIBC's proposal to build a new companion bridge across the Detroit River. To capture and memorialize those significant efforts, enclosure (2) includes a detailed synopsis of the Section 106 adjudication process since April 2006.

The Coast Guard has received no objections to the text of the MOA distributed to all parties on October 3, 2008. Subsequent to this distribution, the MISHPO and DIBC started working on an agreement separate from the MOA, to address maintenance of the existing bridge in accordance with the Secretary of the Interior's Standards for Treatment of Historic Properties. The Coast Guard advocates this separate agreement and has added text to the October 3, 2008 MOA, which refers to the discussions currently ongoing between the Michigan SHPO and the DIBC (eighth WHEREAS statement in the MOA). This is the only text that has been added to the October 3 version of the MOA.

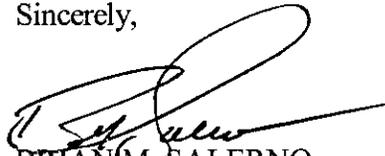
The Coast Guard's role in this project is to determine whether or not a permit will be issued to the DIBC to build a companion bridge to the Ambassador Bridge, and our statutory concern is from the perspective of navigation safety. The MOA is a condition precedent to the completion of the Environmental Assessment, which must be finalized before we can consider permit issuance. To ensure the process continues to move forward, the Coast Guard is committed to meeting our collective goal of having a signed MOA by November 17, 2008. Once the ACHP signs the document, I request that you forward it to the Michigan SHPO for signature. Please notify the Coast Guard (contact information below) once the MOA has been signed and forwarded.

The signed agreement may be returned to:

Ms. Hala Elgaaly, P.E.  
Administrator, Bridge Program (CG-5411)  
2100 Second Street, SW (Room 3500)  
Washington, DC 20593

The Coast Guard appreciates the involvement of the ACHP and the Michigan SHPO concerning the preservation aspects of this project, and looks forward to working with both organizations again on future endeavors.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian M. Salerno", written over a horizontal line.

BRIAN M. SALERNO  
Rear Admiral, U. S. Coast Guard  
Assistant Commandant for Marine Safety,  
Security and Stewardship

Enclosures: (1) Memorandum of Agreement  
(2) SHPO Timeline



JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

DR. WILLIAM ANDERSON  
DIRECTOR

November 26, 2008

DON KLIMA  
ADVISORY COUNCIL ON HISTORIC PRESERVATION  
THE OLD POST OFFICE BUILDING  
1100 PENNSYLVANIA AVENUE NW  
SUITE 803  
WASHINGTON DC 20004

RE: ER05-422 Ambassador Bridge Enhancement Project, Section 4, T2S, R11E, Detroit, Wayne County (USCG)

Dear Mr. Klima:

On November 18, we received an email from the Advisory Council (ACHP) containing a copy of the Memorandum of Agreement (MOA) signed by the U.S. Coast Guard (USCG). Also attached to the email was a copy of the ACHP's letter to Dan Stamper at the Detroit International Bridge Company (DIBC) advising them to sign the MOA and return it to the ACHP, and indicating that the ACHP is prepared to sign the MOA and forward it to the Michigan State Historic Preservation Officer (SHPO) for signature.

I am writing to further document the SHPO's objections to the MOA for the above project as currently written, to clarify apparent misunderstandings, and to express the SHPO's dismay at having been excluded, together with the exclusion of concurring party Gateway Communities Development Collaboration, from communication and decision-making at least since late October.

We object to the USCG's statement in their letter to you dated November 10, "The Coast Guard has received no objections to the text of the MOA distributed to all parties on October 3, 2008." In fact, we voiced our concerns and objections to certain portions of the agreement in an October 9 email and in a teleconference among all parties on October 23, 2008.

The record will show that the SHPO concurred with the finding of adverse effect in March 2007 based on the visual impact of the proposed new bridge and the resulting change in use and potential abandonment of the historic bridge. Historic preservation covenants on the historic bridge have been under consideration as appropriate mitigation since that time. While typically such mitigation would be addressed in a MOA, it was not until July 2008 that the USCG concluded that they could not enforce execution of a third party agreement and would not sign a MOA with any such stipulation. As a maritime state, we have worked for years with the USCG including numerous cases where adverse effects have been avoided through covenant or easement provisions, thus this came as a surprise to us and left us to find an alternative method to protect this historic bridge. The SHPO would be remiss in its mission if we did not insist on this protection and we believe this is the best preservation outcome for this project.

Since that time we have worked diligently with the Detroit International Bridge Company towards other protective mechanisms including amendments to the bridge maintenance agreements with the Michigan Department of Transportation. Only in late September, 2008 were we able to conclude that the best vehicle for preserving the bridge would be a separate preservation agreement to be acknowledged as executed in the preamble of the MOA. The DIBC has been amenable to such an agreement and we have been diligently negotiating language. To that end we have had several productive conference calls with

the DIBC (October 27 and 30 and November 7, 10, 12 and 19) and numerous revisions to the document. Together we have made great progress on the agreement and aside from a few very specific details, we are very close to executing this agreement.

Any implication that the SHPO has been unresponsive or is holding up the process is simply unfounded. We are currently awaiting a response from the DBIC on two last minor issues in the agreement and will then follow with its execution. While we wish the preservation agreement for the bridge were complete by this time, you must consider the practical implications of developing such an agreement when multiple critical participants (management, administrators, legal counsel) must be consulted.

We are also concerned to learn that consultation apparently has occurred between the federal agencies (DHS/USCG) and the ACHP regarding this project without our involvement or full knowledge. The SHPO has not been contacted directly by the lead federal agencies (DHS/USCG) since our October 23 conference call, nor has leadership within the ACHP kept us fully informed of these discussions. We should not have to remind you that the SHPO is a full signatory to this agreement and we do not believe it was appropriate nor procedural to have excluded us from these discussions and decisions.

We also note that the concurring party to the MOA, Gateway Communities Development Collaborative (GCDC), has not been copied on recent correspondence leaving us to conclude that they too have not been informed of recent developments in the consultation process, and I suspect is not aware of the urgency expressed in executing this MOA.

With acknowledgement of this executed agreement in place in the MOA, I will be in the position to sign it. Therefore, I respectfully request that the MOA be held until this agreement is executed and that the section referencing the agreement between the DBIC and the SHPO be revised to reflect an executed agreement in place before submitting this MOA for SHPO signature.

If you have any questions, please contact Martha MacFarlane-Faes, Environmental Review Coordinator, at (517) 335-2721. Thank you for your cooperation.

Sincerely,



Brian D. Conway  
State Historic Preservation Officer

BDC:BGG:MMF

copy: Hala Elgaaly, USCG  
Dan Stamper, DIBC  
Ron Anzalone, ACHP  
Martha Catlin, ACHP  
Ralston Cox, ACHP  
Charlene Dwin-Vaughn, ACHP  
John Fowler, ACHP  
Chris Bzdok, Olson, Bzdok and Howard, Traverse City, MI

LAW OFFICES OF  
**OLSON, BZDOK & HOWARD**

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Michael C. Grant  
William Rastetter, Of Counsel ◦  
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January 20, 2009

\* Admitted in Colorado  
◦ Admitted in Indiana

Ms. Hala ELgaaly, P.E.  
Administrator, Coast Guard Bridge Program  
US Coast Guard  
2100 Second Street, S.W, Room 3500  
Washington, DC 20593

**Via 1<sup>st</sup> Class Mail &  
Email to: Hala.ELgaaly@uscg.mil**

RE: Section 106 Consultation Memorandum of Agreement  
for the Ambassador Bridge Enhancement Project  
Our File N<sup>o</sup>: 5550.00

Dear Ms. ELgaaly:

Enclosed please find a resolution signed by my clients, the Gateway organizations. We appreciate the opportunity to participate in the consultation process, but cannot sign on to its outcome. Thank you for your consideration.

Sincerely,



Christopher M. Bzdok  
[Chris@envlaw.com](mailto:Chris@envlaw.com)

CMB:mnm  
Enclosure: Resolution  
xc: clients

**In the matter of the Ambassador Bridge Enhancement Project  
Section 106 Consultation Process under the National Historic Preservation Act  
16 USC 470 *et seq* and 36 CFR Part 800**

**RESOLUTION OF THE  
GATEWAY COMMUNITIES DEVELOPMENT COLLABORATIVE**

---

**RECITALS**

1. The Detroit International Bridge Company (DIBC) proposes to construct a second span of the Ambassador Bridge directly adjacent to the historic Ambassador Bridge, with the stated purpose of increasing efficiency for existing traffic flows.
2. The Ambassador Bridge is eligible for listing on the National Register of Historic Places.
3. A second bridge span would effectively destroy the historic value of the Ambassador Bridge, including its visual and aesthetic values.
4. The Michigan State Office of Historic Preservation (SHPO) found the proposed second span of the Ambassador Bridge would have adverse effects upon the Ambassador Bridge.
5. Federal law requires the USCG, in consultation with SHPO, to develop and evaluate alternatives or modifications to the proposed project, which could avoid, minimize or mitigate the adverse effects on historic Ambassador Bridge.
6. The USCG has consulted with SHPO, the Advisory Council on Historic Preservation (ACHP), DIBC, and GCDC, and has proffered a Memorandum of Agreement for the consulting parties, including GCDC, to execute.
7. The USCG did not consider all available alternatives or modifications, which would meet the purpose of the proposed second span to the Ambassador Bridge while also avoiding, minimizing, or mitigating the adverse effects of the second span.
8. The proffered MOA would not avoid, minimize, or mitigate the adverse effects of the proposed second span on the historic Ambassador Bridge, primarily the overwhelming visual impacts.
9. The proffered MOA would not assure the perpetual historic preservation of the Ambassador Bridge.
10. In addition to its adverse effects on the historic Ambassador Bridge, the proposed second span would create other adverse effects, including increased pollution and noise in the nearby neighborhoods and reduced national security.

**RESOLUTION**

Therefore, the member-organizations of the Gateway Communities Development Collaborative respectfully decline the invitation to execute the proffered Memorandum of Agreement.

Resolved by the Board of Directors:

---

Bagley Housing Association  
By Its Executive Director

---

Date

---

Bridging Communities  
By Its Executive Director

---

Date

---

Greater Corktown Development Corporation  
By Its Executive Director

---

Date

---

Mexicantown Community Development Corp.  
By Its Executive Director

---

Date

---

Michigan Avenue Business Association  
By Its Executive Director

---

Date

---

Neighborhood Centers, Inc.  
By Its Executive Director

---

Date

---

Southwest Detroit Business Association  
By Its Executive Director

---

Date

---

Southwest Detroit Environmental Vision  
By Its Executive Director

---

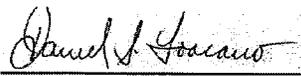
Date

---

Southwest Solutions/Southwest Housing Corp.  
By Its Executive Director

---

Date



Bagley Housing Association  
By Its Executive Director

November 21, 2008

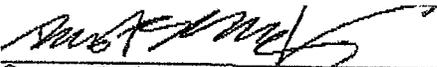
Date



Bridging Communities  
By Its Executive Director

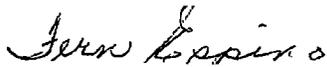
November 21, 2008

Date



Greater Corktown Development Corporation  
By Its Executive Director

*Timothy J. McKay* Date November 21, 2008



Mexicantown Community  
Development Corporation  
By Its Board Chair

November 26, 2008

Date



Michigan Avenue  
Business Association  
By Its Executive Director

November 21, 2008

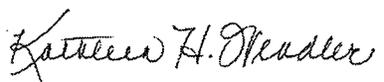
Date



Neighborhood Centers Inc.  
By Its Executive Director

November 21, 2008

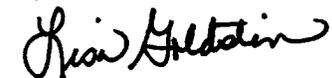
Date



Southwest Detroit Business  
Association  
By Its Executive Director

November 21, 2008

Date



Southwest Detroit  
Environmental Vision  
By Its Executive Director

November 21, 2008

Date



Southwest Solutions/  
Southwest Housing Corp  
By Its Executive Director

November 26, 2008

Date

Section 106

Photographic Log and Key

# QUINN EVANS / ARCHITECTS

## PHOTO LOG

Project Name: Ambassador Bridge Section 106

Project No.: 06145

Photographed by: Ruth Mills

Date: 11/09/2006

Image #	Digital #	Location	Description
1		Detroit News Paper Warehouse	Jefferson and West Grand Boulevard
2		Riverside Park and Parking Lot	Southwest
3		Riverside Park and Parking Lot	South
4		Riverside Park and Parking Lot	Southeast
5		Riverside Park and Parking Lot	East
6		J. W. Westcott Detroit River Station	East
7		Historic Building east of above	
8		Riverside Park and Parking Lot	West
9		Industrial Building adjacent to News Warehouse, with sign "Composite Products Ltd"	
10		Ice Cream Store	NW corner W. Grand and Jefferson
11		Same area, wider shot	West
12		77/79 and 85/87 W. Grand	West
13		100 Block W. Grand West side	NW
14		W. Grand Industrial	NE cnr Jefferson and W. Grand
15		Empty lot (removed buildings)	E side of W. Grand at Fort
16		Crest Motel, west side of W. Grand S. of Fort	
17		129 and 123 West Grand - W side	
18		Looking North on Vinewood	
19		200 Block of Industrial Buildings on Vinewood (215, 255) lkg NW	
20		Same, looking SW	
21		See photo 210 for better shot	
22		3500 Block of 24th looking NW	
23		Same, farther north	
24		3510 24th lkg W	
25		Detroit Animal Control, 3511 Jefferson, lkg SW	
26		Industrial Building in 3500 block of 24th, lkg NE	
27		Cnr of Jefferson and 23rd, lkg NW	
28		744 23rd Street, Alliance Shippers (north of Fort)	
29		Empty lot (removed buildings)	23rd street north of Fort
30		3411 Fort Street	
31		See photo 209 for better shot	
32		1200 Block 25th Street E side	
33		1200 Block 25th Street W side	
34		3500 Block of Howard Street E of 25th, north side	
35		3500 Block of Howard Street E of 2th, south side	

# QUINN EVANS / ARCHITECTS

## PHOTO LOG

Project Name: Ambassador Bridge Section 106

Project No.: 06145

Photographed by: Ruth Mills

Date: 11/09/2006

Image #	Digital #	Location	Description
36		3525-3527 Howard E of 25th, south side	
37		1200 Block of 25th, west side	
38		NE cnr of 25th and Porter (dated 1922)	
39		3526 Howard St. and 1461 24th Street lkg E	
40		1301 and 1401 24th lkg NW	
41		1400 Block of 24th lkg NE	
42		1257 24th Street	
43		1215 24th Street lkg W	
44		1400 block of 25th street lkg NW	1407-1449
45		1400 Block of 25th street lkg SW	
46		1400 Block of 25th street lkg NW	(1449-1475)
47		Webster Elem lkg E	1450 25th
48		Webster Elem lkg NE	
49		1505-1521 25th Street lkg NW	
50		1516-1550 25th Street lkg NE	
51		1535-1559 25th street lkg NW	
52		3600 Block of Bagley S. Side	
53		3500 Block of Bagley S Side	
54		3500 Block of Bagley N Side	
55		1600 Block of 24th, west side	
56		1500 Block of 24th, west side	
57		1522 24th, east side	
58		1522 24th street, rear garage	
59		3500 block of Bagley, N side lkg W	
60		NE cnr of Bagley and 24th	
61		3400 Block of Bagley, north side	
62		3428 Bagley and People's State Bank	
63		3362 Bagley	
64		1614 23rd Street	
65		1619 23rd Street	
66		1633-1635 23rd Street	
67		23rd Street N of Bagley, W side behind El Zocalo	
68		3344 W Vernor	
69		23rd Street N of Vernor	
70		NW corner of Vernor and 24th	

# PHOTO LOG

Project Name: Ambassador Bridge Section 106

Project No.: 06145

Photographed by: Ruth Mills

Date: 11/09/2006

Image #	Digital #	Location	Description
71		3500 Block of Vernor N Side	
72		Lithuanian Hall	
73		Not Used	
74		N side of Vernor W of 25th	
75		1700 block of 25th W side	
76		St Anthony's West side	
77		St Anthony's Rectory	
78		Rear of block 3500 of Bagley, north side	
79		2600 block of Bagley, South side	
80		3500 block of Bagley, south side	3541
81		1730 and 1738 24th Street	
82		1729 and 1742 24th	
83		1711 24th	
84		3400 block of Bagley, S side	
85		NW cnr 21st and Vernor	3000
86		2801 Vernor, School	
87		NW cnr 21st and Vernor, rear	
88		21st street east side N of Vernor	
89		KBD (Beef Distributor?) 2800 Standish	
90		Same	
91		Weco, 3000 Standish	
92		Reymar Steel, 2100 20th street	
93		1841-1845 20th Street, west side N of Vernor	
94		20th Street N of Vernor, East side	
95		2810 Vernor	
96		2737 Vernor	
97		2000 Block of Vernor, S. side	
98		Newark Between 20th and St. Anne	
99		Arrow chemical Products, SW cnr of St. Anne and Newark	
100		Back side of Reymar Steel, St. Anne (new)	
101		2039/2041 St. Anne	
102		2023/2027 St. Anne	
103		2669 Vernor	
104		Geodesic Dome next to above	2667 Vernor
105		NE corner of St. Anne and Vernor	

# PHOTO LOG

Project Name: Ambassador Bridge Section 106

Project No.: 06145

Photographed by: Ruth Mills

Date: 11/09/2006

Image #	Digital #	Location	Description
106		Southwest Solutions Fisher clubhouse	Vernor E of St. Anne
107		2443 Bagley HoneyBee Market	
108		2435 Bagley	
109		18th N of Bagley, E side	
110		18th N of Bagley, E side	Factory
111		18th N of Bagley,W side	Residential 1781-1791
112		18th N of Bagley, W side	Residential N of above
113		Cnr of Newark and 18th	Apac Paper
114		St. Anne, E side, dated 1925	
115		1730-1742 St. Anne, E. side	
116		1735 St. Anne	
117		1739 St. Anne	
118		1906 St. Anne	
119		Chipman, N Side	
120		2630 Chipman	
121		Donovan's Pub and Precinct 3 Activity Center	
122		New Buildings at 20th and Bagley	
123		Same	
124		2730 Bagley, Matrix Theatre	
125		Gazebo at 20th and Bagley, SE Cnr	
126		2715 Bagley	
127		SE Cnr Bagley and St. Anne	
128		Roberto Clemente Rec Center on Bagley	
129		2550 Bagley Tortilla Factor	
130		2634 Bagley	
131		2628 Bagley	
132		2600 Bagley	
133		2545 Bagley	
134		1615 and 1617 16th, S of Bagley	
135		1400-1500 Block of 16th, S of Bagley	New infill?
136		1425 16th	
137		Trinity Church 17th street	
138		1400 Block 17th Street, E Side	
139		Same	
140		1400 Block 17th Street, W side	

# PHOTO LOG

Project Name: Ambassador Bridge Section 106

Project No.: 06145

Photographed by: Ruth Mills

Date: 11/09/2006

Image #	Digital #	Location	Description
141		1500 Block 17th Street, W side	
142		1500 Block 18th Street E side newer infill	
143		1500 Block 18th Street E side, older	
144		1426 18th St new Westside Central Baptist church	
145		1400 block 18th Street W side	
146		2600 block Porter Street S Side	
147		2658 Porter	
148		1400 block St. Anne W Side	
149		Austin btw St Anne and 18th, N Side	
150		Same, S. Side	
151		1500 block St. Anne W Side	
152		Same, E Side	
153		1300 Block St. Anne E side	
154		Same, W side	
155		12-1300 Block Cromwell, N side	
156		Same, S Side	
157		Sampson, N Side	
158		Sampson, S Side	
159		1200 Block St. Anne, W side	
160		St. Anne's Gate condos, E side of 18th Street	
161		Lincoln Park Tool and Die, 18th ST	
162		12-1300 Block St. Anne, E Side	
163		Same W side	
164		Stanton Park	
165		17th Street, new construction	
166		1200 Block 17th street, w side	
167		Berm, E side of 18th Street	
168		14th Street Truck Storage lkg W	
169		Lutheran Bros Commerce C lkg E	
170		14th Street, Daily Sports bldg?	
171		Large bldg E of railroad tracks	
172		Johnson Textile Fabrics, N end of 14th Street	
173		Trojan Bldg, N of 14th Street	
174		Lutheran Bros Commerce Ctr lkg N	
175		No Name - Howard and Vermont next to above	

# PHOTO LOG

Project Name: Ambassador Bridge Section 106

Project No.: 06145

Photographed by: Ruth Mills

Date: 11/09/2006

Image #	Digital #	Location	Description
176		W Lafayette, N Side E of Vermont	
177		Same, S. Side	
178		Det Legal News Inland Press, Lafayette	
179		2101 W. Lafayette	
180		1000 14th Street	
181		Comerica Bank, Lafayette and 14th	
182		Stables Restaurant, W Lafayette and 14th	
183		Greyhound Bldg Lafayette W of 14th	
184		Industrial, Lafayette W of 14th	
185		2707 Fort Bond and Bailey Machinery	
186		Same	
187		2801 Fort, Cloyd Container	
188		Same	
189		Arrow Truck Parts 2637 Fort	
190		Same	
191		2600 Block N Side of Fort	
192		2600 W Fort	
193		Johnny's Restaurant, 2500 Block S side of Fort	
194		Greyhound Bldg W Fort	
195		Composite Forging	
196		Same	
197		Club 2281 (Fort) Entertainment	
198		15th Street S of Fort	
199		2121 Fort (empty)	
200		2065 Fort	
201		2000 block N side of Fort	
202		1963 Fort	
203		1947 Fort	
204		1941 Fort	
205		1915 Fort	
206		177 S 12th	
207		By Detroit News Building (north side)	
208		Display Group Building on Fort (E of Rosa Parks)	
209		Downtown Paper, Fort E of Grand River	
210		3045 W Fort	211: 3015 W Fort

219 1/2 North Main Street Ann Arbor, Michigan 48104 (734) 663-5888

Photo Key  
Location of Areas

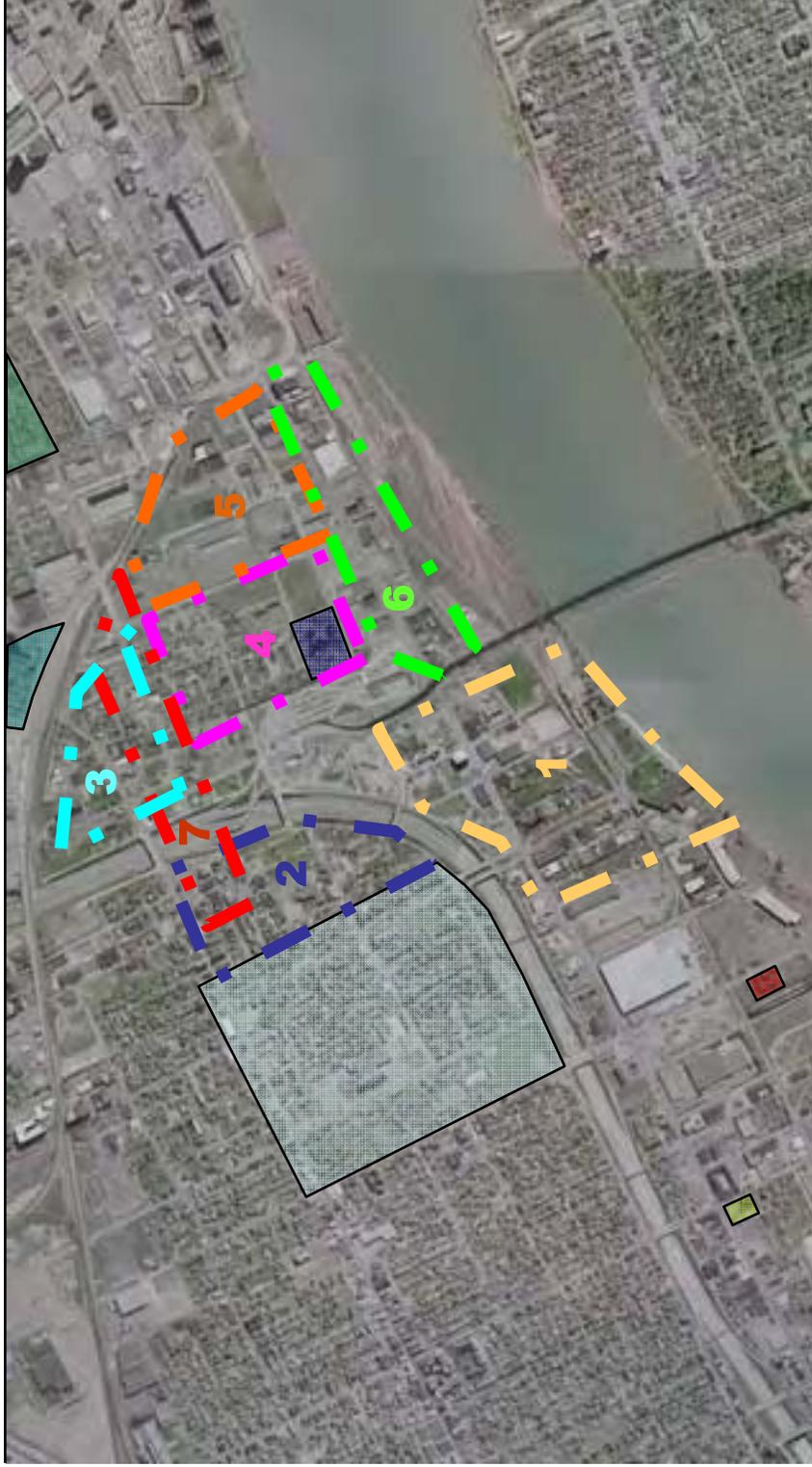


Photo Key  
Area 1  
(#s 1-31,  
209-211)



# Photo Key Area 2 and Area 7 West (#s 32-84)

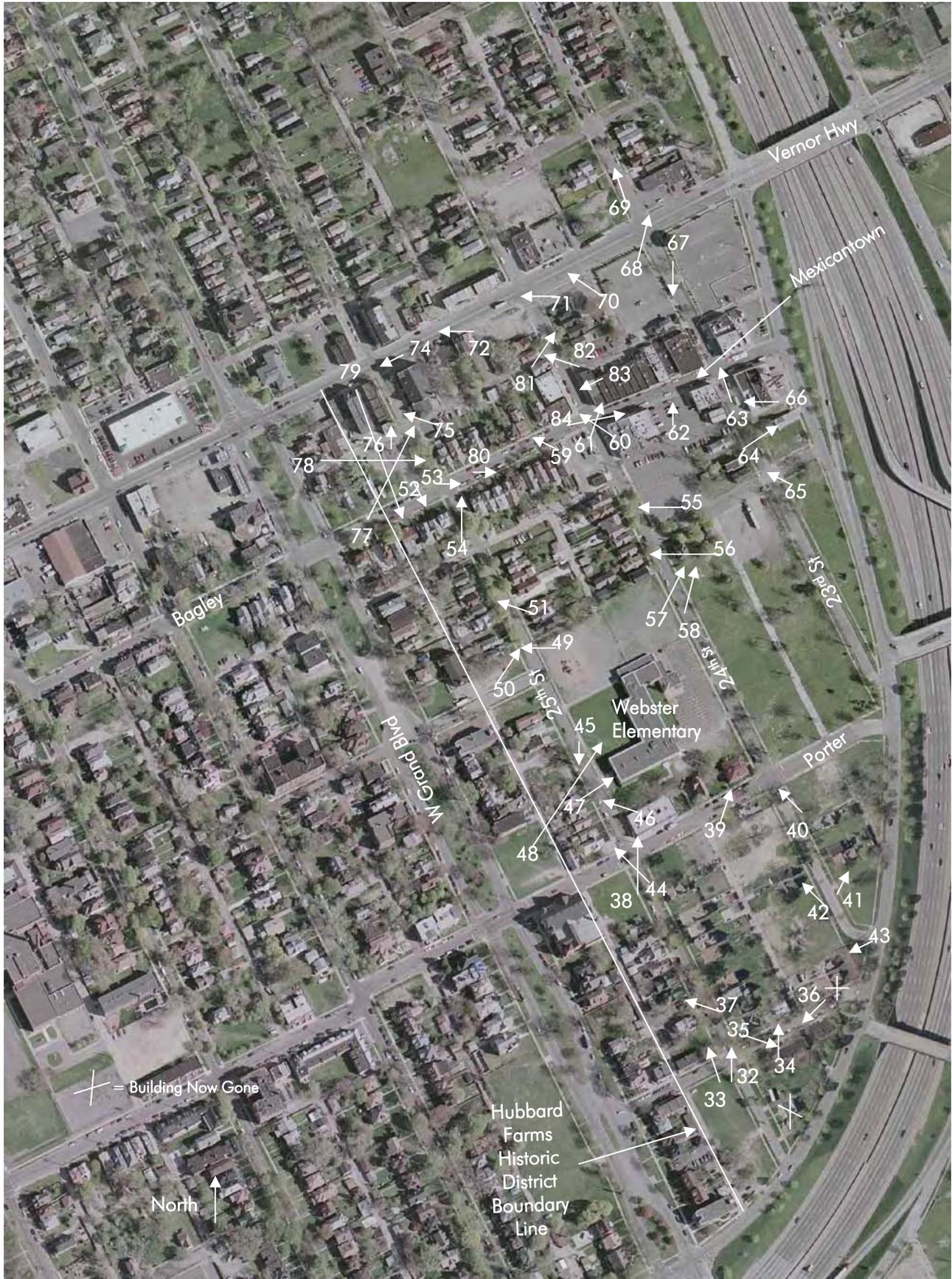
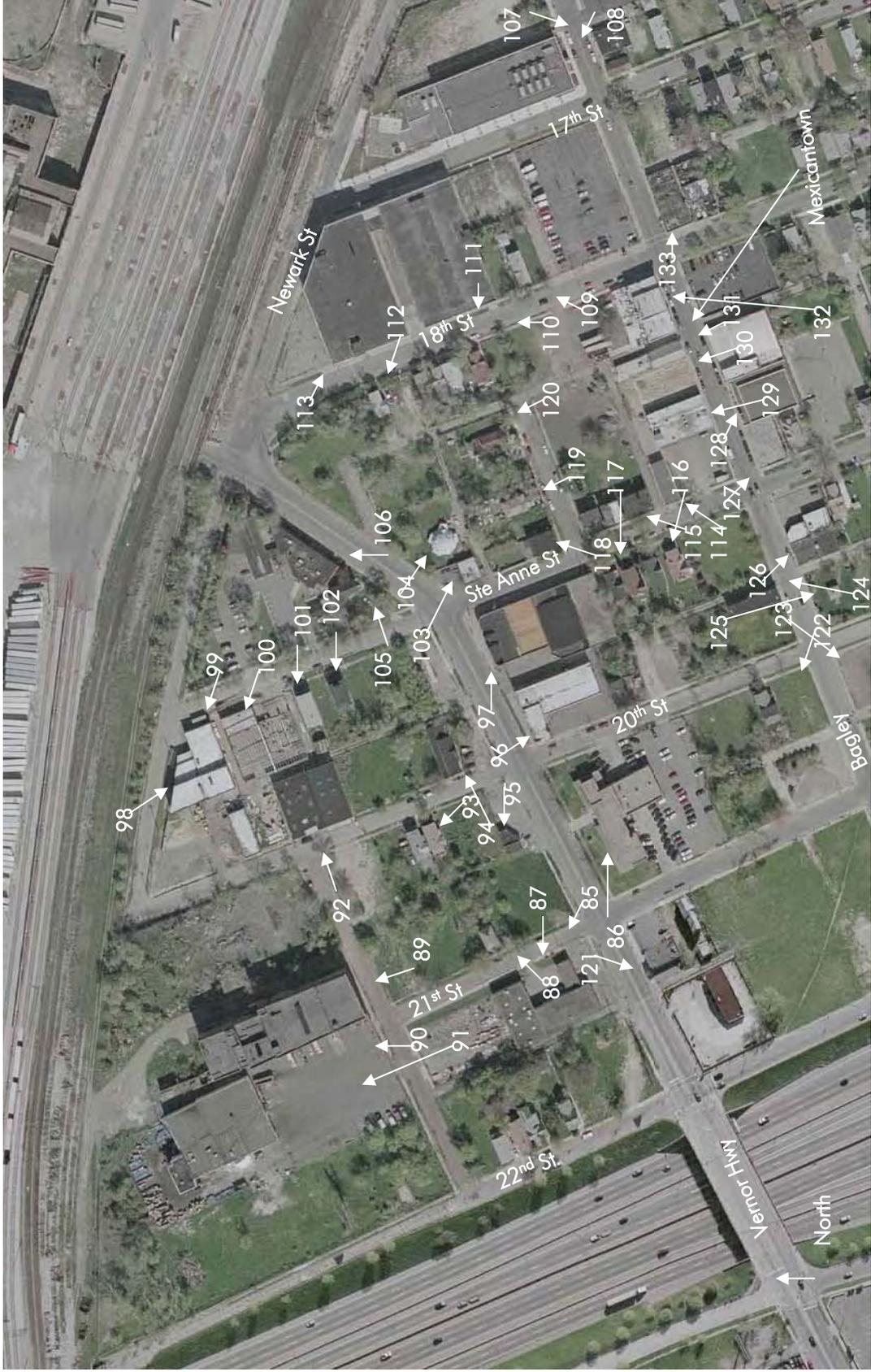


Photo Key Area 3 and Area 7 East (#s 85-133)



# Photo Key Area 4 (#s 134-166)



Photo Key  
Area 5  
(#s 167-  
184)

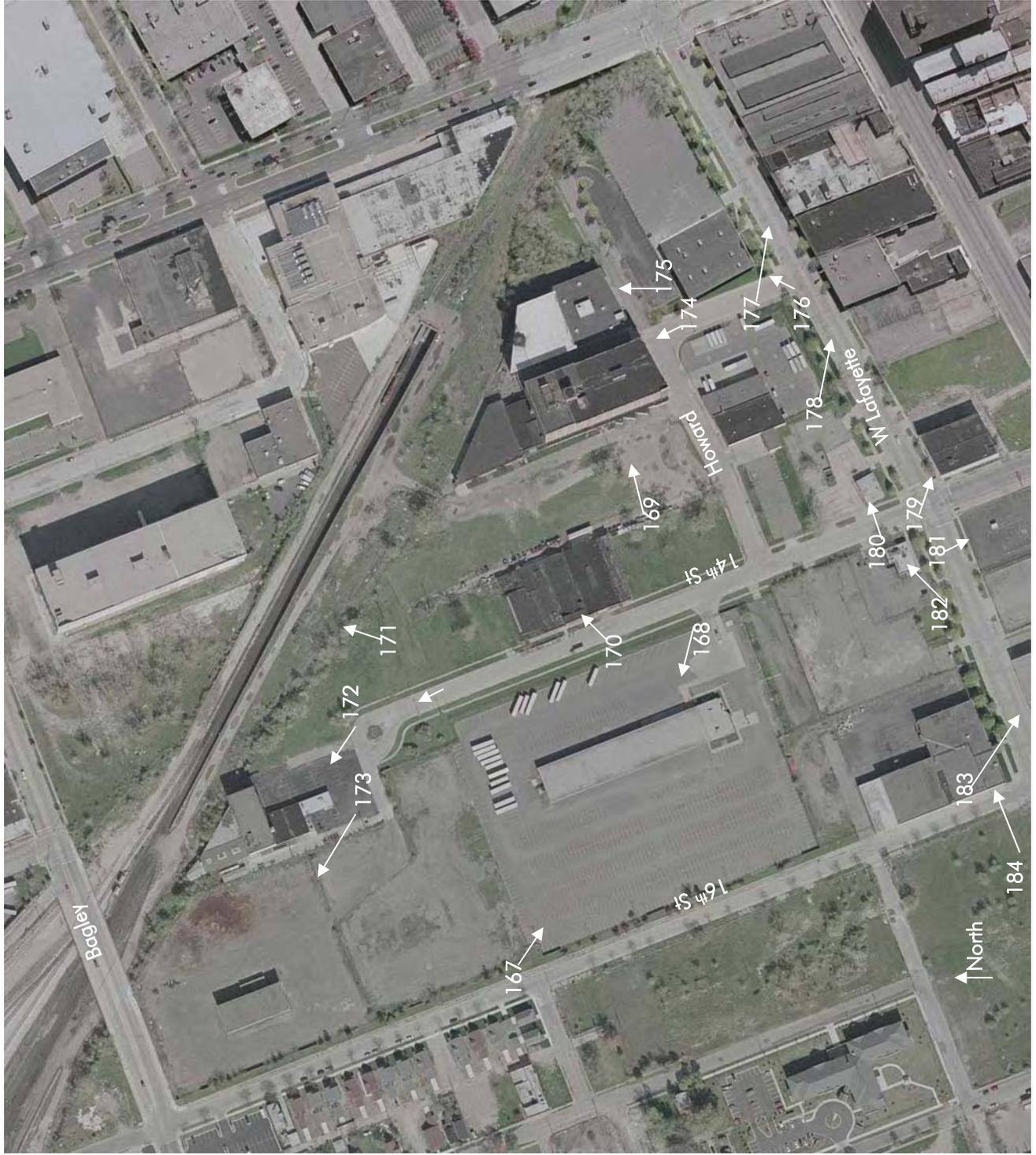


Photo Key Area 6 (#s 185-206)



Section 106

Photos



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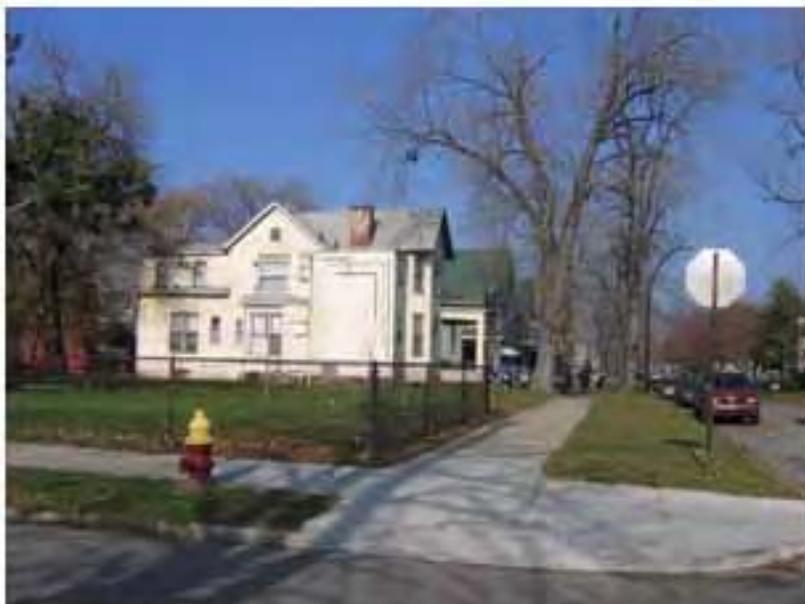
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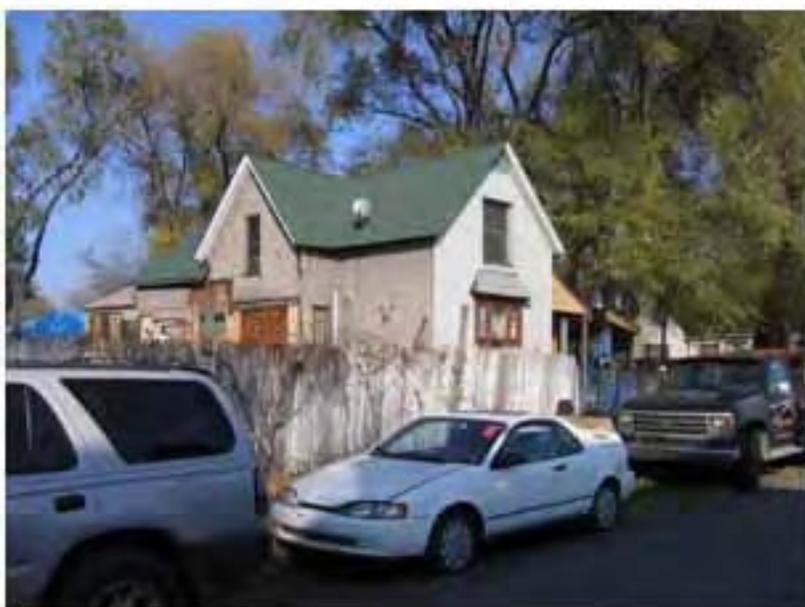
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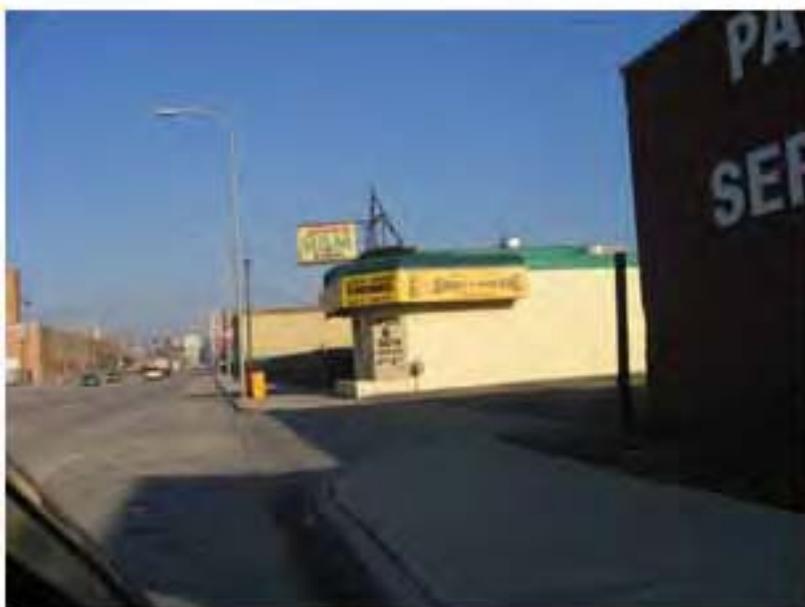
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211b.JPG

# Phase 1 Archeological Survey

**Phase I Archaeological Survey for the Ambassador Bridge  
Enhancement Project, City of Detroit,  
Wayne County, Michigan**

**By**

**David F. Klinge, M.A.**





**Phase I Archaeological Survey for the Ambassador Bridge Enhancement Project,  
City of Detroit, Wayne County, Michigan**

**By**

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**586.939.7000**

**Lead Agency: United States Coast Guard**

**October 3, 2007**

## ABSTRACT

Under contract with the Detroit International Bridge Company (DIBC), ASC Group, Inc. (ASC), has completed the Phase I archaeological survey for the Ambassador Bridge Enhancement Project in the city of Detroit, Wayne County, Michigan. The project entails the construction of a new bridge and international border crossing between Detroit, Michigan, and Sandwich, Ontario, Canada. The proposed bridge will stand approximately 150 ft (45 m) west of the existing Ambassador Bridge and will provide four full-service lanes plus two lanes dedicated to low-risk commercial travelers over the Detroit River. This project is not a part of the ongoing “Ambassador Bridge Gateway Project” being completed by the Michigan Department of Transportation, DIBC, and Canadian Transit Company (CTC). The archaeological investigation was undertaken to comply with Section 106 of the National Historic Preservation Act of 1966, as amended.

The proposed cable-stayed bridge will be supported on the American side by a large tower, which will be constructed entirely on made land near the current riverfront. Three subsequent piers will support the deck/approach between Fort Street and Jefferson Avenue. After consultation with the Michigan Historic Preservation Office (MHPO) and the Michigan Office of the State Archaeologist (OSA), it was determined that the location of these three piers, which fall on or near the historic shoreline of the Detroit River, warranted an archaeological survey in advance of construction. The area of potential effect (APE) for this project is defined as a 2.5 acre (1 ha) parcel immediately west of the existing bridge, bounded on the north by Fort Street and by Jefferson Avenue on the south.

Review of the Michigan archaeological site file revealed 51 previously recorded archaeological sites within a 1-mile (1.6-km) radius of the project area. Twelve have been evaluated for the National Register of Historic Places and none have been found eligible. The majority of these sites are map-documented atlas sites that have not been subjected to subsurface investigation, but several have been identified by previous surveys. In all, 12 previous surveys have been completed within the same radius. Many of these are associated with improvements to the existing bridge and its infrastructure.

Due to the urban character of the APE and the potential for significant amounts of fill to cover the study area, the Phase I archaeological investigation employed a series of backhoe trenches. Eleven trenches, totaling 492 ft (150 m) in length, were excavated in the 2.5-acre (1-ha) APE. Several features from the late nineteenth/early twentieth-century were encountered. These include a series of post molds from a post-in-ground lumber shed associated with the John Beyster Planing Mill and Sash Factory, and a railroad bed and track associated with a small machine shop that stood along Fort Street between 1921 and 1949.

The postholes and associated intact historic strata constitute a previously unidentified archaeological site that was assigned Michigan Archaeological Inventory # 20WA1131. However, intensive modern disturbance has impacted the majority of the former building location and there is little to no interpretable archaeological context present in the APE. In addition, the intact historic strata do not contain enough material

culture to constitute an interpretable artifact assemblage. Thus, the site does not possess a strong research potential and is recommended not eligible for inclusion in the NRHP.

The majority of the APE has been disturbed by demolition and construction that post-dates the Second World War. No strata or deposits associated with the eighteenth-century historic occupation or a prehistoric occupation were documented. No further work is recommended.

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## **CHAPTER 1: INTRODUCTION**

Under contract with the Detroit International Bridge Company (DIBC), ASC Group, Inc. (ASC), has completed the Phase I archaeological survey for the Ambassador Bridge Enhancement Project in the city of Detroit, Wayne County, Michigan (Figure 1). The project entails the construction of a new bridge and international border crossing between Detroit, Michigan and Sandwich, Ontario, Canada. The proposed bridge will stand approximately 45 m (150 ft) west of the existing Ambassador Bridge and will provide four full-service lanes plus two lanes dedicated to low-risk commercial travelers over the Detroit River. This project is not a part of the ongoing “Ambassador Bridge Gateway Project” being completed by the Michigan Department of Transportation, DIBC, and Canadian Transit Company (CTC). The archaeological investigation was undertaken to comply with Section 106 of the National Historic Preservation Act of 1966, as amended.

The proposed cable-stayed bridge will be supported on the American side by a large tower, which will be constructed entirely on made land near the current riverfront. Three subsequent piers will support the deck/approach between Fort Street and Jefferson Avenue. After consultation with the Michigan Historic Preservation Office (MHPO) and the Michigan Office of the State Archaeologist (OSA), it was determined that the location of these three piers, which fall on or near the historic shoreline of the Detroit River, warranted an archaeological survey in advance of construction. The area of potential effect (APE) for the this project is defined as a 2.5 acre (1 ha) parcel immediately west of the existing bridge, bounded on the north by Fort Street and by Jefferson Avenue on the south (Figure 2).

Although construction plans have not been finalized, preliminary pier locations for the three piers in the APE have been determined. The final arrangement of these piers within the APE, however, will be dependent on the engineering requirements of the bridge superstructure such as the length of individual spans between piers, which have not been set at this point. For this reason, the archaeological investigation was designed to investigate potential archaeological resources within the entire 2.5-acre (1-ha) APE and not just the three discrete pier locations.

The purpose of this archaeological investigation is to gather data for compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. The primary goal of this survey was to locate and identify previously undocumented, buried cultural resources within the project area. The secondary goal was to gather enough data to make a preliminary recommendation regarding any identified resource's eligibility for inclusion in the National Register of Historic Places (NRHP). If applicable, the assessment of eligibility follows the NRHP criteria for evaluation (Andrus 1997; Little et al. 2000).

The literature review was conducted by David F. Klinge, M.A., on May 23 and 24, and July 2 and 3, 2007. The research was conducted at OSA, the Library of Michigan, and the Michigan State Archives in Lansing. The fieldwork was conducted by Robbie Williams and Alicia Bonskowski under the direction of David F. Klinge, M.A., who served as the field supervisor and principal investigator. The project manager was Shaune M. Skinner, M.A., RPA.

## **CHAPTER 2: RESEARCH DESIGN**

### **RESEARCH GOALS**

The primary goal of a Phase I archaeological survey is to locate and identify buried cultural resources in a project area. It is difficult to link the Phase I study with a specific research design outside the basic goals of anthropological and historical research. These include the construction of cultural chronologies, the reconstruction of past lifeways, and the continued investigation of the process of cultural change.

The secondary goal of the Phase I survey is to gather sufficient data to make a preliminary assessment of any identified resource's eligibility for inclusion in the NRHP. This secondary goal is most appropriately addressed during a Phase II site evaluation; however, as Phase I methodology does not always provide a sufficient data set to make such a determination. Research designs for the secondary goal must focus on identifying site limits, site integrity, and assessing the relevance to local and regional prehistory or history. This information can be used to make assumptions about a resource's significance. Significance "is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association," and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of significant persons in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded or may be likely to yield, information important in history or prehistory (Andrus 1997).

### **BACKGROUND RESEARCH**

Prior to conducting a successful field survey, it is necessary to have a solid understanding of the environmental setting, prehistory, and history of the region in which a particular project is located. In addition, it is imperative to review the results of previous investigations in the vicinity to assess how those studies might inform the project at hand. This information can be utilized to guide fieldwork and the interpretation of any cultural remains that are encountered.

In May and July of 2007, ASC personnel examined the archaeological OSA archaeological site file. No data was reviewed concerning historical or architectural resources, beyond those apparent in the NRHP, as the present study concerns subsurface archaeological evidence only. All items related to the extent built environment and history/architecture resources within the broader history/architecture APE are being addressed by Quinn Evans Architects. In addition to the archaeological site file, the following resources were consulted at the Library of Michigan, the Michigan State Archives, and relevant online inventories:

- National Historic Landmarks (NHL) listings;
- NRHP listings;
- MHPO online listing of State Historic Sites;
- City of Detroit Historic District Commission online listing of local Historic Districts;
- 7.5' and 15' quadrangles (USGS topographic maps);
- County historic atlas maps;
- Sanborn Fire Insurance Company maps;
- Contract archaeology reports;
- *Archeological Atlas of Michigan* (Hinsdale 1931).

There are no previously documented archaeological sites or historic districts located within 1 mile (1.6 km) of the APE that are included in the NRHP. No NHL sites were found within the 1-mile (1.6-km) radius. However, the existing Ambassador Bridge, which defines the eastern margin of the APE, was determined eligible for inclusion in the NRHP in 1980 and three state and/or local historic districts (designated by the Detroit Historic District Commission) are located within 1-mile (1.6-km) radius. The three districts are the Hubbard Farms Historic District (local), the St. Anne Roman Catholic Church Complex (local), and the Detroit Copper & Brass Rolling Mill (state).

The Hubbard Farms District, bound by West Vernor Highway, West Grand Boulevard, West Lafayette Boulevard, and Clark Street, was designated as a local historic district on January 1, 1993. According to the listing on the Detroit Historic District Commission website, Hubbard Farms was “Originally a Pottawatomie Indian Village, rich in burial mounds.” The area was rich in natural springs, particularly near the location of Fort Wayne, which led the French to name the region “Belle Fontaine” and the

English to christen it “Spring Hill.” In 1827, the area was officially incorporated into Springwells Township. The modern name, Hubbard Farms, is derived from Bela Hubbard, a prominent resident who acquired the property in 1835 and went on to donate much of it to the city and to found the Detroit Museum of Art. The district was incorporated into Detroit ca. 1885, and “should be remembered for its significant architectural as well as cultural merit,” (City of Detroit Planning and Development Department 2007a).

The St. Anne Roman Catholic Church Complex is located at 1000 Ste. Anne Street, and is the eighth incarnation of St. Anne’s in the city. The first church, established in 1701 with the founding of the city, was located just west of Jefferson and Griswold Streets. According to the Detroit Historic District Commission, St. Anne’s is the second oldest Catholic parish in the United States and the oldest continuous institution between the Alleghenies and the Rockies. Construction of the eighth church began in 1886 and it served the as one of two French parishes into the twentieth century. Currently, the parish serves predominantly Hispanic community members and is undergoing extensive renovation in preparation for its 300-year anniversary (City of Detroit Planning and Development Department 2007b).

The Detroit Copper & Brass Rolling Mill is located on the waterfront approximately 0.8 miles (1.3 km) west of the APE. This complex is an industrial facility associated with the late nineteenth and early twentieth century commercialization and industrialization of Detroit’s western waterfront. Unfortunately, a review of the State Historic Preservation Office’s online listing of Historic Districts and Sites did not provide additional information, and the site was not included in the Detroit Historic District Commission’s registry.

### **Previous Cultural Resource Investigations**

A review of the OSA site file revealed that 12 previous cultural resources surveys have been conducted within 1 mile (1.6 km) of the APE (Table 1). One of those surveys, a broad review of historic resources along the waterfront of western Detroit, included the current APE. The remaining 11 surveys were conducted over the past 20 years and are associated in various ways with the improvements to the Ambassador Bridge customs

plaza, toll plaza, or other facilities. In general, these surveys have focused on that area, located between 1,000 ft (305 m) and 2,600 ft (793 m) north of the APE.

Table 1. Previously Conducted Surveys within 1 mile (1.6 km) of the APE.

Consultant	Year	Project Title	Comments
C. Stephan Demeter <i>Commonwealth Associates, Inc.</i>	1984	<i>An Archaeological Evaluation of the West Riverfront Study Area</i>	This is a broad review/inventory of known and potential archaeological resources between the Detroit River to approximately Fort Street and from downtown to a point approximately 1 mile (1.60 km) west of the APE. No subsurface investigation was completed, but the report identified numerous map-documented atlas sites from the late 18 <sup>th</sup> -early 20 <sup>th</sup> centuries and suggested potential research guidelines for many.
Mark C. Branster <i>Great Lakes Research Associates, Inc.</i>	1989	<i>The Ambassador Bridge/Detroit Welcome Center: A Cultural Resource Inventory Study</i>	This is a land-use history and architectural inventory for a 6-acre (2.42-ha) parcel for the proposed Detroit Welcome Center. A significant potential for intact deposits from 19 <sup>th</sup> -century residential occupation was identified.
C. Stephan Demeter and Donald J. Weir <i>Commonwealth Cultural Resources Group</i>	1990	<i>Historic Land Use Study, Ambassador Bridge Cargo Inspection Facility, Ambassador Border Station Detroit, Wayne County</i>	This Phase I cultural resource literature review identified one site (20WN95) within a 17-acre (6.9-ha) study area. A Phase I archaeological investigation was recommended.
C. Stephan Demeter and Donald J. Weir <i>Commonwealth Cultural Resources Group</i>	1991	<i>Phase II Summary Report, Ambassador Bridge Cargo Inspection Facility, Ambassador Border Station, Detroit, Wayne County</i>	This Phase II/III investigation was associated with the previous study. A total of 915 ft (279 m) of trenches were completed in a 2-acre (0.8-ha) study area. The project identified one new site (20WN926), a 19 <sup>th</sup> -century privy vault. No further work was recommended.
Mark C. Branster, Beverly Smith, and Kathryn C. Egan <i>Great Lakes Research Associates, Inc.</i>	1995	<i>Cultural Resource Inventory: Ambassador Bridge Cargo Inspection Facility, Detroit, Michigan</i>	This report contains a land-use history and Phase I literature review as well as a Phase II/III archaeological investigation of a 4-acre (1.6-ha) study area. Seven sites (20WN1045-1051) from the second half of the 19 <sup>th</sup> century were documented and excavated.
C. Stephan Demeter and Nancy F. Demeter <i>Commonwealth Cultural Resources Group</i>	1996a	<i>Land-Use History and Evaluation of Archaeological Sensitivity, Ambassador Bridge Gateway Project, Detroit, Michigan</i>	This report evaluated the archaeological sensitivity of a 124-acre (50-ha) study area bounded by 19 <sup>th</sup> Street, Fort Street and 24 <sup>th</sup> Street. Approximately 40% of the area was recommended for further study to investigate potential 19 <sup>th</sup> -century domestic sites.

Table 1. Previously Conducted Surveys within 1 mile (1.6 km) of the APE.

Consultant	Year	Project Title	Comments
C. Stephan Demeter and Nancy F. Demeter <i>Commonwealth Cultural Resources Group</i>	1996b	<i>An Archaeological and Soils Reconnaissance of the North Study Area, Ambassador Bridge Gateway Project, Detroit, Michigan</i>	This report documents the investigation of a 5-acre (2-ha) study area for the presence of intact Archaic period archaeological sites. Extensive disturbance was recorded, but the report recommended additional study of late 19 <sup>th</sup> -century urban infrastructure (sewer system and public cisterns).
C. Stephan Demeter and Nancy F. Demeter <i>Commonwealth Cultural Resources Group</i>	1997	<i>Land-Use History and Archaeological Assessment of the Proposed Bagley Avenue Reroute, Detroit, Michigan</i>	This report determined that approximately one-half of a 6-acre (2.4-ha) study area had a significant potential to contain intact sites from the late 19 <sup>th</sup> -century. Phase I archaeological investigation was recommended.
C. Stephan Demeter <i>Commonwealth Cultural Resources Group</i>	1998	<i>A Phase I Archaeological Field Study of the Proposed Bagley Avenue Relocation Block, Detroit, Michigan</i>	This report documents the excavation of one 100-ft (30-m) trench in a 1-acre (0.4-ha) study area between Bagley Avenue, 19 <sup>th</sup> St., 21 <sup>st</sup> Street, and the northbound I-75 service drive. No archaeological sites were documented.
C. Stephan Demeter <i>Commonwealth Cultural Resources Group</i>	1999	<i>Phase I/II Archaeological Assessment of the Ambassador Bridge/Gateway South Central Area (20WN1044), Detroit, Michigan</i>	This report documents the testing and evaluation of the Ambassador Bridge project South Central Area. A total of 360 ft (110 m) of backhoe trenches were completed and one archaeological site (20WN1044) was documented. This 19 <sup>th</sup> -century privy was determined not eligible for inclusion in the NRHP and no further work was recommended.
C. Stephan Demeter <i>Commonwealth Cultural Resources Group</i>	1997	<i>Phase I/II Archaeological Testing, Ambassador Bridge/Detroit Welcome Center, Detroit, Michigan</i>	This report documented the testing and evaluation of a 7-acre (2.8-ha) study area with mechanical trenching. Four sites (20WN1020-1023) were found that date to the late 19 <sup>th</sup> -century. None were determined eligible for inclusion in the NRHP and no further work was recommended.
C. Stephan Demeter and William G. Monaghan <i>Commonwealth Cultural Resources Group</i>	1997	<i>A Phase II/III Prehistoric Site Evaluation of the Ambassador Bridge/Detroit Welcome Center, Detroit, Michigan</i>	This report documents the Phase II/III evaluation and excavation of a post-glacial buried sand formation within a 3-acre (1.2-ha) study area. The work was done to assess the potential for prehistoric site preservation and to refine the geological association of this previously unrecorded sand formation. No sites were identified and no further work was recommended.

## Archaeological Resources

Review of the OSA site file revealed the 51 archaeological sites have been recorded within a 1 mile (1.6-km) radius of the project area (Table 2). Many of these

sites are map-documented atlas sites, but a large number have been confirmed or identified through subsurface investigation. A summary of these sites and their NRHP status is presented in Table 2. Site 20WN832, the Navarre-Brevoort Farm, is located within the APE. Figure 3 shows all of the previously documented archaeological sites between Fort Street and the Detroit River from 16<sup>th</sup> Street to Grand Boulevard.

In general, the archaeological sites that have been recorded in the vicinity of the APE are historic sites. They can be divided into two categories. The first category included map-documented atlas sites that have been identified through documentary research. These tend to be earlier domestic sites that date from the mid-eighteenth through the mid-nineteenth centuries that are identified as atlas sites on Table 2. The second category consisted of mid-nineteenth to early twentieth-century refuse middens, privy vaults, or sheet middens associated with the expansion of the city of Detroit and the processes of urbanization in the second half of the nineteenth century. In general, these have been identified through field investigation surveys. A handful of prehistoric sites associated with the Late Woodland period/early Historic period Potawatami occupation of the region and a few nineteenth-century industrial sites have also been recorded. Only 12 of the 51 sites have been evaluated for NRHP eligibility and all have been found not eligible.

Table 2. Previously Documented Archaeological Sites within 1 mile (1.6 km) of the APE.

Site Number	Site Name	Location	Township	Range	Section	Quarter	Temporal Period and Site Type	Site Dimensions (ft/m)	NRHP Status
20WN61	Jefferson and 24 <sup>th</sup>	W. Jefferson St., between 21 <sup>st</sup> and 24 <sup>th</sup>	02S	11E	24	NE-NE	Early historic Native Village and Cemetery (Potawatami)	Unknown	Not assessed (more data needed)
20WN95	—	—	02S	11E	13	—	Prehistoric Native Village	Unknown	Not assessed (more data needed)
20WN274	20WN-H-19	Near west side of intersection of Verner and Penn Central RR Tracks	02S	11E	13	E1/2-E1/2-NE	Historic, type unknown	Unknown	Not assessed (more data needed)
20WN296	20WN-H-41	—	02S	10E	24	SW	Historic (19 <sup>th</sup> century), surface scatter	Unknown	Not assessed (more data needed)
20WN321	Woodbridge	—	02S	12E	16	NW	Historic, type unknown	Unknown	Not assessed (more data needed)
20WN329	Howley	—	02S	12E	18	NWSE	Historic, early 20 <sup>th</sup> -century boarding house midden	Unknown	Not eligible
20WN330	Gold	—	02S	12E	18	SENW	Historic, 18 <sup>th</sup> -19 <sup>th</sup> century farm	Unknown	Not assessed (more data needed)
20WN407	Collot 2	—	02S	11E	24	SESW	Historic, 18 <sup>th</sup> century farm (atlas site)	Unknown	Not assessed (more data needed)
20WN408	Martin Farm	—	02S	11E	24	NESW	Historic, 18 <sup>th</sup> century farm (atlas site)	Unknown	Not assessed (more data needed)
20WN409	Collot 5, 3, and 3A; Collot Lot 13	—	02S	12E	19	N-NW/NW	Historic, 18 <sup>th</sup> century, farm (atlas site)	Unknown	Not assessed (more data needed)

Table 2. Previously Documented Archaeological Sites within 1 mile (1.6 km) of the APE.

Site Number	Site Name	Location	Township	Range	Section	Quarter	Temporal Period and Site Type	Site Dimensions (ft/m)	NRHP Status
20WN410	Collot Lot 11, Collot 6	—	02S	12E	18	SESW SW	Historic, 18 <sup>th</sup> century farm (atlas site)	Unknown	Not assessed (more data needed)
20WN414	Collot 4, Collot Lot 13	—	02S	11E	24	NENE NENE	Historic, 18 <sup>th</sup> century farm (atlas site)	Unknown	Not assessed (more data needed)
20WN415	Collot 5, Collot Lot 12	—	02S	12E	18	SWSW SW	Historic, 18 <sup>th</sup> century farm (atlas site)	Unknown	Not assessed (more data needed)
20WN416	Collot 7, Collot Lot 10	—	02S	12E	18	S-SW	Historic, 18 <sup>th</sup> century farm (atlas site)	Unknown	Not assessed (more data needed)
20WN417	Collot 8, Collot Lot 10	—	02S	12E	18	SW	Historic, 18 <sup>th</sup> century farm (atlas site)	Unknown	Not assessed (more data needed)
20WN418	Collot 9, 9A, 9B and 9C	—	02S	12E	18	NESW	Historic, 18 <sup>th</sup> century farm (atlas site)	Unknown	Not assessed (more data needed)
20WN420	Collot 12, Collot Lot 17	—	02S	12E	18	N-SE	Historic, 18 <sup>th</sup> century farm (atlas site)	Unknown	Not assessed (more data needed)
20WN801	Mays Creek	—	02S	12E	18	—	Historic, 18 <sup>th</sup> century Native American cemetery	Unknown	Not assessed (more data needed)
20WN819	Robert Abbot House	—	02S	12E	18	NWNW NESE	Historic, 19 <sup>th</sup> century house (atlas site)	Unknown	Not assessed (more data needed)

Table 2. Previously Documented Archaeological Sites within 1 mile (1.6 km) of the APE.

Site Number	Site Name	Location	Township	Range	Section	Quarter	Temporal Period and Site Type	Site Dimensions (ft/m)	NRHP Status
20WN820	Campau House	—	02S	12E	18	SESE NESE	Historic, 18 <sup>th</sup> century (ca. 1730) French house (atlas site)	Unknown	Not assessed (more data needed)
20WN822	Lapage-Couseneau House	—	02S	12E	18	NW- NW- SW-SE	Historic, 18 <sup>th</sup> century (ca. 1780) French house (atlas site)	Unknown	Not assessed (more data needed)
20WN823	Cabacier-Wheeler House	—	02S	12E	18	NENW SWSE	Historic, 18 <sup>th</sup> century French house (atlas site)	Unknown	Not assessed (more data needed)
20WN824	Laferte House	—	02S	12E	18	NENW SWSE	Historic, 18 <sup>th</sup> century (ca. 1750) French house	Unknown	Not assessed (more data needed)
20WN825	Bissell House	—	02S	12E	18	NWNW SWSE	Historic, 19 <sup>th</sup> century (ca. 1840) House (atlas site)	Unknown	Not assessed (more data needed)
20WN826	Godfroy House	—	02S	12E	18	SWNW SWSE	Historic, 19 <sup>th</sup> century (ca. 1840) House (atlas site)	Unknown	Not assessed (more data needed)
20WN827	Balsey House	—	02S	12E	18	SWNW SWSE	Historic, 19 <sup>th</sup> century (ca. 1856) House (atlas site)	Unknown	Not assessed (more data needed)
10WN829	Lafontain House	—	02S	12E	18	NESW SESW	Historic, 18 <sup>th</sup> century (ca. 1790) French house (atlas site)	Unknown	Not assessed (more data needed)
20WN830	Ruland House	—	02S	12E	18	SESW SESW	Historic, 18 <sup>th</sup> century (ca. 1780) House (atlas site)	Unknown	Not assessed (more data needed)

Table 2. Previously Documented Archaeological Sites within 1 mile (1.6 km) of the APE.

Site Number	Site Name	Location	Township	Range	Section	Quarter	Temporal Period and Site Type	Site Dimensions (ft/m)	NRHP Status
20WN831	Chabert-LaSalle House	—	02S	12E	18	SESW SESW	Historic, 18 <sup>th</sup> century (ca. 1790) French house (atlas site)	Unknown	Not assessed (more data needed)
20WN832	Navarre-Brevoort House	—	02S	11E	24	SENE NENE	Historic, 18 <sup>th</sup> century (ca. 1771) French house (atlas site)	Unknown	Not assessed (more data needed)
20WN833	Governor Porter House	—	02S	11E	24	NESW NENE	Historic, 19 <sup>th</sup> century (ca. 1834) house (atlas site)	Unknown	Not assessed (more data needed)
20WN834	Labadie-Dorr House	—	02S	11E	24	NESW NENE	Historic, 18 <sup>th</sup> century French house (atlas site)	Unknown	Not assessed (more data needed)
20WN835	Mette House	—	02S	11E	24	SWSW NENE	Historic, 19 <sup>th</sup> century (ca. 1824) House	Unknown	Not assessed (more data needed)
20WN836	Alexia Campau House	—	02S	11E	24	SESW SWNE	Historic, 18 <sup>th</sup> century (ca. 1780) French house (atlas site)	Unknown	Not assessed (more data needed)
20WN837	Windmill	—	02S	11E	24	NESE SWNE	Historic, 19 <sup>th</sup> century (ca. 1810) windmill (atlas site)	Unknown	Not assessed (more data needed)
20WN838	Knagg House	—	02S	11E	24	NWSE SWNE	Historic, 18 <sup>th</sup> century (ca. 1790) British house (atlas site)	Unknown	Not assessed (more data needed)

Table 2. Previously Documented Archaeological Sites within 1 mile (1.6 km) of the APE.

Site Number	Site Name	Location	Township	Range	Section	Quarter	Temporal Period and Site Type	Site Dimensions (ft/m)	NRHP Status
20WN839	JB Campau House	—	02S	11E	24	SENW NWSE	Historic, 18 <sup>th</sup> century (ca. 1790) French house (atlas site)	Unknown	Not assessed (more data needed)
20WN840	Point Industry	—	02S	12E	18	SESE NWSE	Historic, 18 <sup>th</sup> century (ca. 1790) British house (atlas site)	Unknown	Not assessed (more data needed)
20WN841	Clark House	—	02S	11E	24	NWNW NWSE	Historic, 19 <sup>th</sup> century (ca. 1837) House (atlas site)	Unknown	Not assessed (more data needed)
20WN842	General Schwartz House	—	02S	11E	24	NESE NESW	Historic, House (atlas site)	Unknown	Not assessed (more data needed)
20WN926	Preston Subdivision	—	02S	11E	—	—	Historic, 19 <sup>th</sup> century (ca. 1880s) House	Unknown	Not eligible
20WN1020	—	—	02S	11E	13	NENW NESE	Historic, 19 <sup>th</sup> -20 <sup>th</sup> century (ca. 1890- 1910) landfill	Unknown	Not eligible
20WN1021	—	—	02S	11E	13	NENW NESE	Historic, 19 <sup>th</sup> century (ca. 1870- 1880) privy	Unknown	Not eligible
20WN1022	—	—	02S	11E	13	NWNE SE	Historic, 19 <sup>th</sup> century (ca. 1850- 1885) refuse pit	Unknown	Not eligible
20WN1023	—	—	02S	11E	13	NWNE SE	Historic, 19 <sup>th</sup> century (ca. 1870- 1900) refuse pit	Unknown	Not Eligible

Table 2. Previously Documented Archaeological Sites within 1 mile (1.6 km) of the APE.

Site Number	Site Name	Location	Township	Range	Section	Quarter	Temporal Period and Site Type	Site Dimensions (ft/m)	NRHP Status
20WVN1044	—	Bound by Fort Street, 24 <sup>th</sup> St., Savoy St., and 23 <sup>rd</sup> St.	02S	11E	24	NWNE NE	Historic, 19 <sup>th</sup> century (ca. 1867-1880) privy	Unknown	Not eligible
20WVN1045	McPherson-May	364 ft south of intersection of Porter St. and N-S alley	02S	12E	18	SWNW SW	Historic, 19 <sup>th</sup> -20 <sup>th</sup> century (ca. 1894-1907) refuse pit	Unknown	Not eligible
20WVN1047	Lot 32 Privy	125 ft south of intersection of Lafayette Blvd. with N-S alley	02S	12E	18	NWSW SW	Historic, 19 <sup>th</sup> century (ca. 1840-1891) privy	Unknown	Not eligible
20WVN1048	Greenfield-Martin Privy	310 ft south of intersection of Lafayette Blvd. with N-S alley	02S	12E	18	NWSW SW	Historic, 19 <sup>th</sup> century (ca. 1850-1869) privy	Unknown	Not eligible
20WVN1050	Lot 34 Privy	225 ft south of intersection of Lafayette St. with N-S alley	02S	12E	18	NWSW SWSW	Historic, 19 <sup>th</sup> century (ca. 1890s) privy	Unknown	Not eligible
20WVN1051	Lot 33-34 Privy	200 ft south of intersection of Lafayette St. with N-S alley	02S	12E	18	NWSW SWSW	Historic, 19 <sup>th</sup> century (ca. 1890s) privy	Unknown	Not eligible

## **Environmental Setting**

The Ambassador Bridge Enhancement project APE is located in urban Detroit. The soils within the study area are currently urbanized, but prior to development they were characterized by Pewamo-Blount-Metamora association soils. These are nearly level to gently sloping soils that are very poorly to somewhat poorly drained and have a fine to moderately coarse-textured subsoil (United States Department of Agriculture, Soil Conservation Service [USDA SCS] 1977).

Prior to the urbanization of southeastern Detroit in the post-bellum nineteenth century, the area was a part of the Maumee sub-district and was dominated by an extensive lake plain that extended along the length of eastern side of the Lower Peninsula. This feature extended from Lake Erie on the south to Mackinac on the north (Albert et al. 1986). This clay plain is dissected by sandy glacial drainages and fossil beach ridges with varied vegetation. The vegetation in this region would have included “mesic to swamp forest species along with oak savannah, oak-hickory forest, and both wet and dry prairie plant groups” (Albert et al. 1986; Demeter 1997:4). Much of the APE was likely covered with a mixed deciduous forest prairie (Demeter 1997:4). This forest prairie was dominated by species like American elm, red ash, silver maple, and other deciduous swamp species associated with poorly drained areas (Albert et al. 1986).

The area around present-day Detroit was not ideal for agriculture as the poorly drained soils meant that wet meadows, wet mesic forests, and wet prairie habitats dominated the region. Without the aid of extensive drainage modification, the area surrounding modern Detroit was not extensively cultivated in its early historic development. Visitors in the eighteenth century noted that despite being the primary supplier of agricultural goods to the upper Great Lakes settlements, very little land around the city was in production (Demeter 1998).

Until the expansion of the riverfront in the mid-nineteenth century, Jefferson Avenue at the southern margin of the APE was the shoreline of the Detroit River. This large feature served as the primary drainage throughout the pre-contact and early historic periods. Secondary drainages may have included Knagg’s Creek, or the Rousseau des Braseaux, which flows into the Detroit River approximately 2.6 miles (4.2 km) to the west of the APE, and May’s Creek, which joins the Detroit River approximately 1.4 miles (2.2 km) to the east.

## **Cultural Overview**

### **Regional Prehistoric Setting<sup>1</sup>**

The purpose of developing a prehistoric setting is to provide a general background in which to interpret local developments through the synthesis of information regarding the prehistory of the area from previous investigations and general work of Eastern and Midwestern North American prehistory. Regional information provides a framework by that allows site significance to be addressed.

The earliest recognized occupation of southeastern Michigan was marked by the remains of small bands of hunter-gatherers who exploited the existing tundra at the edge of the retreating Wisconsin glacier. Identified as the Paleoindian period, this occupation likely occurred between the Port Huron glacial advance, ca. 11,000 B.C., and the Valuers glacial advance, ca. 9850 B.C. (Prahl 1980). The Paleoindians were highly mobile and likely moved through the landscape on a seasonal round in order to more fully exploit available natural resources. Although often in pursuit of herd animals, the Paleoindians were opportunists and probably utilized a broad spectrum of animal and plant resources. Two distinct procurement traditions have been observed among Paleoindian populations that appear to relate to the changing climate at the end of the Pleistocene. The early periglacial hunters exploited the recently uncovered edge of the glacier that was characterized as a spruce parkland (Fitting 1975). Later Paleoindian hunters exploited the maturing boreal forest using large lanceolate projectile points. These points are typically fluted with concave bases and fall under the broad category of Clovis points.

Early Paleoindian artifacts have found at two sites in northern Detroit. The first was located just south of the division between Macomb and Oakland counties, and the second was located in the area of Newbury Road, Ford Road, Wayne Road, and Cherry Hill Road (Pilling 1980; Mason 1985). More recently, a fluted point was reportedly discovered in the area of Schoolcraft and Middlebelt roads, and a second was located at Ridge Road and Warren Avenue. A final early Paleoindian site was reported in the Mack Avenue area (Pilling 1980).

The next major cultural period in Michigan prehistory was known as the Archaic period, which is subdivided into the Early, Middle, and Late Archaic periods. As the glaciers retreated northward at the end of the Pleistocene, a period of significant environmental change ensued. The climate became temperate, large game species became extinct, and the deciduous forest

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<sup>1</sup> Adapted from Demeter and Demeter 1996a.

common today developed, replacing the boreal-coniferous forests. This environmental change was the catalyst for human adaptive shifts and settlement practices that are collectively encompassed within the Archaic period (Ford 1974). Artifact assemblages from Archaic sites show an increased range of tool types, some of which have specialized functions for the processing of a wider variety of plant and animal resources (Griffin 1967). Although all Archaic period human groups were hunters and gatherers, environmental differences led to regionally distinctive artifact assemblages by the end of the period, which may reflect culturally distinct human social groups (Dragoo 1976).

Changes in human social organization occurred concurrently with expanding food procurement strategies. In eastern North America, organizational changes generally included restricted group mobility, larger aggregations of individuals, development of ritual behavior, development of interregional exchange systems, and the first attempts at plant domestication (Ford 1974). Other results included smaller group territories, sites occupied for longer periods, reuse of sites at more frequent and probably more regular intervals, and the use of a wider variety of plants and animals. Storage facilities and vessels also began to appear more frequently, as did evidence for incipient cultivation of some plant species. Burial ceremonialism and other ritual behavior developed and showed signs of becoming formalized in some regions. Ritual activity might be linked to the establishment of social group identities, the maintenance of territorial boundaries, and the regulation of intergroup alliances and trade. However, this proposition has neither been adequately tested nor fully demonstrated.

During the Early Archaic period (9000 B.C. to 6000 B.C.), small mobile groups gradually became more geographically restricted as seasonally oriented hunting-and-gathering activities were focused on smaller, well-exploited territories. This sedentism can be a direct link to the expansion of the deciduous forests that produced a more favorable habitat for game species (Chapman 1975). In southeastern Michigan, Early Archaic occupations, ca. 8000 B.C. to ca. 6000 B.C., are typically marked by the co-existence of several large varieties of lanceolate, Plano, and basally ground projectile points (Demeter and Demeter 1996).

During the Middle Archaic period (ca. 6000 B.C. to ca. 3000 B.C.), the continuing climate alteration led to a wider selection of exploitable plant foods. However, the major emphasis remained on hunting with an increasingly sedentary lifestyle (Cleland 1966). This broadening economy was reflected in the material cultural as well, which was adapted to

intensive exploitation of forest and riverine environments. The Early Archaic point types were replaced mainly by slender, stemmed lanceolates. Plant-processing tools included a variety of ground stone implements, grooved axes, metates, and nutting stones. Atlatl weights were also noted, and bone tools were included in the artifact assemblage (Broyles 1971; Lewis and Lewis 1961). Middle Archaic sites in southeastern Michigan included several varieties of ground stone tools and corner-notched projectile points. A collection of Middle Archaic artifacts was reportedly recovered from a site near the University of Detroit (Demeter and Demeter 1996).

The Late Archaic period (ca. 3000 to ca. 1000 BC) is the first well-documented occupation in southeastern Michigan (Demeter and Demeter 1996). Throughout the Midwestern and Eastern United States, the Late Archaic period is marked by a dramatic increase in the number of documented sites and artifacts, which is largely attributed to a significant increase in Native American populations (Krakker 1977). In addition, ceremonialism appears to have increased in importance, as indicated by more elaborate, formalized burial practices and the presence of exotic materials obtained from emerging trade networks. Archaic sites in southeastern Michigan attributed to this period included stemmed and notched projectile points as well as ground stone tools such as grooved axes and chisel-shaped celts. These sites often yielded slate bannerstones or birdstones and triangular chipped stone blades (Demeter and Demeter 1996).

Pilling (1980) reported that large-stemmed projectile points were recovered during the 1890s excavations of Fort Lernault in Detroit. However, these points were recovered from a dubious context (Demeter and Demeter 1996). Pilling (1980) reported that a Red Ochre burial was found in the lower Rouge River area and Gillman (1874) reported the recovery of a ground stone, banded slate birdstone in Grosse Point (Demeter and Demeter 1996).

The appearance of pottery in the archaeological record was used to demarcate the beginning of the next major cultural phase in the Midwestern and Eastern United States, the Woodland period. As with the Archaic period, observable differences in material culture, settlement strategies, and resource exploitation strategies have been used to further subdivide the Woodland period into Early, Middle, and Late phases. Recent evidence demonstrates a continuum from the end of the Archaic through the Middle Woodland for the intensification of horticulture and the formalization and elaboration of mortuary practices (Dragoo 1976). The innovation and adaptation of these traits by human groups was not uniform but was synchronized

with the perceived biological and social needs of the groups. Consequently, the rate of change in subsistence and mortuary practices varied from region to region, with some local groups maintaining Late Archaic lifestyles throughout the Late Woodland.

With the exception of pottery, the artifact assemblage from early Middle Woodland (ca. 1000 B.C. to ca. 200 B.C.) period sites in southeastern Michigan does not vary greatly from Late Archaic sites (Demeter and Demeter 1996a). This suggests a continuity of lifeways and subsistence strategies between the two periods, rather than a sudden shift from one cultural epoch to another. Early Woodland pottery tended to be crudely made, with a thick body, large pieces of temper, and a low firing temperature. It was sometimes decorated on the interior and/or exterior with impressed cord markings. Early Woodland types include Marion Thick, Vinette I, and Shultz Thick (Demeter and Demeter 1996a; Fitting 1975). In Wayne County, the Fort Wayne Mound is an Early Woodland site that contained 24 sherds of Marion Thick pottery (Demeter and Demeter 1996a; Halsey 1968; Pilling 1980).

In Michigan, Middle Woodland Native groups (ca. 200 B.C. to ca. A.D. 500) were apparently influenced to some degree by the Hopewell cultural traditions, particularly in ceramic design and mortuary practice. However, most Middle Woodland sites appear to have retained more of the indigenous, non-Hopewellian settlement and subsistence patterns. These include large summer camps along lakefronts and rivers to exploit marine resources and smaller winter hunting camps located in more upland regions (Demeter and Demeter 1996a). There are several documented Middle Woodland sites in the general vicinity of the current APE. They include the central mound at Fort Wayne and the Great Mound at the mouth of the Rouge River (Demeter and Demeter 1996a; Fitting 1965).

The Late Woodland period (c.a. A.D. 500 to ca. A.D. 1600) is the last major cultural period prior to the influence of European cultures in North America. In Michigan, two major Late Woodland period ceramic traditions were recognized. The first, the Wayne tradition (ca. A.D. 800 to ca. A.D. 1000), was a Middle Woodland/Late Woodland transitional style marked by globular, cord-marked pottery with plain or cord-marked rims and simple decoration. The second is the Younge tradition (ca. A.D. 1300 to A.D. 1400), which is characterized by large globular to elongated vessels that were usually collared and often had one or more castellations around the rim. The vessels showed complex rim and shoulders designs, as well (Demeter and Demeter 1996a). There are several sites in the Detroit area that are associated with the Late

Woodland period, and the Younger phase in particular. Younger phase material is reported from intrusive burials at the Great Mound and the Fort Wayne Mound, the Butler Site, a site near Farmington, and a site in the Redford area (Demeter and Demeter 1996a).

During the early historic period in southeast Michigan (1701 ca. 1760), the vicinity of Detroit was home to the Potawatami Indians. The first account of the Potawatami was from Jean Nicolle, who documented the tribe near Green Bay in 1634 (Burton and Burton 1930). Shortly after Detroit was founded in 1701, a group of Potawatami settled in a village a few miles west of the city near the intersection of modern Fort Street and 24<sup>th</sup> Street. This village is shown on Bellin's (1764) map of Detroit (Figure 4). The village was likely settled to foster strong fur trading connections between the French and the Natives, and appears to have been formed at the behest of Antoine Laumet, dit de La Mothe, Sieur de Cadillac, who founded the city (Burton and Burton 1930).

The Potawatami were loyal allies of the French and fought against the British during both the French and Indian War (1754–1763), and Pontiac's rebellion (1763–1764). After losing both of those conflicts, they sided with the British during the American Revolution (1776–1783) and in the War of 1812 (1812–1815). The Potawatami were signatories of both the Treaty of Greenville (1795) and the Treaty of Detroit (1807), which ceded most of southeastern Michigan to the United States. In 1842, the Upper Sandusky treaty claimed the remaining Native lands in Michigan and the last remaining Native groups in Wayne County were relocated west to Kansas and points west of the Mississippi River (Burton and Burton 1930).

### **Regional Historic Setting**

Although regional historic development began in the vicinity of Detroit with the arrival of Sieur de Cadillac in 1701, French explorers, missionaries, and *coureurs de bois* traveled through the region throughout the seventeenth century. The first notable contact with the region occurred when Samuel de Champlain, the “father of New France,” passed through the Detroit River during his many explorations of the interior Great Lakes (1610–1616). It is unknown if Champlain made landfall in the Detroit vicinity, but his explorations are the first documented instances of contact between Europeans and Natives in the area (Burton and Burton 1930).

After Champlain's first voyages, French contact with the Upper Great Lakes and the Michigan region was driven by two forces: the economic profitability of the fur trade, and the conversion of Native Americans to Christianity. To that end, the intrepid *coureurs de bois* plied

the Great Lakes and the surrounding inland waterways over the next several decades. By the 1660s a series of Jesuit missions had been established throughout the region (Burton and Burton 1930). The most famous of these missions, perhaps, were those at Sault Ste. Marie and Michilimackinac.

Interestingly, in all of these travels and explorations, French traders, missionaries, and their Native guides traveled by canoe and bateaux. The first ship of consequence on the Great Lakes above the Niagara escarpment was the Griffin, built by Rene-Robert Cavalier, Sieur de La Salle in 1679. The Griffin was a schooner of between 45 and 60 tons, and carried La Salle on several trips through the Upper Great Lakes. La Salle's explorations eventually carried him through the Great Lakes, down the Mississippi River, and into the Gulf of Mexico in 1682 (Mansfield 1899).

In the immediate vicinity of the APE, however, the most significant historic development occurred in 1701 with the founding of the city of Detroit. The city's founder, Sieur de Cadillac, was a professional military officer who arrived in New France in 1683. After serving at a number of posts throughout Quebec and Acadia, Cadillac served as the commander of Fort Michilimackinac from 1694 to 1697. He was able to convince higher authorities in Quebec about the wisdom of settling along and defending the Detroit River to further secure French claims to the Upper Great Lakes. Arriving at the site on July 24, 1701, Cadillac ordered the construction of an enclosed palisade. The enclosed area was between one acre (0.4 ha) or one arpent (0.8 ac), a French unit of measure that is still used in parts of Quebec and Louisiana. The enclosure was built of felled trees hewn to make a palisade 12 ft (3.6 m) high. Eventually, the palisade enclosed a storehouse/warehouse, St. Anne's Catholic church, and several smaller buildings and structures such as houses, ice-houses, and barns (Burton and Burton 1930). Within several years, a small village arose outside of the fortified settlement.

Detroit was a prime strategic and logistical location for defending and supplying settlements to the north and west, but it did not expand greatly until after the territory was seized by the British in 1760 during the French and Indian War. When Detroit came under British control, the settlement was largely constrained to the area in the immediate vicinity of the fort and a handful of farms to the north and east (Figure 4). This was typical of French settlement patterns throughout the Great Lakes and along the St. Lawrence River in the seventeenth and eighteenth centuries. French colonial aims during that time period were less focused on

intensive settlement than the British and more focused on localized settlement and the development of strong trading alliances with Native groups (Faulkner and Faulkner 1987; Klinge 2001).

The expansion of settlement and the development of the Detroit River waterfront in the vicinity of the APE did not occur until after the British had wrested control of the Great Lakes and Canada from the French in 1760. British colonial aims in the New World tended to be more intrusive than French and were focused on wholesale intensive settlement, often at the expense of local Native groups (Faulker and Faulkner 1987; Klinge 2001). This certainly seems to have been the case in the vicinity of Detroit as the rate of settlement and development on the waterfront greatly increased after the British takeover. In 1771, the local Potawatami, whose village had been erected to the west of Detroit at Cadillac's behest, sold their land, including the APE, to Robert Navarre. Navarre was a local of French descent. The Potawatami likely removed themselves of the area in the face of increasing pressure from British officials, as the two groups had been enemies during the French and Indian War and Pontiac's rebellion, although this is speculative at this point. When they sold the property, the Potawatami urged Navarre to look after their dead; they had been interred near the village site (Demeter 1984). Portions of this cemetery have been uncovered in a series of construction projects dating back to 1867 near the intersection of Fort Street and 24<sup>th</sup> Street and it has been assigned Michigan Archaeological Inventory number 20WN61.

The property the Navarre purchased was filed as Private Claim 20 in 1807, when the United States government conducted a survey of property titles dating to the French and British periods of Detroit's history (Figure 5). The property was described at that time as 4 arpents wide and 40 arpents long (Branster 1989:9). As a measurement of length in colonial New France an arpent was approximately 180 ft (55 m) long, so Navarre's property was approximately 360 ft (110 m) long and 7,280 ft (2,195 m) long. The short side of the property ran along modern-day Jefferson Ave, which historically was known as River Road and ran along the Detroit River shoreline. This pattern of settlement, variously known as the French long lot system or ribbon farms, is based on the seigneuries of the St. Lawrence River valley area and farms in the French countryside (Faulkner and Faulkner 1987). It was designed to provide all landowners and farmers with access to local watercourses, which were often the only efficient and reliable method of travel in the early colonial experience, and also to provide rather equitable access to

the variety of resources available in the water, along the shoreline, and further inland. Although the British had nominal control of the Detroit area in 1760, the persistence and maintenance of the long lot system reveals the continued dominance of French culture and practices in late eighteenth-century Michigan.

A detailed history of Private Claim 20, which has been assigned Michigan Archaeological Inventory number 20WN832 and is known as the Brevoort Farm, is provided in Demeter's (1984) study, *An Archaeological Evaluation of the West Riverfront Study Area*. In that document, Demeter reports that in 1779, Navarre was the head of a household of "11, exclusive of 2 slaves, with milled flour reserves amounting to 400 pounds and livestock holdings consisting of 4 oxen, 14 head of cattle, 5 hogs, 6 horses and 21 sheep" (Demeter 1984:67). By 1782, Demeter continues, a tenant house had been constructed on the property that was occupied by Jean Bte. Couture and the five members of his family. It can be assumed that in addition to the two domestic structures, the farm(s) contained numerous outbuildings like livestock barns, pens, outhouses, and possibly dairy sheds and ice houses.

When Navarre died in 1817, he had already divided ownership of the property between his several heirs. It took nearly 17 years for Henry Brevoort, Navarre's son-in-law, to acquire the rights or title to the entire parcel. In 1833, Brevoort sold the western half of the claim but retained possession of, and inhabited the eastern half (Demeter 1984).

The first major phase of waterfront expansion, wharf construction and filling along the waterfront, occurred in the vicinity of the APE between the 1830s and 1850. By 1850, the Detroit River shoreline had been pushed nearly 400 ft (122 m) south of Jefferson Avenue. In 1853, Brevoort sold all of the new land that had been added to his lot—south of present-day Jefferson Street—to Luther Beecher, who in turn sold it to the Detroit Gas Light Company (Demeter 1984). The gas company constructed the first of several large, brick gas houses and distribution tanks on the property, marking the first significant industrial development in the vicinity of the APE.

The Belden (1876) map of the city at the start of the fourth quarter of the nineteenth century shows this development well (Figure 6). More importantly, the map shows the APE and its vicinity at the cusp of its incorporation into the urban fabric of the city. At this time, the area of Detroit west of the Michigan Central railroad tracks was largely rural in character. Although the area is laid out with streets and avenues, several traces of the long ribbon farms can still be

seen in this map, including several properties that extend from Jefferson Avenue to Michigan Avenue with virtually no interruptions. This urban planning for many of the streets in this area was developed in the 1850s, but actual construction and the expansion of urban Detroit did not occur until after the American Civil War (Demeter and Demeter 1997).

The transition from rural to urban in the project area was not an overnight process, but it did happen fairly quickly between approximately 1870 and 1890 (Demeter and Weir 1991). On the Brevoort farm the process of urbanization began with the death of Henry Brevoort's wife in 1859 when she divided the property among her many children. The fractured farm was subdivided into numerous lots and these were sold individually over the next 20 years. These smaller lots were more readily incorporated into the spreading urban environment and soon several had recombined and developed into a planing mill and sash factory that fronted Jefferson Avenue (Demeter 1984).

By 1885, the APE and the surrounding area had been fully incorporated into the expanding urban fabric of Detroit (Figure 7). By that time, the APE had been redeveloped into the Beyster planing mill and sash factory and its associated lumberyard. Although the mill/factory is the only structure depicted in the APE on the Robinson (1885) map, it is possible that undocumented lumber sheds stood there as well by the time this map was drafted. The waterfront was characterized by industrial development and anchored by the Detroit Gas Light Company facility to the south of the APE and a large freight depot and railyard that stood to the east. Construction of the railyard actually began in the 1850s, and by the 1920s railyard facilities extended all the way to the gas works.

Also depicted on the Robinson (1885) map is the beginning of the second stage of the riverfront infilling. The industrial development south of Jefferson Avenue—here marked as Woodbridge—stood on made land that was deposited between approximately 1830 and 1850. The wharves depicted on the Robinson (1885) map formed the base for continued filling that would push the riverfront approximately 400 ft (122 m) south by the second quarter of the twentieth century.

It is interesting to note that the area north of Fort Street, which is now dominated by the Gateway Plaza, the Ambassador Bridge landing, and the cargo inspection facility, was originally a residential neighborhood. Although the Robinson (1885) map does not provide a substantial level of information regarding building function, those depicted in this area appear to be

predominantly single-family homes. Also visible on this map is the edge of the westward expansion of the city, which stops two blocks west of the APE at 24<sup>th</sup> Street.

By 1892, the final expansion of the waterfront into the Detroit River near the APE was proposed (Figure 8). The Sauer (1893) map depicted the proposed waterfront line at the end of the wharves just south of the APE. Although this map did not provide the same level of detail of development within the APE as the previous map, it charted the continued development of the region and the expansion of the city. Unlike the previous map, this depiction of the city does not indicate that any of the former ribbon farms along the waterfront remain intact. Rather, they had all been fully sectioned by numerous through streets that likely contained the same pattern of industrial buildings south of Jefferson Avenue, a mixture of residential and industrial buildings between Fort Street and Jefferson Avenue, and predominantly residential structures north of Fort Street. The continued westward expansion of the city is also depicted, with development extending all the way to the Woodmere Cemetery 3 miles (4.8 km) to the west.

The Sauer (1905) map depicted the limit of waterfront fill that was first shown on the previous map, as well as the further expansion of the city to the west and north of the APE (Figure 9). Of note on this map is the demarcation of the former boundaries, at least the east and west boundaries, of the Private Claims and farms from the first half of the nineteenth century. Although these are depicted on the previous map, many are not legible. This map shows the Brevoort property encompassing the current APE and lying immediately west of the future location of the Ambassador Bridge.

The Sanborn Fire Insurance (1921) map of Detroit provided a detailed depiction of the maximum level of historic development in the APE (Figure 10). This map showed that the entire APE was occupied by the Beyster planing and sash factory, which was first erected ca. 1885. In 1921, the company was known as the John Beyster & Sons Co., and included the original planing mill and sash factory along Jefferson Avenue, as well as a large lumber warehouse along Fort Street and at least 10 lumber piles and sheds. Interestingly, this map also showed that although major industrial concerns had been erected on the blocks immediately south and west of the APE (including the Detroit Gas Light Company gasworks and a Cadillac Motor Company manufacturing plant), some residential structures persisted between Fort Street and Jefferson Avenue. There are two such buildings depicted immediately east of the APE that were likely destroyed during the construction of the Ambassador Bridge.

The development depicted on the Sanborn Fire Insurance Company (1921) map was the maximum extent of historic construction within the APE. Review of subsequent Sanborn Fire Insurance Company (1931, 1949) maps indicated that between 1921 and 1931, the lumberyard and its facilities changed hands and became the Perrone Lumber Company, but the physical layout within the APE did not change. Between 1931 and 1949, several of the buildings and structures, including all of the lumber sheds and the original planing mill and sash factory along Jefferson Avenue, had been removed and the only building that remained standing was the lumber warehouse along Fort Street in the northeast corner of the APE. This building had been converted into a machine shop, but it retained its original footprint. The only new construction within the APE between 1931 and 1949 was the addition of a steel-frame storage shed, which stood on the remnants of the original planing mill and sash factory, and the addition of railroad spur track, which connected the machine shop on Fort Street with a rail line that ran down the center of Jefferson Avenue. These buildings were demolished sometime after 1949 and the modern warehouse in the center of the APE was constructed during the last decades of the twentieth century.

As documented by these maps, the historic development after 1885 within the APE was less intensive than much of the surrounding area. The two major buildings—the planing mill and lumber warehouse—stood on concrete slabs and occupied only the southwest and northeast corners of the APE. The remainder of the APE was covered with lumber piles and lumber sheds that can be assumed to have had a minimal impact on underlying resources. For this reason, Demeter (1984:69) determined “The Brevoort Farm represents one of the more critical farm frontages of the old Detroit settlement and should be considered as requiring more detailed investigation for the grounds lying between Fort Street and the original riverbank in the event of future development.”

## **CHAPTER 3: METHODS**

### **ARCHAEOLOGICAL FIELD METHODOLOGY**

Due to the urban landscape of the APE, the potential for deep fill deposits, and alluvial soils along the historic shoreline, the mechanically excavated trenches were used to investigate the APE. The machine was a tracked excavator equipped with a 36-in (91-cm) trenching bucket. Trench locations were determined by the proposed location of significant subsurface impact—proposed Piers 2, 3, and 4—and also through review of historic atlases and previous archaeological investigations near the APE. In all, 11 trenches totaling 492 ft (150 m) were completed. Trenches varied in length between 20 ft and 59 ft (6 m and 18 m) and were between 4 ft (1.2 m) and 8 ft (2.5 m) in width. Each trench was excavated at the direction of a qualified archaeologist.

To the best of our ability, each trench was excavated in 10-ft (3-m) sections and by strata. Soil from each strata was visually examined to identify artifacts and inclusions. All trenches were excavated at least 10 in (25 cm) into sterile subsoil and at least one section of most trenches was excavated approximately 1 m (3.28 ft) into sterile subsoil to confirm the lack of deeper cultural strata.

In each trench, archaeologists cleaned and visually examined both walls and the trench floor for evidence of features, artifacts, or intact historic strata. When features were encountered, they were cleaned by hand, photographed, and drawn in profile and plan view. When applicable, features were bisected to recover a sample of artifacts from the feature fill. The location of each trench was plotted on a project map and recorded with a handheld GPS data recorder. At least one wall of each trench was drawn in profile and digital photographs were taken of the same wall. Field notes were recorded that detailed the trench provenience information including location, length, and width, and the stratigraphic data from each trench including depth, color, texture, and inclusions. Recovered artifacts were assigned to the trench and stratum from which they were recovered and returned to the ASC laboratory for processing (washing, identification, and cataloging). As a final note, a series of digital photographs was taken documenting the existing conditions within the APE and all phases of the field investigations.

#### **Curation**

At the completion of the project, all artifacts, field notes, photographs, and maps will be submitted to the Detroit International Bridge Company in Warren, Michigan.

## **CHAPTER 4: PHASE I SURVEY RESULTS AND CONCLUSIONS**

### **RESULTS**

Currently, the APE serves as a parking area and service lot for the Detroit International Bridge Company (DIBC) maintenance crews working on the existing Ambassador Bridge (Figures 11–14). A single building, a corrugated steel-sided warehouse, stands in the center of the parcel, and two impermanent trailers stand on the east side of the lot and serve as a field office and equipment storage (Figure 15). Currently, the ground surface is a filled parking area characterized by a compact medium sand with crushed stone inclusions.

In all, a total of 11 trenches were excavated in the 2.5-acre (1-ha) APE (Figure 15). Trenches varied in length, but all were between 20 ft (6 m) and 59 ft (18 m) long. Trenches 1–6 were excavated in the location of proposed Piers 2, 3, and 4, while Trenches 7–11 were placed to investigate potential historic resources identified during the literature review or to investigate potential areas of minimal disturbance. The field investigation revealed that virtually the entire APE has been impacted by modern construction, demolition, grading and filling to the extent that little remains of the historic ground surface. In general, it appears that these impacts have occurred in the second half of the twentieth century.

Despite the intensive disturbance, a single new archaeological site was encountered within the APE. In Trenches 5 and 6, scant traces of the late nineteenth and early twentieth century ground surface were identified. Underlying the ground surface was a series of postholes related to the late nineteenth/early twentieth-century lumber sheds that stood on the property. This new site, the John Beyster Lumber Shed, has been assigned Michigan Archaeological Inventory # 20WN1131.

#### **Trench 1**

Trench 1 was located in the western half of proposed Pier 4 (Figure 15). This trench was 59 ft (18 m) long and 8 ft (2.5 m) wide and was situated immediately to the east of a concrete access drive to the existing warehouse (Figure 11). Excavation revealed a total of 11 strata, many of which were fill strata associated with late nineteenth through mid-twentieth century construction and demolition events (Figure 16).

The trench can be roughly divided into two sections, split by a large modern intrusion (Figures 16 and 17). The western half of the trench revealed two structural components of a late nineteenth-century building immediately below the current ground surface. These are the broken

remnants of a concrete pad floor and a brick foundation (Feature 2) beneath the eastern end of the pad. The pad was 8 in (20 cm) thick and extended across nearly 12 ft (3.7 m) of the trench. The final 27 in (70 cm) had been removed, but the associated soil strata continued to the brick footer, which was three courses thick and extended to a point 31.5 in (80 cm) below the current ground surface. The brick foundation stood on a poured concrete footer that was 8 in (20 cm) thick. This appears to be the remnants of either the ca. 1885 John Beyster planing mill and sash factory or the later steel-frame warehouse that stood in the same spot. However, no artifacts or intact cultural deposits were found in association with the structural elements and more recent impacts, including a modern utility trench (Feature 1), have impacted portions of both. These facts have obscured a positive identification of these remains, but the poured concrete footer suggests that they are associated with the warehouse.

Underlying the concrete pad in the eastern portion of the trench was a black (10YR 2/1) sandy silt that appears to be fill deposited to support the concrete pad. This overlay three strata of light olive brown (2.5Y 5/4) to dark yellowish brown (10YR 4/6) sand with varying amounts of water-washed pebble and crushed stone inclusions. These appear to be fill (redeposited subsoil) that was deposited and graded to prepare the area for construction, although no artifacts were recovered from these strata to aid in their interpretation. Sterile subsoil was encountered approximately 3.3 ft (1 m) below the modern ground surface and was a 8-inch (20-cm) strata of yellowish brown (10YR 5/6) coarse sand with a substantial amount of water-washed pebbles and cobbles that ranged from 1.2 in (3 cm) to 6 in (15 cm) in size. Identified as Stratum V on Figure 16, this stratum is interpreted as an ancient beach ridge or shoreline deposit of the Detroit River. Immediately underlying this sand was a light olive brown (2.5Y 5/4) sterile clay.

The central portion of Trench 1 was characterized by a massive disturbance that contained a mixture of large concrete rubble and brick rubble in a very dark grayish brown (10YR 3/2) sand mottled with black (10YR 2/1) coarse sand that extended from the current ground surface and into the subsoil. This is interpreted as the demolition material from the twentieth-century steel-frame warehouse that stood nearby. It was apparently demolished and much of the remaining structural debris was buried on site.

In the eastern end of the trench, the stratigraphy showed markedly fewer disturbances. The first stratum was 16 in (40 cm) of black (10YR 2/1) sandy silt fill. Underlying that was between 8 in (20 cm) and 19 in (50 cm) of light olive brown (2.5Y 5/4) sand. The ancient beach

or shoreline stratum was encountered between 24 in (60 cm) and 39 in (100 cm) below the modern ground surface and it overlay sterile clay subsoil.

### **Trench 2**

Trench 2 was excavated through the western end of the location of proposed Pier 4 (Figure 15). This trench was 49 ft (15 m) long, 4 ft (1.2 m) wide, and was located approximately 27 ft (8.4 m) east of Trench 1. While this trench did reveal some modern disturbance, in general the stratigraphy was much more intact than that of the first trench (Figure 18).

Excavation revealed two fill strata overlying the ancient beach/shoreline stratum and sterile clay subsoil (Figure 18). The first stratum was approximately 16 in (40 cm) of modern parking area fill, which was a black (10YR 2/1) silty sand with crushed stone and pebble inclusions. Underlying that was approximately 8 in (20 cm) of black (2.5Y 2.5/1) silty sand with no inclusions that may have been a prepared ground surface dating the second quarter of the twentieth century. This stratum yielded to the ancient beach/shoreline stratum at about 24 in (60 cm) below the current ground surface and that in turn yielded to the olive brown (2.5Y 4/3) sterile clay subsoil.

Two major intrusions were observed in this trench. The first, identified as Feature 3, occupied the central portion of the trench and had been cut through all but the most recent stratum. It was characterized by black (10YR 2/1) coarse sand with slag, crushed stone, and cinder inclusions and is the bedding for the railroad spur track that was constructed in the APE between 1921 and 1949. The second major intrusion was found at the eastern end of the trench and is a modern utility trench that carries power and data feeds to nearby security cameras. This is identified as Stratum VI on Figure 18.

No artifacts or features other than the railroad bed were encountered in Trench 2.

### **Trench 3**

Trench 3 was located at the north end of the APE along Fort Street (Figure 15). This trench was situated to investigate the western end of proposed Pier 2. It was 52 ft (16 m) long and 4 ft (1.2 m) wide and was excavated to a maximum depth of 5 ft (1.5 m) below the current grade. Excavation of this trench revealed that modern demolition and construction impacts have completely disturbed the historic ground surface in this area. Only three strata were observed and included two modern fill strata overlying sterile clay subsoil (Figure 19).

The first stratum was approximately 10 in (25 cm) of the modern parking area surface. It was a very dark brown (10YR 2/2) silt with pebbles and crushed stone inclusions. Underlying the

parking surface fill and extending to a maximum depth of 28 in (70 cm) below the ground surface was a stratum of black (10YR 2/1) silty sand fill with gravel, or crushed stone, inclusions. This overlay sterile clay subsoil without any intervening strata. The subsoil was a dark yellowish brown (10YR 4/6) clay.

No artifacts, cultural deposits, or features were encountered in Trench 3.

#### **Trench 4**

Trench 4 was excavated through the eastern portion of proposed Pier 2, but was offset to the south of Trench 3 in an attempt to avoid the disturbance that was documented in that trench (Figure 15). This trench was 56 ft (17 m) long and 4 ft (1.2 m) wide and was excavated to a maximum depth of 6.2 ft (1.9 m) below the current ground surface (Figure 20). Excavation of this trench revealed the same pattern of disturbance has affected the natural stratigraphy in this area, and provided evidence that this disturbance occurred in the second half of the twentieth century.

The stratigraphy of Trench 4 was identical to that of Trench 3 in that two modern fill strata directly overlay the sterile clay subsoil. In this instance, the first stratum was a very dark brown (10YR 2/2) silt with pebbles and crushed stone inclusions that extended to a maximum depth of 12 in (30 cm) below the current ground surface. The second stratum was a black (10YR 2/1) silty sand with crushed stone inclusions that extended to a maximum of 35 in (90 cm) below the ground surface. The sterile clay subsoil was a light brownish gray (10YR 6/2) clay.

A single modern intrusion extended from the bottom of the second stratum and into the clay subsoil in the eastern half of this trench. The fill in this feature was a very dark gray (10YR 3/1) coarse sand with crushed asphalt and crushed stone inclusions. Several diagnostic artifacts were observed in, but not recovered from, this fill. They included polyethylene plastic sheeting and polystyrene coffee cup fragments. Although these items may date as early as 1950, they are likely of more recent origin (Miller et al. 2000). The nature of this intrusion was unclear, but it is likely a large utility trench or drainage feature. The coarse sand, crushed asphalt, and stone fill contained a significant amount of water, which can not pass easily through the impermeable clay subsoil.

The stratigraphic evidence from Trenches 3 and 4 indicates that sometime after the deposition of the coffee cup fragments (post-1950) in the Trench 4 intrusion, the entire location of proposed Pier 2 was stripped to sterile subsoil and filled with the modern strata that were

observed. No significant features, artifacts, or cultural resources were observed piercing the subsoil in either trench.

### **Trench 5**

Trench 5 was excavated through the eastern portion of proposed Pier 3, just north of the existing warehouse facility (Figure 15). This trench was 46.5 ft (14.2 m) long, 4 ft (1.2 m) wide, and was excavated to a maximum depth of 4.5 ft (1.4 m). Excavation of this trench revealed that while disturbance similar to that encountered in other areas of the site has occurred in this area, intact soils and features from the late nineteenth and early twentieth centuries persist in this location (Figures 21 and 22).

The first two strata in this trench were comparable to and likely deposited during the same grading and filling events as the first two strata in Trenches 3 and 4. For facility, these two modern strata were combined into a single stratum on Figure 21. This modern fill extended to a depth of approximately 29.5 in (75 cm) below the current ground surface and is generally characterized as a gray (10YR 5/1) coarse sand with crushed stone inclusions.

The second stratum in this trench had not been observed elsewhere in the APE. It consisted of a black (10YR 2/1) silt that was between 4 in (10 cm) and 6 in (15 cm) thick and contained brick bats and rubble, crushed stone, and a profusion of sawn lumber debris. Underlying this stratum, Stratum III extended to approximately 4 ft (1.2 m) below the ground surface and was a very dark brown (10YR 2/2) silt with sawn lumber debris and trace amounts of brick rubble. This stratum yielded to sterile clay subsoil at 4 ft (1.2 m). In this instance, water percolation through the highly organic overlying strata had caused staining in the first several inches of the sterile clay, causing the appearance of two clay strata. The first was approximately 4 in (10 cm) thick and was a brown (10YR 4/3) clay, which overlay a dark yellowish brown (10YR 4/4) clay. Underlying these strata, and piercing the clay subsoil, was a series of post molds from square posts set in round post-holes that appeared to be excavated with an auger (Figure 22). These are identified as Features 4–7 and are arranged linearly.

The combination of the two intact soil strata and post molds and holes revealed here appear to be remnants of the lumberyard associated with the John Beyster planing mill and sash factory. Indeed, the post molds and holes are likely the remnants of one of the lumber sheds depicted on the Sanborn Fire Insurance Company (1921) map (Figure 10). The two central post molds—Features 5 and 6—are 6 in (15 cm) by 6 in (15 cm) in dimension and are set in postholes

that are approximately 13 in (33 cm) in maximum diameter (Figure 23). The post holes, which are characterized by dark grayish brown (2.5Y 4/2) clay, have smooth round edges and show no sign of scalloping or multiple cuts that would indicate they were hand dug. These two posts are set 10 ft (3.1 m) apart. The two exterior posts—Features 4 and 7—are smaller. These posts are 4 in (10 cm) by 4 in (10 cm) in dimension and are set in postholes that are a maximum of 11 in (28 cm) in diameter (Figure 24). Feature 4 was located 5 ft (1.5 m) west of Feature 5 and Feature 7 was located 9 ft (2.9 m) east of Feature 6.

Feature 6, which partially extended into the north wall of the trench, was excavated to determine the bottom depth of the features and to recover artifacts that might confirm or reject the supposition that these features are associated with the late nineteenth and early twentieth-century development of the area. The bisection revealed that Feature 6 extended only 10 in (25 cm) below the bottom of the trench and the only artifacts that were recovered included a single brick fragment from the posthole fill and seven fragments of wood from the postmold.

These features and the two intact historic strata are interpreted as the remains of the John Beyster lumberyard that stood on the site from approximately 1885 to the 1940s. Stratum II, which contained a significant amount of sawn lumber debris and brick rubble is interpreted as a demolition layer, marking the end of the lumberyard on site, while Stratum III is interpreted as an occupation layer that marks the ground surface from that time period. The four posts appear to be machine-sawn dimensional lumber set in mechanically excavated holes, suggesting the post-in-ground structure they supported is of relatively recent date for this type of structure. Whereas post-in-ground construction tends to be associated with the seventeenth and eighteenth centuries in this country, it is also a suitable and expedient method of construction for temporary or impermanent structures like the lumber sheds indicated on the Sanborn Fire Insurance Company (1921) map (Figure 10). Collectively, these features and strata have been assigned Michigan Archaeological Inventory # 20WN1131.

In general the preservation observed in this area appeared to correspond with the existing local topography. Trenches 5 and 6 were located on a raised terrace above the level of much of the northern portion of the APE. This terrace can be seen in Figure 14 and the edge corresponds with the contour visible in the line of concrete barriers along the western edge of the APE. Although the entire APE north of the existing warehouse appears to have been impacted during the post-1950 grading and filling, these impacts were less severe closer to the warehouse.

## **Trench 6**

Trench 6 was excavated through the eastern portion of proposed Pier 3 (Figure 15). To investigate the possibility of additional intact deposits closer to the existing warehouse, this trench was offset from Trench 5 by 10 ft (3.1 m) to the south and 15 ft (4.5 m) to the east. It was 36 ft (11 m) long, 4 ft (1.2 m) wide, and was excavated to a maximum depth of 4.3 ft (1.3 m). Excavation revealed stratigraphy that was similar to that in Trench 5 and included the two intact strata found there (Figure 25). More importantly, excavation of these strata revealed several diagnostic artifact types that positively connect 20WN1131 with the late nineteenth through early twentieth-century utilization of the lumberyard.

The first stratum in this trench was 12 in (30 cm) thick and consisted of a very dark gray (10YR 3/1) coarse sand with pebble and crushed stone inclusions. This is the modern parking area surface. It overlies a 4-inch (10-cm) thick intact pad of asphalt. Beneath the asphalt, the second soil stratum was another band of very dark gray (10YR 3/1) coarse sand that contained crushed stone, broken ceramic sewer pipe fragments, and brick rubble that appears to be a modern demolition layer that was deposited and graded to support the asphalt pad above it. The third stratum in this trench corresponds to the second stratum in Trench 5 and marks the demolition of the lumberyard and its associated sheds. It consisted of between 8 and 12 in (20 and 30 cm) of black (10YR 2/1) silty sand with sawn lumber debris. Historic maps reviewed for this project indicate that the lumberyard buildings were largely dismantled between 1921 and 1949 and a handful of artifacts were recovered from this stratum date to that period (Table 3). Although the two diagnostic artifacts—both bottles—that were recovered span the time period in question, their presence dictates that this stratum cannot date earlier than 1913, based on the liquid measurements printed on both. This fact, coupled with the presence of the sawn lumber debris and the brick rubble from Trench 5, reinforces the interpretation of this stratum as marking the end of the lumberyard in the second quarter of the twentieth century.

Table 3. Artifacts from Stratum III, Trench 6.

Provenience	Material	Type	Description	Date Range <sup>2</sup>
Trench 6, Stratum III	Glass	Bottle	Complete 7-ounce machine-made colorless soda bottle. Embossed decoration of shoulder (Kar), and embossed decoration around base, and embossed registry make on base (K), and parison mold seam on base, full-length mold seam.	1913-1970
Trench 6, Stratum III	Glass	Bottle	Complete 2-ounce machine-made medicine bottle. Embossed decoration on shoulder and panels, embossed liquid measurements on side panel, embossed registry mark on base, Owen's suction scar on base, full-length mold seam.	1913-1925
Trench 6, Stratum III	Textile	Gasket	Woven machine or duct gasket.	—
Trench 6, Stratum III	Organic	Wood	Lumber fragment	—

The fourth stratum in Trench 6 corresponds with the third in Trench 5. In this instance, it was a very dark gray (10YR 3/1) sandy silt with sawn lumber debris that may represent an occupation level associated with the lumber sheds. It was first encountered 41 in (105 cm) below the modern ground surface and directly overlay the sterile clay subsoil. The subsoil was a light olive brown (2.5Y 5/6) clay.

### Trench 7

Trench 7 was located on the eastern side of the APE between proposed Piers 2 and 3 (Figure 3). It was 49 ft (15 m) long, 4 ft (1.2 m) wide, and was excavated to a maximum depth of 3.2 ft (1 m). This trench was situated to investigate potential for resources associated with the early twentieth-century lumber warehouse (Figure 10), nearby late nineteenth-century domestic sites (Figure 10), and earlier historic or prehistoric occupations. Excavation revealed that the intensive disturbance documented in Trenches 3 and 4 had affected this portion of the APE as well (Figure 26).

The first stratum in this trench was a very dark brown (10YR 2/2) sand with pebbles and crushed stone that extended to approximately 16 in (40 cm) below the modern ground surface. The second stratum was a black (10YR 2/1) coarse sand with crushed asphalt and crushed stone inclusions that yielded to sterile clay subsoil between 24 in (60 cm) and 35 in (90 cm) below the existing grade. The subsoil was a dark yellowish brown (10YR 4/6) clay.

<sup>2</sup> Based on Society for Historical Archaeology 2007.

### **Trench 8**

Trench 8 was excavated on the west side of the APE, approximately 45 ft (14 m) north of Trench 5. It was 49 ft (15 m) long, 4 ft (1.2 m) wide, and was excavated to a maximum depth of 5 ft (1.2 m). This trench was located to investigate whether intact portions of the archaeological site identified in Trenches 5 and 6 extended north of proposed Pier 3. Excavation revealed that the disturbance documented in Trenches 3, 4, and 7 had also affected this area (Figure 27).

The first stratum in Trench 8 was approximately 20 in (50 cm) of very dark gray (10YR 3/1) coarse sand with crushed stone and pebble inclusions. The second stratum was a black (10YR 2/1) silty sand that extended to a maximum depth of 41 in (105 cm). A third fill stratum composed of a black (10YR 2/1) coarse sand with crushed asphalt inclusions was documented in the eastern half of this trench. This stratum was only 4 in (10 cm) thick, but was reminiscent of the large, post-1950 intrusion documented in Trench 4. Both the third stratum and the second stratum in the western half of the trench yielded to sterile clay subsoil between 37 in (95 cm) and 41 in (105 cm) below the existing grade.

### **Trench 9**

Trench 9 was excavated at the southern limit of the APE along Jefferson Avenue (Figure 15). It was 46 ft (14 m) long, 6.5 ft (2 m) wide, and was excavated to a maximum depth of 4 ft (1.2 m). This trench was placed to investigate the potential that early historic deposits survived near the historic shoreline of the Detroit River. Excavation revealed that much of this location had been disturbed by the construction of a spur railroad track (Feature 3), which led from a track in the center of Jefferson Avenue to the ca. 1931 machine shop (converted lumber warehouse) along Fort Street. The map review indicated that this rail line was constructed between 1921 and 1931. An intact portion of this line was uncovered in this trench (Figures 28 and 29). In addition to the rail line, a single posthole with two post molds was uncovered in this area as well. This is identified as a post associated with a lumber shed depicted in this area on the Sanborn Fire Insurance Company (1921) map (Figure 10).

The first stratum in Trench 9 was approximately 4 in (10 cm) of very dark gray (10YR 3/1) sand with crushed stone inclusions. The second stratum extended to a maximum depth of 28 in (70 cm) and consisted of a dark brown (10YR 3/3) silty sand fill that overlay the railroad track. The third stratum extended across the western half of the trench, but was truncated by the railroad track in the eastern half. It was a dark yellowish brown (10YR 4/6) sand with crushed stone inclusions that extended to approximately 39 in (100 cm) below the existing grade. This

yielded to the ancient beach ridge/shoreline deposit that was also encountered in Trenches 1 and 2. This was a yellowish brown (10YR 5/4) coarse sand with water-washed pebbles and cobbles that overlay sterile clay subsoil. The subsoil was an olive brown (2.5Y 5/4) clay.

Beneath the third stratum, and piercing both the ancient beach ridge/shoreline deposit and the sterile clay subsoil, was a single posthole with two intact post fragments (Figure 30). The posthole is approximately 12 in (30 cm) and it contained a square, sawn post and a round post. The larger round post is approximately 6 in (15 cm) in diameter while the smaller, square post appears to 2 in (5 cm) by 4 in (10 cm) in dimension. Given the modern dimension of at least one post and the association of similar posts with twentieth-century lumberyard structures, this feature is interpreted as a structural remnant to a lumber shed that is depicted on the Sanborn Fire Insurance Company (1921) map to the east of the ca. 1885 planing mill and sash factory (Figure 10). As the only such feature identified, and lacking interpretive data like intact overlying soil strata or associated artifact deposits, this feature was not assigned a site number nor is it included in within the bounds of 20WN1131.

#### **Trench 10**

Trench 10 was excavated along the western margin of the APE between Trenches 3 and 8 (Figure 15). It was 30 ft (9 m) long, 4 ft (1.2 m) wide, and was excavated to a maximum depth of 5 ft (1.5 m). This trench was located to investigate the potential for intact historic strata or cultural resources along the periphery of the APE. Excavation revealed strata identical to those documented in Trench 8, and very similar to the disturbance observed in all of the trenches excavated through the northern half of the APE (Figure 31).

The first stratum consisted of 15 in (38 cm) of very dark gray (10YR 3/1) coarse sand with crushed stone and pebble inclusions. The second stratum was characterized by 18 in (46 cm) of black (10YR 2/1) silty sand. Underlying this stratum was a thin level of black (10YR 2/1) coarse sand with crushed asphalt inclusions that was almost 6 in (15 cm) thick and directly overlay sterile subsoil. In this instance, the subsoil was a light olive brown (2.5Y 5/6) clay.

#### **Trench 11**

The final trench excavation within the APE, Trench 11, was excavated to off the northeast corner of the existing warehouse and east of Trench 6 (Figure 15). This trench was 20 ft (6 m) long, 4 ft (1.2 m) wide, and was excavated to a maximum depth of 4.6 ft (1.4 m). This trench was situated to investigate the potential for the intact historic strata identified in Trenches

5 and 6 to extend to the east in the APE. Excavation revealed substantial disturbance associated with recent utility installation.

The stratigraphy in Trench 11 consisted of four modern fill strata overlying sterile subsoil (Figure 32). The subsoil was light olive brown (2.5Y 5/6) clay and was exposed at a depth of 4 ft (1.2 m) below the current grade. The 4 overlying fill strata were composed of varying levels of black (10YR 2/1) coarse sand through very dark grayish brown (10YR3/2) coarse sand. All of the fill strata contained crushed stone, concrete rubble, brick debris, and obviously modern contaminants like duct tape fragments, plastic insulated electrical wire, and plastic coffee cup lids. A series of dead power lines, which may have powered an electrical gate along Fort Street, were discovered in the fourth fill strata, directly above the subsoil. The power lines were found running along the length of the trench.

## CONCLUSIONS

The archaeological field investigation of the APE revealed that intensive disturbance has affected most of the APE. This disturbance was most obvious in the northern half of the APE, where post-1950 grading and fill has removed all of the historic topsoil. The southern portion of the APE has also been disturbed by construction and demolition episodes, although these appear to be associated with the 1920–1940s construction of a railroad spur track and the demolition of the ca. 1885 planing mill and sash factory. More recent intrusions in this area were also detected, including several modern utility lines that provide power and data transfer to the security system around the APE. With the exception of portions of the railroad spur track and a single post from a ca. 1920s lumber shed along Jefferson Avenue, the only intact cultural strata and features were detected in Trenches 5 and 6. A combination of four post holes/post molds and two intact strata associated with the early twentieth-century lumber sheds that dotted the property were documented in those trenches and assigned Michigan Archaeological Inventory # 20WN1131. The site is associated with the John Beyster planing mill and sash factory that stood along Jefferson Avenue from ca. 1885 to ca. 1949.

20WN1131 is composed of two intact strata and four postholes/post molds exposed in Trenches 5 and 6. The site boundaries are depicted on Figure 15 and encompass just those trenches, as nearby tests revealed the site does not extend beyond their limits. The earliest, or oldest, soil stratum from the site is a potential occupation layer consisting of a very dark gray (10YR 3/1) sandy silt that contained sawn lumber debris and traces of brick debris. It was

encountered between 33 in (85 cm) and 47 in (120 cm) below the current grade. The second intact stratum appears to have been deposited during the demolition of the lumber sheds, which occurred between 1921 and 1949. This stratum overlay the occupation level and was between 8 and 12 in (20 and 30 cm) of black (10YR 2/1) silty sand with sawn lumber debris and brick rubble that was encountered between 29 in (75 cm) and 41 in (105 cm) below the ground surface. While both of these strata contained lumber debris and varying amounts of brick rubble, only the demolition stratum contained other artifact types. Two complete diagnostic bottles, which post-date 1913, were recovered, as was a woven textile gasket. No other artifacts were observed or recovered.

The four postholes/post molds (Features 4–7), were discovered penetrating the sterile clay subsoil in Trench 5 and appear to represent a series of three bays to a single building or structure. The two central features, Features 5 and 6, were characterized by posts that were 6 in (15 cm) by 6 in (15 cm) in dimension and set in postholes that area approximately 13 in (33 cm) in maximum diameter. The postholes are smooth edged and round and appear to have been mechanically excavated. The post molds are located 10 ft (3 m) apart on center and form the central bay to the building. Features 4 and 7 are support posts that flank the central features and appear to define two attached bays. Both are defined by postmolds that are 4 in (10 cm) by 4 in (10 cm) in dimension and are set in postholes that are a maximum of 11 in (28 cm) in diameter. The bays were between 5 ft (1.5 m) and 9 ft (2.7 m) wide. As with the previous, these postholes appear to have been excavated with a mechanical auger. Excavation of Feature 6 recovered only lumber fragments from the post mold and a single brick fragment from the posthole.

Application of the National Register of Historic Places (NRHP) eligibility criteria to 20WN1131 revealed that it is not eligible for inclusion. While the site is related to the urban expansion and industrialization of the Detroit River waterfront in the late nineteenth and early twentieth centuries, this broad theme does not seem refined enough to associate the site with “events that have made a significant contribution to the broad patterns of our history” (Criterion A). The site is also not associated with a significant person (Criterion B). Criterion C states that sites may be eligible if they “embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.” From an architectural standpoint, the site is interesting in that it highlights the

persistence of post-in-ground construction methods into the twentieth century, but the site does not meet Criterion C. As a final note, the site does not appear able contain information important to our understanding of history or prehistory (Criterion D). Lacking an interpretable artifact assemblage, the four identified features and two strata do not provide a sufficient data set to contribute to our understanding of the early twentieth century in Detroit. Accordingly, 20WN1131 is recommended as not eligible for inclusion in the NRHP.

## **CHAPTER 5: RECOMMENDATIONS**

No significant buried cultural resources, or resources that are eligible for inclusion in the NRHP, were documented within the APE. ASC Group, Inc. does not recommend additional archaeological investigation.

## **CHAPTER 6: SUMMARY**

Under contract with the Detroit International Bridge Company, ASC Group, Inc., has completed the Phase I archaeological survey for the Ambassador Bridge Enhancement Project in the city of Detroit, Wayne County, Michigan. The project entails the construction of a new bridge and international border crossing between Detroit and Sandwich, Ontario, Canada. The proposed bridge will stand approximately 150 ft (45 m) west of the existing Ambassador Bridge and will provide 4 full service lanes plus two lanes dedicated to low risk commercial travelers over the Detroit River. This project is not a part of the ongoing “Ambassador Bridge Gateway Project” being completed by the Michigan Department of Transportation, DIBC, and CTC. The archaeological investigation was undertaken to comply with Section 106 of the National Historic Preservation Act of 1966, as amended.

The proposed cable-stayed bridge will be supported on the American side by a large tower, which will be constructed entirely on made land near the current riverfront. Three subsequent piers will support the deck/approach between Fort Street and Jefferson Avenue. After consultation with the MHPO and the OSA, it was determined that the location of these three piers, which fall on or near the historic shoreline of the Detroit River, warranted an archaeological survey in advance of construction. The APE for the this project is defined as a 2.5-acre (1-ha) parcel immediately west of the existing bridge and on the north by Fort Street and by Jefferson Avenue on the south.

The Phase I archaeological investigation consisted of a series of backhoe trenches. In all, 11 trenches totaling 492 ft (150 m) in length were excavated in the 2.5-acre (1-ha) APE. Several features from the late nineteenth/early twentieth century were encountered. These include a series of post molds from at a post-in-ground lumber shed associated with the John Beyster Planing Mill and Sash Factory, and a railroad bed and track associated with a small machine shop that stood along Fort Street between 1921 and 1949. The evidence of the lumber shed constitutes a previously unidentified archaeological site and has been assigned Michigan

Archaeological Inventory # 20WA1131. Intact historic strata from the late nineteenth through mid-twentieth centuries were encountered in association with 20WN1131, but few artifacts were contained within either. This site does not possess a strong research potential and is recommended not eligible for inclusion in the NRHP.

The majority of the APE has been disturbed by demolition and construction that post-dates the Second World War. No strata or deposits associated with the eighteenth-century historic occupation or a prehistoric occupation were documented. No further work is recommended.

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## FIGURES



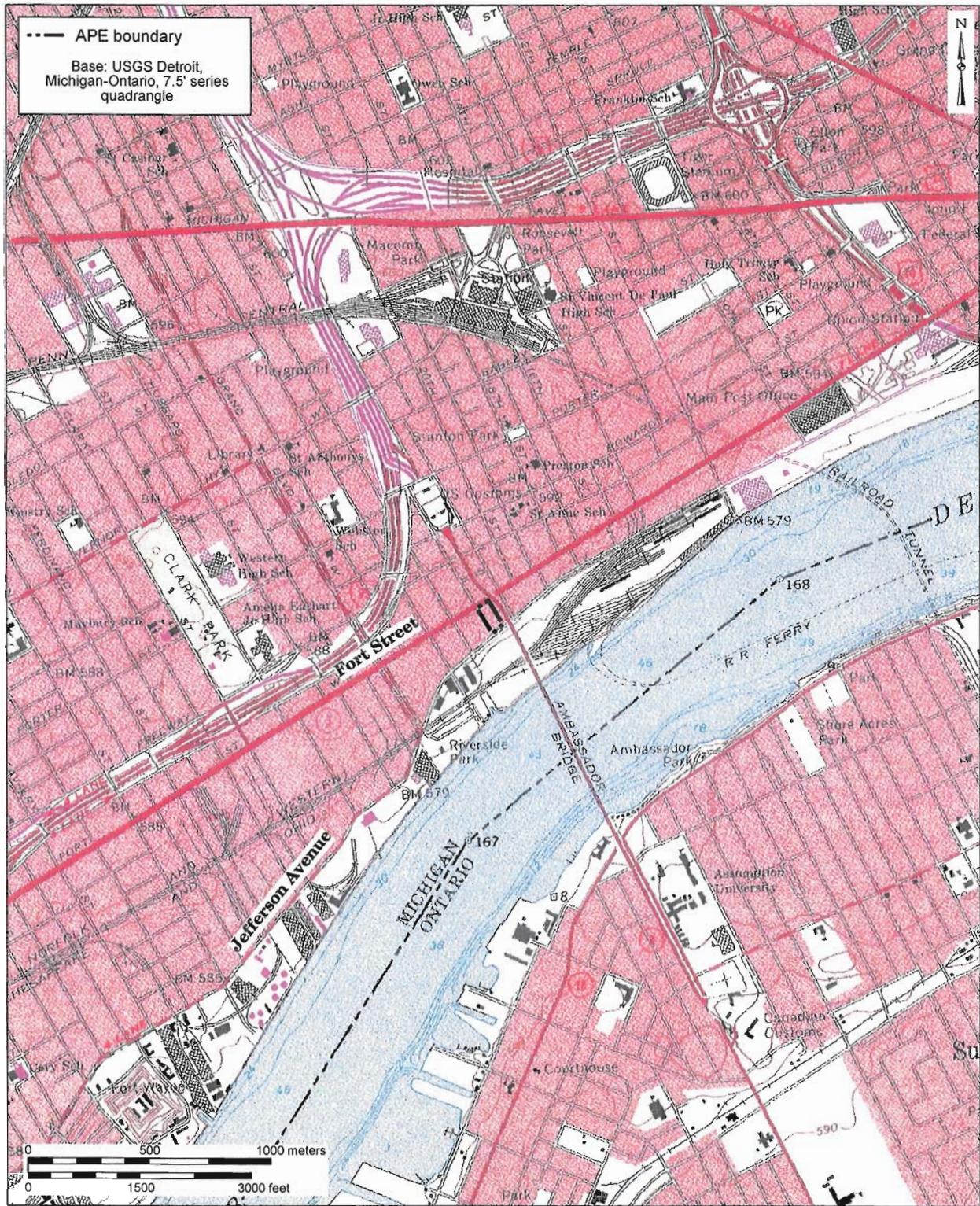


Figure 2. Portion of the 1968 (Photorevised 1973 and 1980) Detroit, Michigan-Ontario quadrangle (USGS 7.5' topographic map) showing the location of the APE.

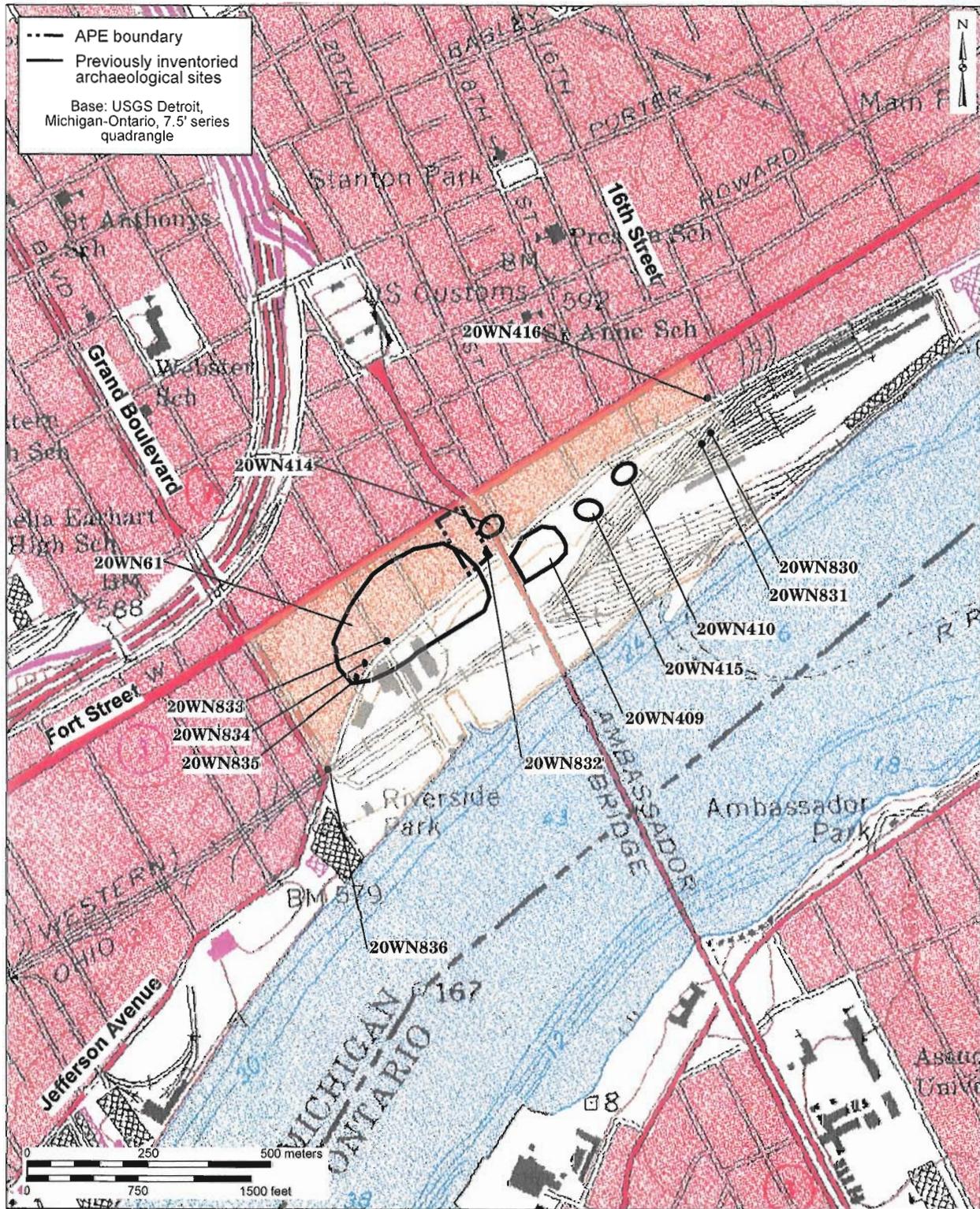


Figure 3. Portion of the 1968 (Photorevised 1973 and 1980) Detroit, Michigan-Ontario quadrangle (USGS 7.5' topographic map) showing the location of previously documented archaeological sites between Fort Street and the Detroit River and between Grand Boulevard and 16th Street.



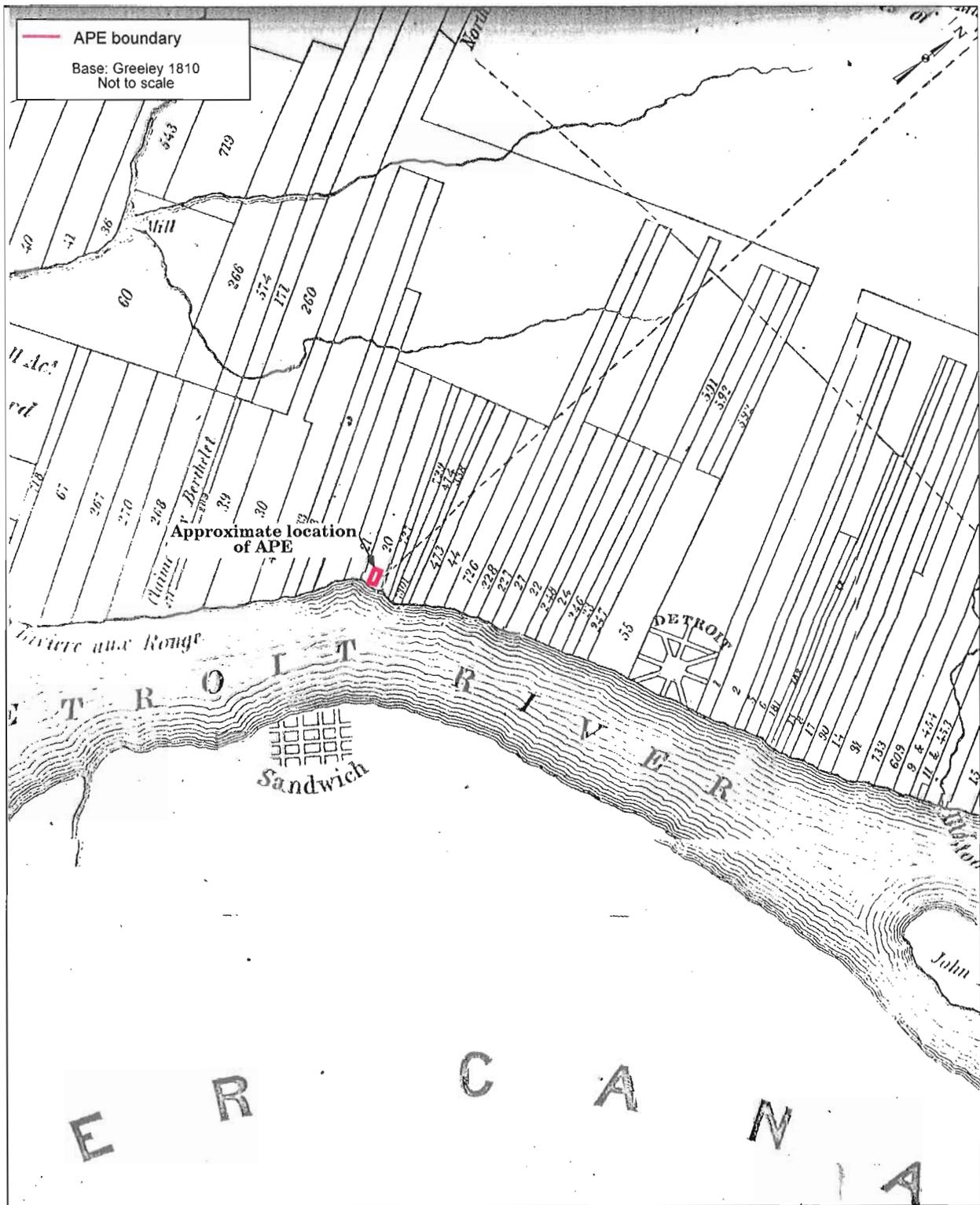


Figure 5. Portion of the Greeley (1810) map of the private claims showing the approximate location of the APE.



Figure 6. Portion of the Belden (1876) atlas showing the location of the APE.



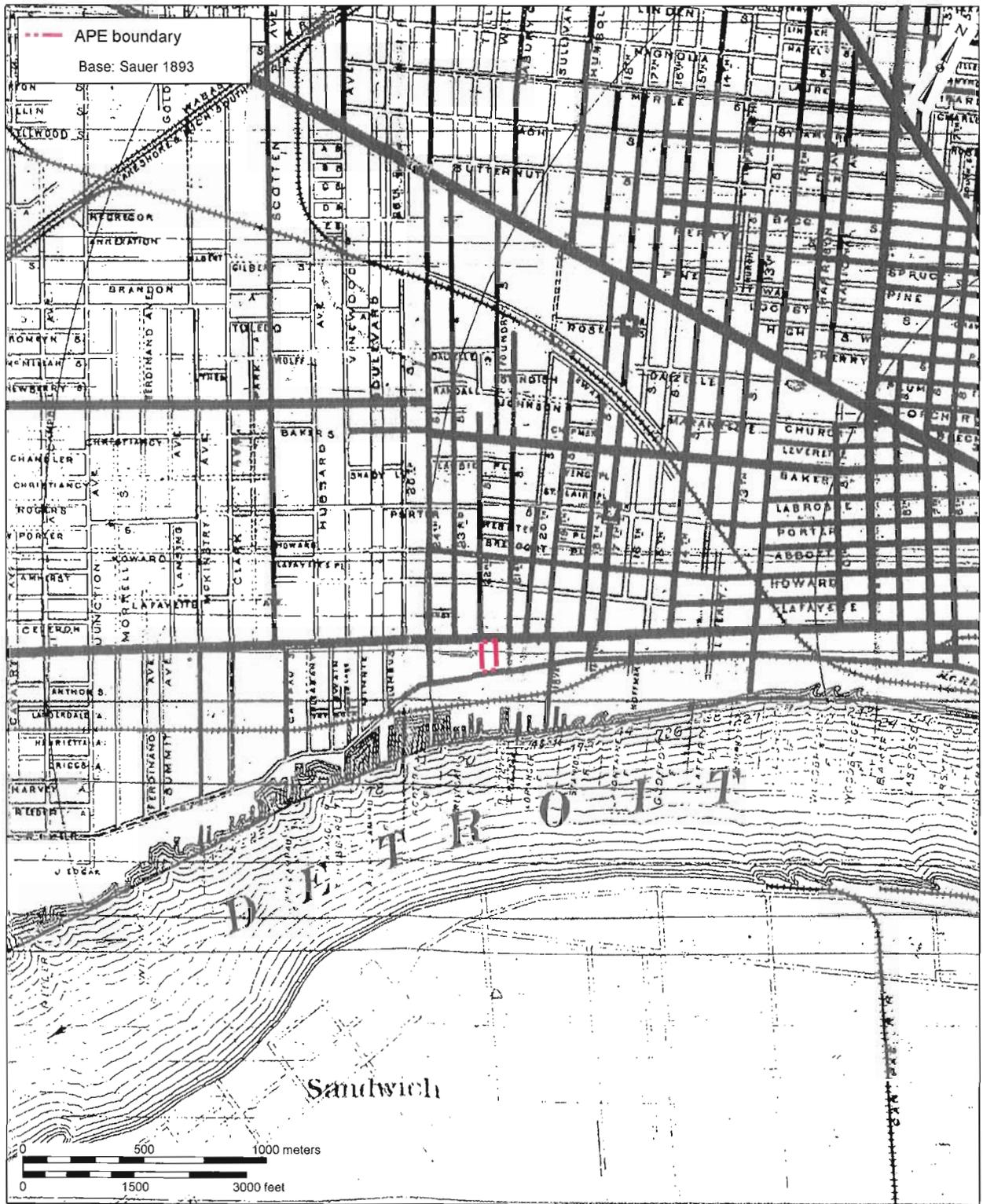


Figure 8. Portion of the Sauer (1893) atlas showing the location of the APE.

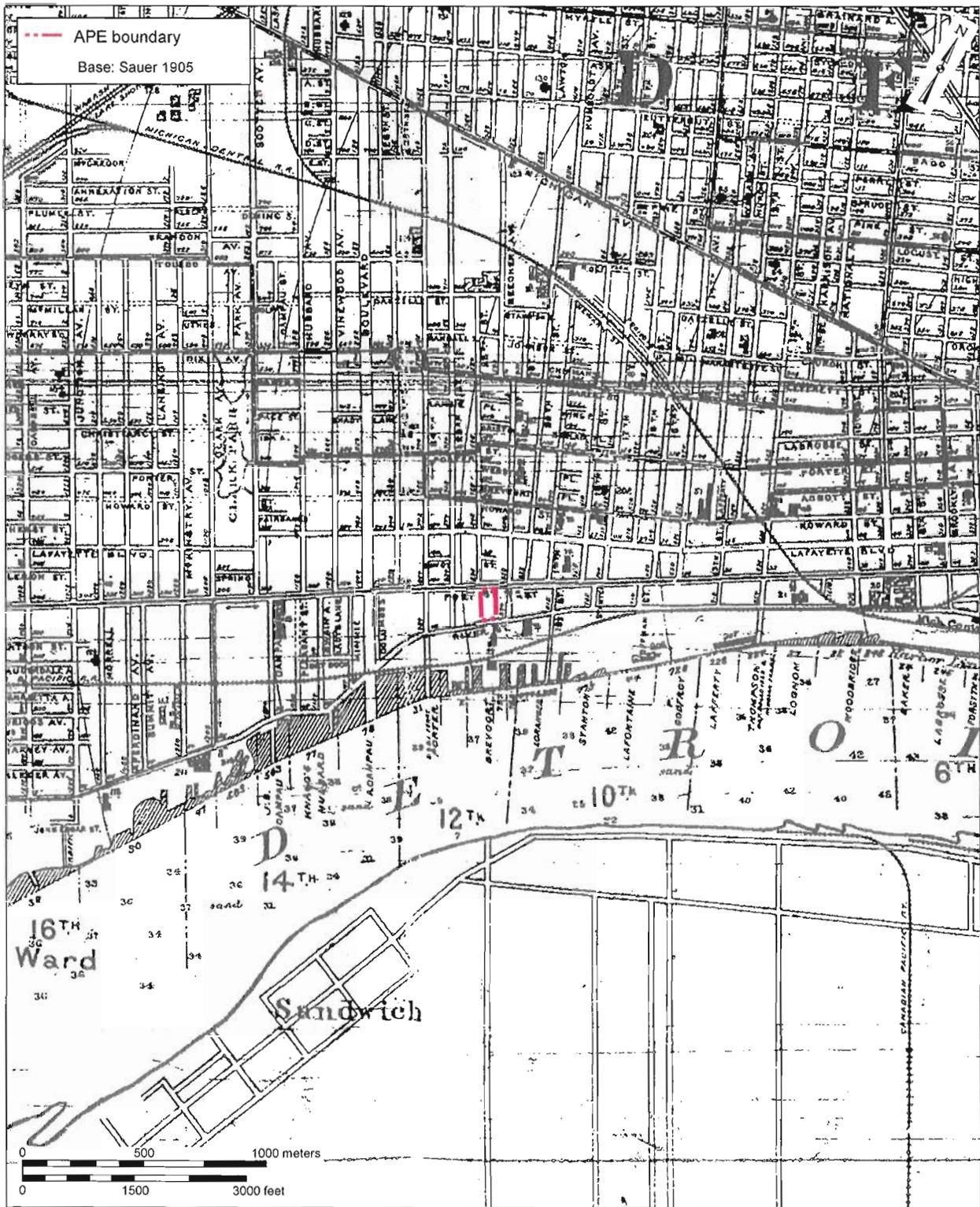


Figure 9. Portion of the Sauer (1905) atlas showing the location of the APE.

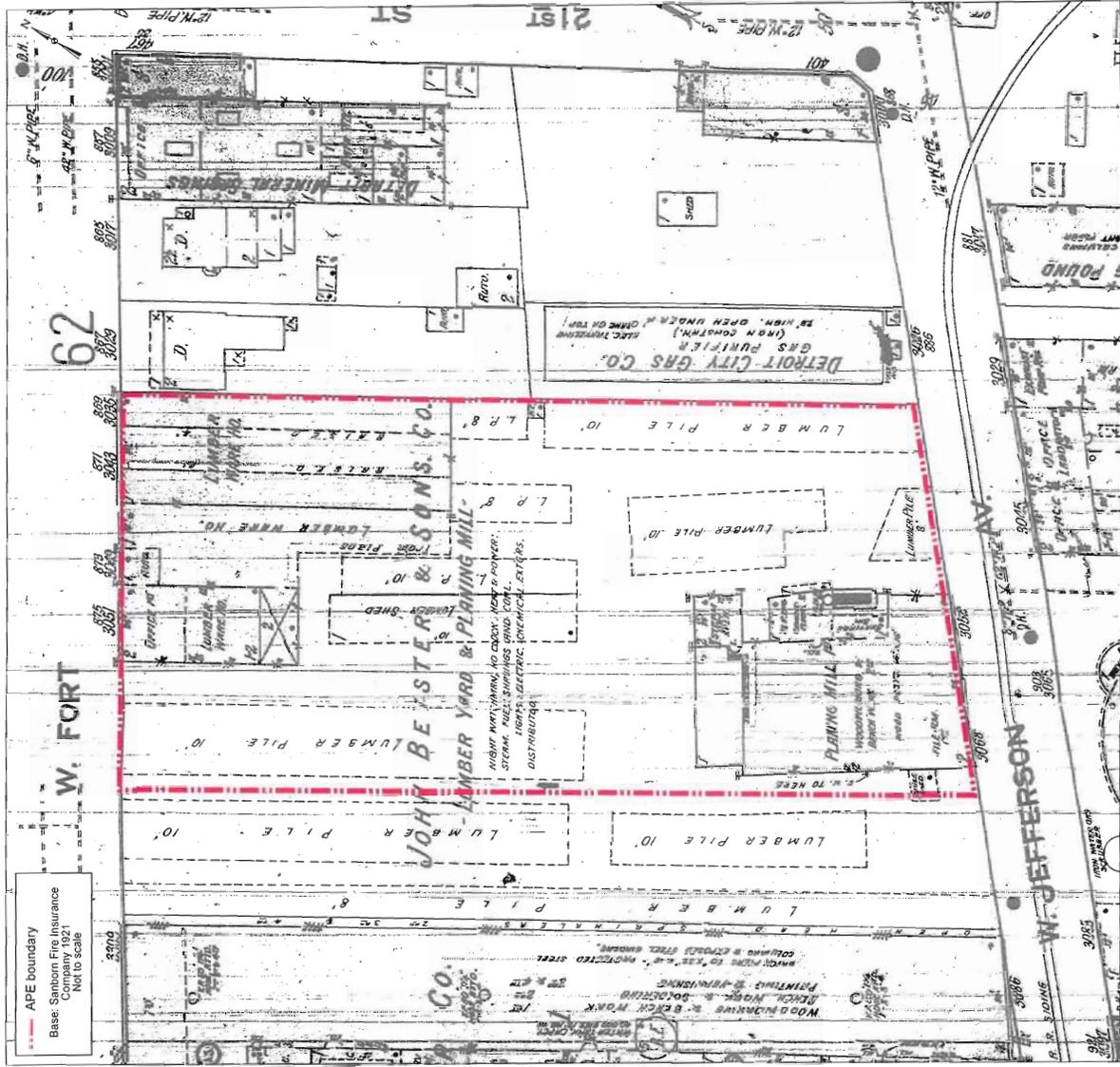


Figure 10. Portion of the Sanborn Fire Insurance Company (1921) map showing the location of the APE.



Figure 11. View of the APE showing existing conditions and Trench 1 excavation, facing northwest.



Figure 12. View of the APE showing existing conditions and Trench 2 excavation, facing southwest.



Figure 13. View of the APE showing existing conditions, facing northwest.

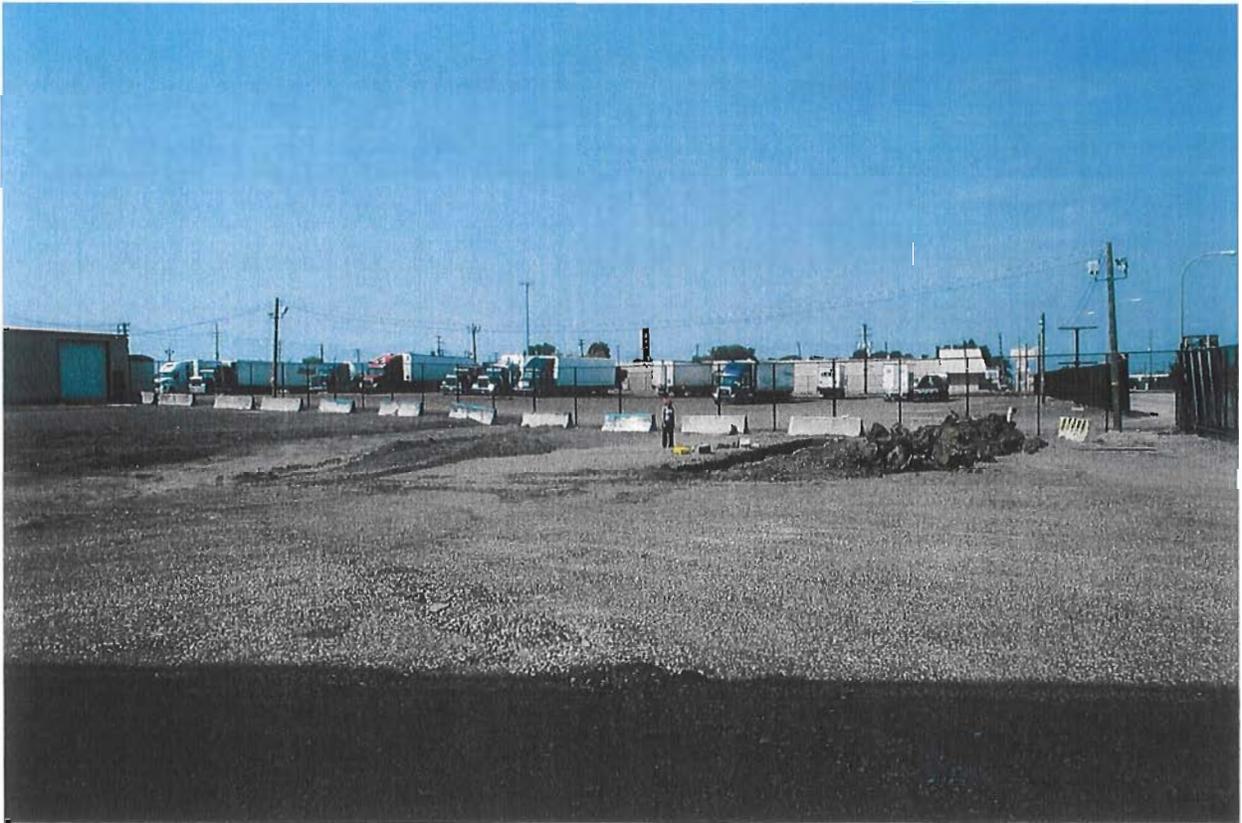


Figure 14. View of the APE showing existing conditions, facing southwest.

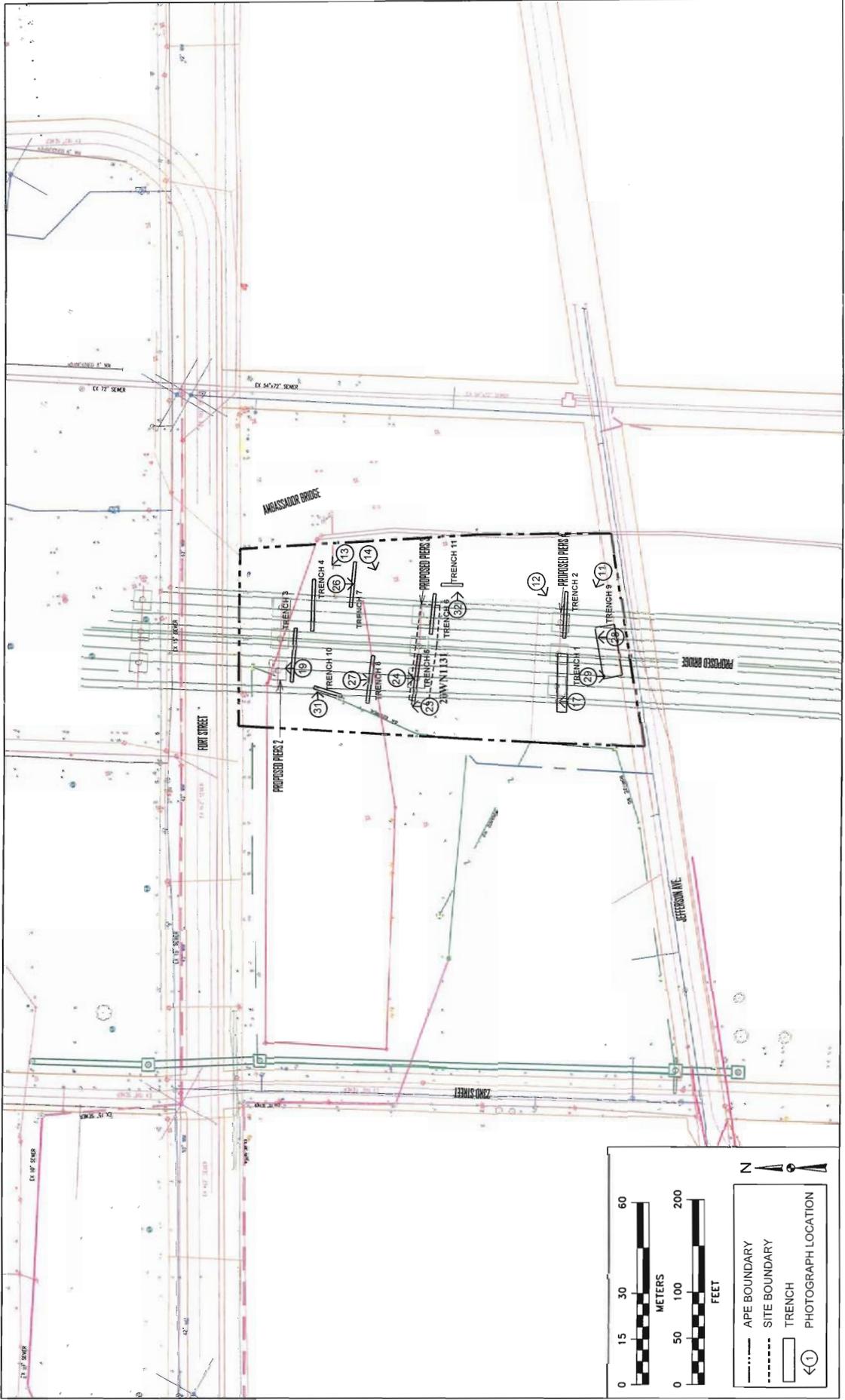


Figure 15. Project map showing trenches, photo locations, and 20WN1131.

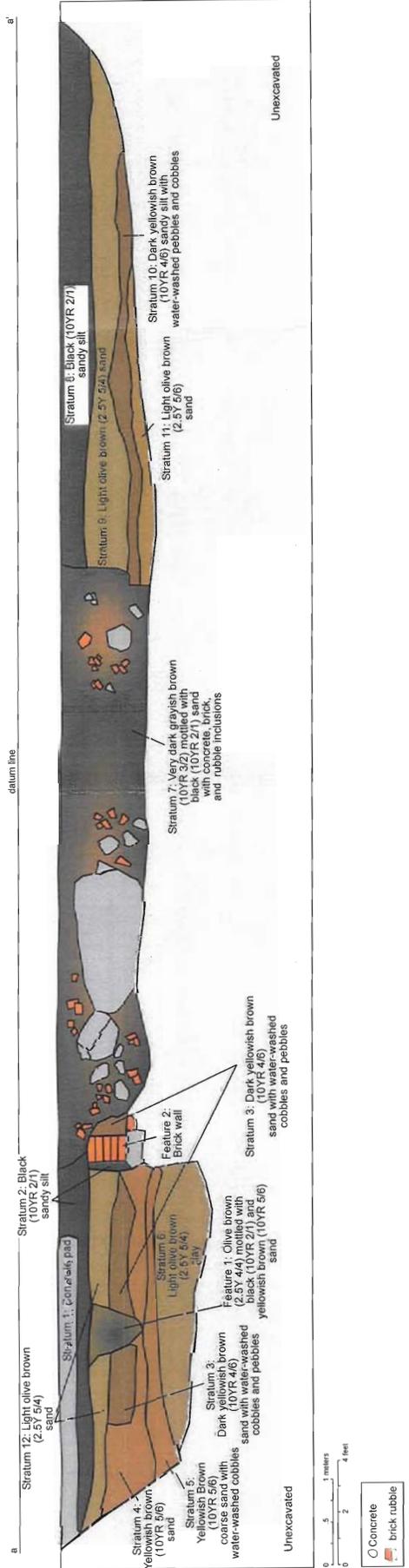


Figure 16. North wall profile, Trench 1.

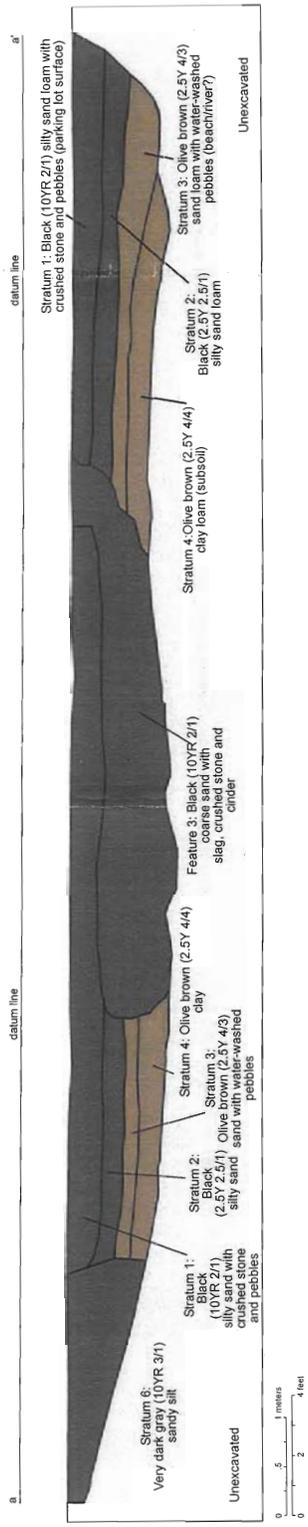


Figure 18. South wall profile, Trench 2.



Figure 19. View of the north profile of Trench 3, facing north.

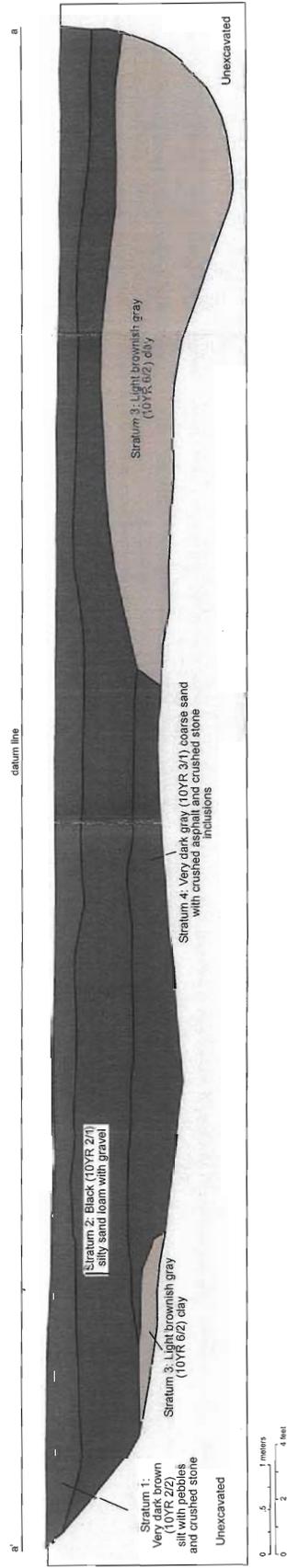


Figure 20. South wall profile, Trench 4.

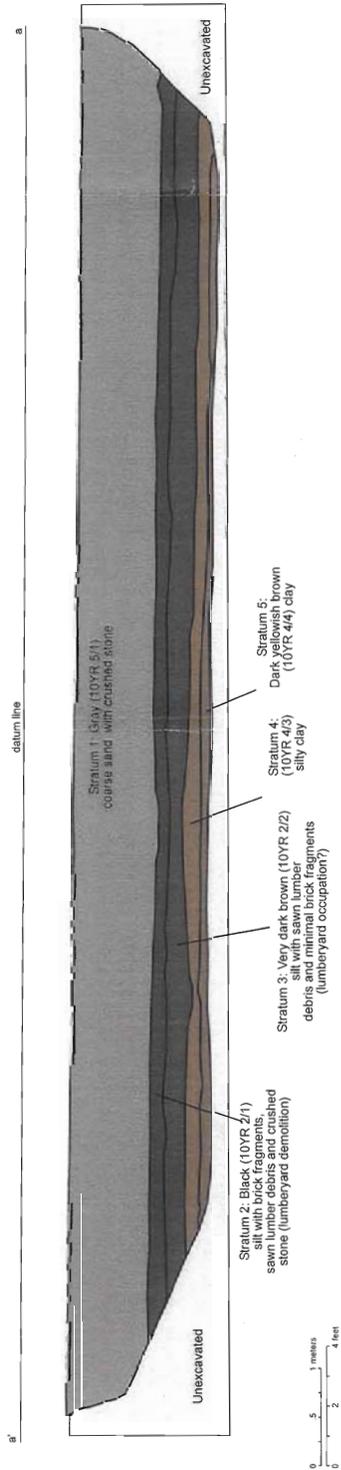


Figure 21. South wall profile, Trench 5.

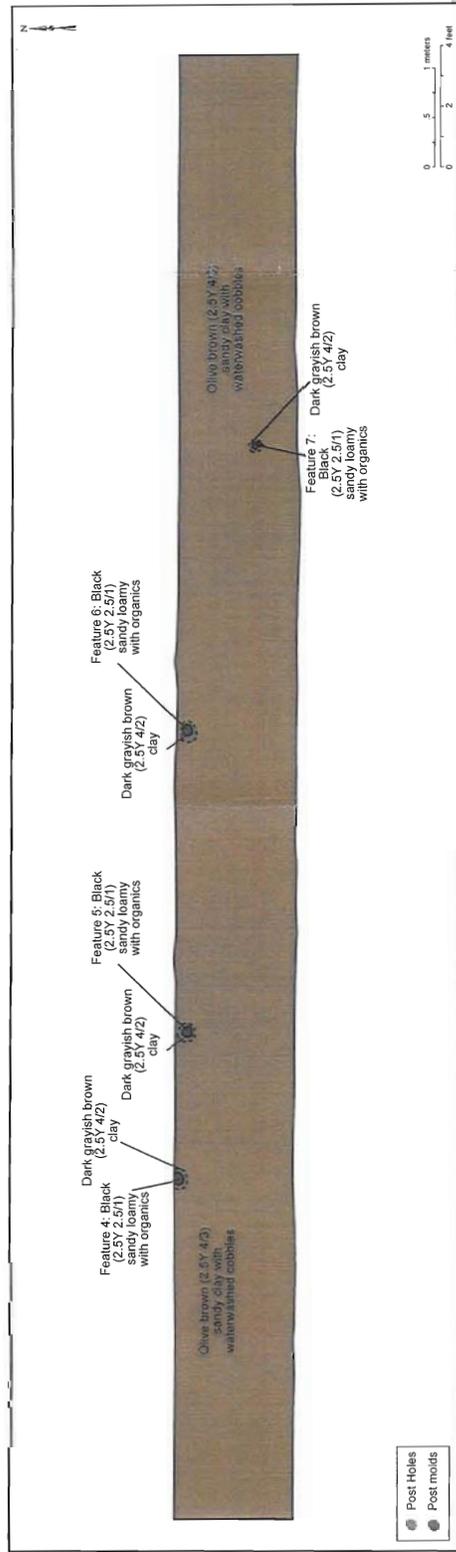


Figure 22. Plan view, Trench 5.



Figure 23. View of Feature 6 in Trench 5, facing north.

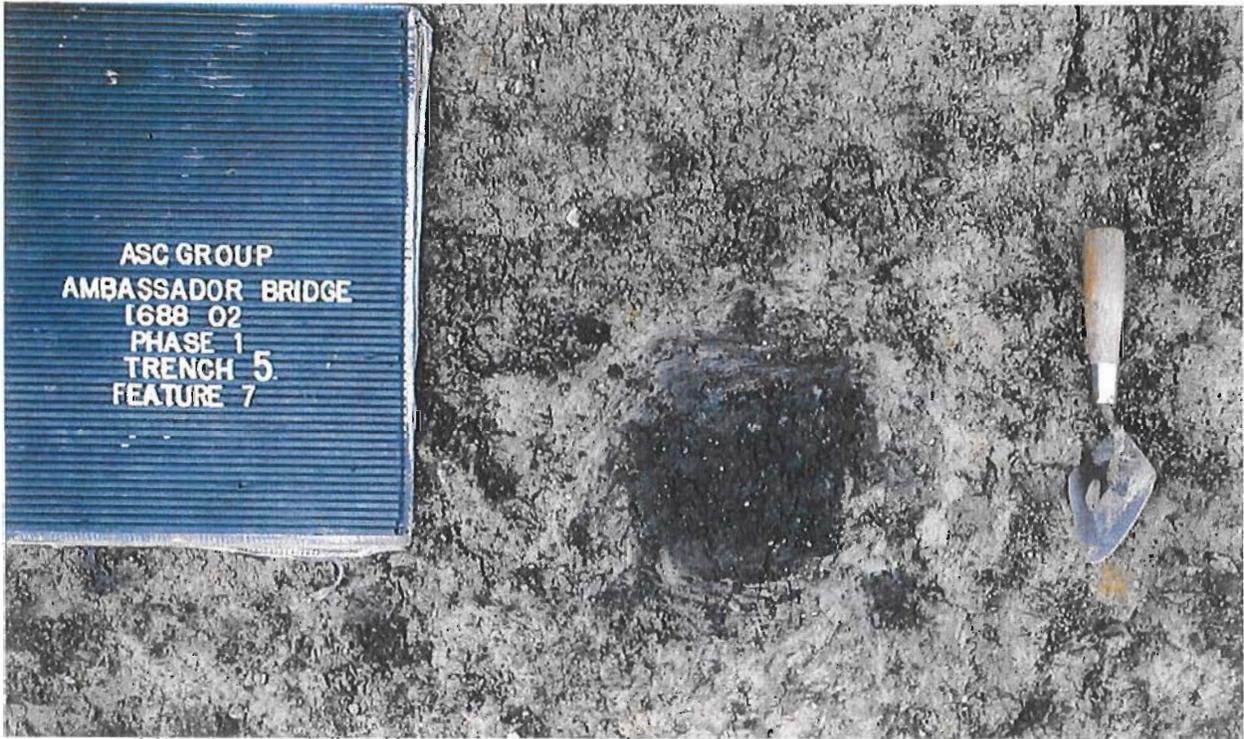


Figure 24. View of Feature 7 in Trench 5, facing south.

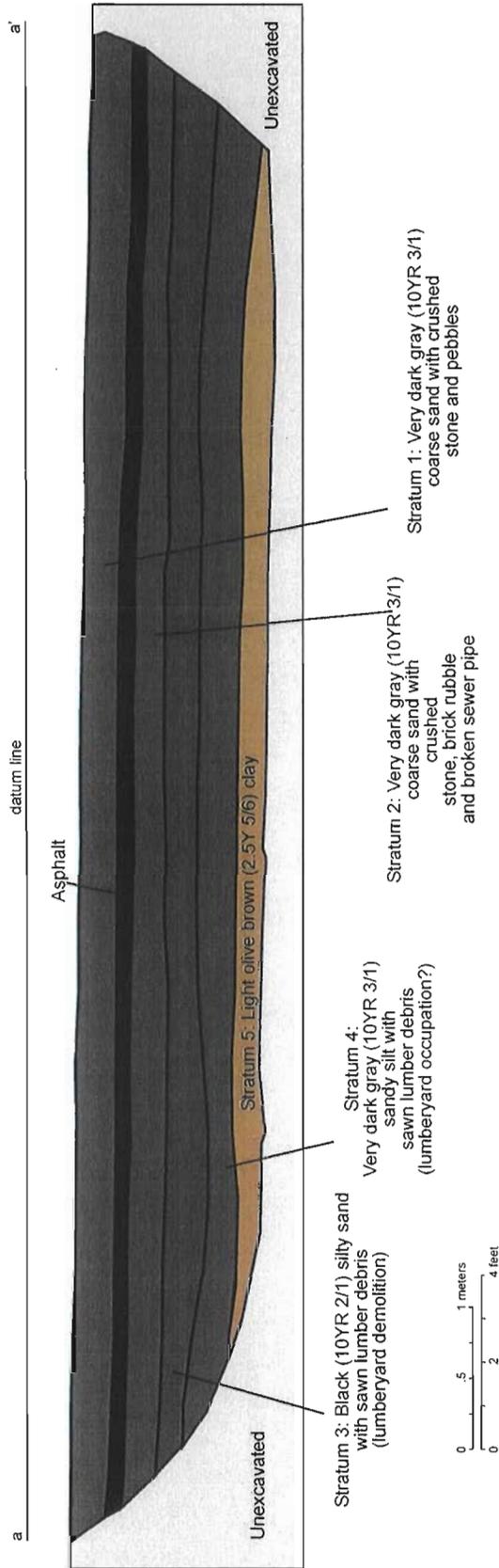


Figure 25. North wall profile, Trench 6.

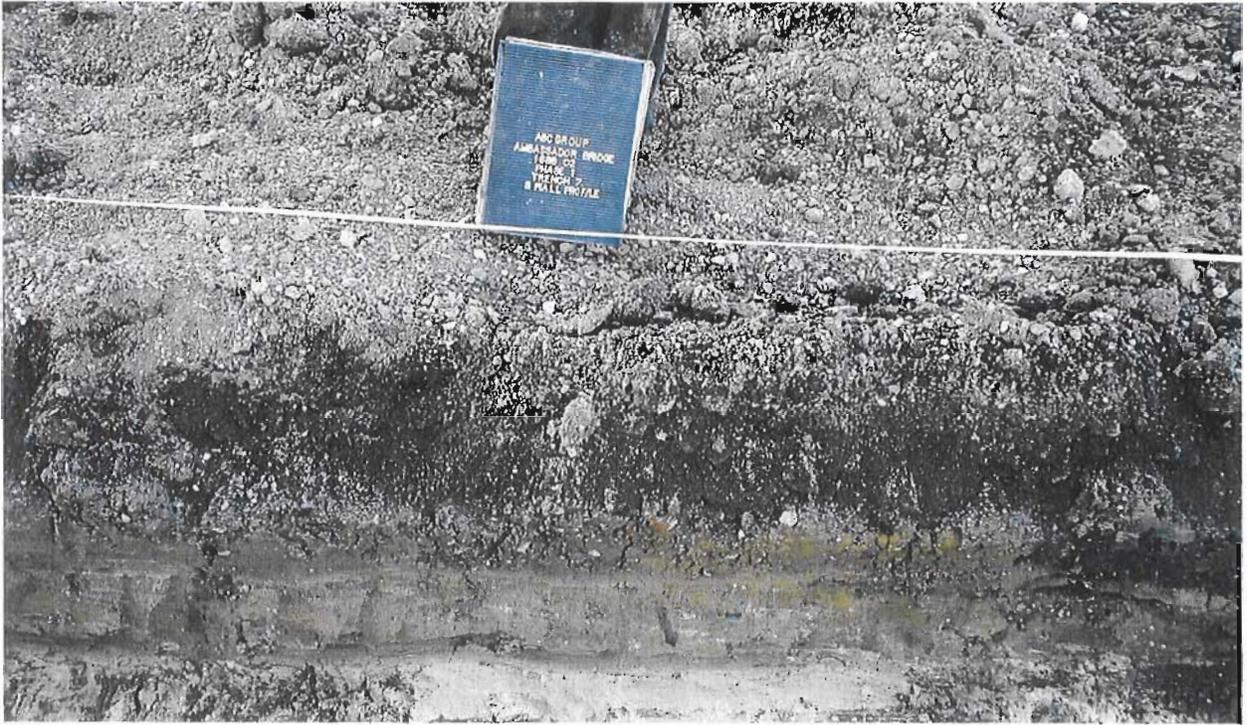


Figure 26. View of a 9.8-ft (3-m) representative section of Trench 7, facing south.

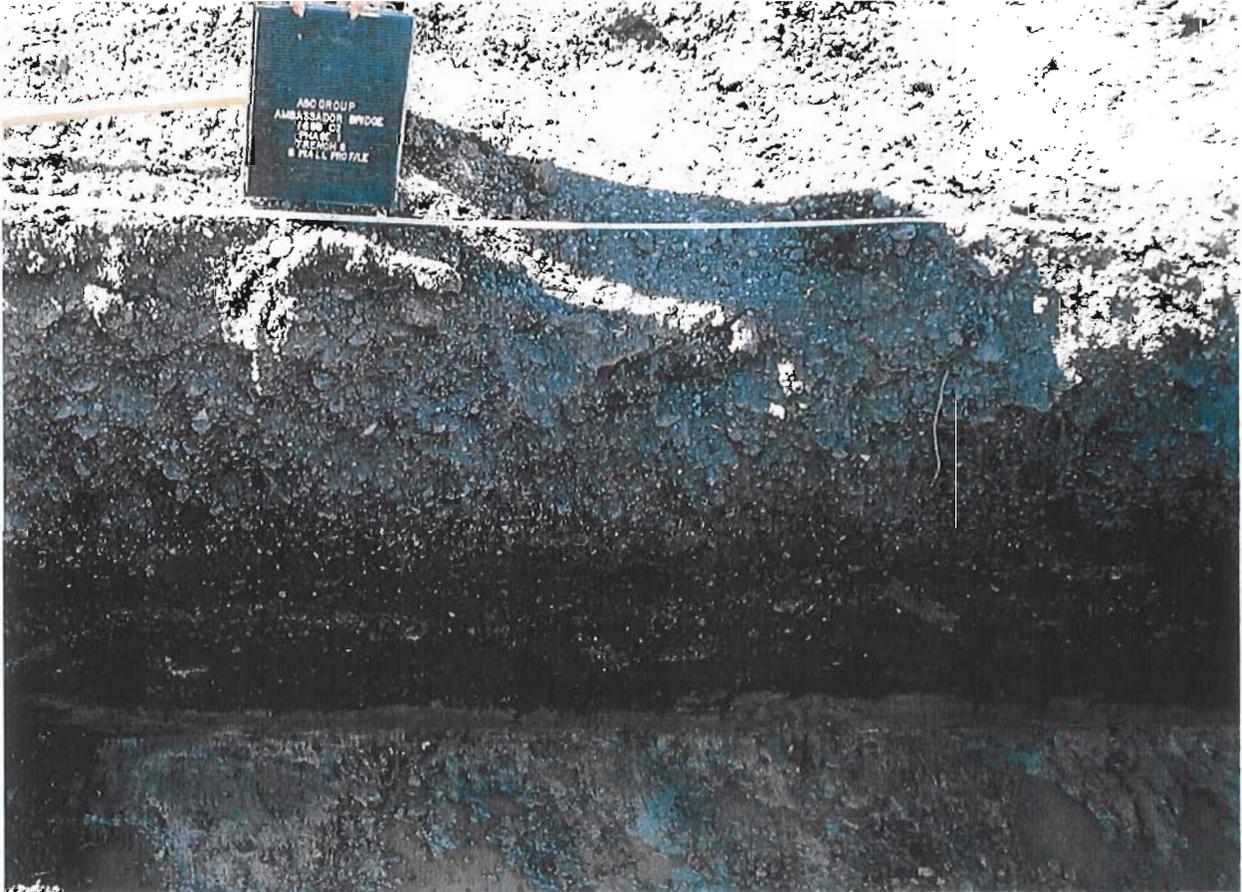


Figure 27. View of a 6.6 ft (2-m) representative section of Trench 8, facing south.



Figure 28. View of the north wall of Trench 9 showing Feature 3 (a railroad track), and Feature 8 (a twentieth century posthole), facing north.

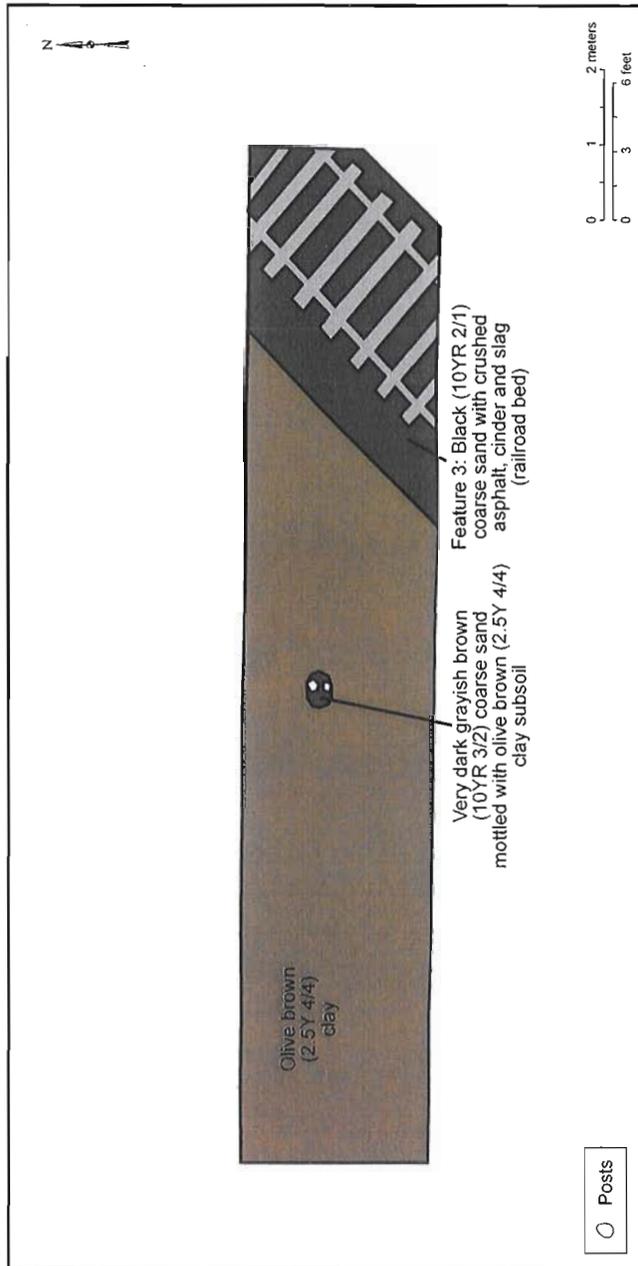


Figure 29. Plan view of Trench 9.

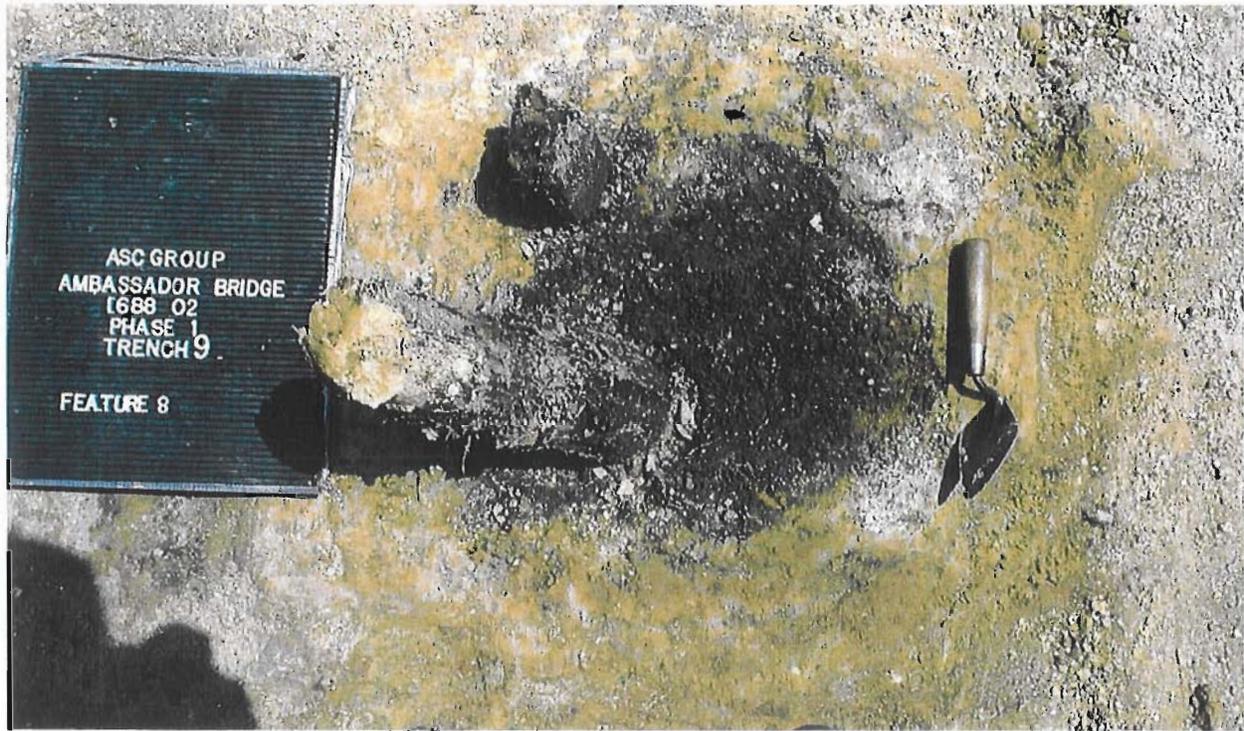


Figure 30. View of Feature 8 in Trench 9, facing south.



Figure 31. View of a 8-ft (2.5-m) representative section of Trench 10, facing west.



Figure 32. View of a 5-ft (1.5-m) representative section of Trench 11, facing east.

**APPENDIX A: MICHIGAN ARCHAEOLOGICAL SITE FORM**

STATE SITE NO. 20WN1131

## MICHIGAN ARCHAEOLOGICAL SITE FORM

SITE NAME: John Beyster Company lumber shed

OTHER NAMES OR NUMBERS:

SITE DESCRIPTION: This site consists of 4 post-holes and post molds in a line that define three bays to a post-in-ground lumber shed dating to the first half of the twentieth century. These features were overlain by an occupation strata/historic ground surface and a demolition stratum that dates from between 1921 and 1949.

COUNTY: Wayne

TOWNSHIP NAME: City of Detroit

TWP/RANGE/SECTION: Twp: 2S Range: 11E Section: SE

QTR-SECTION: SE

UTM COORDINATES WITH DATUM YEAR: NAD1983 N 4687039 E 328749

DIRECTIONS FROM CLOSEST STATE OR COUNTY ROAD INTERSECTION: 285 ft southeast of the intersection of Fort Street and 22<sup>nd</sup> Street

CLOSEST BODY OF WATER: The Detroit River (1,150 ft southeast)

SITE SIZE (length x width or diameter with unit of measurement): 100 ft x 20 ft (2,000 sq ft)

FIELD EVIDENCE (surface scatter, stratification, features, exposed by construction, etc) The site is characterized by two intact strata (a demolition stratum and a possible occupation stratum) that date to the first half of the twentieth century. In addition, four post holes and post molds define three bays from a single post-in-ground lumber shed.

FIELDWORK (institution, principal investigator, year, site visit/survey type/excavation): The field investigation was conducted by ASC Group, Inc. in July of 2007. The principal investigator was David F. Klinge, M.A. The field reconnaissance consisted of a series of backhoe trenches excavated in a 2.5-acre APE that is defined by the location of three piers of the proposed Ambassador Bridge Enhancement Project. In all, 11 trenches totaling 492 ft were completed.

SITE INTEGRITY OR CONDITION: While the site retains some integrity as it is defined here, the remainder of the associated building has been demolished by subsequent construction events.

COLLECTIONS (private or institutional): The entire artifact collection consists of two glass bottles, one sawn large mammal bone, one brick fragment, one woven textile gasket, and nine lumber fragments.

DIAGNOSTIC ARTIFACTS: The chronologically diagnostic artifacts from this project are the two complete glass bottles. One is a 7-ounce beverage bottle, the other a 2-ounce medicinal bottle. Both are made of colorless glass and both were made by automatic bottling machines. The embossed fluid measures on both indicate that they were produced after 1913.

COMPONENTS (list period and site function for each): Lumber shed, ca.1900-1949.

DATES (list radiocarbon dates with lab numbers and associations):

HUMAN REMAINS PRESENT? NO  YES \_\_\_\_\_

IF YES, DETAILS:

OWNERSHIP (LIST NAME OF PERSON OR AGENCY):

PRIVATE OWNER: Detroit International Bridge Company

\_\_\_\_ LOCAL GOVT AGENCY:

\_\_\_\_ STATE GOVT AGENCY:

\_\_\_\_ FEDERAL GOVT AGENCY:

NATIONAL REGISTER SIGNIFICANCE:

- \_\_\_\_ More information needed for evaluation  
 Ineligible for the National Register of Historic Places  
\_\_\_\_ Eligible for the National Register of Historic Places

Person making this evaluation/date: David F. Klinge, M.A. / 08/28/07

WHAT MORE INFORMATION IS NEEDED, OR WHY IS SITE ELIGIBLE OR INELIGIBLE?

The site does not meet any of the four criteria for inclusion in the National Register. Although the site has some degree of integrity, it cannot be connected with a event or trend that influenced broad patterns in our Nation's history, it cannot be associated with a significant person, it does not possess enough integrity to be noted as the work of a master designer or an example of a particularly significant type or style, and the site does not possess a strong research potential.

COMMENTS:

THIS RECORD BY:

NAME: David F. Klinge, M.A.

INSTITUTION/COMPANY: ASC Group, Inc.

DATE: 8/28/07

- APPEND A LIST OF REPORTS AND OTHER DOCUMENTATION ABOUT THE SITE, BOTH PUBLISHED AND UNPUBLISHED, INCLUDING PHOTOS, CORRESPONDENCE, NEWSPAPER ARTICLES, CRM REPORTS, JOURNAL ARTICLES, ETC.

Klinge, David F.

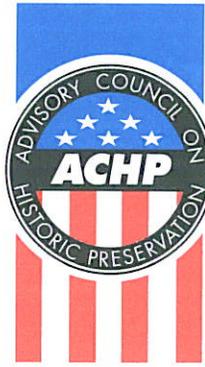
2007 *Phase I Archaeological Survey for the Ambassador Bridge Enhancement Project*  
City of Detroit, Wayne County, Michigan. ASC Group, Middleburg Heights, Ohio. Submitted to the Detroit International Bridge Company, Warren, Michigan.

- APPEND A MAP SHOWING THE SITE LOCATION AS PRECISELY AS POSSIBLE  
(suggestion: at TopoZone.com you can find the USGS map for the vicinity, mark the site location, and save the results to a file that you can send along with this form.)

TO SUBMIT THIS FORM:

e-mail to [barbaram@michigan.gov](mailto:barbaram@michigan.gov), fax it to 517/241-4738, or mail it to Office of the State Archaeologist, Michigan Historical Center, 702 W. Kalamazoo St., Lansing, MI 48909-8240

# Memorandum of Agreement



Preserving America's Heritage

January 14, 2009

Ms. Hala Elgaaly, P.E.  
Administrator, Coast Guard Bridge Program  
U.S. Coast Guard  
2100 Second Street, SW, Room 3500  
Washington, DC 20593

REF: *Ambassador Bridge Enhancement Project*  
*Detroit, Wayne County, Michigan*

Dear Ms. Elgaaly:

Enclosed is your copy of the fully executed Memorandum of Agreement for the referenced project. By carrying out the terms of the Agreement, you will fulfill your responsibilities under Section 106 of the National Historic Preservation Act and the regulations of Advisory Council on Historic Preservation (ACHP).

The ACHP has initialed the changes to the 8<sup>th</sup> Whereas Clause in the Preamble of the Agreement to acknowledge the conclusion of the consultation and execution on December 8, 2008 of the Preservation Agreement between the Michigan State Historic Preservation Officer and the Ambassador Bridge Company. We added our initials to the changed Whereas Clause on a pdf version of page two of the document, which replaces the page from the original that was lost in the mail. Once the Coast Guard has obtained the signature and initials of the concurring party, Gateway Communities Development Collaborative, we request that you return the original Agreement, including the initialed pdf version of page two, to the ACHP.

If we may be of further assistance as the Agreement is implemented, please contact Martha Catlin at (202) 606-8529, or via e-mail at [mcatlin@achp.gov](mailto:mcatlin@achp.gov).

Sincerely,

Charlene Dwin Vaughn, AICP  
Assistant Director  
Office of Federal Agency Programs  
Federal Permitting, Licensing, and Assistance Section

Enclosure

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004  
Phone: 202-606-8503 • Fax: 202-606-8647 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)

**MEMORANDUM OF AGREEMENT  
AMONG  
THE UNITED STATES COAST GUARD,  
MICHIGAN STATE HISTORIC PRESERVATION OFFICER (SHPO),  
ADVISORY COUNCIL ON HISTORIC PRESERVATION, AND THE DETROIT  
INTERNATIONAL BRIDGE COMPANY REGARDING THE AMBASSADOR  
BRIDGE ENHANCEMENT PROJECT (ABEP), MICHIGAN SHPO PROJECT  
ER-05-422, ACROSS THE DETROIT RIVER BETWEEN DETROIT,  
MICHIGAN, UNITED STATES, AND WINDSOR, ONTARIO, CANADA  
PURSUANT TO 36 CFR PART 800.6(b)(2)**

**WHEREAS**, the United States Coast Guard (USCG) is the federal agency responsible for the processing of a federal bridge permit application in the Ambassador Bridge Enhancement Project (undertaking) pursuant to federal bridge statutes and the USCG Bridge Administration Program, [33 U.S.C. 491, 494, & 495]; and

**WHEREAS**, the undertaking consists of the construction of a companion bridge adjacent to, and immediately west of, the existing Ambassador Bridge over the Detroit River, connecting the cities of Detroit, Michigan, United States, and Windsor, Ontario, Canada; and

**WHEREAS**, the USCG is the lead federal agency on this project with responsibility for completing the requirements of Section 106 of the National Historic Preservation Act, and is the only federal agency charged with issuing a federal permit for the project; and

**WHEREAS**, the USCG has defined the undertaking's area of potential effect (APE) as: bounded on the north and east by a major railroad line, on the south by the Detroit River, and to the west by Grand Boulevard and the Hubbard Farms Historic District; and

**WHEREAS**, the Ambassador Bridge Enhancement Project connects directly into the United States Plaza as modified by the Ambassador Bridge Gateway Project, currently under construction and developed by the Michigan Department of Transportation (MDOT) and DIBC and approved by Federal Highways Administration (FHWA) originally in 1997 and reevaluated and approved again by FHWA in 1999, 2004 and 2007; and

**WHEREAS**, the USCG has determined that the undertaking will have an adverse effect on the existing Ambassador Bridge, which is eligible for listing in the National Register of Historic Places, and has consulted with the Advisory Council on Historic Preservation (ACHP) and the Michigan SHPO pursuant to 36 C.F.R. part 800, which are regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. § 470f), and will have no adverse effect on other historic properties in the APE or project area; and

WHEREAS, on February 18, 2004, DIBC and the Michigan Department of Transportation (MDOT) entered into Contract 2004-2013 which governs the maintenance and operation of the existing Ambassador Bridge for the purposes of keeping the Bridge reasonably fit and safe for public travel and requires the DIBC (or subsequent owners of the Ambassador Bridge) to inspect the bridge structure in accordance with the standards and procedures set forth in the then current version of 23 C.F.R. part 650, National Bridge Inspection Standards, and as stipulated in the then current version of the American Association of State Highway and Transportation Officials Manual for Condition Evaluation of Bridges, or successor standards and procedures; and

WHEREAS, Michigan SHPO and DIBC, ~~are currently discussing a~~ have agreed on a means of for applying Secretary of the Interior's Standards for the Treatment of Historic Properties 36 CFR Part 68 for the maintenance of the existing bridge as reflected in a Preservation Agreement for the bridge, executed on December 8, 2008; and

WHEREAS, the USCG has consulted with the Detroit International Bridge Company (DIBC) and the Gateway Communities Development Collaborative (GCDC) regarding the effects of the undertaking on historic properties and has invited DIBC to sign this MOA as a signatory party and GCDC to sign as a concurring party; and

WHEREAS, DIBC will retain an experienced professional exhibit designer to develop a permanent exhibit that tells the story of the construction of the historic Ambassador Bridge in relation to the new bridge. The exhibit shall be on display at a location on DIBC property that is accessible by the traveling public and agreed to DIBC and the Michigan SHPO. The exhibit shall emphasize the historic technology of the old bridge and the technology of the new bridge. The exhibit shall utilize historic photos and documentation concerning the construction and completion of the historic bridge, photographs and documentation concerning the construction of the new bridge, as well as contemporary photographs and documentation of both the historic and new bridges in situ. As plans are developed for the exhibit, the consulting parties shall be given at least 30 days to review and comment on the proposed content and design and if the permanent exhibit must be relocated, DIBC will provide notification to all parties and consult with the SHPO to find a new location for the exhibit; and

WHEREAS, the SHPO, ACHP, and DIBC have concurred that the "diamond-shaped" tower option will be utilized in the design of the second bridge. Architectural details related to the design of the deck lighting, railings and overall bridge lighting have been solicited from community members, with final details to be developed between DIBC and their contracted builder in a "design-build" arrangement. The DIBC shall consult with the SHPO as plans are developed for non-structural elements (e.g. lighting) and aesthetic treatments on the new bridge to ensure compatibility with the existing bridge and GCDC has stated they have no official opinion concerning the design features of the second bridge; and

WHEREAS, DIBC has agreed to support and participate in efforts (with the appropriate community organizations and local, state and federal governmental agencies

BDC  
12/11/08  
JH  
11/17/08  
HE  
12/22/08  
JMF  
1/14/09

through the Detroit Riverfront Conservancy or through a new committee) to ensure access to the Detroit Riverfront west of the downtown area for public use; to support and promote the Corktown / Mexicantown Green Link connecting southwest Detroit to the greater southeast Michigan greenway system; and to research the feasibility and, if appropriate, plan the implementation, of non-motorized use of the historic Ambassador Bridge between Detroit and Canada...DIBC has agreed to provide \$20,000 annually for five (5) years to the Detroit Riverfront Conservancy or new committee to coordinate the projects, including staff, research, and professional consulting fees (engineering, planning, legal, landscaping). The Detroit Riverfront Conservancy or a new committee shall hold the initial meeting within 3 months from the date of the Coast Guard bridge permit and remain in existence for five years from the date of the Coast Guard bridge permit, or until each of the items has been completed, whichever comes first; and

**NOW, THEREFORE,** the USCG, ACHP, SHPO, and DIBC agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

The USCG shall ensure that the following measures are carried out:

#### Stipulations

##### 1. **Maintenance and Protection of Existing Ambassador Bridge**

- a. The existing Ambassador Bridge will continue to be maintained in accordance with any and all relevant permits issued by the Coast Guard including the March 4, 1921 permit issued by the US Army Corps of Engineers. DIBC shall maintain the bridge in compliance with the provisions of any other law or regulation as may be under the jurisdiction of any federal, state or local authority having cognizance of any aspect of the maintenance of said bridge, to include the MDOT Agreement Number 2004-2013.
- b. The Coast Guard shall not permit a new bridge that is not designed and constructed in such a manner as to avoid physical damage to the existing bridge.
- c. MDOT Contract 2004-2013 will be inserted in any permit to be issued for the Ambassador Bridge with any amendments thereto.

##### 2. **Recordation.**

- a. **HAER Documentation.** The USCG will contact the Historic American Engineering Record (HAER) at the National Park Service to determine the level and kind of photographic and historical documentation

necessary to meet HAER standards for the historic Ambassador Bridge. USCG will ensure that recordation is accepted by HAER in writing prior to the construction of the new bridge. The completed documentation will be provided to the Library of Congress and the SHPO/Archives of Michigan.

- b. **Historical Report.** Based on the historical and photographic documentation provided to HAER, an illustrated narrative history will be developed in report form. The historical report will cover the current undertaking; the process of the evolution of the design; the history of the role of the Ambassador Bridge in the development of the community; and the anticipated changes in the community that will result from the construction of the new bridge. A draft of the historical report, including illustrations, will be provided to the reviewing parties for review and comment. The reviewing parties will be afforded 30 days from receipt of the proposed draft of the report for review and comment. DIBC will consider the views of reviewing parties in the further development of the historical report. The USCG shall receive annual status updates on the report.
- c. **National Register Nomination.** In consultation with the SHPO, DIBC shall list the Ambassador Bridge in the National Register of Historic Places. DIBC may choose to hire a consultant or other qualified professional to undertake this measure. The preparation of the nomination material shall begin no later than six (6) months from the date the new bridge is opened to traffic. DIBC shall initiate consultation with the SHPO regarding work to be done for the National Register listing prior to commencing work on the listing. The final improvements to the National Register listing shall be submitted to the SHPO for review and approval within twelve (12) months from the date the bridge is opened to traffic.

## Administrative Provisions

### 1. Monitoring and Reporting

Each year on January 15th following the execution of this MOA until it expires or is terminated, the DIBC shall provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in DIBC's efforts to carry out the terms of this MOA.

### 2. Post-Review Discoveries

If historic properties are discovered other than those named in this Agreement, or if unanticipated effects on historic properties are found, the USCG shall consult

with the SHPO, the DIBC and other affected parties to reconsider the terms of this Agreement and to amend it in accordance with Stipulation 10.

In the event of a discovery, any project activity in the vicinity of the discovery shall cease. The USCG and/or DIBC shall notify the SHPO and other relevant authorities of the discovery within 24 hours of the discovery.

If human remains are uncovered, the USCG and DIBC shall follow appropriate provisions of the Michigan statutes and federal law. The USCG and the DIBC shall also notify and coordinate with the SHPO and the Office of the State Archaeologist (OSA). The USCG and the DIBC shall also follow the recommendations outlined in the Advisory Council on Historic Preservation *Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects* (February, 23, 2007). If human remains are determined to be Native American, the USCG shall consult with the appropriate Tribe to determine appropriate treatment and disposition of the remains.

### **3. Schedule for Completion**

Notwithstanding the specific time requirements within each Stipulation, the USCG will continue to implement Stipulation 1 for the duration of any relevant Coast Guard permit, or until the DIBC notifies all parties regarding the proposal to remove the existing (original) Ambassador Bridge. This MOA will become null and void if the Coast Guard permit becomes null and void. At such time, and prior to work continuing on the undertaking, the USCG shall either: (a) execute an MOA pursuant to 36 CFR 800.6; or (b) terminate consultation pursuant to 36 CFR 800.7(a); and take into account, and respond to the comments of the ACHP under 36 CFR 800.7(c)(4). Prior to such time, the USCG may consult with other signatories to reconsider the terms of the MOA and amend it in accordance with Administrative Provision 7, below. The USCG shall notify the signatories as to the course of action it will pursue.

If the DIBC is unable to meet this schedule for completion, DIBC shall consult with the signatories to discuss the reasons for the delay and to determine reasonable new dates for completion of the mitigation. New dates for completion shall be agreed upon in writing among the signatory and concurring parties but shall not require amending this Agreement.

### **4. Points of Contact**

The USCG Point of Contact (POC) will be the Bridge Administrator, Coast Guard Headquarters, United States Coast Guard, Bridge Administration Program, CG-5411, 2100 Second St SW, Rm. 3500, Washington DC 20593, ATTN: Administrator, Coast Guard Bridge Administration Program at (202) 372-1511. The POC for the SHPO will be Environmental Review Coordinator, State Historic

Preservation Office, 702 W. Kalamazoo Street, PO Box 30740, Lansing, MI 48909-8240. ph 517-335-2720; fax 517-335-0348 email: er@michigan.gov. The POC for the ACHP will be the Director, Office of Federal Agency Programs, Advisory Council on Historic Preservation, at (202) 606-8503, The Old Post Office Building, 1100 Pennsylvania Avenue, NW, Washington, DC 20004. The POC for the DIBC will be the President, Detroit International Bridge Company, P.O. Box 32666, Detroit, MI 48232, ph. (586) 939-7000 ext. 2551; fax (586) 755-8924; email: verenda@ambassadorbridge.com.

#### **5. Other Provisions**

Nothing in this Agreement is intended to conflict with current law or regulation or the directives of the United States Coast Guard or the Department of Homeland Security. If a term of this agreement is inconsistent with such authority, then that term shall be invalid, but the remaining terms and conditions of this agreement shall remain in full force and effect.

#### **6. Effective Date**

The terms of this agreement will become effective on the date of issuance of a Coast Guard bridge permit.

#### **7. Amendment and Modification**

This Agreement may be modified upon the mutual *written* consent of the parties in accordance with 36 CFR § 800.6(c)(7).

#### **8. Dispute Resolution**

- a. Objections from the Public- If an objection is raised by a member of the public during the implementation of the measures stipulated in this Agreement, the USCG shall take the objection into account and shall consult with the objecting party and parties to this Agreement to resolve the objection.
- b. Objections from Parties to the Agreement - Should the USCG, SHPO, or ACHP object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, USCG and DIBC shall consult with such party to resolve the objection. If USCG determines that such objection cannot be resolved through such consultation, USCG will:
  1. Forward all documentation relevant to the dispute, including USCG's proposed resolution, to the ACHP. The ACHP shall provide USCG with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final

decision on the dispute, the USCG shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories, and provide them a copy of this written response. USCG will then proceed according to its final decision.

2. If the ACHP does not provide its recommendation regarding the dispute within the thirty (30) day time period, the USCG may make a final decision on the dispute and proceed accordingly. Prior to proceeding, the USCG shall notify the parties to this MOA of its decision regarding the dispute.

The USCG's responsibility to carry out all other actions subject to the terms of this MOA that are not subject to the dispute remain unchanged.

## **9. Termination**

- a. If the USCG, SHPO, or ACHP determines that the terms of this MOA will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Administrative Provision 7, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, the USCG, SHPO, or ACHP may terminate the MOA upon written notification to the other signatories. The party proposing to terminate the Agreement shall so notify all parties to this Agreement explaining the reasons for termination and affording at least sixty (60) days to consult and seek alternatives to termination. The parties shall then consult.
- b. Should such consultation fail to resolve the dispute, the USCG, the ACHP, or the SHPO may terminate the Agreement by so notifying all parties. Should this Agreement be terminated, the USCG shall either:
  1. Consult in accordance with 36 CFR § 800.6(a) in an effort to resolve any adverse effects, or
  2. Terminate consultation and request the Council comment in accordance with 36 CFR § 800.7(c).

**APPROVED BY:**

**UNITED STATES COAST GUARD**

BY: Hala Elgaaly Date: 11/7/2008  
Hala Elgaaly, Administrator, Bridge Program  
U.S. Coast Guard

**MICHIGAN STATE HISTORICAL PRESERVATION OFFICER**

BY: Brian D. Conway Date: 12/11/08  
Brian D. Conway, SHPO

**ADVISORY COUNCIL ON HISTORIC PRESERVATION**

BY: John M. Fowler Date: 12/8/08  
John M. Fowler, Executive Director

**DETROIT INTERNATIONAL BRIDGE COMPANY**

BY: Dan Stamper Date: 11/20/08  
Dan Stamper, President

**CONCURRING:**

**GATEWAY COMMUNITIES DEVELOPMENT COLLABORATIVE**

BY: \_\_\_\_\_ Date: \_\_\_\_\_  
Christopher M. Bzdok, GCDC Counsel

# Preservation Agreement

## PRESERVATION AGREEMENT

**This Preservation Agreement (Agreement) is made this 5th day of December, 2008, between the Detroit International Bridge Company, 2000 Howard Street, Detroit, Michigan 48226 (DIBC or Company) which is a for profit company, and the State of Michigan, acting through the Department of History, Arts and Libraries, Michigan Historical Center, State Historic Preservation Office and Officer, 702 W. Kalamazoo Street, Lansing, Michigan 48909 (SHPO).**

### Recitals

**Whereas, DIBC presently owns certain property commonly known as the Ambassador Bridge, located at T2S, R11E, Section 4, City of Detroit, County of Wayne, Michigan, which is listed in or is eligible for listing in the National Register of Historic Places (NRHP) and which consists of the structure as defined in exhibit A; and**

**Whereas, DIBC which is a for profit company, desires to pursue its Ambassador Bridge Enhancement Project, entailing the construction of a replacement of the current bridge span crossing the Detroit River to Canada, which will facilitate safer vehicular traffic across the River; and**

**Whereas, United States Coast Guard (USCG) is considering whether to issue a permit to DIBC for construction of the replacement span; and**

**Whereas, under the National Historic Preservation Act of 1966, 16 USC § 470 *et seq* (NHPA), and in particular, Section 106 of the NHPA, 16 USC §470f, as well as implementing regulations found at 36 CFR Part 800, federal agencies with authority to license undertakings shall, before issuing any license, take into account the effect of the undertaking on any site, building, structure, or object that is included in or eligible for inclusion in the NRHP, and shall consult with the federal Advisory Council on Historic Preservation and the SHPO; and**

**Whereas, under Section 101(b)(3) of the NHPA, 16 USC §470(a)(b), and 36 CFR §800.2(c)(1) and 800.6(b)(2), the SHPO reflects the interests of the State of Michigan and its citizens in the preservation of their cultural heritage, consults with federal agencies on federal undertakings that may adversely impact historic properties, and also consults on the contents of any plans developed to protect, manage, and/or reduce or mitigate harm to historic properties; and**

**Whereas, the United States Coast Guard has determined that the Ambassador Bridge Enhancement Project will have an adverse impact on the Historic Bridge and that a reasonable mitigation of this adverse effect is to accept contractual assurances from the Company that it will maintain and preserve portions of the Historic Bridge in accordance with the recommended approaches set forth in regulations prescribing standards for the treatment of historic properties, as promulgated by the Secretary of the Interior at 36 CFR §67.7 and 36 CFR Part 68, to the extent those standards can be reasonably applied to an international bridge over navigable water; and**

**Whereas, DIBC and SHPO desire to execute this Agreement.**

Now therefore, in consideration of the recitals listed above, the promises made below, and the mutual benefits received by the parties, together with other good and valuable consideration, the parties agree as follows:

**1. COMPLIANCE WITH STANDARDS**

DIBC agrees to maintain and preserve the Main Towers, current signs on top of main towers and Cables (Property or Historic Property) [See attached exhibit A] in accordance with the recommended approaches in the Secretary of the Interior's *Standards for Treatment of Historic Properties, Standards for Preservation*, promulgated at 36 CFR §68.3, so as to preserve and enhance those qualities that made the Historic Bridge eligible for listing in the NRHP. When rehabilitation is the appropriate treatment, DIBC agrees to rehabilitate the Property in accordance with the recommended approaches outlined in the Secretary of the Interior's *Standards for Treatment of Historic Properties, Standards for Rehabilitation*, as promulgated at 36 CFR §68.3 and §67.7. DIBC shall be further guided by the Secretary's Guidelines for Rehabilitating Historic Buildings (latest edition), the *Preservation Briefs* series, Technical Preservation Services' publications, and other applicable federal historic preservation guidance materials. The parties agree that rehabilitation is the appropriate treatment when repair or replacement of deteriorated features is necessary or when additions to the Property are planned. In the event that DIBC determines that traffic demands require the return to service of the Property, then during such periods of use, these requirements of historic preservation shall be suspended but automatically apply when and if the Property is once again retired from active use.

**2. COSTS**

DIBC agrees to assume the cost of the continued maintenance and repair of the Property, so as to keep it in a sound state of repair and prevent deterioration. DIBC also agrees to assume the costs of preserving and maintaining the architectural, archaeological, and historic integrity of the identified Property pursuant to the Secretary's Standards, as described in Section 1.

**3. PLANNING**

DIBC agrees to submit plans of proposed construction, alteration, replacement, or rehabilitation of distinctive materials, features, finishes, or spaces which would affect the appearance or the structural integrity of the Main Towers, current signs on top of main towers or Cables of the Historic Bridge to the SHPO for review, to enable the SHPO to determine if proposed work will be in compliance with this Agreement. The SHPO agrees to promptly review and comment on all submitted planning documents.

**4. PERMISSION**

DIBC agrees not to perform any construction, alteration (either visual or structural), remodeling, or any other activity, or to allow others to engage in such activity, which would materially affect the historic and structural integrity or the appearance of the Main Towers, current signs on top of main towers or Cables of the Historic Bridge, without first seeking prior written permission from the SHPO whose approval shall not be unreasonably withheld. The Company may consult with the SHPO at any time to determine an efficient process to comply with this section.

**5. EXEMPTION**

The SHPO agrees that the Company may perform routine maintenance and add additional signage at the Property without contacting the SHPO and is exempt from obtaining written permission from the SHPO for that activity. SHPO also agrees that the bridge is an operating entity.

**6. PROFESSIONAL QUALIFICATIONS**

DIBC agrees that all historic preservation activities carried out under Section 1 will be conducted by or under the direct supervision of a person or persons whose qualifications meet, at a minimum, the Secretary of the Interior's *Professional Qualifications Standards* set forth at 36 CFR Part 61, Appendix A, and at 48 FR 44738-44739, for the relevant discipline.

**7. INSPECTIONS**

DIBC agrees that upon reasonable notice, the SHPO, its agents, and designees have the right to inspect the Property at any reasonable time to ascertain whether or not the terms and conditions of this Agreement are being met. Access to the Property shall not be unreasonably withheld. The failure of the SHPO to exercise the right of inspection for an extended period of time shall not be construed as a waiver of that right.

**8. NOTICES**

The parties understand and agree that any notices, requests, responses, permissions, approvals or other writings required to be given by one party to the other party may be sent by first class mail to the addresses indicated on page 1. Any notice given in this manner shall be deemed delivered two (2) days after it has been deposited with the United States Postal Service. Each party may change its mailing address by giving notice of the change to the other party. The failure to give notice of an address change shall not constitute a waiver of any notice requirement.

**9. INDEMNIFICATION**

Except as otherwise specifically provided herein, DIBC will indemnify and hold harmless the State of Michigan, the Department of History, Arts and Libraries, and the SHPO, and their officers, employees, and agents, for any liability for judgments, damage, and expenses resulting from claims or actions of any nature by third parties arising from DIBC's actions or inactions under this Agreement.

**10. PROPERTY TRANSFERS**

The parties agree that nothing in this Agreement shall prevent DIBC from conveying and transferring the Property to another corporation or legal entity. However, DIBC agrees to incorporate the terms and conditions of this Agreement, either verbatim or by express reference, in any deed or other legal instrument by which it may divest itself of a portion or all of its legal interest in the Property. DIBC further agrees to give the SHPO written notice of any such a transfer at least thirty (30) days prior to the proposed date of transfer and following execution, a copy of the deed or other instrument by which it divests itself of an interest in the Property.

**11. ASSIGNMENTS**

The SHPO may with written agreement of the parties assign any part or all of the SHPO's rights and responsibilities under this Agreement to another organization that is qualified to protect historic resources. The SHPO shall notify DIBC in writing of any such assignment and furnish the successor assignee's name and address to DIBC for agreement prior to the assignment. DIBC shall not unreasonably withhold approval.

**12. CERTIFICATIONS**

DIBC agrees that upon receipt of a written request from the SHPO, DIBC will promptly furnish the SHPO with written certification that to the best of DIBC's knowledge, the Company is in compliance with the terms and conditions of this Agreement.

**13. GOVERNING COURT AND LAW**

Because the obligations undertaken by the parties to this Agreement arise under federal law including but not limited to compliance with standards pursuant to federal regulations under the jurisdiction of the U.S. Department of the Interior, disputes arising under such laws and regulations which cannot be resolved by the parties shall be resolved by a United States Federal Court of appropriate jurisdiction. To the extent that state law may be interpreted, the laws of the State of Michigan are applicable.

**14. VIOLATIONS**

DIBC acknowledges that the SHPO, after giving written notice to DIBC, may institute an action or actions to enjoin violations of this Agreement, require specific performance of the Agreement, and require restoration of the Property in conformance with the Secretary of the Interior's *Standards for Treatment of Historic Properties*. The SHPO has available to it all legal and equitable remedies to enforce the Company's obligations under this Agreement. If DIBC is found by a court of competent jurisdiction to have violated any of its Agreement obligations and is not the materially prevailing party in such litigation, in addition to other remedies DIBC shall reimburse the SHPO for all of its costs and expenses incurred in connection with the SHPO's enforcement of this Agreement, including but not limited to filing fees, court costs, attorney's fees, architectural fees, engineering and expert witness fees, and other expenses of litigation.

**15. TERMINATION**

The parties recognize that circumstances may arise which make continuation of this Agreement infeasible or inappropriate, including removal of the existing (original) Ambassador Bridge by DIBC or other circumstances arising under the Memorandum of Agreement, Michigan SHPO Project ER-05-422 ("MOA"). Under any such circumstance, DIBC may request the SHPO to issue a Notice of Release and Termination thereby terminating the Agreement as to a date certain. This Agreement shall also terminate if the MOA is null and void or if the Property becomes ineligible for listing in the NRHP due to damage, destruction or other causes.

**16. DAMAGE OR DESTRUCTION**

If the Property is severely damaged or destroyed by natural, accidental or other manmade causes and restoration and/or reconstruction may not be feasible or reasonable, DIBC agrees to notify the SHPO in writing within thirty (30) days of the damage or destruction. DIBC agrees not to undertake repairs or reconstruction of any type, other than emergency work to protect public safety or security or prevent further damage to the Property, without the SHPO's prior written permission, which specifies that the proposed work will conform to the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. The SHPO shall be deemed to have consented to such repairs if it fails to provide a written denial of such consent within sixty (60) days of receiving the request.

**17. ENTIRE AGREEMENT**

This Agreement constitutes the entire agreement of the parties. The parties certify that no representations, promises, or other agreements have been made or relied upon by either of them or by any person acting on their behalf which are not specifically set forth in this

instrument. All representations, promises, and other agreements previously made, whether orally or in writing, are understood by the parties to be superseded by and merged into this instrument, which may not be amended orally.

18. AMENDMENTS

This Agreement may only be amended in writing. Each amendment shall be executed by a duly authorized representative or representatives of both parties. No amendment may be made or take effect unless it is consistent with the historic preservation purpose of this Agreement.

19. SEVERABILITY

If any term, section, or other provision of this Agreement (or any amendment to the Agreement) is held invalid or illegal, or otherwise determined unenforceable by a court of competent jurisdiction, the provision will be severed from the Agreement, and the remaining provisions of the Agreement shall continue in full force and effect as if the Agreement never contained the severed provision.

20. COUNTERPARTS

The parties may execute this Agreement in two or more counterparts, which shall, as an aggregate, be signed by representatives of both parties. The Agreement shall be deemed effective as of the date the Permit is issued by The United States Coast Guard. Photocopies and/or facsimile pages of the signature pages to this Agreement shall have the same force and effect as the original signatures.

IN WITNESS WHEREOF, the representative(s) of the parties sign their names on the dates specified below as evidence of the parties' execution of this Agreement:

DETROIT INTERNATIONAL BRIDGE COMPANY

By: [Signature] Date: 12/8/08  
Dan Stamper, President

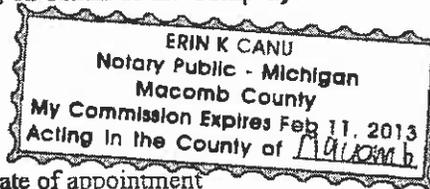
State of Michigan )  
County of Wayne )

The foregoing instrument was acknowledged before me on 12/8/08, 2008, by Dan Stamper, President, Detroit International Bridge Company, on behalf of the Company.

[Signature]  
Signature

Erin K. Canu

Print name exactly as it appears on notary public certificate of appointment



Notary Public, State of Michigan, County of Macomb  
My commission expires 2/11/2013  
Acting in the County of Macomb

MICHIGAN DEPARTMENT OF HISTORY, ARTS AND LIBRARIES

By: Mark Hoffman Date: 12/5/08  
Mark Hoffman, Deputy Director  
Department of History, Arts and Libraries

By: Brian D. Conway Date: 12/5/08  
Brian D. Conway  
State Historic Preservation Officer

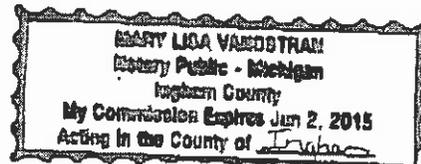
State of Michigan )  
County of Ingham )

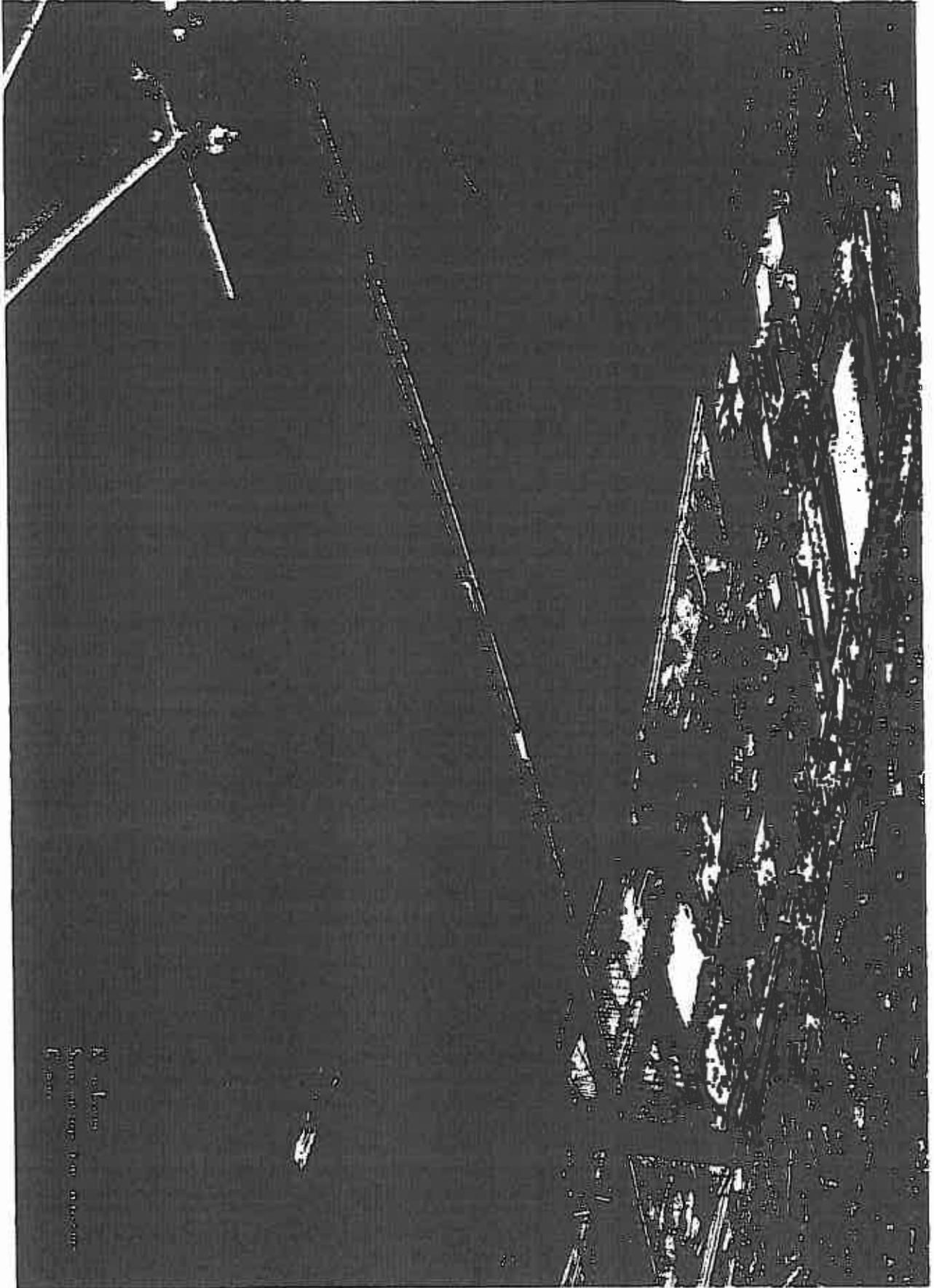
The foregoing instrument was acknowledged before me on 12/5/08, 2008, by Mark Hoffman, Deputy Director, Department of History, Arts and Libraries, and by Brian D. Conway, State Historic Preservation Officer, on behalf of the Department.

Mary Lisa VanOstran  
Signature

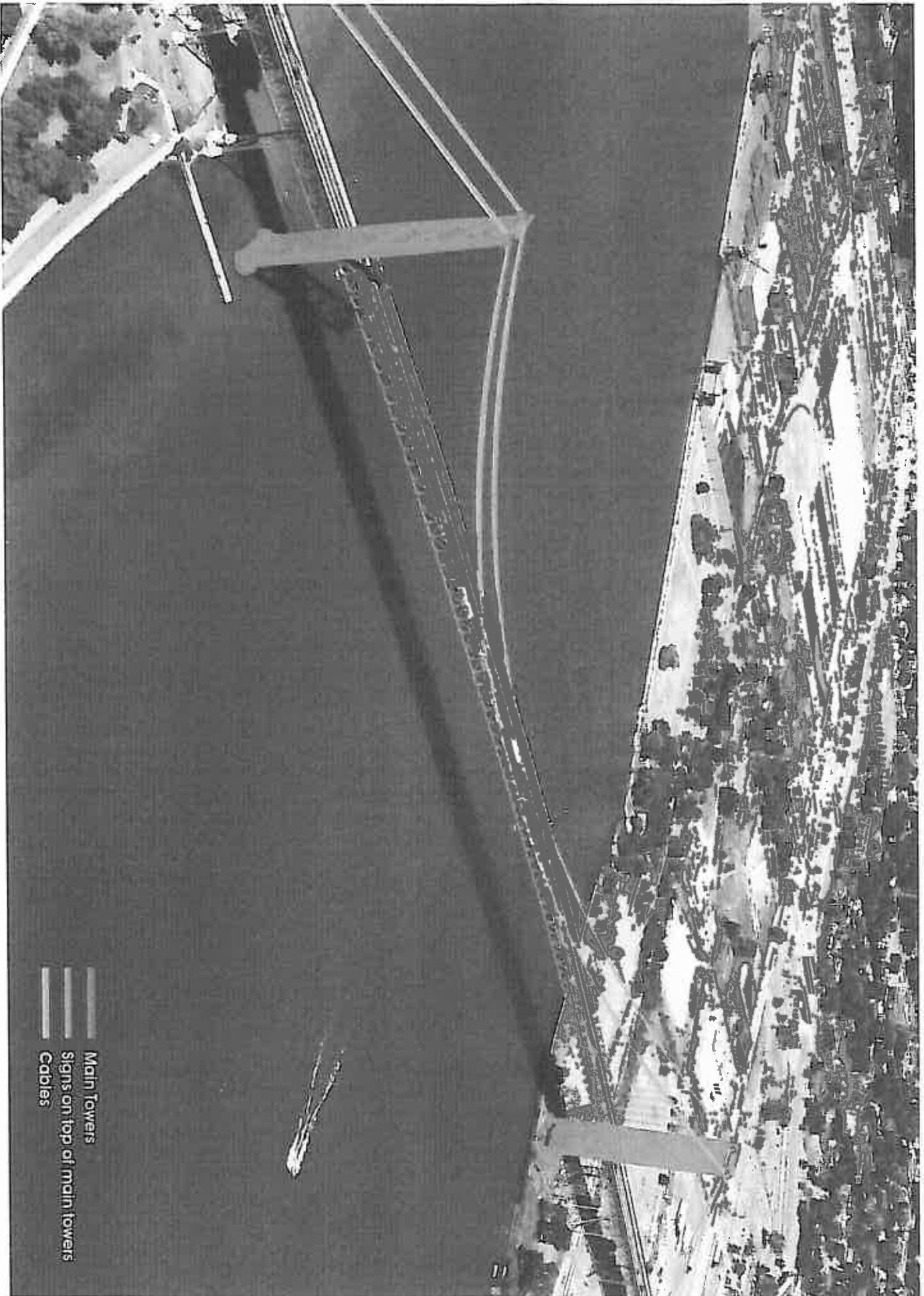
Mary Lisa VanOstran  
Print name exactly as it appears on notary public certificate of appointment

Notary Public, State of Michigan, County of Ingham  
My commission expires 6/2/2015  
Acting in the County of Ingham





12/05/2008 09:44 FAX 5173350348



Main Towers  
Signs on top of main towers  
Cables