



CITY OF DETROIT
GENERAL SERVICES DEPARTMENT

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TO: Council President Pro-Tem Tate

FROM: *BWD* Brad Dick, COO, City of Detroit

DATE: March 8, 2024

RE: AB FORD PARK- 6006111

Please find the departments response to questions received regarding the above-mentioned subject:

A. Transparency and Accountability

1. Before work begins, please provide a complete copy of the soil tests and results showing:
 - a. date;
 - b. location (including necessary maps);
 - c. type of test complete; and
 - d. results.
 - e. Note: These reports were just provided two (2) days and there must be time allowed to review them.
Information previously provided
2. What standards are being used to determine the acceptable levels of contamination for the various contaminants found?
Information previously provided
3. Please provide a report identifying the timeline of specific actions related to the soil tests, including:
 - a. when the decision was made to conduct tests;
 - b. when the contract for that work was executed;
 - c. how it was funded; and
 - d. who made the decisions related to actions associated with the tests.
 - e. Note: These reports were just provided two (2) days and there must be time allowed to review them.
Information previously provided



4. There appears to be some differences between the dates of when information was available and when the General Services Department (GSD) took action. That must be confirmed.

GSD took action once the final Due Care Evaluation was received and approved by BSEED.

5. GSD has suggested that there were several options for remediation.
 - a. What were they?

GSD only received the recommendation from BSEED for the current remediation plan, which is what we shared with the community. The remediation efforts at AB Ford Park follow similar recommendations and standards that have been instituted at Riverside Park and other parks in southeastern Michigan using EGLE standard practices.

- b. What were the cost
Refer to A.5.a
 - c. What were the environmental impacts?
Refer to A.5.a
 - d. What criteria was used to select the option chosen? ***Refer to A.5.a***
6. Before work begins, please provide a complete copy of the studies conducted to determine the type (species), size, age and health of the entire inventory of trees on the site.

The tree inventory report will be shared.

7. What standards is being applied to determine if a tree is: a) healthy; b) in need of assistance to be healthy; or c) is in need of removal?

Ratings are given based on the International Society of Arborists Health and Condition Standards. Justification for the rating given to each tree are on the inventory report. The ratings are incidental to the fact that 2' of cap material that is required will severely impact the health of the trees in the coming few years.

8. According to the Contract Summary (Contract 600611) provided to City Council and its Neighborhood and Community Services Committee, the project is being implemented by the Detroit Building Authority (DBA) and there has been no bidding. However, we assume the DBA is required to competitively bid projects under its management.
 - a. Please provide a copy of the Project Plans, Bid Book, Bid Tabs, Bid Evaluation and Award Report
The DBA did competitively bid the project through BidNetDirect, the solicitation and bid tabulation will be provided.



9. It has been reported that American Rescue Plan Act (ARPA) funds are being used for this project. Has this project been included in previous Appropriations Summary Reports.
 - a. Does the use and reprogramming of these Federal funds require Public Notice and Comment and if so, please provide details regarding statutory public engagement for the proposed modifications or amendments.
The contract 6004774 for Phase 1 is ARPA funded and was approved by council and issued 9/16/2022 for \$2.125m. Phase 2 work, this contract 6006111 before committee now, does not include any APRA funding.
 10. Please provide meetings, dates or other notification(s) (website or social media) to the community that the park was scheduled to be closed prior to the February 20 Dept. of Neighborhood Services Meeting.
GSD attended the January 4th Jefferson Chalmers CDC meeting to inform of the construction starting and park closing.
 11. We are hoping for on-going community engagement for this project, what are the Administration's future plans on this matter?
 - a. The community would like an in-person discussions with Administration officials as part of the community engagement efforts.
We will be holding weekly office hours to connect with the community on questions and concerns. Schedule will be provided when construction begins.
 12. Six documents and two presentations are provided at <https://detroitmi.gov/departments/detroit-parks-recreation/parks-and-greenways/current-park-projects/ab-ford-park>, however, taken together, there is over 1,600 pages of information to review and additional questions have surfaced and must be addressed.
No response required.
- B. Contamination and Remediation**
1. Given the industrial heritage of Detroit and specifically, the significant amount of industrial businesses located between Conner and St. Jean, we are not surprised that soil throughout the City and in the Jefferson-Chalmers neighborhood is contaminated.
 - a. Understanding that we are living with the impacts of our industrial heritage every day, what can we do to slow the implementation process in order to more fully understand the potential risks and impacts due to exposure?
The potential risks and impacts have been laid out in the environmental assessments and due care evaluation. The City is legally obligated to remediate the park for public use. This work does not exacerbate conditions. It repairs and mitigates against the effects of the contamination and makes the park safe for public use.
 2. See A5., above, what other remediation approaches were considered?
See answer A.5.a.



3. During the February 29 Virtual Meeting, the installation of a protecting membrane and two (2) of soil was discussed as the only activity conducted so as not to disturb contaminated soil and later, BSEED officials suggested portions of the park would be “cut and capped.” Please confirm the specifics of proposed work and specific locations.
The grading plan will explain this more thoroughly, this will be a great topic to discuss in office hours.
 4. Can you provide other examples or precedents for this type of remediation in other parts of the city or elsewhere?
Some examples include Riverside Park, Joe Louis Greenway, Mt. Elliott Park, St. Aubin Park, and Rouge Park.
 5. Can the areas that are contaminated at the levels that would be dangerous be cordoned off so that work can focus on those areas and limited access to the park may continue?
The entire park will be closed for the health, safety and welfare of the public during construction. GSD always closed park sites during construction of this scale for the safety of citizens. We are determined to have the park open to the public in Spring of 2025.
 6. Can the work be done in phases, so as not to restrict access to the entire park?
No, this is the most effective and efficient way to get this work done.
 7. What containment or sediment control is being used to protect the community from exposure due to contaminated dust or from soil erosion during construction?
Soil erosion and dust control measures are part of the construction work. It is our goal to disturb as little of the existing soil as possible and only where it is required to meet grading or construction requirements. The risk for these contaminants is only direct contact, meaning touching the soil.
 8. Might we expect to find contamination in other parks and playfields including, Lakewood East, Maheras/Gentry, Mariner Park, Victoria Park’s Park, Hansen Playfield and the activity field west of Carstens/Robinson?
 - a. If so, what action should we take to protect our community, while not undermining other quality of life concerns?
We cannot speculate to contamination without testing the soil. There are no plans to do testing in the other parks mentioned at this time.
- C. Environmental Impact and Safety**
1. Noted above in A4., GSD has suggested that there were several options for remediation. What were they and what were the cost and environmental impact?
See answer A.5.a.



2. What other environmental impacts have been examined as a result of this project, including:
 - a. Oil-gas spills and exhaust from chainsaws, chippers, bulldozers, gravel-trains and dump trucks;
As with any construction site, increased machinery usage is required for a short period of time. We believe the ecological benefit of the new trees and meadow land will greatly outweigh the temporary effects of construction.
 - b. Loss of and time to reconstruct ecosystem for migratory patterns of birds and other wildlife that inhabit the trees and areas that surround them?
We are developing 5.5 acres of the park into bird meadow which is a partnership with the Audubon and USFWS. Approximately 600 trees will be planted in place of the lost trees. We believe that the finished project will be a clean public park space with a much stronger ecological profile.
 3. At the proposed 20-30 trucks per day for seven months, over 4,000 dump trucks will arrive and depart every 10- 15 minutes.
Our math is 3-5 trucks per hour. There will be days when trucking will be lighter and others when we'll be able to get more trucks through. The hours will be during regular business hours and weekends will be limited. If it is desired to limit daily truck traffic, this will extend the timeline of the project and disturbance to the neighborhood.
 - a. What is the environmental impact of that action, including noise, dust, and the vibrating shock to area homes, etc.?
We do not have this information.
 - b. What road construction will be necessary after the work is complete? Is that being factored into the cost of the project?
We are committed to working with DPW on any necessary road repairs after the project. However, we do not expect the trucks to be over standard weight limits of the roads.
 4. What efforts are being done to ensure the safety of children accessing the school facilities along Dickerson/Lenox?
A daily site manager will be on the project to coordinate traffic with the schools and oversee all the trucking and ensure compliance.
- D. Project Scope and Alternatives**
1. As noted in A6., above, it would be helpful to have a clear and thorough detail of the project's scope and elements. Please provide a copy of the contract and bidding details before construction begins.
See answer A.8.a.
 2. Noted above in A8., GSD has suggested that there were several options for remediation. What were they and what were the cost and environmental impact?
See answer A.5.a.



3. Tree Management

- a. Can new trees be planted and allow for nature to take its course, creating a new canopy of trees to mature and build the ecosystem before the old growth trees are removed?

The risk of the dying trees could damage new trees, park amenities, or park users by dropping limbs, or expose contaminated soil if uprooted. The equipment needed to remove the older trees once dead could also damage the new improvements.

- b. Please provide details regarding the proposed process (sequence, timing, etc.) for tree removal?

The tree removal process will take approximately 3 weeks. Contractors will begin on one side of the park and make their way across the park to complete the removals.

- c. For trees that must be removed, what will happen to the wood and chips? Can the materials be sold for fire wood and ground cover or contributed to urban gardens in the area?

It is required that all material leaving the site be taken to a class 2 landfill.

- d. What size, type/variety (species) are proposed and where will they be planted?

The full list of species can be found in the presentation on the project website. Trees will be planted in a variety of sizes from 2" caliper (approx. 10-12' tall when planted) and up to ensure some variety in the canopy and promote shade.

- e. Are Cottonwood trees being considered in the replanting

No, we are not considering replanting Cottonwood due to its relatively short lifespan and weak-wooded nature, and high maintenance. We have selected Quaking Aspen which has a similar structure, affect, and aesthetic as cottonwoods while being hardier, easier to maintain, and stronger.

- f. Do the new trees have a deep root structure?

- i. If so, will the proposed membrane be punctured as the trees grow and undermine the benefit of the membrane?

A majority of a tree's root system is shallow and wide spreading in the first 1-2' depth of soil, however any deeper tree roots will be able to grow through the membrane while the cap maintains its 2' structure.

- g. We understand the concern to spend this money with haste. But, could the City partner with a nonprofit that would sell the tree materials and deposit those proceeds into an interest-bearing escrow that would fund tree removal at a later date when the trees expire?

See answer D.3.c.

- h. What alternative resources might be identified for tree removal at a later date as they expire?

See answer D.3.a.



4. Tree and Debris Removal

- a. What will happen with the tree lumber and related wood chips? Will they be taken to a landfill?

Yes a class 2 landfill.

- b. Why not partner with a large nonprofit (American Forest, Greening of Detroit, etc.) to establish a mill on vacant land near the site?

- i. Consider the sale of milled lumber, firewood and wood chips and use those proceeds for short- term tree care and intervention and escrow additional funds for tree removal at a later date, thereby reducing the urgency to spend funds now.

See answer D.3.c.

5. What is the status of the EPA project? Answers provided to date are not adequate. If the City does not implement this project immediately and waits for the Section 205 process to be complete, including the

construction of flood protection, it will be more than a decade and not implementing the project now could result in a loss of funds.

This has been discussed a various community meetings. The EPA project is not on hold at the request of the city, rather the EPA understandably made the decision to pause the project until they had more information on how the flood mitigation strategies would affect their investment into the project. We have encouraged the EPA to move forward with construction multiple times since 2019, providing a signed letter stating the flood mitigation would be designed around their project if already constructed. Based on the most recent information EPA's Amber Faulkner provided at the Detroit River PAC meeting March 11th, it sounds like they may be pursuing this route to begin construction before the Sec. 205 process. When their construction moved forward it will be welcome in AB Ford Park.

- a. Why is it not included in this phase of the project?

The EPA project for the AB Ford site was estimated around \$4 million, we do not have the additional funds to construct their project, nor did it seem economical to provide that funding when the EPA have earmarked money for it to be implemented.

- b. If the EPA project were designed or necessarily modified to ensure its northern shore will be built to the apparently prescribed to the 580' NADV might it proceed as part of a strategy to remove the community from the floodplain?

The Army Corps and FEMA determine the floodplain, they would need to evaluate the project to make that determination.



6. If the EPA project were allowed to proceed, an upland excavation that would later be converted to the habitat restoration could serve as a dock to deliver the large quantity of soil necessary by barge. Might this alternative be explored?

As stated above, it is not feasible for the city to take on the excavation of the EPA project, especially without knowing the exact timeline their project will move forward. The City explored the idea of bringing soil in via barge, however additional costs and permitting made it unfeasible. Trucking the soil to the site is the most economic and efficient option for this project.

7. Why aren't the best management practices (BMP) and the green storm infrastructure (GSI) similar to what was implemented on the western portion of the site being used for the parking area to the east?

The east side parking lot is not being redesigned or reconstructed, it will be resurfaced in its current configuration, so we do not have the ability to redirect stormwater. Additionally, we do not have the funding for this.

8. Is the 140 linear feet of seawall replacements along the Detroit River proposed in the Giffels-Webster Project #: 20370.00D, procured by the DBA in September included in this work?

The seawall is not being replaced, only repairing the existing wall's tiebacks that have failed causing the damage we see today. The repair will be completed under a separate contract yet to come before council, but in the same construction period as this project. Contractors will coordinate and sequence the work in an appropriate manner.

- a. If so, if the EPA project proposes to remove those seawalls and large quantities of soil for the lagoon, shouldn't efforts be made to save on the overlapping of the expenditures and waste of money?

The seawall and riverwalk now is a safety hazard. As stated in previous responses, we do not know the exact timeline of the EPA project and found it pertinent to make limited but necessary repairs for the safety of park users. Similar to repairing a pothole on a road that is awaiting replacement.

- b. What other seawall repairs and/or replacements along Lakewood Canal are proposed as part of this project? Please provide specific locations and proposed specific design solutions.

GSD does not have information on the seawall contract scope except the portion pertaining to AB Ford Park.

9. Questions related to the floodplain.

- a. Since the 100-Year Floodplain Map bisects the park in a southeastern trajectory, what efforts are being made to ensure that the proposed work will not detrimentally impact, but rather serve as an element of necessary flood protection?



The addition of 2' of soil will raise the grade across the entire park, making most of the park above the 580' requirement. We are hoping the park will now be considered 'high ground' similar to other portions of the park and assist in removal from the floodplain, however only FEMA can make that determination.

- b. Given that most of AB Ford Park is at an elevation higher than the residents that are adjacent to it at the north, what efforts are being made to ensure the proposed changes in grade and topography will not detrimentally impact those residents that are in the floodplain?

We will be grading the soil to existing drainage structures along the north edge of the park to gather any runoff before reaching adjacent property. We will be meeting with and working directly with property owners who abut the park to address this.

- c. What efforts are being made to ensure the additional dirt being delivered will not detrimentally impact the floodplain in other ways?

Please see answer D.9.a.

- d. Is the proposed work engineered in a manner that meets performance standards including stability, seepage and settlement necessary to ensure it can provide flood protection?

Yes, professional engineering services for the project were provided by Giffels Webster. However, it is not an engineered levy/berm.

- e. Drawings and specifications showing the engineered fill that complies with flood protection requirements as well as specific pre- and post-construction contours would aid in understanding compliance and the addressing of these concerns.

Drawings can be reviewed and discussed in office hours.

10. It had been suggested that ARPA funds were being used to implement this project. GSD officials noted on the February 29 virtual meeting that there is no deadline to use the funds. Please confirm the source of funds.

- a. If ARPA funds are to be used, what is the deadline to obligate and spend those resources?

The remediation contract is not ARPA funds, however the Phase 1 park amenities construction is ARPA funded. The ARPA funds must be spend by June 2025. The park should be completed and funds spent in Spring of 2025 when the park reopens.

- b. If there is no deadline to use the funds, why not phase the project, allowing for continued, but limited use and access while also making sure this project does not harm the community as it relates to both short and long-term environmental impacts.

Legally we are required and obligated to remediate the park as soon as possible. The Phase 1 park amenities cannot begin construction until the remediation takes place as they are most 'surface level' improvements (playgrounds, walkways, plazas, etc.). We need the remediation to be completed with enough time to construct these improvements before the deadline.



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11. Jefferson East has announced that they are suspending the Jazzin' at The Vanity festival and hope to move it to the park, where the Concert by the River Series was hosted decades ago. What if any accommodations for the return of that event should be considered and can accommodation for that be done now, why the various improvements are being implemented?

The planned park amenities include the addition of four new picnic shelters, two of them being large event shelters, as well as a central event lawn area to accommodate large gatherings or events. New walkways and an extension of the Riverwalk to Lakewood st. will allow easier pedestrian access to the park. We look forward to welcoming events such as Jazzin' at the Vanity and others to the park when it reopens in 2025.

Please do not hesitate to contact me directly with any questions or concerns.

cc: Crystal Perkins, Director – General Services Department
Stephanie Washington - Mayors' Office
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