



The City of Detroit Housing & Revitalization Department (HRD) is serving as the Responsible Entity (RE) for the Brewster Wheeler Phase I-III and the Sanctuary at Brewster projects, funded by the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City of Detroit has assumed HUD's environmental review responsibilities for the project. HRD is conducting a review of this project to comply with Section 106 of the National Historic Preservation Act, and its implementing regulations 36 CFR Part 800, under a [Programmatic Agreement with the Michigan State Historic Preservation Office and Advisory Council on Historic Preservation](#).

### **Project Scope:**

MHT Housing, Inc. (MHT) proposes to construct the Brewster Wheeler I, Brewster Wheeler II, Brewster Wheeler III, and The Sanctuary at Brewster projects as Phases I-IV (respectively) of a five-phase affordable housing development project. Phase V consists of the historic rehabilitation of the Brewster Wheeler Recreation Center, which is currently underway using non-federal funds. Collectively, Phases I-IV will include four four-story buildings, parking lots, sidewalks, picnic shelters, outdoor activity areas, and landscaping between these features. The proposed Projects are located in the City of Detroit, Wayne County, Michigan, in the Brush Park area of the city, also known as 2900 Saint Antoine St. The Project Areas consist of fenced, vacant land in an urban setting, with maintained grass cover.

Excavation for construction will occur to an approximate depth of 1.2 m (4 ft) for footings for the new buildings' slab foundations, 1.8 m (6 ft) for elevator pits, and approximately 3.7 m (12 ft) for utilities. Surface grading will occur throughout all four Project Areas for parking lots, sidewalks, picnic shelters, outdoor activity areas, and landscaping. Due to soil contamination, approximately 1.2 m (4 ft) of soil will be removed from below the proposed building foundation and 0.9 m (3 ft) throughout the remaining portion of the Sanctuary at Brewster Project Area. Contamination mitigation for the Brewster Wheeler I, II, and III Project Areas is still in development and subject to review and approval by the Michigan Department of Environment Great Lakes and Energy (EGLE) but is anticipated to be similar to the mitigation outlined for The Sanctuary at Brewster.

### **Previous Consultation Conducted:**

On March 25, 2024, the Michigan State Housing Development Authority (MSHDA) initiated Tribal Consultation for the Sanctuary at Brewster (Phase IV of development). Invitations were sent to: The Forest County Potawatomi Community, Wisconsin, Hannahville Indian Community, Michigan, Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan, Little Traverse Bay Bands of Odawa Indians, Michigan, Menominee Indian Tribe of Wisconsin, Miami Tribe of Oklahoma, Pokagon Band of Potawatomi Indians, Michigan and Indiana, Sault Ste. Marie Tribe of Chippewa Indians, Michigan, and Seneca Cayuga Nation, Michigan. The Forest County Potawatomi Community THPO responded with a finding of No Historic Properties affected of significance to the FCPC and requested to remain a consulting party to this development. The Pokagon Band of Potawatomi THPO provided the determination that the project will have No Adverse Effect on any historic, religious, or culturally significant resources to the Pokagon Band of Potawatomi Indians and requested to be contacted if cultural resources were uncovered during construction.

On October 14, 2024, The Housing & Revitalization department initiated tribal consultation for the Brewster Wheeler Phases of the development and notified Tribes of the adverse effect determination. No additional responses were received.



### **Funding:**

At this time, all sources of Federal funding are not yet verified; however, Sanctuary at Brewster is expected to receive MSHDA CERA, Low Income Housing Tax Credits, and Project Based Vouchers (PBV's) and City of Detroit HOME-ARP funds. The Detroit Housing Commission (DHC) has committed Project Based Vouchers (PBVs) to the Brewster Wheeler I-III Developments.

In July 2024, MHT submitted applications for the Brewster Wheeler Phases I-III for consideration for City of Detroit HOME Funding. The City of Detroit also serves as the Responsible Entity for DHC PBV's and has taken the position as leading agency for the ongoing Section 106 consultation related to this development due to our funding commitments across all phases of development.

### **Archaeology Investigation Adverse Effect Summary:**

Historic research and field investigation, conducted by professional archaeologists with the Mannick & Smith Group, have identified and defined several archaeological sites in the project area. Together, these sites comprise the Brewster Wheeler Archaeology District, which has been determined eligible for listing on the National Register of Historic Places (NRHP) by the City of Detroit HRD and Michigan's State Historic Preservation Office. The district is eligible under NRHP Criterion A for its association with events that have made significant contribution to the broad patterns of our history, district is significant for its association with multiple local and national historic contexts, including the following themes:

- Industrial Growth, ca. 1850-1950
- European Jewish Immigration and Community in Detroit, ca. 1840-1950
- The First Great Migration, African American Migrants, and Paradise Valley, ca. 1910-1950
- Federal Public Housing Development and the Interstate Highway System, ca. 1935-1960
- Federal Public Housing Decline and Community Disinvestment, ca. 1960-2014

The district is also eligible under NRHP Criterion D for the potential for its archaeological deposits to yield important data regarding middle-class and working-class immigrant and African American lifeways in Detroit from the mid-19th through mid-20th centuries.

Based on the archaeological work conducted to date, the period of significance for the Brewster Wheeler Archaeological District has been identified as 1850-1970.

**The city will be utilizing its existing [Programmatic Agreement-Appendix F- Mitigation Measures](#) to define the parameters of a memorandum of agreement between the federal funders, developer, SHPO, and consulting parties.**

If you would like additional information or would like to participate in the development of the memorandum of agreement, please reach out to Tiffany Ciavattone, Principal Preservation Specialist, [ciavattonet@detroitmi.gov](mailto:ciavattonet@detroitmi.gov).