



CITY OF DETROIT PUBLIC ACTION PLAN FOR COMMUNITY DEVELOPMENT BLOCK GRANT - DISASTER RECOVERY (CDBG-DR)



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**Julie Schneider, Director
Housing and Revitalization Department
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 908
Detroit, MI 48226**



Mayor, Mike Duggan

**Prepared by: Housing and
Revitalization Department
(HRD)**

Submitted to HUD 4/4/25

¹ WXYZ Detroit – “Photo Gallery – Major storms cause flooding across Metro Detroit”

ACTION PLAN CHANGE LOG

Version (Date)	Summary of Changes Made	Substantial or Nonsubstantial

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I. EXECUTIVE SUMMARY

Overview

The U.S. Department of Housing and Urban Development (HUD) awarded the City of Detroit, through its Housing and Revitalization Department (HRD), \$346,864,000 in funding to support long-term recovery efforts following 2023 Presidential Major Disaster Declaration (federal disaster declaration FEMA #4757 - Michigan Severe Storms, Flooding and Tornadoes). The Allocations for Community Development Block Grant Disaster Recovery (CDBG-DR) and Implementation of the CDBG-DR Consolidated Waivers and Alternative Requirements Notice, also known as the Allocation Announcement Notice (UN AAN) published January 16, 2025, made funds available to the City of Detroit by the Disaster Relief Supplemental Appropriations Act, 2025 (Public Law 118-158 also known as the “Universal Notice”) approved on December 21, 2024.

Community Development Block Grant- Disaster Recovery funding is designed to address needs that remain following a Presidentially Declared Disaster after all other assistance has been exhausted. This plan details how funds will be allocated to address the remaining unmet need in Detroit, Michigan. To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for quicker recovery.

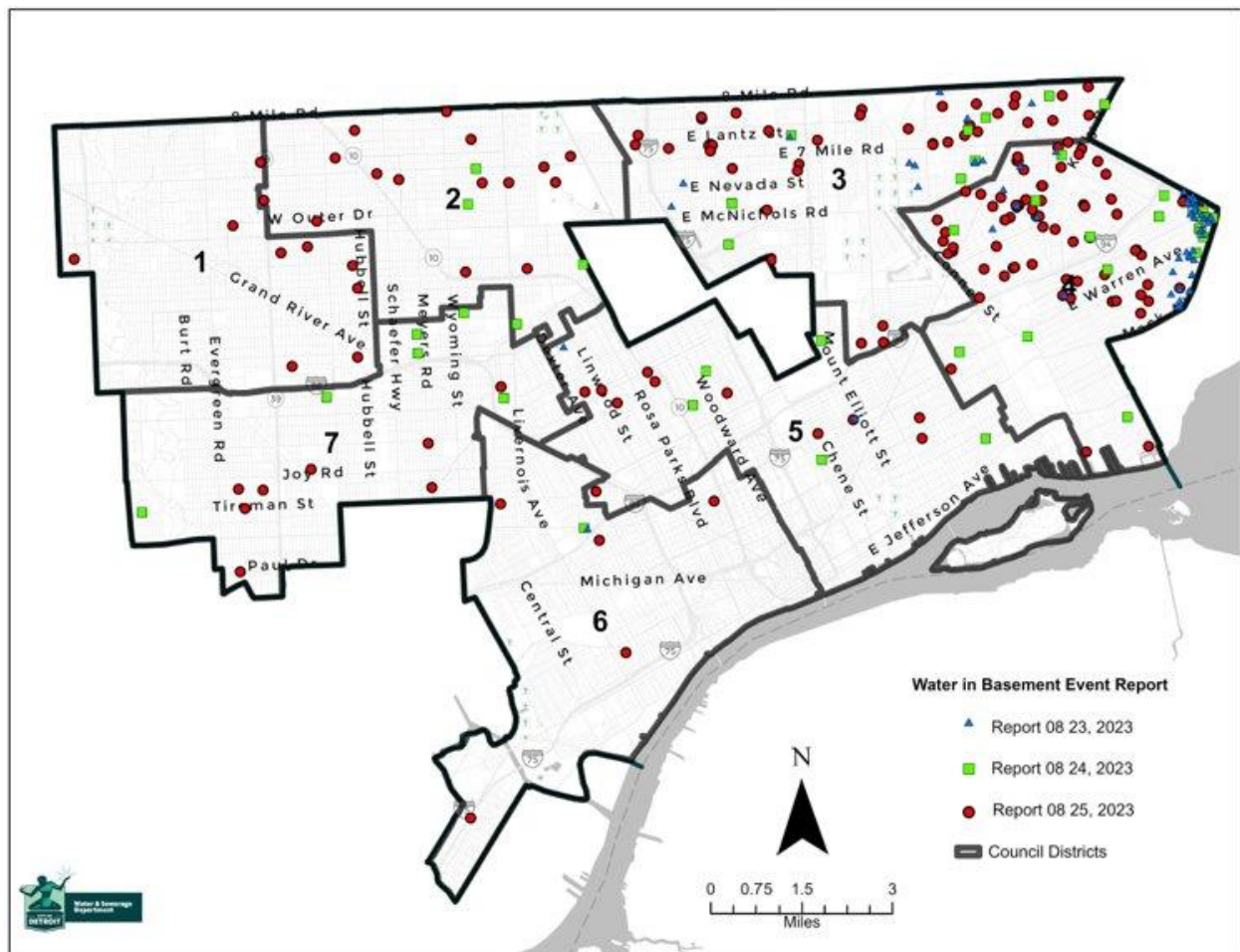
In January 2025, HUD allocated \$346,864,000 in CDBG-DR funds to the City of Detroit, Housing and Revitalization in response to 2023 Presidential Major Disaster Declaration (federal disaster declaration FEMA #4757 - Michigan Severe Storms, Flooding and Tornadoes), through the publication of the “Universal Notice” in the Federal Register, Vol. 90, No. 5, January 8, 2025 (Updated March 19, 2025). This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025 (Public Law 118-158) approved on December 21, 2024. (These CDBG-DR funds are for necessary expenses for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 United States Code [U.S.C.] 5301 et seq.3 (HCDA)) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the “most impacted and distressed” (MID) areas resulting from a qualifying major disaster in 2023.

To fulfill the requirements of this allocation, the City of Detroit must submit to HUD an Action Plan for Disaster Recovery that identifies its unmet recovery and resilience needs. This Action Plan outlines the proposed use of CDBG-DR funds and eligible activities available to assist impacted Detroit neighborhoods to meet unmet housing, infrastructure, planning, and other needs that have resulted from the impacts of subsequent flooding events due to heavy rains.

Specifically, this plan aims to promote and ensure access to housing for low-to moderate income residents, and strengthen neighborhoods impacted by the disaster by investing in housing and infrastructure.

Disaster Specific Overview

On August 24-26, 2023, Detroit experienced a 1 in 25-year rainstorm (0.01% probability), resulting in 2.4 inches of rain in a 1-hour period in some areas of the city. The average across the city was 1.5-3 inches of rain in 4 hours. ²This amount of rain exceeded the capacity of the city's infrastructure, which was designed to withstand 1.5-3 inches of rain in a 24hr period and was the root cause of flooding. The city estimates that around 5,000 households (majority low-to-moderate income) were directly impacted by the disaster.



Water in Basement Event Report

Detroit Water and Sewerage Department report demonstrating water in basement reports from Detroit residents during the storm

The storm, which produced the torrential downpour, led to flooding on streets and freeways, as well as flooding in residential and commercial basements. In addition, flooding impacts also

² From the Great Lakes Water Authority (GLWA) Rain Gauge Data

included collapsed sewer lateral service lines coming from single-family residences and capacity/failure to function issues with the city's combined storm water and sewer system.

The following conditions were not the primary cause of the flooding, but can be deemed as critical factors that exacerbated the impact based on analysis performed from previous flood events (including the most recent Presidentially Declared Disaster #4507 in June of 2021)-

- **Limited Storm Water & Sewer Capacity** - The City's combined storm water and sewer system was only designed to handle a 10-year storm, and the city was impacted by a 1 in 25-year storm event.
- **Insufficient Green Stormwater Infrastructure** - The City has limited green storm water infrastructure, and the infrastructure in place was not designed for this level of rainfall.



Historical Photo of Detroit Sewer System

The City of Detroit's sewer lines were installed anywhere between 70-90 years ago and are unable to handle the amount of rainfall from rainstorms in the more recent decades.

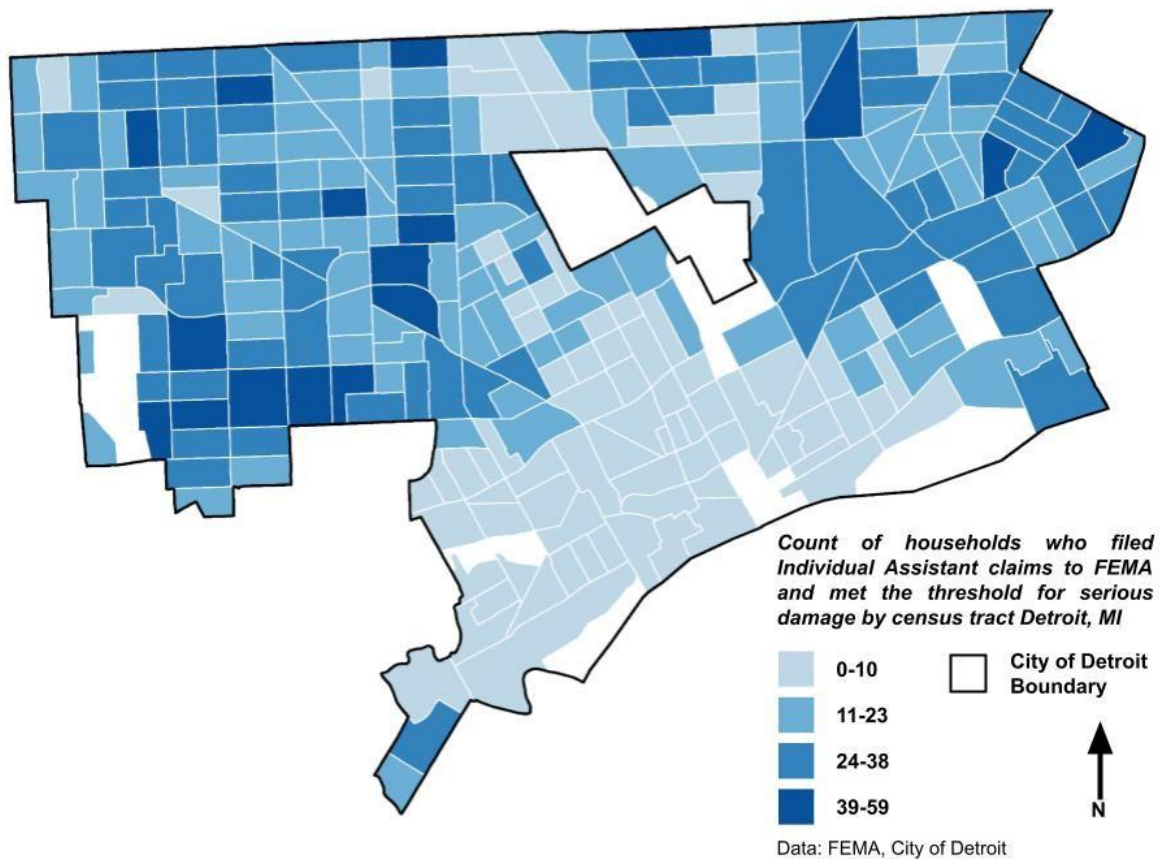
Most Impacted and Distressed Areas

HUD Identified MID Areas

HUD has identified the entire City of Detroit as a MID “Most Impacted and Distressed” area. In accordance with HUD guidance, the City of Detroit analyzed the impacts of the disaster to identify the level of citywide damage, which will be used as the basis for an unmet needs assessment and identification of priorities for CDBG-DR funding. During the storms on August 25-26, 2023, more than 2.4 inches of rain fell in a 1-hour period in some areas of the city, causing flooding of homes, businesses, streets, and highways.

Overview of the Impacts of the Qualifying Disaster

Based on the calculation of unmet needs provided by HUD utilizing FEMA Individual Assistance (IA) data, majority of the total unmet need for Detroit for the disaster equated to unmet Housing needs. That assessment correlated to the amount of FEMA Individual Assistance Claims received as a result of the disaster. There were 89,872 households who registered for FEMA IA, of which 77,904 households registered found to have some damage, almost all of which was basement flooding. Of the 77,904 households, 5,003 met the HUD threshold for seriously damaged. The City is waiting for complete information on for the FEMA IA data, but as a result of early data received, **the City of Detroit has identified housing and infrastructure that supports housing as key activities for addressing the unmet needs.**



This map shows households who filed Individual Assistant claims to FEMA and met the threshold for serious damage.

The City has identified additional needs based on pre-disaster data. The level of unmet needs is significantly greater than the amount of funding available. Therefore, the City proposes activities that align with accessible funding and activities closest to the impacts of the disaster.

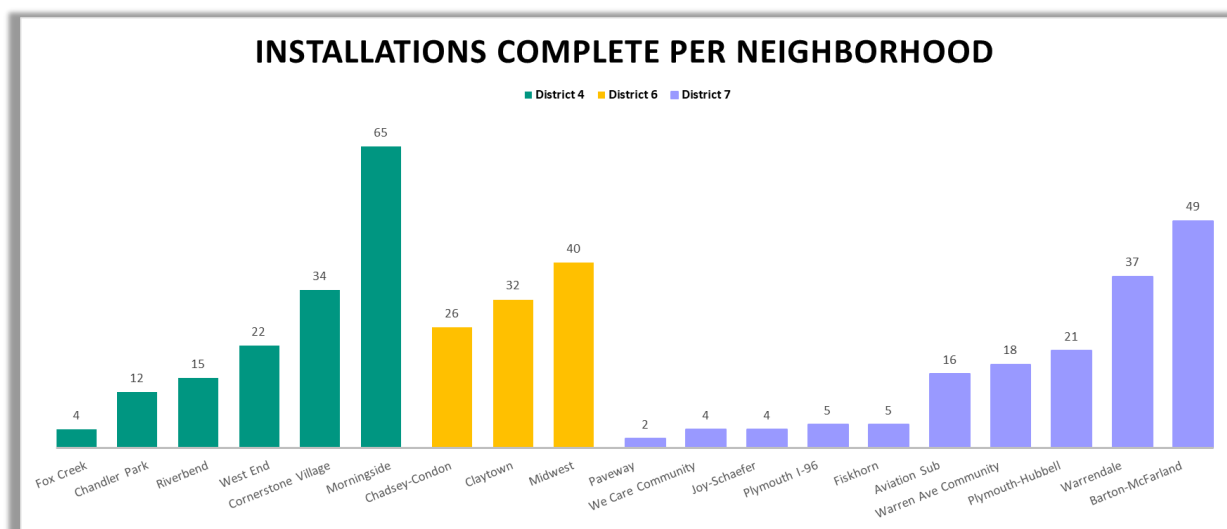
The City, through its Housing and Revitalization Department (HRD), anticipates delivering the proposed activities in coordination with the Detroit Water and Sewerage Department (DWSD), Detroit Department of Public Works (DPW), Detroit Housing Commission (DHC) and their contractors, subrecipients and developers.

The primary objective of this plan is to meet the needs of low- and moderate-income neighborhoods by preserving, rehabbing and/or constructing affordable housing units in the City of Detroit. Furthermore, the city proposed investing in infrastructure and public facilities activities both for recovery and mitigation, to provide flood protection and prevent such impacts from happening again in the future.

During the August 24-26, 2023, rain event, up to 2.4 inches of rain took several days to recede from basements and streets. In Michigan, specifically in Detroit, most families use their

basements as family rooms or recreation areas and for storage, including for some of their most cherished belongings. Not only did the homes have basement backups in August 2023, but Detroit neighborhoods also had backups in June 2021 and June 2016 after a heavy rainstorm, and several neighborhoods across the city experienced basement backups and flooding in August 2014, with a rainfall of 4.57 inches.

However, due to the number of low-to-moderate income households in the city, most residents that continue to have basement backups are unable to install a backwater valve and maintain their sewer lines, which is why the City launched the Basement Backup Protection Program (BBPP) in May 2022 (funded with \$6.4MM in American Rescue Plan Act funding) and the Private Sewer Repair Program (PSRP) in January of 2024 (funded with \$43MM of 2021 CDBG-DR funding). The impacts of these programs will increase the resilience of the single-family housing stock and decrease city-wide repetitive loss. The BBPP program served 704 households in 11 target neighborhoods. The City continues to serve residents through the PSRP by repairing or installing new sewer laterals for eligible households. As of February 2025, the PSRP program has served 404 households, with a goal of 1,500.



PSRP Installations completed per neighborhood as of February 2025





Before, During and After photos of PSRP work in the City of Detroit.

Table 1A: Disaster Overview

Disaster Summary	
Qualifying Disaster:	Michigan Severe Storms, Tornadoes and Flooding (DR-4757-MI)
HUD-identified MID Areas:	City of Detroit, Michigan
Grantee-Identified MID Areas	N/A

Table 1B: CDBG-DR Allocation Overview

CDBG-DR Allocation Overview:	
CDBG-DR Allocation:	\$301,621,000
CDBG-DR Mitigation Set Aside:	\$45,243,000
Total Allocation:	\$346,864,000

Unmet Needs, Mitigation Needs

Table 1C: Unmet Needs and Proposed Allocations

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD identified MID Areas	Estimated % to LMI
Administration	\$17,343,200	5%			
Planning	\$2,000,000	1%	0%		
Housing	\$73,000,000	21%	0%	100%	100%
Infrastructure	\$209,277,800	60%	0%	100%	100%

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD identified MID Areas	Estimated % to LMI
Economic Revitalization	0%	0%	0%	0%	0%
Public Services	0%	0%	0%	0%	0%
Exempt Public Services	0%	0%	0%	0%	0%
CDBG-DR Mitigation Set-Aside	\$45,243,000	13% ³	13%	100%	100%
Total	\$346,864,000	100%	13%	100%	100%
% of Total	100%	100%	13%	100%	100%

II. UNMET NEEDS ASSESSMENT

Evaluate the Impacts of the Three Core Aspects of Recovery

The City of Detroit, through its unmet needs assessment, identified various unmet disaster recovery needs, especially related to Housing and Infrastructure. ***It is important to note that the City used local data, and as additional data from federal sources are shared, the City will update its Unmet Needs Assessment accordingly.*** Many residential neighborhoods and public facilities experienced basement backups due to a variety of factors, including but not limited to, rain events beyond the capacity of the existing public sewer system and private infrastructure such as collapsed or cracked sewer lateral service lines attached to houses. These issues can exacerbate a significant rain event that causes basement backups. In addition, the city experienced flooding of highways and streets due to aging infrastructure and documented changes in precipitation patterns. Public facilities such as emergency shelters experienced flooding which forced some shelters to close and move to temporary locations.

Housing

While the disaster led to many unforeseen circumstances for Detroit residents, the housing unmet needs predate the date of the disaster. While housing costs in Detroit are low compared to the surrounding region, housing affordability remains a major challenge due to the lower

incomes of many Detroit households. Rents have grown by an average of 4.5% annually in Detroit since 2019. Median gross rent was \$1,043 in Detroit in 2023, compared to \$1,183 in the Metro Detroit area and \$1,406 nationally. This rent growth outpaces growth in median income, making affordable housing options increasingly unattainable for the lower-income Detroit families. Around 60% of renters in Detroit are considered extremely low-income and earn \$35,000 or less annually. In 2023, 39% (roughly 100,000) of Detroit households were cost burdened (meaning they paid more than 30% of their income on housing) at the time of the disaster (ACS 2023). Extremely low-income households are disproportionately impacted by rising housing costs, leaving fewer resources for other critical expenses such as food, transportation, and childcare. Consequently, disaster recovery expenses fell on homeowners and renters already experiencing economic hardships.

<u>Housing Cost Burdened Households by Income (ACS 2023)</u>			
<u>Household Income</u>	<u>Cost Burdened</u>	<u>Not Cost Burdened</u>	<u>Cost Burdened %</u>
<\$20,000	<u>52,249</u>	<u>3,943</u>	<u>87%</u>
\$20,000-\$34,999	<u>26,268</u>	<u>16,438</u>	<u>62%</u>
\$35,000-\$49,999	<u>13,089</u>	<u>22,541</u>	<u>35%</u>
\$50,000-\$74,999	<u>6,630</u>	<u>29,571</u>	<u>18%</u>
\$75,000+	<u>2,085</u>	<u>60,417</u>	<u>3%</u>

The scale of housing challenges related to the disaster were exacerbated by the age of the housing stock in Detroit. More than 58% of the housing stock in Detroit was built prior to 1950 and 92% was built prior to 1980. Housing units of this age were generally not built with disaster/weather related resiliency design considerations. Further, the infrastructure built/installed at the time of housing construction has aged and is prone to failure when stressed by extreme weather events. As this housing stock faces high incidences of deferred maintenance, investments are needed to prevent new vacancies and reduce unsafe living conditions for residents.

<u>Timeframe Built</u>	<u># of Units</u>	<u>% of Total Units</u>
<u>2000 or later</u>	<u>13,620</u>	<u>4%</u>
<u>1980-1999</u>	<u>13,722</u>	<u>4%</u>
<u>1950-1979</u>	<u>109,674</u>	<u>33%</u>

<u>Prior to 1950</u>	<u>195,245</u>	<u>59%</u>
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Detroit has approximately 25,000 rental housing units that are rent- and income-restricted to serve as affordable housing for extremely low- to low-income residents (approximately 20% of rental housing units). Households in these units may be at risk as the subsidy/restrictions expire, and/or the limited cash flow contributes to deferred maintenance and deterioration over time. HRD is currently tracking 2,400 regulated affordable housing units that are at risk of losing affordability restrictions over the next five years including expiring LIHTC units and Section 8 contracts up for renewal.

To meet substantial needs, Detroit must not only preserve its existing affordable housing but add supply through new housing production. The cost of construction in Detroit has been historically high relative to other parts of the state, and recent challenges such as construction costs that have increased by 41% since 2021 and interest rates that have increased by more 4.5 percentage points from 2022 to 2024 have exacerbated the problem. With few exceptions, all new housing construction requires subsidies, and the finite subsidy tools available currently limit production.

Emergency Shelters, Interim, and Permanent Housing

Disaster recovery must consider the needs of people experiencing homelessness as many formal supports (shelters and supportive services) and informal supports (e.g., community resource sharing) may be impacted. To review the unmet need for homelessness in Detroit, the 2023 Point in Time count was reviewed. The Point In Time (PIT) count measured the number of sheltered and unsheltered people experiencing homelessness on a single night in Detroit (2023 Detroit Continuum of Care Point-in-Time Count Detailed Data Report)⁴.

As shown in the table below, the City of Detroit could estimate on any given night in 2023, 1,280 or more people are experiencing sheltered homelessness, 1,069 staying in emergency shelters and 211 transitional housing. The Detroit Continuum of Care (CoC) is required to conduct an unsheltered Point-in-Time count every other year and was not required to complete one in 2023, however in 2022 there were 202 or more people experiencing unsheltered homelessness- living on the street, or staying in a place not meant for human habitation (2023 Detroit CoC Point-in-Time Count Detailed Data Report).

⁴ 2023 Detroit CoC Point-in-Time Count
<https://static1.squarespace.com/static/5344557fe4b0323896c3c519/t/6466684d3cc8374754b7f6d7/1684432974058/2023+Detailed+PIT+Report+Finaldg.pdf>

City of Detroit Point in Times Count Results 1/26/2023

City of Detroit Point in Times Count Results 1/27/2021				
	Sheltered			
CoC	Emergency Shelter	Transitional Housing	Unsheltered	Total Households
2023	1,069	211	N/A*	1,280
2022	1,279	210	202	1,691

*An unsheltered PIT Counts was not conducted in 2023 due to it being required every other year. An unsheltered PIT was conducted in 2022.

City of Detroit Total Year-Round Housing Inventory Count by CoC

City of Detroit Total Year-Round Housing Inventory Count by CoC			
CoC-501	Emergency Shelter Beds	Transitional Housing Beds	Total Beds
2023	1,019	234	923
2022	991	279	1,270

Source: 2023 Detroit CoC Housing Inventory Count, Summary Data Report⁵

It is important to note, the City of Detroit does not operate any homeless shelters. However, several are Subrecipient non-profit organizations that receive CDBG public service and Emergency Solution Grant (ESG) funds that provide emergency homeless prevention by way of transitional housing for the most vulnerable population. This plan proposes supporting Emergency Shelters improvements as a public facility activity.

Public facilities such as emergency shelters experienced flood damage. In 2023, the City of Detroit funded 959 emergency shelter beds, consisting of 14 year-round shelters and 3 warming centers. The 2023 disaster impacted several emergency shelters. Three shelters sustained damage to their buildings that did not result in a loss of beds but changes in operations such as having to relocate where meals were served, residents being unable to do laundry until the flooding was fixed, and areas of the building that couldn't be accessed. An additional shelter had damaged supplies and furniture which had to be disposed of.

Recognizing the City's long and well-documented infrastructure challenges, as well as its ongoing efforts to mitigate future flooding in our most vulnerable areas, the City of Detroit is committed to rebuilding resiliently. In assessing unmet needs, it is important to consider the additional costs of safeguarding housing and community development investments from future disasters. It is especially important to support shelters as they have limited options for

⁵2023 Detroit CoC Housing Inventory Count, Summary Data Report chrome-
https://static1.squarespace.com/static/5344557fe4b0323896c3c519/t/6466673283fa8734f3a8c764/1684432690419/2023+DETROIT+COC+HIC+SUMMARY+W+CHRONIC+DETAILS_.pdf

rehabilitation funding and are operated by non-profits who may struggle with capital campaigns.

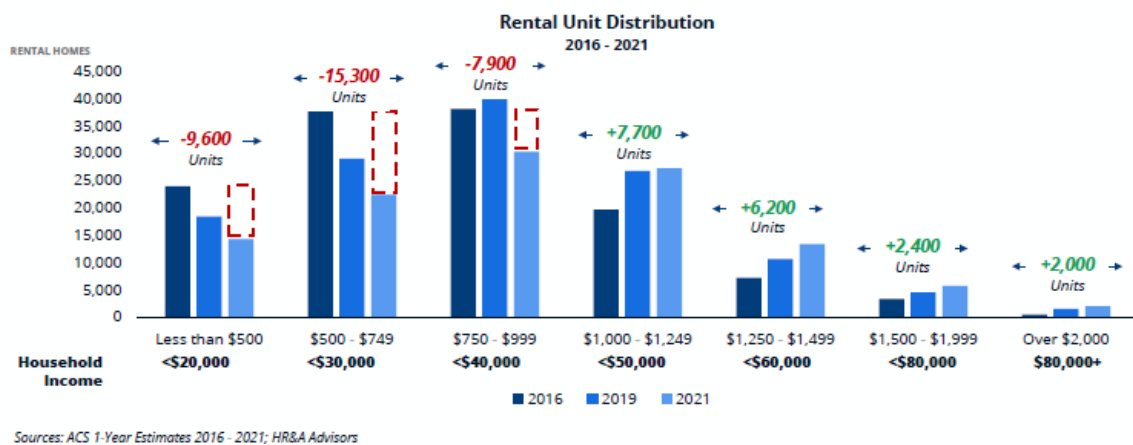
Rental and Owner-Occupied Single Family and Multifamily Housing

The housing stock in the City of Detroit is comprised overwhelmingly of detached, single-family houses. ACS 2023 data estimates show that roughly 71% of Detroit's housing stock was single-family houses, nearly all of which were detached dwellings. Detached duplexes are also a standard of Detroit's housing typology, but the ACS found that duplexes accounted only for another 5.4% of the overall stock. Single-family homes are most distressed stock and most susceptible to becoming obsolete after a flooding event.

However, unlike typical detached single-family neighborhoods across the United States, in Detroit, many residents of such neighborhoods rent. This is in large part an outcome of the foreclosure crisis and Great Recession. In 2021, an estimated 49% of occupied Detroit housing units were renter-occupied.⁶

The number of low- and moderate-income cost burdened renter households has nearly doubled since 2010. While extremely low-income renter households have declined, it may be indicative of their inability to find affordable housing within the city. Rent growth rate in the city is larger than the Metropolitan Statistical Area (MSA). Between 2019-2021 the City of Detroit annual rent growth was 4.5% while the MSA was only 4.0%.

Renters earning less than \$35,000 face a substantial rental supply gap. Between 2016 and 2021 the City of Detroit lost over 32,000 rental units affordable to low-income families earning less than \$40,000 annually.



⁶ [US Census Bureau](#). 2021 American Community Survey

The City is losing the low rent and naturally occurring affordable housing units. These units have deferred maintenance in general, and flooding events likely cause low rent units to go vacant.

The proposed activities will improve access to safe and healthy housing for low-to-moderate (LMI) people who otherwise do not have access to the resources to prevent the impacts of disasters such as these. LMI Detroit residents can face unique challenges and have more difficulty responding to disaster events than the general population due to physical and financial capabilities, health concerns, and location and quality of their housing, among other factors.

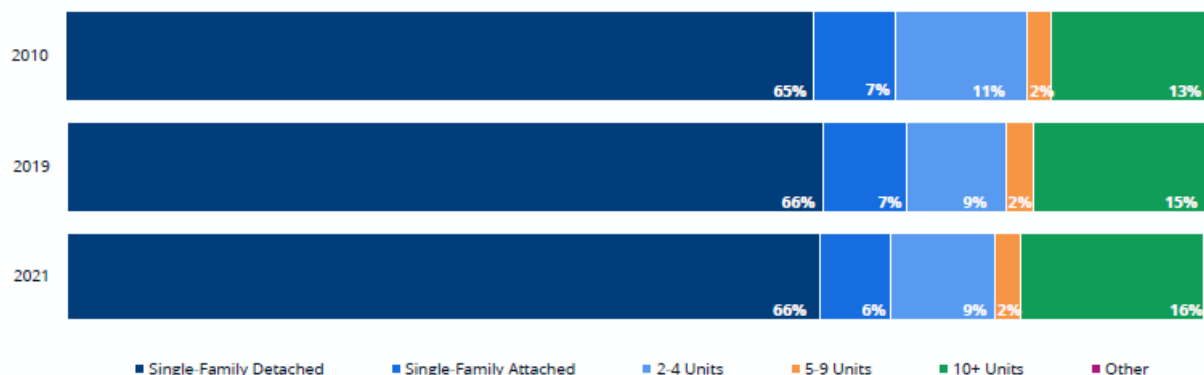
Pre-Disaster Renter and Owner-Occupied Housing for 2023

	Renter - Occupied (#)	Renter - Occupied (%)	Owner - Occupied (#)	Owner - Occupied (%)	Vacancy Rate (%)
City of Detroit	118,290	36%	137,567	41%	23%

Over 22% of Detroit's existing housing stock remains vacant. Single-family detached and attached units make up 54% of renter occupied residential units. Single-family housing continues to be the backbone of Detroit's housing supply, housing over two-thirds of residents.

Detroit's multi-family housing stock has declined over the past decade. These are mostly naturally affordable and often house family households.

Detroit Occupied Housing Units by Typology 2010 - 2021



Sources: ACS 1-Year Estimates 2010-2021

Public Housing (Including HUD-assisted Housing) and Other Affordable Housing

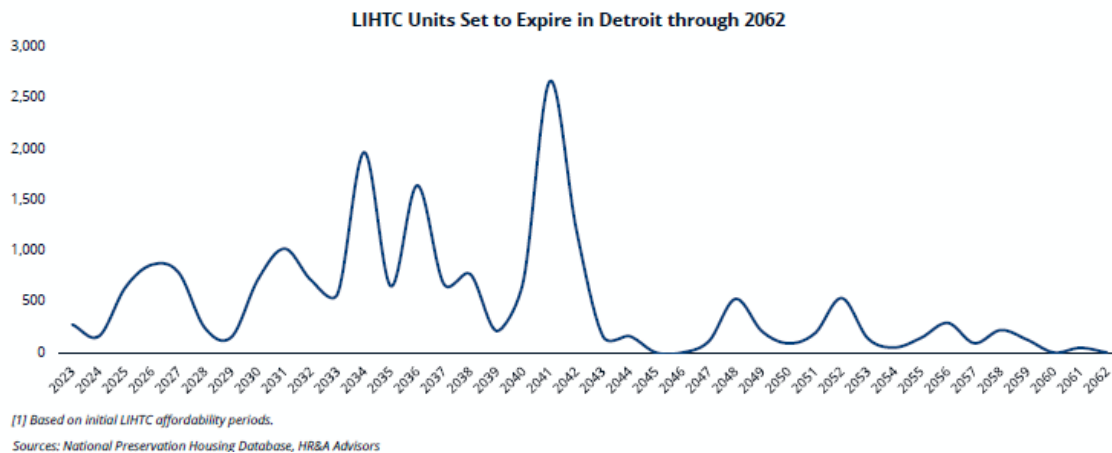
The federal government defines affordable rents as housing costs that do not exceed 30% of a household's monthly income. For renters, these costs include rent and basic utilities (electric, gas and water). There are two basic types of affordable rental housing in Detroit:

- Naturally occurring: This type of housing is not government regulated but is considered affordable to households at market rate because costs amount to less than 30% of their monthly income.
- Regulated: This type of housing is subsidized by government programs to ensure that low-income households do not pay more than 30% of their income on rent, or that rents are restricted at a level that is affordable for low-income households.

There are two broad categories of regulated affordable housing:

- Public Housing: Owned and operated by Detroit Housing Commission.
- Other regulated housing: Privately owned but offer affordable rents for low-income tenants.

The City of Detroit was in the midst of an affordable housing crisis prior to Disaster. Cost burden and lack of affordable housing were identified as one of the housing issues faced by the City. At the time, more than 100,000 households had rent and other expenses exceeding 30% of the household income. The City of Detroit has identified a significant need for affordable units for family households with children and no spouse and for single person households. About 60% of Multifamily naturally occurring affordable housing (NOAH) units are 1-bedroom units. There are limited number of larger NOAH units, challenging the ability of lower-income families in finding housing. In the next five years, nearly 3,000 affordable housing units funded through LIHTC will lose their affordable requirements without further intervention.



Infrastructure

The City of Detroit experienced a 25-year storm in August of 2023. The City's infrastructure is built for a ten-year flood, and the disaster pushed existing systems over their capacity. The Detroit Water and Sewerage Department (DWSD) routinely maintains sewer-catch basin cleanout throughout the city. This is important because there is a combined sewer system where all sewage from residential, commercial, and industrial sources flow to the same place. Fluctuating lake levels add pressure to the sewer system. If there is a rise in lake or river levels, that water may also flow to the sewer system. Changing precipitation patterns, fluctuating Detroit River levels past flood stages, and aging infrastructure present immediate and significant challenges to the combined sewer system.

Detroit's impervious surfaces cause stress on the sewer system by funneling stormwater into sewers instead of absorbing it into the ground. In addition, much of the surrounding counties drain through the City of Detroit, making Detroit the bottom of the water shed. Based on a sample of DWSD customers, approximately one-third of the houses in Detroit have compromised lateral connections. While many key wastewater pumping stations have had upgrades to their electrical supply recently, some still have an inconsistent, weak power supply. Consequently, heavy rain events, like the storm in August 2023, can cause all combined sewage and rainwater to overflow into basements, residential streets, and local highways.

Infrastructure improvements as one of the City's recovery and mitigation projects will be developed in a manner that considers an integrated approach to housing, infrastructure, economic revitalization, and overall community recovery. The City of Detroit will continue to work with Federal, State and neighboring local jurisdictions to provide guidance on promoting a sound short-and-long term recovery plan in the affected areas by coordinating available resources to help in the restoration and recovery of damaged communities. Disaster recovery

presents affected communities with unique opportunities to examine a wide range of issues such as housing quality and availability the adequacy of existing infrastructure.

Economic Revitalization

The disaster's impact on businesses is believed to be less severe than its impact on housing. Early FEMA and SBA claims data show that residential areas comprised a majority of the impact area. In addition, businesses are also more likely to carry insurance for the damage they incurred. As data is received related to economic development impacts, this Action Plan will be updated to reflect that information. ***The City of Detroit requested data from the Small Business Administration, and will update this plan to reflect that data as soon as it is made available.***

The hardest hit areas of the MID were residential neighborhoods, not job centers or entertainment destinations. Most economic activity in Detroit neighborhoods is retail-oriented, a sector that has suffered for decades dating back to the mid-1900s when retail flight followed a significant population shift to suburban cities and townships. Since then, institutional barriers in the financial industry and elsewhere have suppressed the retail economy in Detroit. As a result, retail businesses in Detroit neighborhoods are few and Detroiters often shop in the suburbs or online to meet their needs. Hence, the impact of the disaster on businesses was limited.

Table 2A: Quantified Disaster Impacts and exacerbated Pre-Existing needs of Housing, Infrastructure, and Economic Development, Other Financial Assistance, and Remaining Unmet Need

Cost Categories	A Direct and Indirect Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Rental Housing*	\$30,296,942,000.00	\$25,000,000.00	\$30,271,942,000.00
Owner-Occupied Housing**	\$27,500,000.00	\$0	\$27,500,000.00
Infrastructure***	\$1,200,000,000.00	\$0	\$1,200,000,000.00
Economic Development	Unknown	Unknown	Unknown

Total	\$31,524,442,000.00	\$25,000,000.00	\$31,499,442,000
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Estimated Affordable Rental Housing Unmet Need*		
Number of Cost Burdened Households	100,321	ACS 2023
Average Cost of Affordable Housing Unit	\$302,000	HRD analysis of recent multifamily development activity (studio, 1-Br, 2-Br)
Total Cost of Unmet Affordable Housing Need	\$30,296,942,000	Cost burdened households x average unit cost
Average gap financing required	\$40,200	HRD analysis of recent multifamily development (studio, 1-Br, 2-Br)
Total Cost of Subsidy Needed for Unmet Affordable Housing Need	\$4,032,904,200	Cost burdened households x average gap

Estimated Affordable Homeownership Unmet Need**		
Number of Low- & Moderate-Income Home Purchases Annually (Estimate)	1,100	HMDA & Detroit Future City
DPA per transaction	\$25,000	HRD
Total Cost of Unmet Affordable Housing Need	\$27,500,000	LMI home purchases x DPA

Estimated Infrastructure Unmet Need***		
An estimated 65,400 (30%) of the 218,000 residential sewer connections have varying degrees of failure. The failures are either significantly offset, collapsed, or completely plugged with roots and debris to the extent that trenchless rodding is no longer feasible.	The estimated cost per connection is \$20,000, as majority of these connections are located between 12 to 15 feet deep.	65,400 laterals X \$20,000/ea = \$1,200,000,000

It is important to note that while the City is proposing the majority use of CDBG-DR for infrastructure, even though the unmet needs show housing as the greatest need, the repair and replacement of the infrastructure is important to address the impact of flooding on housing, ultimately supporting the housing unmet needs.

The City of Detroit did not receive any FEMA Public Assistance funds for this disaster.

III. MITIGATION NEEDS ASSESSMENT

As required by HUD, the City of Detroit developed a mitigation needs assessment based in part on the FEMA approved ⁷City of Detroit Hazard Mitigation Plan. This assessment addresses current and future risks, including hazards, vulnerability, and impacts of disasters and identifies appropriate mitigation actions to reduce the highest risks that Detroit faces.

The goal of the Hazard Mitigation Plan (HMP) is to minimize or eliminate long-term risks to human life and property from known hazards by identifying and implementing cost-effective hazard mitigation actions. The City of Detroit's HMP extensively reviews alternatives and designed strategies that would work best for the City. The plan provides carefully considered directions to City government by studying the overall damage potential and ensuring that funds are well spent.

Hazard mitigation does not mean that all hazards are stopped or prevented. It does not suggest complete elimination of the damage or disruption caused by such incidents. Natural forces are powerful, and most natural hazards are well beyond our ability to control. According to the Federal Emergency Management Agency (FEMA), hazard mitigation includes any sustained action taken to reduce or eliminate long-term risk to life and property from future disasters. Every community, including Detroit, faces different hazards and has different interests and resources to bring to bear to address its problems. As there are many ways to deal with natural hazards and many agencies that can help, there is no one solution to managing or mitigating their effects.

Located in southeastern Michigan, Detroit is the largest city in Michigan, and the 26th largest city in the United States in 2020. ⁸Founded in 1701, the city was named the Ville d'Étroit or "City of the Strait" because of its position on the Detroit River. The Detroit River separates the City of Detroit from the City of Windsor, Ontario and serves as an international boundary between the United States and Canada.

Detroit is on the northern banks of the Detroit River and south of Lake St. Clair. The land area of Detroit comprises 138.7 square miles and has an elevation that ranges from 570.52' to 589.94' North American Vertical Datum (NAVD), as measured at the Detroit River.

⁷ Detroit Office of Homeland Security & Emergency Management. *City of Detroit Hazard Mitigation Plan*, January 2022. by Detroit Office of Homeland Security & Emergency Management.2022.https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf

⁸ Detroit Office of Homeland Security & Emergency Management. *City of Detroit Hazard Mitigation Plan*, January 2022.pg 5. https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf

Due to the increase in developments across the City of Detroit, floodplains are impacted which contributes to flooding being a major hazard in Detroit. Prior to the developments, rainfall could more easily simply soak into the ground or slowly find its way to the river. With impervious surfaces the rainfall runs off quickly to the streets and man-made channels and pipes. Floods cause significant damage to public and private property, disable utilities, make roads and bridges impassable, destroy crops and agricultural lands, cause disruption to emergency services, and result in fatalities.

The Detroit HMP developed a risk assessment to rate the likelihood of any disaster harming Detroit. Below charts 1, 2, and 3 illustrate Flooding as the greatest hazard risk for the City of Detroit.

Chart 1. Hazard Risk

Hazard	Potential for Causing Death	Population Affected	Property and Economic Damage	Local Response Capability
Flooding	2	4	4	5
Infrastructure Failure – Energy Emergency	1	4	3	3
Structural Fires	4	2	3	4
Extreme Winter Weather	3	5	1	2
Extreme Summer Weather	2	2	2	2
Hazardous Materials Releases	4	2	2	3
Public Health Emergencies	3	2	1	2
Civil Disturbance	2	2	3	2
Public Transportation Accidents	3	2	1	3
Petroleum and Natural Gas Pipeline Accidents	2	3	2	2
Drought	2	2	0	2
Nuclear Power Plant Accidents	1	2	3	2
Oil/Natural Gas Well Accidents	0	1	3	2
Earthquake	1	1	1	2

⁹ Detroit Office of Homeland Security & Emergency Management. *City of Detroit Hazard Mitigation Plan*, January 2022, https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf

Chart 2

Hazard	Likelihood of Occurrence (25%)	Potential for Causing Death (25%)	Population Impacted (20%)	Physical and Economic Damage (20%)	Local Response Capability (10%)	Total	2015 Rank	2021 Rank
Civil Disturbance	2 (.50)	2 (.50)	2 (.50)	3 (.60)	2 (.20)	2.30	5	8
Drought	2 (.50)	2 (.50)	2 (.40)	0 (.0)	2 (.20)	1.70	11	11
Earthquake	1 (.25)	1 (0.25)	1 (.20)	1 (0.20)	2 (.20)	1.1	10	14
Infrastructure Failure	5 (1.25)	1 (0.25)	4 (.80)	3 (.60)	3 (.30)	3.20	3	2
Extreme Summer Weather	4 (1)	2 (.50)	2 (.50)	2 (.40)	2 (.20)	2.60	6	5
Extreme Winter Weather	4 (1)	3 (.75)	5 (1)	1 (.20)	2 (.20)	3.15	1	4
Structural Fires	3 (.75)	4 (1)	2 (.40)	3 (.60)	4 (.40)	3.15	2	3
Flooding	3 (.75)	2 (.50)	4 (.80)	4 (.80)	5 (.50)	3.35	6	1
Hazmat Releases	2 (.50)	4 (1)	2 (.40)	2 (.40)	3 (.30)	2.60	7	6
Nuclear Power Plant Accident	1 (.25)	1 (.25)	2 (.40)	3 (0.60)	2 (.20)	1.70	9	12
Oil/Natural Gas Well Accident	1 (.25)	0 (.0)	1 (.20)	3 (.60)	2 (.20)	1.25	9	13
Pipeline Accident	1	2	3	2	2	1.75	12	10

Hazard	Likelihood of Occurrence (25%)	Potential for Causing Death (25%)	Population Impacted (20%)	Physical and Economic Damage (20%)	Local Response Capability (10%)	Total	2015 Rank	2021 Rank
	(.25)	(.50)	(.60)	40	(.20)			
Public Health Emergency	4 (1)	3 (.75)	2 (.40)	1 (.20)	2 (.20)	2.55	4	7
Public Transportation Accident	2 (.50)	3 (.75)	2 (.40)	1 (.20)	3 (.30)	2.15	8	9

Chart 3. Significant Natural Hazard

Significant Natural Hazards						
Natural Hazard	Time of Potential Occurrence				Last Major Event	
	Spring	Summer	Fall	Winter	Year	Location
Energy Emergency	X	X	X	X	2021	City-Wide
Extreme Summer Weather	X	X			2020	City-Wide
Extreme Winter Weather			X	X	2021	City-Wide
Structural Fires	X	X	X	X	2021	City-Wide
Hazardous Materials Release	X	X	X	X	2019	SW Detroit
Public Health Emergency	X	X	X	X	2020	Nationwide
Floods	X	X	X	X	2021	City-Wide

As the risk assessment tables demonstrate, flooding is at the forefront of Detroit's hazard risks. Consequently, mitigation activities will be geared towards reducing the potential losses and preventing Detroit's vulnerability to flood disaster events.

Hazard & Vulnerability Risk Analysis

¹⁰Flood Insurance History

The City of Detroit has been a part of the National Flood Insurance Program (NFIP) since 1974 with an initial Flood Insurance Rate Map (FIRM) identified in 1981. In 2017, the City joined the Community Rating System (CRS) and maintains a Class 8 rating.

According to NFIP, there are 403 policies in force in Detroit. These policies provide insurance worth \$82,121,200 as of 2021. The NFIP Repetitive Loss/Severe Repetitive Loss data provided indicates a total of 64 RL/SRL properties with a net total claim of \$1,437,151.30. The National Center for Environmental Information (NCEI) estimates total property losses for a 15-year period to be \$169,600,000 for an average loss of \$11.3 million per year. These figures would suggest that adequate coverage is provided to those who would be most impacted by river flooding in Detroit. According to NOAA, the River Rouge crested above flood stage in Detroit on 41 occasions between 1968 and 2021. When combined with other flooding events recorded through NCEI records, such as heavy rain or snow melt, the city has experienced 2.96 flooding events per year since 1978.

¹¹Most Recent Disaster

Prior to the August 2023 event, in June 2021, the City of Detroit was impacted by a significant amount of rainfall. On June 25-26, 2021, Detroit experienced a 1 in 1,000-year rainstorm (0.01% probability), resulting in 6-8 inches of rain in a 12-hour period in some areas of the city. This amount of rain far exceeded the capacity of the city's infrastructure, which was designed to withstand 1.7 inches of rain in a one-hour period and was the root cause of flooding. Between 32,000 - 47,000 households (majority (82%) low-to-moderate income) were directly impacted by the disaster.

In addition, in August 2014, the City of Detroit had unusually frequent and extreme amounts of rainfall that created flood conditions in the Metropolitan Detroit area. The National Weather Service said that the total of 4.57 inches of rain that fell for the day is the second heaviest calendar-day rainfall on record in Detroit at the time, after the 4.74-inch rainfall of July 31, 1925. The flooding closed major freeways, hospitals, businesses, schools and government offices. This storm has been categorized by some weather experts as a 100-year type of event.

¹⁰ Detroit Office of Homeland Security & Emergency Management. *City of Detroit Hazard Mitigation Plan*, January 2022, pg 36-38. https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf

¹¹ Detroit Office of Homeland Security & Emergency Management. *City of Detroit Hazard Mitigation Plan*, January 2022. Pg.40-42. https://detroitmi.gov/sites/detroitmi.localhost/files/2022-02/Detroit%20HMP2021%20FullPlan_FINALDraftPublicPost_2.3_0.pdf

Almost 10 billion gallons of sewer overflows poured into southeast Michigan's waters in the historic August flooding, according to a Detroit Free Press review of data from the Michigan Department of Environmental, Great Lakes and Energy. More recently, FEMA announced that federal disaster assistance has been made available to the state of Michigan to supplement recovery efforts in the areas affected by severe storms, tornadoes and flooding from Aug. 24-26, 2023.

Conclusion of Mitigation Needs Assessment

This Mitigation Needs Assessment makes it clear that historically, flooding has been a major hazard for the City of Detroit. By characterizing the hazard in terms of its frequency and the City's vulnerability, the City can draw on this needs assessment and the HMP to identify current and future flood hazards throughout the City of Detroit and target CDBG-DR funds toward cost-effective solutions to mitigate flooding over the long term. In addition, this assessment further supports proposed CDBG-DR mitigation activities undertaken as part of this allocation so that, at a minimum, they do not exacerbate hazards but rather serve to lessen their impacts.

Table 3A: CDBG-DR Mitigation Set-Aside Needs Assessment

CDBG-DR Mitigation Set-Aside Needs Assessment:			
Categories Affected	A Total Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Housing*	Unknown	Unknown	Unknown
Infrastructure**	\$1,244,900,000.00	\$0	\$1,244,900,000.00
Economic Development	Unknown	Unknown	Unknown
Total	\$1,244,900,000.00	\$0	\$1,244,900,000.00

****The housing and economic mitigation needs are unknown at this time and will be updated if and when additional data is obtained. However, it is important to note that some of the infrastructure MIT unmet needs include projects that are meant to protect and mitigate housing from future flooding events.***

****The total infrastructure mitigation unmet is based on local unmet needs data related to planned mitigation projects. This includes:**

1. Jefferson Chalmers Flooding and Floodplain Mitigation Project (preliminary estimate prior to engineering activities including feasibility due diligence and implementation costs - \$20M)

2. Traffic Signal Connectivity – Install generator connector switches to all of the 819 city jurisdiction traffic signals (\$10M)
3. Harding Canal – Levee and seawall project to mitigate both overland flooding and floodplain designation in the Jefferson Village neighborhood. (estimated around \$5M, BRIC application submitted to FEMA for assistance).
4. Erma Henderson Park & Marina/Gold Coast Neighborhood – during the last period of high great lake levels, the marina had to be closed because facilities were underwater. (Est. \$15M)


In addition, DWSD projects include:


Flood Risk Mitigation Projects

Near Term

DWSD has developed over **\$442M** in near-term flood mitigation projects. The projects are at various stages within the development pipeline with several new starts beginning in 2025.



 Shovel-Ready		Projects have been designed and partially permitted. Earliest construction dates <u>estimated</u> below:	
West Chicago North Stormwater Improvements	Neighborhood infrastructure projects with direct discharges. Work will reduce CSOs discharge, street flooding and basement backup risk.	\$0.7M (Design)	June 2025
		\$20.0M (Const.)	
		\$2.0M (CEI)	
Schoolcraft Stormwater Improvements	Water quality improvements for west service yard for direct discharge site.	\$1.6M (Design)	August 2025
		\$43.0M (Const.)	
		\$4.0M (CEI)	
West Yard Improvements	Green infrastructure and impervious removal. Projects will reduce stormwater within combined sewer areas that reduces basement backup risk.	\$0.5-2M (Const.)	July 2025
Brightmoor GSI Construction		\$2.9M (Const.)	July 2025
Bentler-Westbrook GSI Construction		\$1.0M (Const.)	July 2025
Minock Park GSI		\$1.4M (Const.)	July 2025
DWSD COSTS		\$77.1 M(+/-2.0M)	

 Accelerated Delivery		Projects have preliminary engineering completed. Earliest construction dates estimated below:	
Central Services Facility Green Parking Lot	Reconstruction of the employee parking lot that will manage runoff for the 100-year storm.	\$7.0M TBD (Const.)	Spring 2025
Sewer Lateral Connection Imp.	Est. 60,000 sewer laterals City wide (\$20K each)	\$1,200.0M (Const.)	TBD
Brightmoor Property Acquisition and Site Clearing	Purchase of land for Brightmoor stormwater ponds and structure demolition package.	\$5.5M (Const.)	Spring 2025
Brightmoor Phase I Pond and Outfall Construction	Construction of storm sewer outfall, stormwater basin and restoration.	\$2.0M (Design) \$20.0M (Const.) \$5.5M (CEI)	Feb-March 2026
Brightmoor Phase II Large Scale GSI Design/Build Project	Construction of collection sewers extending east from Brightmoor Pond.	\$4.0M (Design) \$40.0M (Const.) \$4.0M (CEI)	June 2027
Brightmoor Phase III	Construction of collection sewers extending to Southfield Freeway.	\$4.0M (Design) \$40.0M (Const.) \$4.0M (CEI)	Spring 2027
Jefferson Chalmers Corner Lot GSI Improvements	Construction of GSI within vacant parcels in Jefferson Chalmers neighborhood.	\$0.7M (Design) \$3.3M (Const.) \$0.3M (CEI)	Spring 2026
Vernor Relief Sewer at Michigan Central	Construction of a relief sewer to alleviate frequent flooding.	\$0.5M (Design) \$6.0M (Const.) \$0.5M (CEI)	Spring 2026
I-375 Downtown Stormwater District Sewer Improvements	Upsizing proposed MDOT/DWSD storm sewer to manage former Wayne County Jail and Brewster parcels.	\$1.6M (Design) \$6.0M (Const.)	MDOT Dept.
DWSD COSTS		\$1,354.9M	

Note that the \$1.2B for sewer lateral connection improvements is included in the unmet needs assessment under Section II.

Flood Risk Mitigation Projects

Long Term

Through the work of grant funded studies, DWSD is developing concepts for over \$1.0B in long term strategies to mitigate flooding and reduce CSOs to the Detroit River and Rouge River.



Under Study – East		Projects are part of ongoing or future studies. As a result, highly-conservative, order of magnitude project cost estimates and earliest dates for construction estimated below	
Jefferson Chalmers Direct Discharge System	Construction of collection sewers, detention and pump stations for direct discharge to river.	\$73.0M	2030
Bedford Sewer District/Fox Creek Stormwater Only Conversion	Reconfiguration of Bedford Sewer, Fox Creek and Fox Creek Relief stormwater only in Morningside Neighborhood.	\$100.0M	2030
Morningside/East English Village Optimization Sewers	Construction of sewers that balance flow between surcharged and underutilized sewers.	\$50.0M	2028
Small Scale GSI – Fox Creek Neighborhood	Construction of block scale GSI to help reduce impacts of stormwater runoff on the combined sewer system.	\$25.0M	2028
Large Scale GSI – Riverbend Neighborhood	Construction of an offline stormwater detention pond to attenuate flow prior to direct discharge to the Fox Creek.	\$50.0M	2029
Fischer Sewer District Stormwater Only Conversion	Reconfiguration of sewers within the Fischer sewer district. Work will repurpose the outfall for stormwater only.	\$250.0M	2032
Meldrum Sewer District Direct Discharge	Construction of stormwater only sewers and direct discharge to the Detroit River downstream of Lieb Screening Facility.	\$65.0M	2034
Near East Side Sewer Direct Discharge	Construction of stormwater only sewers and direct discharge to the Detroit River.	\$150.0M	2036
DWSD COSTS		\$763.0 M	

Under Study – West		Projects are part of future studies. As a result, highly-conservative, order of magnitude project cost estimates and earliest dates for construction estimated below	
McNichols West Relief Sewer Stormwater Conversion	Water quality improvements for west service yard for direct discharge site.	\$90.0M	2030
Michigan/Martin Capacity Enhancement Projects	Sewer upsizing, impervious removal and offline detention to reduce flooding in SW Detroit.	\$100.0M	2032
McNichols East Relief Sewer Stormwater Conversion	Water quality improvements for west service yard for direct discharge site.	\$60.0M	2034
DWSD COSTS		\$250.0 M	

IV. ALLOCATION AND AWARD CAPS & FUNDING CRITERIA

All the CDBG-DR funding will be administered by the City of Detroit through its Housing and Revitalization Department (HRD), who is the responsible entity for this process. Funds being passed through to other entities as applicable are described below. The City will also be the Responsible Entity for the decision making and completion of environmental review per 24 CFR 58.4.

Administration

Table IVA: Grantee Administration Activity(ies) Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:	\$17,343,200	5%
Total	\$346,864,000	100%

Planning

Table IVB: Grantee Planning Activity(ies) Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Planning Activity Number One	\$2,000,000	1%
Planning Total:	\$2,000,000	1%
Total	\$346,864,000	100%

Housing

Housing Programs Overview

Table IVC: Grantee Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Housing Program Number One	\$34,050,000	10%
Housing Program Number Two	\$31,000,000	9%
Housing Program Number Three	\$10,000,000	3%
Housing Program Total:	\$75,050,000	22%
Total	\$346,864,000	100%

Grantee Housing Program Number One

Program Title: Affordable Housing Development

Amount of CDBG-DR Funds Allocated to this Program: \$34,050,000

Eligible Activity(ies): Housing Rehabilitation 24 CFR Part 570.202 and New Construction as waived per III.D.5 of the CDB-DR Universal Notice

National Objective: Low-to-Moderate Income Persons – Housing (LMH) 24 CFR 570.208(a)(3)

Lead Agency and Distribution Model: HRD will administer this program through eligible Developers. HRD will utilize its existing infrastructure for providing gap financing for the development of affordable housing, through its bi-annual competitive Notice of Funding Availability (NOFA) process. HRD has an existing multifamily underwriting team; CDBG-DR funds will be used to add capacity to this team as needed to support the volume of anticipated new project pipeline.

Program Description: This program will utilize CDBG-DR funds to invest as gap financing that will create disaster-resilient affordable housing that incorporates best practice stormwater management principles. The program will leverage other public and private investment in the developments to help create an estimated 700 affordable housing units that provide Detroit residents at 80% AMI or below with safe, quality housing.

Eligible Geographic Areas: City-Wide

Other Eligibility Criteria: Developers apply for funding for eligible affordable housing projects through the bi-annual NOFA. For projects that score competitively for City funding, HRD will make the determination on when and where to utilize CDBG-DR funding based on the project's characteristics, most critically that the plans include adequate stormwater management design and the interaction with other project financing. NOFA criteria is subject to change, and information on how projects/applications will be scored and prioritized will be laid out in the NOFA.

Maximum Amount of Assistance Per Beneficiary: The following restrictions will be placed on funding allocations for the Affordable Housing Development Program: Maximum award per project: \$1,000,000 for 9% LIHTC; \$3,000,000 for all others* Maximum award per developer per round: \$3,000,000*

Due to rising construction costs, HRD will consider on a case-by-case basis, requests above the \$1,000,000 limit for 9% LIHTC projects and a maximum award above \$3,000,000 per developer, per round if the applicant can demonstrate an increase in score through MSHDA's QAP as a direct result.

Maximum Income of Beneficiary: 80% AMI

Mitigation Measures: This project does meet the definition of mitigation by providing quality and resilient affordable housing that will lessen the displacement impact of future disasters for City residents.

Reducing Barriers for Assistance: The City of Detroit will conduct proactive, strategic communication and program outreach throughout the life cycle of the program to ensure that barriers will be readily identified and reduced. The success of this communication and outreach

will heavily depend on the levels of engagement from key community stakeholders and the City's responsiveness to any and all identified issues.

Grantee Housing Program Number Two

Program Title: Affordable Public Housing

Amount of CDBG-DR Funds Allocated to this Program: \$31,000,000

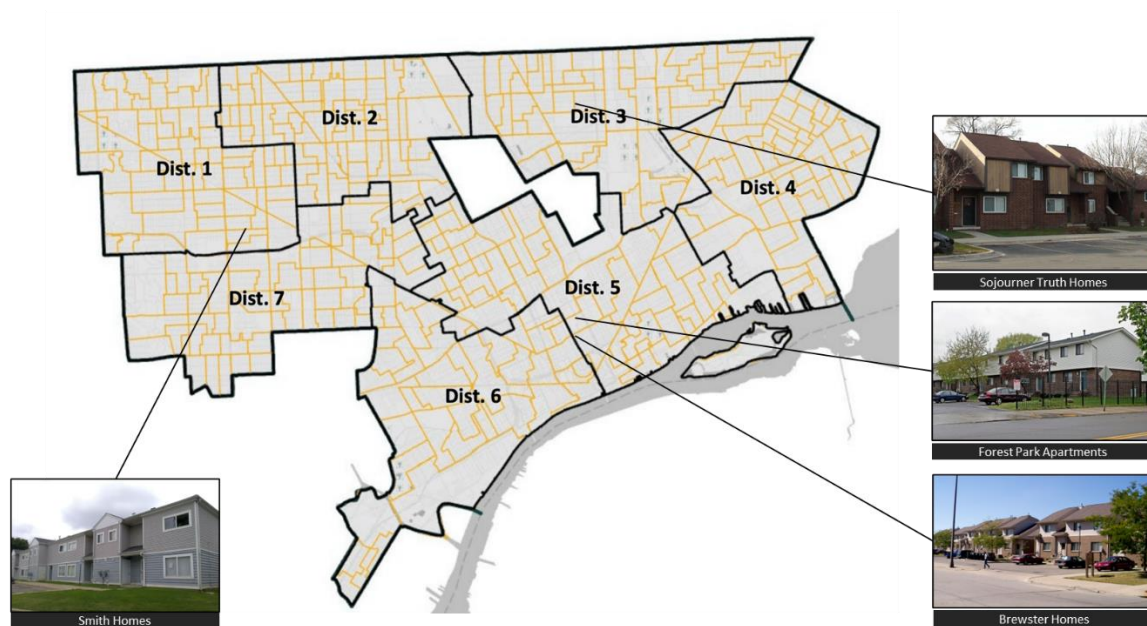
Eligible Activity(ies): Housing Rehabilitation 24 CFR Part 570.202(2) and New Construction as waived per III.D.5 of the CDB-DR Universal Notice

National Objective: Low-to-Moderate Income Persons – Housing (LMH) 24 CFR 570.208(a)(3)

Lead Agency and Distribution Model: HRD and DHC will enter into a subrecipient agreement for the program. DHC will oversee implementation and procure contractors. Qualified contractors/developers will have an opportunity to bid on projects via Request For Proposals (RFP). Each project will produce new housing units that are designated as deeply affordable and set aside for the city's most vulnerable residents (very low income, at or below 30% AMI).

Program Description: The Detroit Housing Commission (DHC) will be rehabilitating and/or upgrading existing public housing units for rent by extremely low-income households. DHC has identified sites that have between 150-350 units each, that include vacant units requiring rehabilitation due to deferred maintenance and/or age of the property(ies). This will include infrastructure upgrades (i.e. water/sewer line replacements, green storm water infrastructure and greenspace) in order to support the addition of new units. The city has an aging public housing portfolio in need of modernization and climate resilient infrastructure upgrades to protect low-income residents from further exposure to potential climate-related damage to their housing. Due to the city's poverty level and 36% rental rate of occupied housing, it is imperative that these funds be used to protect low-income renters from future catastrophic damage as weather events remain imminent. This program will serve residents at or below 30% AMI located in Districts 1, 3, 5, and 7 and would produce approximately 300 new units of public housing.

Eligible Geographic Areas: Brewster Homes - 3526 St Antoine, Detroit, MI 48201, Smith Homes - 14313 Crescent Dr, Detroit, MI 48223, Forest Park - 1130 E Canfield St, Detroit, MI 48207, Sojourner Truth - 4801 Nevada Ave, Detroit, MI 48234



Other Eligibility Criteria: N/A

Maximum Amount of Assistance Per Beneficiary: It is anticipated that each project will not exceed \$15,000,000 in CDBG-DR funding, unless otherwise authorized by HRD and DHC

Maximum Income of Beneficiary: 30% AMI

Mitigation Measures: Climate resilient affordable housing may help prevent future displacement by placing residents in newer housing units. Implementing these projects now reduces the potential impact of damage in the future, and bringing stronger housing units online allows DHC to move residents to better units and leverage that rental income to more quickly address capital repairs in its portfolio.

Reducing Barriers for Assistance: The City of Detroit will conduct proactive, strategic communication and program outreach throughout the life cycle of the program to ensure that barriers will be readily identified and reduced. The success of this communication and outreach will heavily depend on the levels of engagement from key community stakeholders and the City's responsiveness to any and all identified issues.

Grantee Housing Program Number Three

Program Title: Down Payment Assistance

Amount of CDBG-DR Funds Allocated to this Program: \$10,000,000

Eligible Activity(ies): Homeownership Assistance 24 CFR Part 570.201(n)

National Objective: Low-to-Moderate Income Persons – Housing (LMH) 24 CFR 570.208(a)(3)

Lead Agency and Distribution Model: The Housing & Revitalization Department (HRD) is responsible for several duties to ensure the Detroit Down Payment Assistance Program operates effectively and meets its intended goals, as follows:

- Selection and Management of Procured Contractors
- Program Design and Development
- Documentation and Record Keeping
- Financial Management
- Coordination with Private Sector Entities
- Legal Compliance
- Communication and Outreach
- Monitoring and Evaluation
- Reporting
- Program Efficiency and Improvement
- Default Management
- Asset Management

Through the City of Detroit procurement process, the selected Detroit Down Payment Assistance Program Administrator will be responsible for the following activities:

- Program Design
 - Preliminary program terms
 - Referral and intake process
 - Lender and stakeholder engagement
 - Marketing and outreach plan
- Program Implementation
 - Finalize program documents
 - Finalize program website
- Program Administration
 - Application Intake: The Program Administrator will be responsible for communicating with potential applicants and instructing them on how to apply for the program. The Program Administrator will receive and process all applications and review them for accuracy, completeness, and appropriate supporting documents necessary to determine eligibility.
 - Education: The Program Administrator will ensure that all applicants complete HUD homebuyer education.
 - Loan Prequalification: The Program Administrator will work with the Lender throughout the loan process and provide the Lender with all forms to be completed in conjunction with the City's DPA program.

- **Underwriting:** The Program Administrator will underwrite all City DPA grants/loans and adhere to all underwriting guidelines created for the program.
- **Loan Origination:** The Program Administrator will work with the Lender throughout the loan origination process to ensure that the City's DPA documents and other information are submitted to the first mortgage lender. The first mortgage loan package will be reviewed by the Program Administrator for compliance with the City's DPA guidelines.
- **Loan Closing Process:** The Program Administrator will facilitate the entire loan closing process and prepare and submit all applicable closing documents, including closing disclosures, deed of trusts, and promissory notes, in coordination with the City. The Program Administrator will be responsible for determining how all legal documents for the City's DPA loans will be prepared.
- **Evaluation & Modification**
 - Interim and final evaluations, and submissions for any program modifications (if necessary).
 - Reporting. Adherence to all Department and Federal requirements including but not limited to data related to demographics, DPA usage, participating lender, homebuyer education agency, PITI, etc.

Program Description: The City of Detroit's Detroit Down Payment Assistance Program aims to rebuild homeownership in Detroit. The program provides qualifying residents grants for down payments and prepaids, including interest rate buy down, closing costs, and principal reduction, in conjunction with purchasing a home using a purchase mortgage or a purchase renovation mortgage. The program is available to low-to-moderate income earners who may be able to afford a monthly mortgage payment, but don't have savings enough for a down payment.

Eligible Geographic Areas: City-Wide

Other Eligibility Criteria: In addition to income eligibility, and the completion of a HUD approved homebuyer education class, additional program criteria for the Detroit Down Payment Assistance Program include: DPA award to not exceed 50% of the purchase price, Meet first time homebuyer criteria, Occupancy of the home as primary residence for 3 years, or pay back prorated rate, Contribution of at least \$1,000 to closing, Housing ratio to not exceed 35%. Application criteria is subject to change, and information on how projects/applications will be scored and prioritized will be laid out in the application.

Maximum Amount of Assistance Per Beneficiary: Not to exceed \$25,000/household

Maximum Income of Beneficiary: 80% AMI

Mitigation Measures: N/A

Reducing Barriers for Assistance: The City of Detroit will conduct proactive, strategic communication and program outreach throughout the life cycle of the program to ensure that barriers will be readily identified and reduced. The success of this communication and outreach will heavily depend on the levels of engagement from key community stakeholders and the City’s responsiveness to any and all identified issues.

Infrastructure

Infrastructure Programs Overview

Table IVD: Grantee Infrastructure Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Infrastructure Program Number One	\$7,227,800	2%
Infrastructure Program Number Two	\$25,000,000	7%
Infrastructure Program Number Three	\$175,000,000	50%
Infrastructure Program Total:	\$207,227,800	60%
Total	\$346,864,000	100%

Grantee Infrastructure Program Number One

Program Title: Public Facility Rehabilitation – Homeless Shelters

Amount of CDBG-DR Funds Allocated to this Program: \$7,227,800

Eligible Activity(ies): Public Facilities and Improvements 24 CFR 570.201(c)

National Objective: Low-to-moderate Income Persons – Limited Clientele (LMC) 24 CFR 570.208(a)(2)

Lead Agency and Distribution Model: The City of Detroit, through the Housing and Revitalization Department, will make funds available through a Notice of Funding Availability (NOFA) to award funds to eligible projects. Grants will be awarded to eligible Emergency Shelter Public Facility applicants for eligible activities based on an application process and awarded to the extent that funds are available. The City of Detroit will use NOFA packages to gather the information necessary to assess each project and potential subrecipient. Eligible applicants will

be notified through direct emailing and by NOFAs posted on the City's Oracle site and CDBG-DR website.

Program Description: This program will award funds to eligible projects within the City to address unmet recovery needs associated with emergency shelter public facilities impacted by the August 2023 flooding. The program defines public facilities as projects that improve emergency shelters owned by nonprofits that are open to the public and receive referrals from Detroit's Coordinated Assessment Model (CAM). Funding and Program guidelines will further define eligible projects for applicants

Eligible Geographic Areas: Nonprofit operated Emergency shelters located within the boundaries of the City of Detroit will be eligible.

Other Eligibility Criteria: The application process will require applicants to demonstrate how their projects address unmet recovery and/or mitigation needs and how funds will be used equitably in their communities. Applications for funding may be evaluated on, but not limited to, the following project components: Amount of project detail provided and tieback to the disaster and community need, Project's impact on unmet recovery needs or mitigation of future disasters, Applicants may not be presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in federal programs, as indicated by the System for Award Management (www.sam.gov). NOFA criteria is subject to change, and information on how projects/applications will be scored and prioritized will be laid out in the NOFA.

Maximum Amount of Assistance Per Beneficiary: Projects under this NOFA will not exceed \$5,000,000 unless authorized by HRD.

Maximum Income of Beneficiary: Beneficiaries are presumed benefit but anticipated to be at 30% AMI or below

Mitigation Measures: This project does meet the definition of mitigation as funds will allow recipients to make improvements to public facilities that will directly address unmet recovery needs and increase the resilience of the shelter facilities to lessen the impact of future disasters. Mitigation funds are included in the public facilities budget and may be used to support improvements to facilities that were not directly impacted by the flood event but increase the resilience of the facilities and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, suffering and hardship, by lessening the impact of future disasters.

Reducing Barriers for Assistance: The City of Detroit will conduct proactive, strategic communication and program outreach throughout the life cycle of the program to ensure that barriers will be readily identified and reduced. The success of this communication and outreach will heavily depend on the levels of engagement from key community stakeholders and the City's responsiveness to any and all identified issues.

Program Title: Brightmoor Stormwater Improvement Project

Amount of CDBG-DR Funds Allocated to this Program: \$25,000,000

Eligible Activity(ies): Public Facilities and Improvements 24 CFR 570.201(c)

National Objective: Low-to-moderate income persons – Area Benefit (LMA) 24 CFR Part 570.208(a)(1)

Lead Agency and Distribution Model: DWSD will bid out a single construction contract. The contract will be inclusive of all elements needed to construct the stormwater sewer system and excavate the stormwater basin. This includes roadway removals, the new storm sewer outfall at Lyndon Avenue, storm sewer, utility relocations, mass grading and roadway restoration. DWSD will oversee this work providing construction engineering and inspection via an existing contract not funded with CDBG-DR.

Program Description Many residential neighborhoods across Detroit and public facilities experience recurrent basement backups due to a variety of factors. These can vary greatly from localized problems at homes (cracked sewer laterals) to regional sewer system failures (power loss and sewer capacity exceedance). Whatever the issue, significant rain events are causing basement backups across the City of Detroit resulting in widespread property damage and sometimes insurmountable repair and restoration costs to Detroit residents. In addition to property damage, the city experienced flooding of highways and streets due to aging infrastructure and climate change. Public facilities such as emergency shelters experienced flooding which forced some shelters to close and move to temporary locations.

Over the past 10 years, Detroit has experienced multiple rainstorms which exceed the design storm of the existing sewer system (10-year, 1-hour event) – these include August 11, 2014, June 25-26, 2021, July 16, 2021, August 29, 2021 and August 24, 2023. Each of these storms have resulted in basement backup claims within the City which harm residential properties and impose significant financial and social burdens. Although the location and intensity of these high-exceedance storms have varied across the city, the connected nature of the Detroit sewer system, which is all tributary to a single wastewater treatment plant, means that any project that removes stormwater will have benefit at both a neighborhood, citywide, and across counties. As seen in the 2021 storms in particular, the large volume of water that fell over the regional sewer system eventually flowed to the interceptors and regional pump stations. This ultimately overburdened Detroit neighborhoods at the bottom of the regional sewershed. As part of an ongoing resiliency strategy, Detroit and the Great Lakes Water Authority are working to find cost effective projects that work to remove stormwater from the regional sewer systems. This helps to create additional capacity at larger interceptors while also relieving local neighborhood infrastructure.

Eligible Geographic Areas: The project is bounded by the west by the Rouge River, north by Keeler Street, on the east by Evergreen Road and on the south by Lyndon Avenue. The project will serve the Brightmoor neighborhood.



Other Eligibility Criteria: N/A

Maximum Amount of Assistance Per Beneficiary: This project is an area benefit, and not a direct benefit to a beneficiary.

Maximum Income of Beneficiary: At or below 80% AMI

Mitigation Measures: The project will significantly reduce the risk of future disasters by removing stormwater from the combined sewer system for residents and businesses within the Fenkell sewer district. The project is the continuation of over a decade of project work within the Upper Rouge Tributary drainage area. The removal of stormwater from the combined sewer system will have a significant impact in reducing basement backups and street flooding for increasingly recurrent intense summer storms. The sum of these actions is a more resilient regional sewer system resistant to future flooding. The project is listed within the City of Detroit Hazard Mitigation Plan (Page 136) as an implementation strategy to address flooding. The specific project (Flooding Action Item) is as follows: -Sewer separation projects to remove flow and reduce grade line at the following locations: Fischer, East English Village, Near-eastside separation, Puritan, Fenkell, Lyndon, Schoolcraft and W. Chicago

Reducing Barriers for Assistance: The City of Detroit will conduct proactive, strategic communication and program outreach throughout the life cycle of the program to ensure that barriers will be readily identified and reduced. The success of this communication and outreach will heavily depend on the levels of engagement from key community stakeholders and the City's responsiveness to any and all identified issues.

Grantee Infrastructure Program Number Three

Program Title: City-Wide Alley Sewer Repair

Amount of CDBG-DR Funds Allocated to this Program: \$175,000,000

Eligible Activity(ies): Public Facilities and Improvements 24 CFR 570.201(c)

National Objective: Low-to-moderate income persons – Area Benefit (LMA) 24 CFR Part 570.208(a)(1)

Lead Agency and Distribution Model: DWSD will assign various alley sewer repairs to qualified contractors to reconnect sewer lateral connections to the public sewer main that have either fallen off the public main, or that have collapsed altogether. DWSD will prepare and advertise competitive solicitations for contractors familiar with this type of underground work. DWSD anticipates that at least three contracts will be awarded.

Program Description: A failed connection to the public sewer main will allow sand, soil, roots, and grit to enter the public sewer main while also severely impeding flow from residential properties. This debris and sediment accumulate in the sewer mains, reducing flow capacity, increasing the likelihood of sewer surcharging that can lead to flooding and water in basement. As Detroit's sewer system and the resident-owned lateral sewers continue to age, these types of failures are becoming increasingly common. The effects of these failures can be realized during any wet weather event, however the severity of them is greatly increased during extreme wet weather events such as those experienced in 2016, 2021 and 2023. This activity will replace failed connections between the public sewers and private lines. The work will be done within the public right-of-way.

Eligible Geographic Areas: The project will be implemented citywide, within income service areas.

Other Eligibility Criteria: N/A

Maximum Amount of Assistance Per Beneficiary: This project is an area benefit, and not a direct benefit to a beneficiary.

Maximum Income of Beneficiary: At or below 80% AMI

Mitigation Measures: This project does meet the definition of mitigation, repairing or replacing sewer laterals may prevent future damage to residential homes, lessening the hardship cause to low-to-moderate income households who may not be able to afford insurance or afford to make those types of repairs without assistance. The activity that will take place as part of this project is included in the City of Detroit Hazard Mitigation Plan (Page 137) as an implementation strategy to address basement flooding. The specific project (Flooding Action Item) is as follows: Design and conduct a study to examine and refine flood mitigation

strategies including increased inspections, storage, strategic sewer separation, and other potential strategies to significantly reduce wide-spread basement and street flooding. In addition, the improvements from this project will benefit areas downstream, by reducing sediment and other debris, as well as reducing the accumulation of debris within downstream pipes. The reduction in debris and grit will also benefit the regional wastewater treatment plant.

Reducing Barriers for Assistance: The City of Detroit will conduct proactive, strategic communication and program outreach throughout the life cycle of the program to ensure that barriers will be readily identified and reduced. The success of this communication and outreach will heavily depend on the levels of engagement from key community stakeholders and the City's responsiveness to any and all identified issues.

CDBG-DR Mitigation Set-Aside

CDBG-DR Mitigation Set-Aside Programs Overview

The City of Detroit's mitigation projects will increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters. Incorporation of these measures also reduces costs in recovering from future disasters.

The City of Detroit mitigation activities will support long-term plans put in place by local and regional communities that promote the future well-being of these damaged areas by the hardening of infrastructure and public facilities so that communities withstand future disasters. The City of Detroit will coordinate with other local and regional planning efforts to leverage those efforts as much as possible. The City of Detroit is proposing to construct infrastructure and public facilities improvements as its mitigation activities. This activity will help prevent future impacts from flooding.

Table IVF: CDBG-DR Mitigation Set-Aside Allocation Summary

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD and Grante Identified MID	CDBG-DR Mitigation Set-Aside Allocation Amount	% of CDBG-DR Allocation Mitigation Set-Aside ¹²
Planning (15% cap)			0%	\$0	0%
Housing	Unknown	Unknown	0%	\$0	0%
Infrastructure	\$1,244,900,000.00	100%	100%	45,243,000	100%
Economic Revitalization	Unknown	Unknown	0%	\$0	0%
Total	\$1,244,900,000.00	100%	100%	45,243,000	100%
Funds that have not been allocated:				\$0	0%
Grant Total (Recovery funds + Mitigation + Unallocated):				346,864,000	100%

Table IVG: Grantee CDBG-DR Mitigation Set-Aside Programs Overview

Eligible Cost Category	CDBG-DR Mitigation Set Aside Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Does this Program have tie back to the disaster?
CDBG-DR Mitigation Set-Aside Standalone Program Number One	\$20,000,000	100%	No
CDBG-DR Mitigation Set-Aside Standalone Program Number Two	\$16,243,000	100%	No
CDBG-DR Mitigation Set-Aside Standalone Program Number Three	\$9,000,000	100%	No
Total:	\$45,243,000	100%	

Program Title: Jefferson Chalmers Flooding and Floodplain Mitigation

Amount of CDBG-DR Funds Allocated to this Program: \$20,000,000

Eligible Activity(ies): Public Facilities and Improvements 24 CFR 570.201(c)

National Objective: Low-to Moderate Income Persons – Area Benefit 24 CFR 570.208(a)(1)

Lead Agency and Distribution Model: HRD will allocate funding to the Detroit Building Authority (DBA), who will provide oversight of the project. The DBA will procure an engineering consultant team, who will manage the project, including procurement of contractors, pre-construction, construction and post-construction oversight.

Program Description: The city will install permanent fixtures for temporary stop logs (or other mitigation option) to keep flood water and Detroit River water out of the sewer system and adjacent properties. This permanent fixture (or other flood prevention devices) will aid in the removal of the floodplain designation in the Jefferson Chalmers neighborhoods and surrounding neighborhoods. The installation of the three (3) stop log structures will be across Lakewood, Phillip and Fox Creek canals, and include earthwork in Mariners, Riverfront - Lakewood East, AB Ford and Maheras Gentry Parks, and a floodwall at KAM Marine/Bayview Yacht Club.

[Excerpted from “Lake St Clair Flood Risk Reduction Study for the Jefferson-Chalmers Neighborhood, Detroit, Michigan U.S. Army Corps of Engineers (USACE) - Floodplain Management Services Program (FPMS) April 2022”] Water levels in the Great Lakes system have been rising substantially in the last few years. On Lake St. Clair, water levels have risen over five feet over the past seven years. The heavy precipitation in the winter and spring of 2019 has caused Lake St Clair’s water level to continue its rapid increase to an elevation higher than some of the coastal, canal front, and riverine shorelines throughout the City of Detroit.

This rise has increased the occurrence and magnitude of flooding in the densely populated neighborhoods along canals connected to Lake St. Clair. In response to the 2019 flooding, the City of Detroit utilized sand bagging techniques to build up shorelines and minimize the impacts of flooding as the situation worsened rapidly. However, these efforts were successful in mitigating all damages. In preparation for 2020 flooding, the City of Detroit employed additional temporary flood protection defenses, including HESCO barriers and Tiger Dam structures, along with sandbag structures, to provide additional protection to residences, public infrastructure, and public health in general. These measures are intended to mitigate flood damages in the short term, until a more permanent solution is developed and implemented in the Jefferson-Chalmers neighborhood.

In August of 2019, the City of Detroit requested USACE FPMS assistance for the identification of effective long-term flood mitigation measures in the Jefferson-Chalmers neighborhood in Detroit. This was initiated by both preliminary FEMA Flood Information Rate Maps (FIRM) (now final) that put more homes in the 1% flood zone, as well as experiencing flooding due to record high Great Lakes levels in 2019. This study is intended to be the first step in evaluating mitigation measures that can be utilized for a long-term solution to reduce flood risk due to coastal influences from Lake St. Clair and the Detroit River. This study *does not* evaluate severe storm events that result in interior drainage flooding. This FPMS study is designed to help inform the process undertaken by the City of Detroit to pursue the implementation of long-term solutions for flood mitigation efforts in the Jefferson-Chalmers area. This study looks at concept-level alternatives and does not provide a feasibility level solution, nor does it include design efforts.

There are many unknowns at this time related to the project. Prior to any construction beginning, the City will first procure a team of consultants and engineers to address subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase. Approval by regulatory agencies such as EGLE, USACE, GLWA, FEMA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology and hydraulics in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

In addition, the City is committed to exploring other mitigation alternatives during the Study and Preliminary Engineering phases.

Eligible Geographic Areas: This mitigation project will serve the neighborhoods bordered by Clairepointe Street (W), E. Jefferson Avenue (N), Alter Road (E), Detroit River (S), and will also provide relief to adjacent parcels to the north of E. Jefferson Avenue (Clairepointe to Alter) that are currently designated in the Special Flood Hazard Area (0.2% Annual Chance Flood).

<https://hazards->

[fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd](https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd)

(Type “Jefferson Chalmers, Detroit, MI” in search box - zoom to area – blue zone = Coastal Floodplain) roughly bounded by Conner/Clairepointe Avenues (West Boundary), E. Jefferson Avenue (North Boundary), Alter Road (East Boundary) and the Detroit River (South Boundary)

<https://hazards->

[fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd](https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd)

[9cd](https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd) (Type “Jefferson Chalmers, Detroit, MI” in search box zoom to area – orange zone = 0.2% Annual Chance Flooding) roughly bounded by Conner Avenue (West Boundary), Kercheval Avenue (North Boundary), Alter Road (East Boundary) and E. Jefferson Avenue (South Boundary)



Other Eligibility Criteria: N/A

Maximum Amount of Assistance Per Beneficiary: This project is an area benefit, and not a direct benefit to a beneficiary.

Maximum Income of Beneficiary: At or below 80% AMI

Mitigation Measures: The project will prevent future flooding due to cyclical and rising Great Lakes levels and aid in the removal of FEMA floodplain designation for the entire Jefferson Chalmers neighborhood and adjacent neighborhoods as noted above. Installation of permanent structures for 3 stop log (aka “temporary, removable dam panel”) sites (or other mitigation option) across Lakewood, Phillip and Fox Creek canals. The stop logs will be installed temporarily during months of high Great Lakes levels, then removed and stored until needed again. Earthwork berms are proposed in Mariners, Riverfront - Lakewood East, AB Ford and Maheras Gentry Parks, and a floodwall at KAM Marine/Bayview Yacht Club is also proposed.

Reducing Barriers for Assistance: The City of Detroit will conduct proactive, strategic communication and program outreach throughout the life cycle of the program to ensure that barriers will be readily identified and reduced. The success of this communication and outreach will heavily depend on the levels of engagement from key community stakeholders and the City's responsiveness to any and all identified issues.

Grantee CDBG-DR Mitigation Set-Aside Program Number Two

Program Title: Public Facility Rehabilitation – Homeless Shelters (MIT)

Amount of CDBG-DR Funds Allocated to this Program: \$16,243,000

Eligible Activity(ies): Public Facilities and Improvements 24 CFR 570.201(c)

National Objective: Low-to-moderate Income Persons – Limited Clientele (LMC) 24 CFR 570.208(a)(2)

Lead Agency and Distribution Model: The City of Detroit, through the Housing and Revitalization Department, will make funds available through a Notice of Funding Availability (NOFA) to award funds to eligible projects. Grants will be awarded to eligible Emergency Shelter Public Facility applicants for eligible activities based on an application process and awarded to the extent that funds are available. The City of Detroit will use NOFA packages to gather the information necessary to assess each project and potential subrecipient. Eligible applicants will be notified through direct emailing and by NOFAs posted on the City's Oracle site and CDBG-DR website.

Program Description: This program will award funds to eligible projects within the City to address mitigation needs associated with emergency shelter public facilities. The program defines public facilities as projects that improve emergency shelters owned by nonprofits that are open to the public and receive referrals from Detroit's Coordinated Assessment Model (CAM). Funding and Program guidelines will further define eligible projects for applicants.

Eligible Geographic Areas: Nonprofit operated Emergency shelters located within the boundaries of the City of Detroit will be eligible.

Other Eligibility Criteria: The application process will require applicants to demonstrate how their projects address unmet recovery and/or mitigation needs and how funds will be used equitably in their communities. Applications for funding may be evaluated on, but not limited to, the following project components: Amount of project detail provided and tieback to the disaster and community need, Project's impact on unmet recovery needs or mitigation of future disasters, Applicants may not be presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in federal programs, as indicated by the System for Award Management (www.sam.gov). NOFA criteria is subject to

change, and information on how projects/applications will be scored and prioritized will be laid out in the NOFA.

Maximum Amount of Assistance Per Beneficiary: Projects under this NOFA will not exceed \$5,000,000 unless authorized by HRD.

Maximum Income of Beneficiary: Beneficiaries are presumed benefit but anticipated to be at 30% AMI or below

Mitigation Measures: This project does meet the definition of mitigation as funds will allow recipients to make improvements to public facilities that will directly address unmet recovery needs and increase the resilience of the shelter facilities to lessen the impact of future disasters. Mitigation funds are included in the public facilities budget and may be used to support improvements to facilities that were not directly impacted by the flood event but increase the resilience of the facilities and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters

Reducing Barriers for Assistance: The City of Detroit will conduct proactive, strategic communication and program outreach throughout the life cycle of the program to ensure that barriers will be readily identified and reduced. The success of this communication and outreach will heavily depend on the levels of engagement from key community stakeholders and the City's responsiveness to any and all identified issues.

Grantee CDBG-DR Mitigation Set-Aside Program Number Three

Program Title: Traffic Signal Connectivity and Power Backup System

Amount of CDBG-DR Funds Allocated to this Program: \$9,000,000

Eligible Activity(ies): Public Facilities and Improvements 24 CFR 570.201(c)

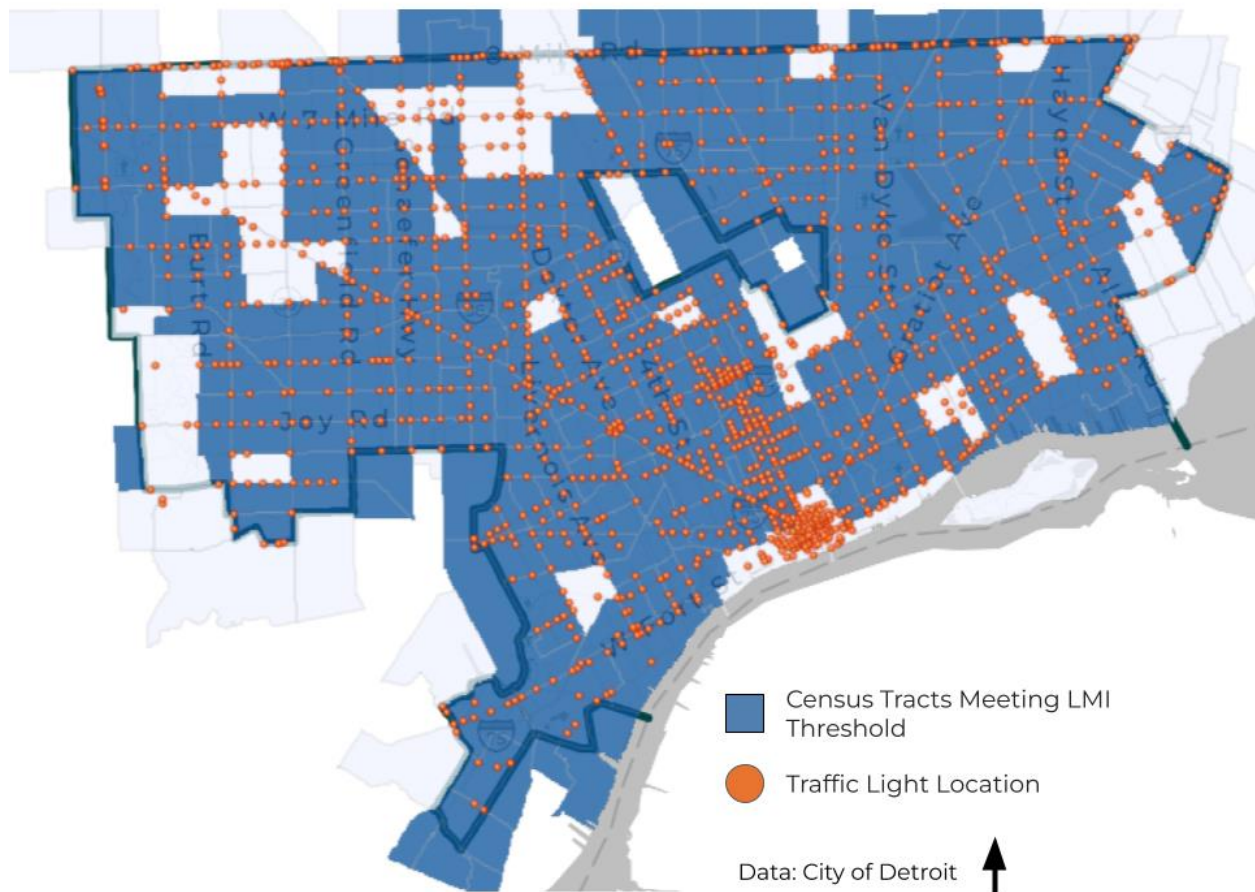
National Objective: Low-to Moderate Income Persons – Area Benefit 24 CFR 570.208(a)(1)

Lead Agency and Distribution Model: The connectivity component of the project will be fully implemented by contractors, whose work will be procured and overseen by Department of Public Works (DPW) staff. The back up power sources and generator switches will be installed by procured contractors.

Program Description: During severe storm events, in addition to storm related flooding, there are often several power outages that cause traffic signals to go dark for significant periods of time. This program connects the balance of city jurisdiction traffic signals (230) to the centralized Traffic Management Center, so that all signals can be monitored and controlled remotely. This connectivity will allow for traffic signal malfunctions to be immediately noted in real time, thereby minimizing the time for traffic signals to be restored to full, safe operating

status. This project also creates the capacity for signals to fully operate during power outages, by installing back power sources at key, high traffic intersections and outfitting all signals with quick connector switches that allow generators to be quickly connected during a loss of power. The implementation of this project will mitigate the impact of power outages created by future storm events.

Eligible Geographic Areas: City-wide (230 traffic signals).



Other Eligibility Criteria: N/A

Maximum Amount of Assistance Per Beneficiary: There is no direct beneficiary, this program provides an area benefit.

Maximum Income of Beneficiary: At or below 80% AMI

Mitigation Measures: This project qualifies as a Mitigation project, as it will go a long way towards making intersections safer for vehicle operators and pedestrians during future storm events that result in the loss of power. It will lessen the impact of future disasters that cause power outages. It will reduce the risk of injury or loss of life, as high-volume traffic intersections will have working signals.

In 2024, there were 2419 separate instances of traffic signals malfunctioning; having traffic signals connected to our satellite Traffic Management Center allows these malfunctions to be noted in real time, and reduces the time required to repair the malfunction, and to restore the intersection to a safe condition with traffic signals operating in red, yellow, green.

In 2024, the city of Detroit had 234 separate incidents that resulted in loss of power to traffic signals. 71 of these power outages were due to storms, and an average of 18 separate traffic signals lost power during each reported power outage.

Reducing Barriers for Assistance: The City of Detroit will conduct proactive, strategic communication and program outreach throughout the life cycle of the program to ensure that barriers will be readily identified and reduced. The success of this communication and outreach will heavily depend on the levels of engagement from key community stakeholders and the City's responsiveness to any and all identified issues.

V. GENERAL INFORMATION

Citizen Participation

Per the "Universal Notice" in the Federal Register (90 FR 1754), in order to permit a more streamlined process and ensure disaster recovery grants are awarded in a timely manner, HUD has waived requirements at 24 CFR 91.105(b) through (d) and replaced them with requirements found in section I.C.2 - "Citizen Participation Requirements".

In addition, in order to ensure disaster recovery grants are awarded in a timely manner, the City of Detroit is waiving its requirements in its Citizen Participation policy found at #6 (Consideration of Public Comments) #9 (Publication of the Consolidated Plan, Annual Action Plan and Performance Reports) #10 (Public Hearings on the Consolidated and Action Plan), #11 (public Comment Period on the Proposed Consolidated and Action Plan) #12 (Substantial Amendments) for the CDBG-DR grant and is replacing them with the requirements below that align with the Citizen Participation Requirements in the Universal Notice.

Publication of the CDBG-DR Action Plan:

The City will publish a summary of the proposed CDBG-DR Action Plan on the City's Disaster Recovery website. This summary will be a prominent posting and will describe the contents and purpose of the action plan. Copies of the complete proposed plan will be available in the offices of the Housing and Revitalization Department and on the City's website. The City will publish all proposed Public Action Plan, amendments and public comments on the City disaster recovery website. Citizens, and other interested parties will have a reasonable opportunity to review the plan or substantial amendment.

Publication of the Action Plan and Opportunity for Public Comment:

Comments and opinions on the proposed CDBG-DR Action Plan will be considered by the City when preparing the final Action Plan. A summary of comments and views received will be attached to the final plan. A summary of the reasons for not accepting opinions or views not included in the plan will also be attached to the final plan. A draft will be available on the City's Disaster Recovery website.

Citizens can provide comments by using the following methods:

- Via telephone: 1-313-224-6380, Hours: Monday to Friday from 8:30 am-4:30 pm
- Via email at: Disasterrecovery@detroitmi.gov
- In writing at: Housing & Revitalization Department, Disaster Recovery Team, 2 Woodward Ave, Ste. 908, Detroit MI, 48226

Meetings

The city will provide citizens with reasonable and timely access to local meetings on CDBG-DR Action Plan related matters. In many cases, public notice of these meetings will be given using the methods described in the above public hearing section.

Public Hearings

The City will follow the requirements of the City of Detroit Community Outreach Ordinance as applicable and/or hold at least two (2) public hearings to obtain citizen views and to respond to proposals and questions on the Action Plan per the requirements of the Universal Notice. Public hearings may be held virtually. If more than one public hearing is held in person, the City will hold each hearing in a different location that promotes geographic balance and maximum accessibility.

The City of Detroit will hold two city-wide public hearings to inform residents on the draft CDBG-DR action plan after being posted on the disaster recovery website. The City will post a notice of public hearings on the City's CDBG-DR website. Public hearings will be held at a time convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities or limited English proficiency (LEP).

Notice of these hearings will be published on the City's Disaster Recover website at least one (1) day prior to the start of the public comment period, and the City will utilize one or more of the following methods of communication to inform residents such as: electronic mailings, press releases, statements by public officials, media advertisements, public service announcements and/or contacts with neighborhood organizations through the City Department of Neighborhoods.

Outreach and Engagement

The City of Detroit will hold 2 virtual public meetings, Citizens will be notified through the Housing and Revitalization Department's GovDelivery email, social media public notice, media advertisements and through the City of Detroit's Department of Neighborhoods.

In addition to the activities above, the City of Detroit will publish the action plan on the City of Detroit's Disaster Recovery webpage for a 30-day public comment period. Citizens will be encouraged to present their comments and opinions on the proposed plan at the public hearing, or by mail, email, or telephone directed to the offices of the Housing and Revitalization Department. Citizens will be notified via email blast at GovDelivery and Department of Neighborhoods listservs, social media outlets, and public service announcements.

Comments and opinions on the proposed action plan will be considered by the city when preparing the final action plan. A summary of comments and views received will be attached to the final plan. A summary of the reasons for not accepting opinions or views not included in the plan will also be attached to the final plan. A draft will be available on the City's website.

Citizens can provide comments via email at ***disasterrecovery@detroitmi.gov***. For more information, citizens can refer to the City of Detroit's Citizen Participation plan at:

<https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>

City of Detroit Disaster Recovery Webpage

In accordance with Section II.A.1.c of the Universal Notice, the City of Detroit must have procedures to maintain a comprehensive public website that permits individuals and entities awaiting assistance and the public to see how all grant funds are used and administered. As a result of CDBG-DR funds being appropriated, the city has created a separate CDBG-DR webpage <https://detroitmi.gov/departments/housing-and-revitalization-department/disaster-recovery>.

The City's CDBG-DR webpage will be updated on a regular basis (at minimum, quarterly) in accordance with established procedures and standards so that it will contain links to information regarding the use and management of grant funds. Links to all action plans and action plan amendments, performance reports, citizen participation notices, and program information for activities described in the action plan. Contracts and procurement actions that do not exceed the federal micro-purchase threshold, as defined in 2 CFR 200.1, are not required to be posted to the City's website.

Consultation of Developing the Action Plan

Consultation was held with the Detroit Housing Commission, Detroit Homeland Security and Emergency Management, Detroit Water & Sewerage Department, Detroit Department of Public Works, Detroit

Office of Sustainability, along with over 270 contacts across 117 non-profit and community organizations.

Consideration of Public Comments

Public Comments are attached to this document as Exhibit A

Modifications to the Action Plan

A substantial amendment to the Action Plan will follow the same procedures for publication as the original Action Plan in accordance with the city's Citizen Participation Plan.

<https://detroitmi.gov/sites/detroitmi.localhost/files/2023-01/Citizen%20Participation%20Plan%20-%20Revised%20%2810-17-22%29.pdf>.

All amendments, both substantial and non-substantial, will be posted on the city's CDBG-DR website. The beginning of every amendment will include a section that identifies the content that is being added, deleted, or changed. In addition, this section will include a revised budget allocation table that reflects the entirety of all funds and will clearly illustrate the movement or reallocation of program funding. The city's most recent version of the entire Action Plan will be accessible for reviewing as a single document at any given time.

Substantial Amendment

When a substantial amendment to the action plan is being considered, a notice will be published on the City's website and distributed via GovDelivery and Department of Neighborhoods list serves and social media outlets, in adherence with ADA and LEP requirements, that the city intends to amend the action plan. City of Detroit residents may request document translation and/or on-site interpreter services using the form link: <https://app.smartsheet.com/b/form/f2386a588787406aaa0268b05441a219>. The City of Detroit will follow the procedure outlined in the Citizen Participation Plan. This notice will describe the amendment and indicate how citizens may comment on it. A period of at least 30 days of the posting will be provided for citizens to comment on the amendment before it is an implemented substantial amendment. The City will consider, review, and respond to all public comments and views received on proposed substantial amendments and submit to HUD for approval. A summary of these comments and views will be attached to the substantial amendment. If comments and views are not accepted, the reasons for not accepting them will be summarized and attached to the substantial amendment.

At a minimum, the following modifications will constitute a substantial amendment:

- A change in the program's benefit or eligibility criteria.
- the addition or deletion of an activity.
- a proposed reduction in the overall benefit requirement, or
- A reallocation which constitutes a change of 25 percent or greater of a program budget (the four major program areas are Housing, Infrastructure, Economic Development and Planning)

Nonsubstantial Amendment

Although non substantial amendments do not require HUD's approval or seek public comment to become effective, the City will notify HUD of any plans to make an amendment that is not substantial. The City will notify HUD five (5) business days before the change is effective.

The city understands that the DRGR system must approve the amendment to change the status of the Public Action Plan to "reviewed and approved." The DRGR system will automatically approve the amendment by the fifth day, if not completed by HUD sooner.

Performance Reports

The City of Detroit will assign a Project Manager who will oversee the development and submission of quarterly progress reports (QPR's) for CDBG-DR. This Program Manager will work with partners, subrecipients, developers and/or contractors to collect applicable data and narratives for the QPR and will be trained to upload and submit information into HUD's Disaster Recovery Grant Reporting (DRGR) system within 30 days of the end of each quarter. All approved QPR's will then be posted by the Program manager or designee to the Disaster Recovery webpage.

Complaints

The city will respond to written complaints related to the CDBG-DR Action plan and substantial amendments in a timely manner. Complaints are encouraged to be submitted via email at disasterrecovery@detroitmi.gov but may also be submitted via telephone at 313-224-6380 or by mail to:

City of Detroit
2 Woodward Ave.
Suite 908. Housing and Revitalization Department (HRD)
Detroit, MI 48237.

Formal complaints may be made in person at public meetings and hearings, by mail, email and by telephone to the offices of the Housing and Revitalization Department (HRD). Response to

written complaints will be made in writing within 30 days, where practical. Persons with complaints will be encouraged to put such complaints in writing with appropriate documentation. Informal complaints may be oral complaints at public hearings, meetings, and by telephone. When possible, City staff will try to respond orally to such complaints immediately. In some instances, people making oral complaints will be asked to put the complaint in writing with appropriate documentation. In other instances, the City has and will respond within 30 working days either orally or in writing as appropriate and convenient.

Owners of property assisted with CDBG-DR funds will also be provided with opportunities to appeal the quality of work on their properties. The CDBG-DR Program Manager or their designee will review the appeal, and then either approve or deny the appeal. The owner will be notified in writing of the decision made within 30 days of the appeal. If the owner is not satisfied with the decision, the appeal is escalated to the Director of the Housing and Revitalization Department, where the Director has the final say. There's a limited time to respond to the appeal and all responses are provided in writing.

A record of each filed complaint or appeal is kept in an information file. When a complaint or appeal is filed, HRD will respond to the complainant or appellant within 30 business days where practicable. For expediency, HRD will utilize telephone communication as the primary method of contact, email and postmarked letters will be used as necessary to document conversations and transmit documentation. Information about the right and how to file a complaint shall be printed on all program applications, guidelines, and HRD's public website for CDBG-DR in all local languages, as appropriate and reasonable. Procedures for appealing an HRD decision on a complaint shall be provided to complainants in writing as part of the complaint response.

VI. EXHIBIT A – PUBLIC COMMENTS

Summary and Response of CDBG-DR Public Comments

February 27, 2025- March 28, 2025

Questions/Comments: (Email) I appreciate the opportunity to review the draft CDBG-DR Action Plan for the 2023 allocation of \$346 million. As a Detroit resident and small business owner, I understand the importance of these funds in supporting disaster recovery and community revitalization. I would like to emphasize the need for funding allocations that directly support small businesses, particularly those involved in essential services such as moving, delivery, and waste management. These industries play a crucial role in rebuilding and maintaining our communities. Access to grants or low-interest loans for local businesses could enhance recovery efforts, create jobs, and stimulate economic growth. Additionally, I encourage prioritizing home rehabilitation programs, infrastructure improvements, and targeted investments in underserved neighborhoods to ensure equitable recovery across Detroit. Transparency in how these funds are distributed will be essential to building trust and maximizing impact. Thank you for your time and consideration. I look forward to seeing how this funding will be used to strengthen our city.

Response to Questions/Comments: Thank you for your feedback. Funds will be used to address infrastructure repairs to prevent flooding in our residential areas across all city council districts, and we are targeting funds in the Brightmoor neighborhood for a large green stormwater infrastructure project. We agree that supporting small businesses is important, however these funds must be used to address impacts from the disaster and funds must be allocated based on unmet needs. The City has used FEMA and local data to determine that at this time Housing and Infrastructure are our greatest unmet need related to the 2023 disaster. We will, however, continue to share procurement opportunities with small businesses who are interested in providing the good and services needed to complete these proposed projects. All CDBG-DR procurements can be found here: <https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programming-and-information/cdbg-disaster-recovery/cdbg-dr-contracts-and-procurement>.

Please note that all of the details related to the use of CDBG-DR funding can be found here: <https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programming-and-information/cdbg-disaster-recovery>.

Questions/Comments: (Email) It would be better use if each homeowner received a grant for home improvement, especially water proofing.

Response to Questions/Comments: Thank you for your feedback. Based on FEMA Individual assistance data, we believe that only about 5,000 residents were directly impacted by the 2023 storm. Providing direct rehabilitation to these households requires that they be income eligible, demonstrate that they were directly impacted, and require proof that other funds (like homeowners insurance) were not received for the impact. To alleviate the burdens for homeowners and serve more Detroit households (12,000) the City is proposing to address

basement flooding by providing the sewer alley repair program. This will ease regulatory requirements, serve more households, and continue to prevent basement flooding in residential areas.

Questions/Comments: (Email) I propose we use money to assist homeowners repair infrastructure deficiencies that FEMA denied due to lack of funds.

Response to Questions/Comments: Thank you for your feedback. The City is proposing to use \$252,470,800 of the award towards infrastructure projects. This includes \$175MM towards sewer alley repairs to assist with residential neighborhoods across the City with preventing future basement flooding.

Questions/Comments: (Email) I am writing to OPPOSE the Canal Closure Plan and Flood Wall Project proposed by the City. I am a resident of and own a home in Jefferson-Chalmers where I've lived for the past 7 years - I live on Eastlawn by the AB Ford Park. In 2022, when the City initially proposed the Canal Closure, the City was met with overwhelming opposition to log jam the canals by the residents of the Jefferson-Chalmers community - all the reasons why our neighborhood opposed the City's proposal to shut the canals down were thoroughly researched and presented to the City in public forums - THE CITY AGREED WITH RESIDENTS TO ABORT THE CANAL CLOSURE PLAN. It is unconscionable that only a little over two years later, the City is proposing the Canal Closure Plan again - We STILL do not want our water ways log jammed, we will continue to fight the City on this proposal that would lead to the detriment of our . I can think of a lot OTHER things the City could do with the \$20 million that would actually benefit the residents of the Jefferson-Chalmers community - And I'd be happy to express these ideas with any City Official who might actually listen.

Response to Questions/Comments: Thank you for your feedback. The floodplain designation for Jefferson Chalmers went into effect April 2021. The impacts of living in the floodplain include, but are not limited to, potential negative impacts on property values, flood insurance requirements, lack of access to federal resources and constraints to substantial improvements to properties. As a result, the City is proposing the Jefferson Chalmers Flood Mitigation project which includes the installation of three stop log closure devices in which the temporary, removable stop log segments that will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again. In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

Questions/Comments: (Email) Thank you for the opportunity to provide input about the proposed plan. I agree that significant amounts of funding should be designated to infrastructure as outline. But the housing needs in the city of extensive and believe that additional funding to rehabilitate vacant apartment buildings to provide affordable housing is needed. Therefore an additional 25 million for housing would have a positive impact on the number of homeless families in the city.

Response to Questions/Comments: Thank you for your feedback. We agree that the housing needs are extensive and if additional funding is made available, we will consider increasing our

budget for housing. In addition to CDBG-DR, the City invests other funding annually into Affordable Housing, including but not limited to- CDBG and HOME.

Questions/Comments: (Email) I am an active, nature-loving young adult that has lived on Lakewood in Jefferson-Chalmers since January of 2022. During my 3 years here, I have grown to love my neighbors and my neighborhood. Kayaking through the canals just a few blocks from my home has been a dream come true, and I have been saving for my first motorboat for over a year now. It would be devastating to our community to have the canals closed. I wanted to let you know that I strongly oppose it, as the water access in Jefferson-Chalmers is a huge reason why I chose to live here. Please hear myself and my neighbors and find a different solution to the flooding. The canals are so important to us!

Response to Questions/Comments Thank you for your feedback. The floodplain designation for Jefferson Chalmers went into effect April 2021. The impacts of living in the floodplain include, but are not limited to, potential negative impacts on property values, flood insurance requirements, lack of access to federal resources and constraints to substantial improvements to properties. As a result, the City is proposing the Jefferson Chalmers Flood Mitigation project which includes the installation of three stop log closure devices in which the temporary, removable stop log segments that will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again. In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

Questions/Comments: (Email) I am vehemently against any closures to any or the canals! On October 11, 2022 at Hope Community Church this plan was relayed to our community and we unanimously told the city NO to closing canals!

The plan submitted in this document is a health risk and plan for failure for the following reasons: <https://detroitmi.gov/.../DRAFT%20Public%20CDBG-DR...>

1. Closing any of the canals is a public health risk and would create stagnant water issues. That water must circulate. There are already existing stagnant water issues along Ashland, Manistique and Alter.
2. The stagnant water will be compounded by the Sewage Release that currently discharges in the Fox Creek from communities to the northeast!
3. To lose canal access to the river would be a GREAT loss to recreation and to business.
4. This plan will drastically lower all property values within the Jefferson-Chalmers area.
5. Canals are a reason many of us live in Jefferson-Chalmers. This plan kills our neighborhood.

The city has promised to complete seawalls along city-owned 17 lots and done NOTHING. Those who OWN canal property are RESPONSIBLE for their own property and must make the repairs. These property owners reap the benefits of canal front living including in their property values

and if their seawall is failing, they are causing other property owners to be at risk of flooding and flood insurance.

My general solution:

1. Create an all encompassing seawall plan
2. City/County Require each property owner with canal front to comply
3. City vets and chooses a contractor/contractors for the entire job
4. Contractor benefits by bringing in heavy equipment 1-time for entire job
5. All property owners receive a discounted rate on their seawall
6. Financing is possibly made available...

This is an OPPORTUNITY to repair the failed seawall infrastructure throughout the Jefferson-Chalmers neighborhood and save our top resource!

Response to Questions/Comments Thank you for your feedback.

- (Canal Closing) The currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.
- (Property Values) The floodplain designation for Jefferson Chalmers went into effect April 2021. The impacts of living in the floodplain include, but are not limited to, potential negative impacts on property values, flood insurance requirements, lack of access to federal resources and constraints to substantial improvements to properties.
- (Environmental Impacts) There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:
 - Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- (Seawalls) We acknowledge that repairs are needed for the city-owned seawalls. However, addressing the seawall repairs will not remove the neighborhood from the floodplain. Additional information regarding grant opportunities for private owners (through another funding source) will be shared soon to assist with their seawall repairs. There are limited options to fund private seawall projects with the public's money, as expending city general funds on private seawalls is a non-starter. It is possible for the community to explore initiating a Special Assessment District (SAD) for private seawall Improvements. The city cannot advocate for (or against) an SAD proposal, but we can

help provide guidance and administrate a neighborhood-initiated SAD request. Repairs, replacements, and height adjustments to existing public and private seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight.

Questions/Comments: (Email) Harbor Island resident with a house on the canal/Scripps side. I am contacting you to urge you to reject any proposed use of recovery funds to essentially close the canals as described in the current proposal, p. 48

We have a strong community here on the canal. It includes:

- *Commerce in the form of boat slip rentals, kayak tours, access to Coriander Restaurant
- *Boating and fishing, kayaking, paddleboarding, additional sports
- *Garden flower and vegetables
- *Native American history
- *Colorful Prohibition tales featuring canal access to booze
- *Canal family and friends
- *Nature with kingfishers fishing in the canals, turtles, bird nests, more
- *Pride in black waterfront ownership legacy and future opportunities for that
- *Access to Canadian friendship

Closing the canals will wipe out our canal community. It even just sounds ridiculous. Please don't go for this proposal, and please explore and advance alternatives more carefully. I believe my neighbors will speak against the proposal with additional reasons. Thank you for listening to my voice here.

Response to Questions/Comments Thank you for your feedback. The floodplain designation for Jefferson Chalmers went into effect April 2021. The impacts of living in the floodplain include, but are not limited to, potential negative impacts on property values, flood insurance requirements, lack of access to federal resources and constraints to substantial improvements to properties. As a result, the City is proposing the Jefferson Chalmers Flood Mitigation project which includes the installation of three stop log closure devices in which the temporary, removable stop log segments that will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again. In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email) After attending today's meeting for community feedback on the CDBG Disaster Recovery Draft Action Plan, I must say that I **strongly oppose** the City's proposal to use the \$20M in funding to install levees and stop logs in the Jefferson-Chalmers neighborhood. I understand that there is significant funding available, which must meet certain criteria for how it is spent, and I understand the desire to remove the floodplain designation which is a desire that I also share. However, there are significant and obvious concerns with the proposal which have not been addressed, which have the potential to cause great harm to the neighborhood and its wonderful residents.

There are very significant potential downsides for (1) water stagnation, becoming a mosquito breeding ground, (2) blocked river access for the neighborhood's many businesses, fishing charters, and recreational users, (3) it doesn't address the root issue of sewer backups caused by combined sewerage systems including discharges from outside the City, (4) devalued properties, (5) ongoing costs for the city for removing and reinstalling the stop logs depending on water levels, (6) stop logs being left unmaintained, similar to the Tiger Dams which were left in residents yards long after they were needed, (7) overflow sewage being discharged into the Fox Creek canal with nowhere to go due to the stop logs.

Given the seriousness of these concerns and the clear lack of an answer to some basic questions during the meeting, I am left very concerned with the City's proposal. This seems like a very expensive shortcut to try to remove the floodplain status that doesn't address the root issue of sewage backups. **Spending a lot of money doesn't always lead to a solution - sometimes it just leads to a more expensive problem.**

Some questions that I have:

- 1) Who came up with the idea of installing levees and stop logs?
- 2) How are "periods of high water levels" defined and how often are those estimated to occur, where the stop logs would need to be installed?

- 3) I read that during periods of low water levels the stop logs would be removed. What does "removed" mean? Does it mean that they would be left in a raised position, or would the entire barrier be removed and stored somewhere?
- 4) Who is in charge of operating the stop logs?
- 5) I see a variety of designs for stop logs when looking online. Is there a proposal for what the stop log installation or design would look like?
- 6) During the call it was alluded to that water stagnation had been considered, however it wasn't brought up again. What measures are planned to be taken to prevent water stagnation, unpleasant smells, mosquito breeding, etc.?

Response to Questions/Comments Thank you for your feedback.

1. Who came up with the idea of installing levees and stop logs? – **U.S. Army Corps of Engineers (USACE), the information can be found in a City of Detroit Floodplain Management document here:**
https://detroitmi.gov/sites/detroitmi.localhost/files/2022-08/Jefferson%20Chalmers%20FPMS%20Study_July2022.pdf
2. How are "periods of high water levels" defined and how often are those estimated to occur, where the stop logs would need to be installed? – **National Oceanic and Atmospheric Administration (NOAA) keep trends on the levels of the Great Lakes, including a level viewer here: <https://www.glerl.noaa.gov/data/wlevels/> This information is used to determine the rate of high water levels. When waters reach approx. 575ft., that is when stop logs will likely be deployed. Historically this has occurred roughly every 10 years, with incidents occurring for about 4-6 months at a time.**
3. I read that during periods of low water levels the stop logs would be removed. What does "removed" mean? Does it mean that they would be left in a raised position, or would the entire barrier be removed and stored somewhere? – **The City anticipates that individual stop log segments will be lifted from their fixtures and stored until needed again.**
4. Who is in charge of operating the stop logs? – **City of Detroit**
5. I see a variety of designs for stop logs when looking online. Is there a proposal for what the stop log installation or design would look like? – **The design on the stop logs will be determined during preliminary engineering studies and due diligence.**
6. During the call it was alluded to that water stagnation had been considered, however it wasn't brought up again. What measures are planned to be taken to prevent water stagnation, unpleasant smells, mosquito breeding, etc.? - **The water stagnation will be studied and resolved during preliminary engineering.**

Questions/Comments: (Email) As a property owner along the river in this area, I am opposed to a plan that blocks access for any period of time to the Bayview Yacht Club/Kam Marine properties.

Response to Questions/Comments Thank you for your feedback.

Questions/Comments: (Email) As a homeowner on the canal. By Permanently blocking the canal outlet to the river would severely impact my property value in that Access to the river is a large part of the unique value of my home in this area. I feel that an alternative plan that does not permanently block access to the river should be developed.

Response to Questions/Comments Thank you for your feedback. The currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

Questions/Comments: (Email) I am writing to express opposition to the installation of stop logs on the Jefferson Chalmers canals. It was my and my neighbors' understanding that this proposal was rejected already, we are confused and concerned by the city's recent notice of this plan being revived.

- The waterways in our neighborhood are some of the most prized natural amenities in this city, closing them off to the Detroit river would surely cause economic and ecological harm.
- The city needs to do further studies of the potential impacts and explore more options for the residents of Jefferson Chalmers.
- Has there been any discussion of matching funds to homeowners with faulty seawalls to have these projects completed?
- Has there been any outreach to federally insured contractors capable of taking on the project of the remaining seawalls in need of repair?
- Is there potential for a SAD program for our area to fund seawall repairs? If so, why has this not been offered as a solution?
- What studies have been completed to review the economic and ecological impact of closing the canals? Has the city conducted any surveys of residents on the canals who would consider leaving the city if this project were to take place?
- I believe I speak on behalf of most of not all of my neighbors by saying this is NOT the answer.

Response to Questions/Comments Thank you for your feedback. We recall previous comments by a number of neighborhood residents in opposition to a similar proposal, however

that proposal recommended two permanent canal closures and one stop log installation. The currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

The floodplain designation for Jefferson Chalmers went into effect April 2021. The impacts of living in the floodplain include, but are not limited to, potential negative impacts on property values, flood insurance requirements, lack of access to federal resources and constraints to substantial improvements to properties.

Repairs, replacements, and height adjustments to existing public and private seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight.

There are limited options to fund private seawall projects with the public's money, as expending city general funds on private seawalls is a non-starter. It is possible for the community to explore initiating a Special Assessment District (SAD) for private seawall Improvements. The city cannot advocate for (or against) an SAD proposal, but we can help provide guidance and administrate a neighborhood-initiated SAD request.

No further surveys have been conducted for residents on the canals.

Questions/Comments: (Email) Imagine being a kid. You are living in your home that you and your family work hard to keep, maintain, and cherish. It is the pride of your family's lineage and it is deeply tied to your family's identity. Your family grows an intimate relationship with the water, the land & the property that you all work hard for in a city you love. Imagine feeling like that, only for that city to not return that love back.

I love Detroit. I really do, and I'm proud to be here. There was a time when the city and its residents worked hand and hand to create sustainability for both. Now, it doesn't feel like that. I ask you to put yourself in the scenario I mentioned above, irregardless of money, politics or class, please tell me how you would feel. That is the feeling of many Detroiters who woke up thinking that what they and their families work hard for, in a city they love, would be respected—only to not be heard the first time when asked if the residents of the city wanted permanent stop logs. **LET ME REPEAT THAT PERMANENT.** There are residents in the city who have proposed better and more sustainable options to this matter. The city and its residents do not need another quick fix similar to what happened with the orange dams that were placed in backyards (something that residents also pushed back on and are still dealing with), only for it to backfire when the severe weather took place.

Do you remember the calls the city took? Is this another problem you all want to have? I hope the answer to that is no. I really pray this city isn't this cold to the residents that vote, support local officials and spend their hard-earned money in the city. This is an election year and this issue will very much affect who gets into office and what support they will receive. Word of mouth is reliable and powerful. I propose we work towards sustainability and community togetherness. Finding common ground and working towards a shared goal. Making Detroit sustainable and sustainable for decades long after you or I are here.

Water can not be stopped. It will go where it wants to go. Stop logs will do nothing but overwhelm DWSD in another location that the city, its residents and the federal government will pay for time and time and time again. We know this. We know this all too well. We have the resources with this CDBG funding to be creative and work with nature in a way that is best for all. There are organizations who can help the city gather this information & are equipped and ready to do so. There is room to work together. But there isn't room to create even more of a gap between residents & the government. Chaos thrives in disparity and the city has been through too much to go backwards. The thread is thin, **but we, we can make it stronger.** This is the fabric of Detroit. The greatest city in the world. The city that innovates, moves to the beat of its own drum & inspires the world.

We do not need stop logs and a short-term fix. We can rely on our innovation and creation for a long-term, sustainable fit. Let's be on the right side of history.

Response to Questions/Comments: Thank you for your feedback. The currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

Upon receiving the funding, the City intends to procure a consultant team to ensure that this is the most prudent and feasible option for the flooding and floodplain challenges.

Questions/Comments: (Email) This email is to represent a **Clear Opposition** to the proposed Flood Mitigation plan. Let me first mention we have never had a flooding problem here, even during the summer of 2019 when the water levels were extremely high we had no issues. The plan represented is vague at best and offers no clarity.

- - Closing the harbor entrance will directly affect our ability to operate our business and local recreational boating.
- - We service and store more than 130 boats, these boaters may not be able to come in for storage or they would could be stuck in storage not be able to launch and use their boats. These boaters could be left stranded with no options.
- - We would have to shut down, lay staff off and have no revenue stream to pay taxes etc.
- - The State of Michigan promotes and rely' s on the Recreational Boating Industry for about \$700, 000.00 Annually.
https://www.nmma.org/assets/cabinets/Cabinet508/Michigan_Boating_Economics%20CD%204.pdf
- - Property values would be directly affected.
- - A more logical solution would be to make sure that the infrastructure of sea walls, property, roads etc. are high enough to stop points of ingress not block water from a complete harbor or entrance.
- - Gregory's River Club Condominium Association and Bayview Yacht Club are also directly affected if this harbor was to close.

Response to Questions/Comments: Thank you for your feedback. While Kam Marine may not have experienced any issues from the rising lake levels in 2019, there was canal overtopping within the Jefferson Chalmers neighborhood. In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the

sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, “flooding” means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

The City acknowledges that we still need to confirm additional information. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

Questions/Comments: (Email) Please reply to my concerns regarding Jefferson Chalmers Flooding and Floodplain Mitigation and related activities in the CDBG-DR Plan.

I live on Lakewood Street a few doors down from the canals, where I’ve observed flooding and floodplain issues for 46 years. I participated in the City’s public meetings on its proposed stop logs programs in 2022, and I briefly discussed that work with Mayor Duggan in 2023. I have the following concerns:

Floodplain mitigation. Can the City adopt permanent activities to inform the public on the following issues?

1. Why we need to remove FEMA’s floodplain restrictions—the short and long-term costs for those restrictions, and
2. Why we need the stop log dams system—FEMA’s apparent mandate for local government control of flood barriers.

Lakewood, Phillip and Fox Creek canals. Can the City describe how the it will address these additional concerns in the canals, which may be exacerbated when stop log dams are in place?

1. Combined sewer overflows (CSO's) during storm events into the canals. Is the Jefferson Chalmers Direct Discharge System on page 29 related to ending these CSO's?
2. Fresh water circulation in the canals.

Response to Questions/Comments: Through the Department of Neighborhoods, the City remains committed to ongoing dialogue with the residents of Jefferson Chalmers regarding the impacts of being in a floodplain (flood insurance requirements, impacts on the use of federal funding, and limitations to substantial improvements on properties just to name a few). The City intends to procure a consultant team to assist with stakeholder outreach as the official mitigation project is being developed.

There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email) To whom it may concern:

Hello, I just moved to Klenk Island in the Jefferson Chalmers neighborhood in December. I have lived and worked in the neighborhood for about eight years and love that I'm now able to put down roots here owning a home with my husband. I have major concerns and questions about the Jefferson Chalmers Flooding and Floodplain Mitigation Plan that I'd like to share.

To start, I attended the zoom meeting on March 10th and was discouraged and very frustrated that when I logged on at 6:01 I had missed what seemed to be half of the city's presentation. I was told by a neighbor that the meeting had started ten to fifteen minutes early. I would like to recommend for future meetings that the presentations and introductions from the city actually

start at 6:00pm and not ten to fifteen minutes early. If I was mistaken on the time that the meeting started then I apologize, that is my responsibility, but otherwise I find that very inconsiderate and unhelpful and would like to pass the word along to have the start time be an honest time for all who are looking to attend.

Without knowing who was leading the call, who was sharing the information, where the research and proposals had come from and what roles and positions each person had, it made it very confusing as an attender who arrived what I thought was on time. When there were questions at the end of the call and people out of nowhere on screen would appear and would be commenting on what the proposal was and different aspects of it, it felt chaotic and disorganized. I don't think that's what was intended and it all stemmed from the meeting not starting at the correct time.

So my first set of questions would be, Who designed and thought up this proposal, specifically in regards to the Jefferson-Chalmers flooding and stop logs? What research went into this, besides the USACE report from 2022? Someone referred to the Jefferson Chalmers stop logs as "still at concept level". With that being said, when does it move to more than just a concept? What sort of dates and timelines are associated with this project to make it move from a concept to a legitimate plan?

I was able to hear and view the powerpoint presentation during the meeting in regards to the stop logs. However I did not hear that installing the stop logs would resolve the floodplain designation. So my most pressing question is for the department of people who put this plan together, **what is required to get this neighborhood out of the floodplain designation? And why would we install "temporary" stop logs if that will not get the neighborhood out of the floodplain?** What do the canals have to do with the floodplain? The water levels in the canals behind my house are currently so low I can't even access the dock because there's no water in it. There might be high water levels in Lake St. Clair but I do not see the direct impact of that in the canals surrounding my house that you are looking to put stop logs in.

Back to the topic of the floodplain designation, in some of my research surrounding this topic I found it helpful to see that -- "FEMA uses the most accurate flood hazard information available and applies rigorous standards in developing [Flood Insurance Rate Maps \(FIRMs\)](#)." (quote from [website](#)) *Rigorous standards* sound like it's more than my paygrade to understand how the mapping gets worked out. But if it's the job of someone to determine the mapping then is it possible to ask them what is required to get us out of the floodplain? Would we ever be able to get out of the floodplain? Or is the topography of the neighborhood too low? Has someone already asked these questions for this neighborhood? If so, I would love to read the report and see what the steps would be to get out of the floodplain.

My next set of questions and comments has to do with if this plan was to continue moving forward past the concept level. What kind of stop logs would be put in place? After being told in the meeting simply to Google the designs for stop logs I did just that and I have concerns about what the designs would be. My husband has dreamed of owning a sailboat and that weighed heavily into our decision to buy a house on the canal that would give him direct access to Lake St. Clair and the Detroit River. If some of the designs of stop logs were put in place, he and others would not be able to get through because there would be a height limit to the boats coming from the canals to the Detroit River. On the opposite side, the stop logs that rise from the bottom would also cause issues with people who kayak the canals because of the already low water levels in the canals would mean a kayak would bottom out against the new infrastructure that was there. And to narrow the canals with stop logs that move from the side might also cause issues for the fishing boats and others who have a wider boat and use the canal for recreation or their careers depend on it. **I am resistant to the idea of installing any sort of stop log, as temporary as they may be.**

Another reason that I'm resistant to the idea is that I do not trust that the temporary nature of the stop logs would actually be temporary unless these questions have been thought through and have clear answers. Who would open and close the stop logs? Would that be a department of the city or a singular person who decides that? How often would the stop logs be opened or closed? Would someone be tracking weather patterns for months and years to determine when we might get another 1 in 25-year storm and be ready to close the stop logs? Would the neighborhood and community have any say in the decision to open and close the stop logs? How would residents here be communicated with about the openings and closings?

According to the Public Action Plan the limited storm water and sewage capacity were deemed critical factors in the flooding. Why couldn't we spend the money on infrastructure as opposed to installing these three stop logs? On page 24 of the report in Chart 1 it shows flooding as the #1 rank overall if you total the columns. Since flooding is an event based on the weather, which we cannot control, is there a possibility to use the funds for infrastructure failures or structural fires since those are the next highest total combined numbers which show the highest threats? Chart 2 on page 24 continues to prove that point that the probability of flooding is ranked a 3/5 for likelihood of occurrence whereas infrastructure failure is at a 5 and to me shows that money could be used for more infrastructure repairs and not on the stop logs that we don't know would even take us out of the floodplain.

(As for the flooding of the Rouge River and the neighborhoods that are impacted by that flooding, I would be happy to give them all the stop logs from this side of town if it would be beneficial to help with the flooding in other parts of the city.)

But as someone who has cleaned sewage water out of mine and my neighbors basement during the flooding of 2021, it was not just rainwater that I was cleaning up. There was a problem with

the pumping station and the infrastructure (and also it was just a wild storm that we haven't seen in 1,000 years).

In conclusion, **I do not support the stop logs in the Jefferson-Chalmers neighborhood that plan to block the Lakewood, Philip, and Fox Creek canals.** I hope that you take these questions and comments into consideration when deciding how to move forward with the funding and the plan.

Response to Questions/Comments: Thank you for your feedback.

1. We acknowledge that the CDBG-DR presentation on 3/10 did begin early and apologize for any inconvenience this may have caused. You can view the recorded presentations on our webpage here: <https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programming-and-information/cdbg-disaster-recovery>
2. The U.S. Army Corps of Engineers, in their 2022 floodplain management study, recommended an alternative that included one stop log installation and two permanent canal closures. Rather than close any canals permanently, the City is now proposing three stop log installations.
3. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:
 - Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
 - Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

This process will determine the timeline.

4. In order to get relief from the floodplain designation, all possible sources of flooding would need to have some sort of intervention/physical change installed to meet FEMA requirements.
 - a. The canals are a source of flooding within the neighborhood. In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, “flooding” means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means

more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

- b. Repairs, replacements, and height adjustments to existing public and private seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight https://www.fema.gov/sites/default/files/documents/fema_meeting-criteria-accrediting.pdf There are limited options to fund private seawall projects with the public's money, as expending city general funds on private seawalls is a non-starter.
5. The City will consult with FEMA as a part of the project development process to ensure that what we are proposing will get us floodplain designation relief.
6. The currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.
7. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:
 - Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
 - Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.
8. A detailed final operations and maintenance plan will be developed by the City as part of the project pre-construction process as approved by FEMA.
9. The proposed project in the Action Plan is using the CBDG-DR Mitigation funds, which does not require us to tie-back to the 2023 storm but requires us to address future impacts from potential flooding. The City is proposing over \$175M in infrastructure projects that are related to the sewer capacity issues.

Questions/Comments: (Email) I am a Detroit resident, developer, and builder. We need to receive disaster relief and expect that HUD and this administration honor our investments in infrastructure and affordable housing.

Response to Questions/Comments: Thank you for your feedback. The City is proposing majority of the funding go towards housing and infrastructure.

Questions/Comments: (Email) I am a landlord and developer in Detroit and I am writing to express my support of allocating HUD dollars for affordable housing programs and community infrastructure in the City. As a small developer, programs like the new affordable housing PILOT, rental assistance for low-income families and the City's investment in basic infrastructure (clearing alleys, replacing sewer lines, lead pipe replacement) have directly affected my projects and allow me to continue investing in Detroit neighborhoods.

Response to Questions/Comments: Thank you for your feedback.

Questions/Comments: (Email) My feedback concerning the City of Detroit CDBG-DR Action plan is the I find it to be the following--

- Welcomed and resident focused
- Organized and realistic to serve the our homeowner needs
- Utilizing and comprehensive and long range approach
- A plan the I can endorse and look forward to the City accomplishing it's concrete and well thought out goals

Thank you for allowing me to add my feedback on this plan. I know from personal experience (good and bad) with some of the issues it seeks to address it's importance to homeowner's. This also will have a great impact on the quality of life and PRIDE of citizenship of Detroiters.

Response to Questions/Comments: Thank you for your feedback.

Questions/Comments: (Email) I would like to request that Stahelin Avenue between Puritan and McNichols be considered for flood prevention. This area, especially closer to McNichols, is frequently flooded, even with small rain events. You can see water pooling on the surface of many yards and vacant lots and basements are frequently flooded. Flooding often spills over in the backyards of those who live on Sunderland, the adjacent road, as well. Grandmont Rosedale Development Corporation owns an affordable rental property on Stahelin near McNichols which flooded so many times in the last couple of years that our insurance company dropped us and we had to find a new provider. We have renovated this same house three times now, due to flooding.

The area is also right near Cooke Elementary School, located at Puritan and Stahelin, where many students walk home from school. While this stretch of Stahelin is located in North Rosedale Park, these three blocks were mostly developed in the 1950s and 1960s with a much smaller housing stock than the rest of the neighborhood. This stretch of Stahelin was economically devastated during the Great Recession, and never really recovered like the rest of the neighborhood did. As such, the median income in this area is much lower than the surrounding neighborhood and residents here do not have the means to address flood mitigation on their own.

Response to Questions/Comments: Thank you for your feedback.

Unfortunately, the area that you indicated does not fall within the income restrictions which is 51% or more of the census tract be considered low or moderate income, which is a requirement for this federally funded grant program.

We have forwarded your request to DWSD Maintenance and Repair division for further investigation to determine whether sewer main cleaning or catch basin cleaning is needed to provide improved drainage and conveyance. We do have an existing service request to investigate a blocked basin at or near 16615 Stahelin Avenue (SR#167341), we will make sure this is prioritized.

Questions/Comments: (Email) Dear City of Detroit Disaster Recovery Team,
As you know, Southwest Detroit's underground infrastructure is over 95 -122+ years old & needs to be replaced &/or repaired with the \$346 million funding for a long-term preventative action plan for our water main system & our sewer system. Targeting Southwest Detroit's neighborhoods include the City of Detroit's Historic Corktown & Hubbard Farms Historic Districts, two of the oldest neighborhoods within our City.

Southwest Detroit neighborhoods are also very densely populated, where generational family homeowners invest in their homes which adds another justification for the City to invest in our neighborhoods' antiquated infrastructure. Our City must implement an important & necessary preventative action plan for infrastructure investment in Southwest Detroit's densely populated neighborhoods because never again, should hundreds of families & their homes, cars & streets become flooded & not habitable for 2-3 months due to a massive water main break that was & continues to be disastrous for our families who were impacted. Thank you for this infrastructure investment consideration in Southwest Detroit.

Response to Questions/Comments: Thank you for your feedback.

Unfortunately, the areas of Corktown and Hubbard Farms that you indicated do not fall within the mandatory income restrictions which is 51% or more of the census tract be considered low or moderate income, which is a requirement for this federally funded grant program.

The 54-inch water main break that caused extensive flooding and hardship recently within portions of Southwest Detroit is a water transmission asset under the control of the Great Lakes Water Authority. This CDBG-DR project is targeted for providing flood risk mitigation from wet weather events primarily through alley sewer repairs, not drinking water transmission or distribution system improvements. We will forward your input to GLWA, and I have also attached a presentation of near term DWSD initiated water system improvements in and around the neighborhoods you referenced.

DWSD Engineers and contractors are doing comprehensive inspection and assessment of the water and sewer systems under DWSD's control on a neighborhood-by-neighborhood basis. These assessments lead to strategic capital improvement projects that rehabilitate or replace the highest risk assets first. Both neighborhoods you referenced are scheduled for the comprehensive inspection and assessment of both DWSD water and sewer systems. Below is a link to this comprehensive program if you would like additional information:

<https://detroitmi.maps.arcgis.com/apps/dashboards/ef345a033b31455b831ea3723886f564>

Questions/Comments: (Email) The presentations of how the money will be allocated was helpful. Is there any way block clubs can attempt to get their alleys on the list for repair? We have 2 sink holes.

Response to Questions/Comments: Thank you for your feedback. Please send us specific location information and our team will determine whether the location meets the federally funded income criteria. Once our team develops a proposed plan, we will review with the respective council members before finalizing.

Questions/Comments: (Email)



March 28th, 2025

RE: Support for the City of Detroit's CDBG-DR Action Plan

Dear Sir or Madame,

Jefferson East, Inc. (JEI) expresses its support for the CDBG-DR Action plan laid out by the city of Detroit in response to the 2021 floods. As a community development organization serving many of the neighborhoods impacted by these disastrous floods, the plans outlined will help residents recover, improve public infrastructure to prevent future floods, bolster emergency response, and provide support for critically needed affordable and disaster resilient housing.

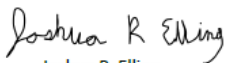
In addition, the \$20 million allocation to support shoreline flood defense systems within the Jefferson Chalmers neighborhood are critically needed to remove this vital community from the federally established floodplain. This designation has negatively impacted residents by lowering property values, forcing residents to purchase flood insurance, and has killed economic development by preventing federal funds from supporting development.

As an example, an affordable housing development that JEI's development subsidiary (EJDEVCO) developed that now lies within the floodplain must now buy federal flood insurance at a cost of more than \$6,000 annually. This cost works to reduce the affordability as each unit has to bear an additional \$62 per month cost. As a result, the federal floodplain designation reduces affordability and works to displace our most economically vulnerable residents.

We fully understand that before the proposed shoreline flood defense system can be built, several critical solutions must be engineered. These include a permanent halt to emergency sewerage and stormwater discharge from the Fox Creek Back Water Gates, hydrological studies to understand other potential water outflows into the local canal system, and a clear understanding by residents of the mechanisms around the operation and maintenance of this new publically owned system. This includes clear terms that define when and how the 3 temporary "Stop Log" canal closures will be closed/opened.

However, despite these still to resolve issues, JEI feels that it is critical that the city of Detroit work to rapidly deploy all elements of the flooding recovery and mitigation efforts outlined in the current CDBG-DR action plan. We look forward to continue to work with the city of Detroit, federal/state agencies, and stakeholders to move this process forward.

Kindest Regards,


Joshua R. Elling
CEO

Response to Questions/Comments: Thank you for your feedback.

Questions/Comments: (Email) Jefferson Chalmers Water Project, I am opposed to the current proposal.

Response to Questions/Comments: Thank for your feedback.

Questions/Comments: (Email)



March 21, 2025

City of Detroit

Via email to: Disasterrecovery@detroitmi.gov

Re: 2023 CDBG-DR Action Plan

Bayview Yacht Club ("BYC") submits the following comments in response to the Notice of Public Outreach issued in connection with the CDBG-Disaster Recovery Draft Action Plan arising out of the August 24-26, 2023, presidentially declared disaster for flooding and severe storms.

The plan proposes to allocate \$20,000,000 to construct (a) stop log structures across Lakewood, Phillip and Fox Creek canals, (b) earthworks in Mariners, Riverfront - Lakewood East, AB Ford and Maheras Gentry Parks, and (c) a "floodwall at KAM Marine/Bayview Yacht Club," to prevent water from the Detroit River from flooding into the neighborhood during high water levels on the Great Lakes. The City claims that implementation of its plan will "aid in the removal of the floodplain designations in the Jefferson Chalmers neighborhood and surrounding neighborhoods."

BYC is a Michigan non-profit corporation with approximately 1,000 members that owns a clubhouse and marina facilities on the Detroit River between Maharas Park and Conner Creek. The club's facilities include a commercial kitchen to serve dining and banquet rooms that are used year-round, marina facilities providing summer dockage, winter boat storage, and both fixed and mobile equipment used to move, launch, and haul out boats. The club is managed by a full-time professional management team and operated by a staff of full and part-time employees. BYC's real property consists of 6 parcels of land, some of which are non-contiguous. Access to BYC is via Clairpointe and a private access drive that is shared with other property owners or their tenants, including KAM Marina, MST Associates, and the Gregory River Club condominium.

The City's plan does not identify exactly where the proposed floodwall would be located nor does it address how the erection of a floodwall during periods of high water on the Great Lakes would impact access to BYC and the other properties. It must be recognized that water levels on the Detroit River are not a function of short-term heavy rainfalls and do not dissipate within a few days after a storm. To the contrary, winter snow fall, the extent of ice cover and other factors over the entire Great Lakes basin impact water levels in the Detroit River. Consequently, water levels rise and fall in seasonal and annual cycles. When water levels are high, they typically remain at high levels for one or more boating seasons before they begin to fall. Likewise, when water levels are low they typically remain low for one or more boating seasons before the trend reverses and they begin to rise again. Indeed, during periods of low water BYC often must



undertake the expense of dredging its harbors to maintain adequate water depth for its marina facilities to be used. Waiting several years for water levels to rise again is not a practical option.

Under these circumstances it is not reasonable for the City to propose to build a floodwall that blocks or otherwise impedes access to BYC during periods of high water levels that may last for months or even years. BYC has operated at its current location for over 100 years and recently

replaced its clubhouse at a substantial cost that required much of it to be financed through bank loans. BYC's revenues are dependent on membership dues and member usage of the club's facilities. Blocking access to the club for what could be months or even years would have severe adverse consequences, not only for the club but also its employees, food vendors and other suppliers and their employees.

It also should be noted that the 2023 disaster that is the subject of the City's Plan did not result in any water overflowing Bayview's property, nor did any water flow over the access drive and on to Clairpointe or flood any of the surrounding neighborhood. Furthermore, not even the all-time high water levels that occurred in 2019 and 2020 result in any such overflow or flooding.

BYC is a member of the Jefferson-Chalmers community and would like to cooperate with its neighbors in their effort to be removed from designation as a floodplain by FEMA, but not at the expense of being shut down and having to lay off its employees for any period of time. Rather than erecting a floodwall that blocks access from Clairpointe, the City should develop a plan that maintains access at all times to BYC, KAM and the other properties that use the common access drive. Raising the elevation of the public road leading to the access drive high enough to satisfy FEMA requirements without impairing the ability for vehicles, including large trucks and trailers, to enter and leave BYC, KAM and the other properties would be a much better solution for all concerned. Therefore, BYC is strongly opposed to the Plan to the extent it contemplates erecting a flood wall at the entrance to BYC/KAM.

Finally, while the proposal to place stop logs across three of the canals at Fox Creek, Philip and Lakewood would not have a direct impact on BYC's operations, some of our members use those canals for recreational purposes and we believe access to the water is an essential and key feature of the community. Consequently, we are also opposed to the Plan to the extent it calls for the erection of stop logs that would prevent access to these canals for any period of time.

Bayview Yacht Club
By: Paul Falcone
Paul Falcone, Commodore

Response to Questions/Comments: Thank you for your feedback.

In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of

river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, “flooding” means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

Questions/Comments: (Phone) “The three stop logs are closing the canals and pose a health and safety risk. It creates stagnant water in canals and neighborhoods and causes mosquito infestations and smells terrible. There is a CSA sewer from Grosse Pointe that dumps raw sewage (poop water) into the Fox Creek Canal (AKA Ashland Canal). This would be an absolute detriment to the neighborhood and the community already told the City no on this project.”

Response to Questions/Comments: There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email) I am a longtime homeowner in Jefferson Chalmers. I'm writing to oppose the measures outlined in the Community Block Development Grant Action Plan as well as offer alternative suggestions to help meet the objectives of the proposal.

The proposal outlines \$20 Million in funding for a Jefferson Chalmers Flooding and Floodplain Mitigation project, which includes installation of permanent fixtures for temporary stop logs at several key points along the riverfront, including Fox Creek Canal, Lakewood Canal, and Phillip Canal. The intention of this proposal is to mitigate neighborhood flooding, however this plan as described would be ineffective at best and has the potential to create more issues than it prevents.

Firstly, there are several key fallacies which these recommendations are predicated upon:

1. The action plan references *"Water levels in the Great Lakes system have been rising substantially in the last few years. On Lake St. Clair, water levels have risen over five feet over the past seven years."* This statistic is inaccurate, as the water levels have been rising and falling cyclically since we first began measurement and are currently receding. In the early 2010's, the water was so low I was able to walk down the center of the canal near what is now Coriander Kitchen. Levels again are approaching a low cycle, with many boaters concerned that water levels may be too low to safely navigate the canal system this season.
2. The plan conflates separate flooding events of 2019 and 2021. The pump station failures of 2021 were some of the most catastrophic in terms of overall damage and community impact, yet this was wholly unrelated to water levels, rather mechanical failure combined with human error. My home has been damaged multiple times from water backups - not from the Detroit River but from the Detroit Sewage system.

While I believe the facts are being misconstrued to help advance this project, as a homeowner and member of the community I do understand the value of protecting our neighborhood from potential water damage as well as the economic benefits of removing our floodplain designation. The stop log solution is simply not the answer.

One reason why this plan is untenable is that the impacts of actually employing a dam would have catastrophic results. Fox Creek is a natural tributary which feeds into the Detroit River, not the other way around. Putting a dam would do nothing to stop water from coming into the canal system however it would prevent it from flowing out to the river. This could have the potential to create a worse flooding issue by creating a backup of water with nowhere to go. Additionally, damming off the canals would have extreme environmental impacts, trapping animals and creating stagnant water. Stagnant water is extremely hazardous as it creates breeding grounds for insects, disease, and decay. The marvel of our canal system is that the water flows steadily keeping our canals healthy and clean.

When the city first proposed installing stop log fixtures, public forums were held to provide comment on the matter. I attended one such session at Hope Community Church, in which the neighborhood residents were strictly opposed to this measure and showed up in droves to voice their dissent. At the time, residents were still working with the city to have sandbags and Tiger Dams removed from their properties as the threat of high water had long passed. The confidence that the city would be able to remove stop logs in any timely fashion after a high water event is non-existent, as we've all seen recent examples of mismanagement and poor coordination of city services. I'm disappointed to see the will of the people has not been taken seriously and the same plan is rearing its head once again, this time hidden behind Zoom calls in lieu of a public forum.

The only way to truly mitigate impacts of a high water event is to repair seawalls in the community. While this option would create additional logistical complexity, it would be more effective, safer, and maintain the integrity of the neighborhood which is paramount. It would eliminate all concerns of high water, stagnant water, and access to waterways. Funding this initiative could be achieved through a combination of the \$20 million already designated for stop log dams, grant money, and public private partnership. The residents would welcome this plan with open arms as it would protect their neighborhood rather than destroy it, ensuring their homes are safe, property values are protected, and their insurance burden is reduced. There is no better time to repair the seawalls than right now as we approach another low water cycle.

Jefferson Chalmers is a true gem of the City of Detroit. Since I first moved to the neighborhood in the late 1970's I've marvelled at the unique charm and magic this neighborhood holds. Residents seek out this neighborhood because of the water, and it is our duty to protect and preserve this feature for future generations to enjoy. The proposed solution is short sighted, ineffective, and would create irreparable damage to this special place.

Response to Questions/Comments: Thank you for your feedback.

1. The action plan references *"Water levels in the Great Lakes system have been rising substantially in the last few years. On Lake St. Clair, water levels have risen over five feet over the past seven years."* This statistic is inaccurate, as the water levels have been rising and falling cyclically since we first began measurement and are currently receding. In the early 2010's, the water was so low I was able to walk down the center of the canal near what is now Coriander Kitchen. Levels again are approaching a low cycle, with many boaters concerned that water levels may be too low to safely navigate the canal system this season. – **At the time of the report referenced, the water levels were trending upward (2020). National Oceanic and Atmospheric Administration (NOAA) keep trends on the levels of the Great Lakes, including a level viewer here:**

<https://www.glerl.noaa.gov/data/wlevels/> This information is used to determine the rate of high water levels. When waters reach approx. 575ft., that is when stop logs will likely be deployed. Historically this has occurred roughly every 10 years, with incidents occurring for about 4-6 months at a time.

2. The plan conflates separate flooding events of 2019 and 2021. The pump station failures of 2021 were some of the most catastrophic in terms of overall damage and community impact, yet this was wholly unrelated to water levels, rather mechanical failure combined with human error. My home has been damaged multiple times from water backups - not from the Detroit River but from the Detroit Sewage system. – **It is important to note that this proposed project is being funded with CDBG Mitigation funds and does not specifically tie-back to any disaster. The purpose of the project is to mitigate any future canal overtopping flooding like 2019, from happening again and remove the neighborhood from the floodplain.**
3. Fox Creek is a natural tributary which feeds into the Detroit River, not the other way around. Putting a dam would do nothing to stop water from coming into the canal system however it would prevent it from flowing out to the river. This could have the potential to create a worse flooding issue by creating a backup of water with nowhere to go. – **Fox Creek may have been a natural water course long ago, however, it has been enclosed and combined with sanitary flows which enter the GLWA system. The only remaining watershed to Fox Creek is from the properties that immediately abut it. The Detroit River is its only real source of fresh water.**
4. Additionally, damming off the canals would have extreme environmental impacts, trapping animals and creating stagnant water. Stagnant water is extremely hazardous as it creates breeding grounds for insects, disease, and decay. The marvel of our canal system is that the water flows steadily keeping our canals healthy and clean. **There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:**
 - a. **Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.**
 - b. **Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.**
5. The only way to truly mitigate impacts of a high water event is to repair seawalls in the community. While this option would create additional logistical complexity, it would be more effective, safer, and maintain the integrity of the neighborhood which is paramount. It would eliminate all concerns of high water, stagnant water, and access to waterways. Funding this initiative could be achieved through a combination of the \$20 million already designated for stop log dams, grant money, and public private

partnership. The residents would welcome this plan with open arms as it would protect their neighborhood rather than destroy it, ensuring their homes are safe, property values are protected, and their insurance burden is reduced. There is no better time to repair the seawalls than right now as we approach another low water cycle. - **Repairs, replacements, and height adjustments to existing public and private seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight**

https://www.fema.gov/sites/default/files/documents/fema_meeting-criteria-accrediting.pdf

There are limited options to fund private seawall projects with the public's money, as expending city general funds on private seawalls is a non-starter. It is possible for the community to explore initiating a Special Assessment District (SAD) for private seawall Improvements. The city cannot advocate for (or against) an SAD proposal, but we can help provide guidance and administrate a neighborhood-initiated SAD request.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best.

Questions/Comments: (Email) As a homeowner I am writing to express my opposition to the proposed \$20 million stop log project presented at the March 10, 2025 meeting, which is part of the \$346 million HUD-funded initiative. I appreciate the opportunity to voice my concerns and thank you for providing two meetings to review the proposal's content. Our neighborhood is in dire need of infrastructure updates, and I agree with many aspects of the proposal. However, I have significant concerns regarding the stop log proposal.

As a 13-year resident of Detroit, with the past five years spent in the Jefferson Chalmers neighborhood, I am aware of the flooding issues in our area. Despite not being in a designated flood zone, I was aware of the potential for flooding when I purchased my home. I have factored in the cost of flood insurance, understanding that our proximity to the water and low-lying area make flooding a likelihood. Prior to moving here, I was aware of the city's sewer line

and infrastructure issues, which have caused regular basement flooding, including a major incident in 2016 due to pump station problems.

My opposition to the stop log proposal is based on the following concerns:

1. During high water or storms, sewage dumps into Fox Creek. It would become a health hazard for residents and wildlife if the stop logs are closed, as it would prevent the water from draining into the river. The city would need to address this sewage issue before considering the stop logs.
2. The canal is home to a diverse range of wildlife, including beavers, mink, muskrats, fish, amphibians and various bird species. Closing the stop logs would lead to stagnant, sewage-filled water, causing harm to these animals. Has an ecologist or wildlife specialist assessed the potential impact of this proposal?
3. The stagnant water would also pose a health hazard to residents.
4. The local businesses which are kayaking tours, a restaurant, and a boat launch, would be impacted and potentially forced to shut down if the canals are closed.
5. I am skeptical about the city's ability to manage the stop logs effectively, given their historical track record. Who would be responsible for managing the closures and communicating with residents? At what water level would the stop logs be closed, and would it be based on the lowest seawall of abandoned properties? In my experience, the city has not demonstrated a commitment to supporting homeowners in this neighborhood.

Specifically, I recall the following incidents:

- The city installed tiger dams in our yards in 2019 at a cost of approximately \$3 million, claiming they would be reused for future flooding. However, the dams remained in our yards for years, even after the water receded, and homeowners were left to remove them themselves. I question whether any of the materials were actually collected for reuse.
- Many homeowners, including myself, spent significant amounts of money replacing seawalls, only to find that the city did not provide adequate support or guidance. I personally spent \$50,000 on seawall repairs after being told by the city it was my responsibility as a homeowner.
- Two years ago, there was a proposal to close the canals, which the neighborhood had to fight to revoke.
- The current proposal for stop logs as a "non-permanent" structure raises concerns that it could become permanent if the city chooses not to reopen it.

Furthermore, I am concerned that the stop logs would enable absentee homeowners to continue neglecting their properties, as they would NOT be incentivized to maintain their seawalls. I urge the city to enforce ticketing for homeowners who fail to maintain their seawalls and to provide support for new homeowners to complete necessary repairs. Did the city document the houses with seawall breaches in 2019 to communicate with and ticket the homeowners? We've been told the past 4 years the city would start ticketing negligent

homeowners. I have 3 owners next to me who have never received 1 ticket and do not live on the property. What incentive do they have to improve or sell their property if you're not going to enforce anything? Including a photo of 256 Ashland that has looked like this for 5 years.

For example, the house at 282 Ashland Street, which was responsible for flooding my street and neighboring homes, has had two consecutive owners who do not live on the property and have not made any repairs to the seawall. If high water levels return, it will flood the street again. I implore the city to get involved in requiring repairs or providing communication about needed repairs to new homeowners. Including a video of this property in 2019.

I believe that the city is misallocating funds by blaming the canals for flooding, when the real issue lies with the failing infrastructure and pump stations. I'm including a chart of the water levels since 1918 for you to see 2019 was an outlier. I would rather see the \$20M funds directed towards addressing the longstanding infrastructure problems. If the funds must be allocated to the canals, I would like to collaborate with my neighbors and your team to explore alternative solutions that would allow the canals to remain open while incentivizing and supporting homeowners to make seawall repairs. Additionally, the people/team controlling these stop logs needs to be someone living in the neighborhood who's familiar with the water cycles and able to communicate effectively to us as neighbors.

Response to Questions/Comments: Thank you for your feedback.

1. During high water or storms, sewage dumps into Fox Creek. It would become a health hazard for residents and wildlife if the stop logs are closed, as it would prevent the water from draining into the river. The city would need to address this sewage issue before considering the stop logs. – **The only time the Fox Creek enclosed sewer discharges to the open channel is in extraordinary storm events in which the GLWA system is being overwhelmed. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:**
 - a. **Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.**
 - b. **Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.**
2. The canal is home to a diverse range of wildlife, including beavers, mink, muskrats, fish, amphibians and various bird species. Closing the stop logs would lead to stagnant, sewage-filled water, causing harm to these animals. Has an ecologist or wildlife specialist assessed the potential impact of this proposal? **Please see above.**
3. The stagnant water would also pose a health hazard to residents. **Please see above.**

4. The local businesses which are kayaking tours, a restaurant, and a boat launch, would be impacted and potentially forced to shut down if the canals are closed. **Please see above.**
5. I am skeptical about the city's ability to manage the stop logs effectively, given their historical track record. Who would be responsible for managing the closures and communicating with residents? At what water level would the stop logs be closed, and would it be based on the lowest seawall of abandoned properties? In my experience, the city has not demonstrated a commitment to supporting homeowners in this neighborhood. - **A detailed final operations and maintenance plan will be developed by the City as part of the project pre-construction process as approved by FEMA. It is our intent to remove the temporary stop logs as soon as Great Lakes water levels are trending downward below canal overtopping flood levels.**
6. Regarding delinquent property owners, please contact the Buildings, Safety Engineering and Environmental Department (BSEED) at <https://detroitmi.gov/departments/buildings-safety-engineering-and-environmental-department/bseed-divisions/property-maintenance>
7. I believe that the city is misallocating funds by blaming the canals for flooding, when the real issue lies with the failing infrastructure and pump stations. - **In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, "flooding" means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.**
8. I'm including a chart of the water levels since 1918 for you to see 2019 was an outlier. I would rather see the \$20M funds directed towards addressing the longstanding infrastructure problems. If the funds must be allocated to the canals, I would like to collaborate with my neighbors and your team to explore alternative solutions that would allow the canals to remain open while incentivizing and supporting homeowners to make seawall repairs. Additionally, the people/team controlling these stop logs needs to be someone living in the neighborhood who's familiar with the water cycles and able to communicate effectively to us as neighbors. - **While 2019 was the highest lake level on record, there have been other years when the Great Lakes levels have exceeded low canal abutting property elevations, thus posing a threat to the regional sewerage system.**

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain

mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Repairs, replacements, and height adjustments to existing public and private seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight https://www.fema.gov/sites/default/files/documents/fema_meeting-criteria-accrediting.pdf here are limited options to fund private seawall projects with the public's money, as expending city general funds on private seawalls is a non-starter. It is possible for the community to explore initiating a Special Assessment District (SAD) for private seawall Improvements. The city cannot advocate for (or against) an SAD proposal, but we can help provide guidance and administrate a neighborhood-initiated SAD request.

Questions/Comments: (Email) I am writing to OPPOSE the Canal Closure Plan and Flood Wall Project proposed by the City. I am a resident of and own a home in Jefferson-Chalmers where I've lived for the past 7 years - I live on Eastlawn by the AB Ford Park. In 2022, when the City initially proposed the Canal Closure, the City was met with overwhelming opposition to log jam the canals by the residents of the Jefferson-Chalmers community - all the reasons why our neighborhood opposed the City's proposal to shut the canals down were thoroughly researched and presented to the City in public forums - THE CITY AGREED WITH RESIDENTS TO ABORT THE CANAL CLOSURE PLAN. It is unconscionable that only a little over two years later, the City is proposing the Canal Closure Plan again - We STILL do not what our water ways log jammed, we will continue to fight the City on this proposal that would lead to the detriment of our . I can think of a lot OTHER things the City could do with the \$20 million that would actually benefit the residents of the jefferson-Chalmers community - And I'd be happy to express these ideas with any City Official who might actually listen.

Response to Questions/Comments: Thank you for your feedback. We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic

opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

Questions/Comments: (Email)

March 24, 2025

City of Detroit

Via email to: Disasterrecovery@detroitmi.gov

RE: 2023 CDBG-DR Action Plan

Gregory River Club (GRC) submits the following response to the CDBG-DR Recovery Draft Action Plan. GRC is a 48 unit condominium association of boat owners. Most of our members are either Detroit citizens or citizens of neighboring cities. Your action plan describes erecting a flood barrier that can be closed in times of high water. Our concern is this structure would prohibit access to our facilities which could endanger property and safety. We wish to point out the Great Lakes rises and falls on a regular cycle of about 11 years, meaning closure for flooding could entail long periods of time, should it ever occur. Single or even multiple event rainfalls have little if any impact on Detroit River levels and even in the record high years of 2019/2020 our properties and those around us did not flood.

Closing our access road in the event of anticipated high water would materially damage the value of our facilities and prevent the quiet enjoyment of our property. We are strongly opposed to the plan as currently described in your presentation. However, we will entertain a solution that raises the elevation of surrounding lands to create a passive barrier to high water if the solution provides continuous access to pedestrian and motor vehicles up to and including semi-tractor trailer vehicles.

Respectfully,

Gregory's River Club Association

Jon M. Somes
President

Response to Questions/Comments: Thank you for your feedback.

In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club/Gregory River Club Association entrance that keep the businesses open and functional (as floodwater water elevations allow.)

In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, “flooding” means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

Questions/Comments: (Email) I oppose the stop log and flood walls proposal. I thought that since it had been rejected by the community it was no longer on the table!?! The Water Project proposal seems a much better and longer term solution. A mix of natural shoreline, rip-rap and sea walls is preferred. The Detroit shoreline has never been treasured or protected as it should. The canals are what makes Jefferson Chalmers so unique. We should strive to make it beautiful, desirable and preserve public access to our waterfront. Closing the canals would cause water stagnation and trap raw sewage from the Fox Creek station. It would undermine property values and hurt functioning business.

Is there a possibility of the city hiring a contractor with a bid on replacing sea walls that could be partially funded by the feds and split between property owners with favorable loan opportunity? It seems our biggest problem is really infrastructure, the floods occurred due to pump failure not high water levels. In the interest of current Detroit development we need to preserve our water access which makes Detroit a desirable destination for visitors. Longest freshwater coastline in the world! Let's preserve it. I am also against constructing the new pump station in a residential area.

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic

opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, “flooding” means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

We received a number of detailed questions for which we currently do not have the answers. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Repairs, replacements, and height adjustments to existing public and private seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight

https://www.fema.gov/sites/default/files/documents/fema_meeting-criteria-accrediting.pdf

There are limited options to fund private seawall projects with the public's money, as expending city general funds on private seawalls is a non-starter. It is possible for the community to explore initiating a Special Assessment District (SAD) for private seawall Improvements. The city cannot advocate for (or against) an SAD proposal, but we can help provide guidance and administrate a neighborhood-initiated SAD request.

Please note that a new pump station is not being proposed as a CDBG-DR project.

Questions/Comments: (Email)

28 March 2025

Via disasterrecovery@detroitmi.gov

Julie Schneider, Director
City of Detroit Housing and Revitalization Department
Coleman A. Young Municipal Center
2 Woodward Avenue - Suite 908
Detroit, MI 48226

RE: Comments on CDBG-DR Draft Action Plan – February 27, 2025

Ms. Schneider:

We appreciate the opportunity to provide comments on Draft Action Plan (Plan) for Community Development Block Grant-Disaster Recovery (CDBG-DR) published on February 27, 2025.

The flood protection, so called, proposal discussed on pages 24-27 and 47-52 is the primary focus of this letter and comments contained herein. There are other elements of concern on page 29 which are also addressed here. Highlights of text on, as well as notes embedded in, those pages are included as attachments.

Opposition to Stop Log and Flood Wall Proposal – The Grantee CDBG-DR Mitigation Set Aside Program Number One referenced in the Plan and city officials participating in Public Meetings have noted that the \$20 million proposal matches the US Army Corps of Engineers (The Corps) Floodplain Management Services (FPMS) Study published in July 2022. The Jefferson-Chalmers community has made it clear that blocking access to any waterway as presented in the Study is not acceptable. Unrestricted access to the water everywhere, 24/7/365 must be part of any flood protection project.

We continue to be outraged/concerned by the Administration's unrelenting advancement of this concept, particularly since city officials assured the community that *"We heard the residents loud and clear. We are not going to look at that option. The community was strongly against it, and we should listen to the community"* pronounced Tyrone Clifton, Director of the Detroit Building Authority and one of the city officials who spoke to residents at the Tuesday meeting. See attached Detroit News, October 12, 2022 article.

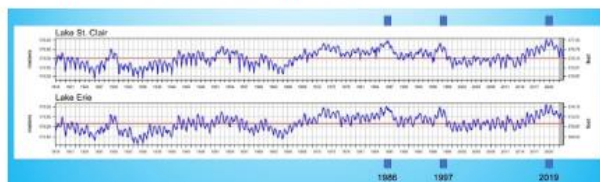
Why does the Administration continue to advance a flood protection concept rejected by the community and contradict their prior commitment made to the community?

Historical Context and Flooding History – Historic proposals from decades ago fail to recognize larger development forces, including the former designation as an Urban Renewal Community when the existing housing fabric was constantly at risk for eminent domain. Large, obsolete infrastructure investments would have segregated the community and effectively undermined property values, promoting the taking and clearance approach of Urban Renewal. By way of example, the large berm surrounding the southern edge of Victoria Park exacerbates the topographical swale that bisects the center of the community, thereby increasing the risk of flooding to homeowners outside the fence line.

At the same time, climate threats are greater in the interior of the community due to cloud bursts and infrastructure failures that cause basement back-ups, excess water unable to leave the community through catch basins and discharges from the Fox Creek Combined Sewage Overflow (CSO) located near East Jefferson and Ashland. While The Corps' FPMS Report focuses primarily on shoreline vulnerabilities related to future Great Lakes rise, the threat of high lake levels is decades away.

It commonly understood that it takes five consistent years of wet weather in the entirety of the Great Lakes basin – that's from Ottawa to Ohio - to cause lake levels to rise. While the Great Lakes are generally higher than they were 100 years ago, the high-water cycle is on a 20 to 30-year routine based upon National Oceanic & Atmospheric Administration

(NOAA) and Corps data demonstrated in the graph below, borrowed from Figure 3, page 12 of the FPMS. The graph uses the North American Vertical Datum (NAVD).



As shown above, previous high lake levels were in 1997 and 1986 and according to the Environmental Protection Agency (EPA), low ice cover leads to lower lake levels because reduced ice allows for increased evaporation. In February 2024, NOAA noted that Lakes Erie and Ontario are at

historic lows, not seen this low in since 1973. According to the NOAA Observed Water Levels at Station 9044049, Windmill Point, Michigan, between 2019 and 2022, water levels exceed 576.5' NAVD two-thirds of the time.

For the thirty (30) days of June 2021, the maximum water was 576.17' at 2:36 am on June 18, 2021. Yet, during the catastrophic storm on June 25-26, 2021, the CSO blasted water at such a volume that condoms were hanging from trees and sewage breached the shoreline along Fox Creek. Shoreline breach during and after CSO discharges is a common occurrence when water levels in the canal can rise as much as three (3') feet in minutes.



Condom in Tree following CSO discharge on June 25-26, 2021



Backyard Flooding along Fox Creek – June 2021

At the same time, the observed conditions along the western shoreline of Fox Creek suggest that nearly 20% is at 576.75' NAVD or lower.

Finally, several places along the Detroit River far exceed these levels, as documented by the City's Planning & Development Department in the Jefferson-Chalmers Neighborhood Framework Plan (2017) and Detroit Building Authority (DBA) Project 20370.00D (2023).

Finally, while the Jefferson-Chalmers community is 1.2 square miles, there is nearly 10 miles of shoreline. Any flood protection design must address shoreline vulnerabilities for the ENTIRE community with a comprehensive, parcel-by-parcel focused approach.

Errors of Fact and Plan Inconsistencies

Conclusion of Mitigation Needs Assessment (page 27)	
1. Jefferson Chalmers Flooding and Floodplain Mitigation Project (preliminary estimate prior to engineering activities including feasibility due diligence and implementation costs - \$30MM)	The FPMS Report suggests the cost to be between \$161-170 million. While there are less expensive solutions, \$30 million is certainly not adequate. What other source of funding has been identified to provide comprehensive flood protection?
Program Description (page 49)	
The Plan states: "keep flood water and Detroit River water out of the sewer system and adjacent properties.	Stop logs have a greater chance of causing more flooding from CSO discharges breaching the shoreline than from the chance of the Detroit River encroaching into the system decades from now.
This permanent fixture will AID in the removal of the floodplain designation . . .	The use of the term "AID," is deceptive. Without a complete solution, this proposal will NOT remove the community from the floodplain.
. . . in the Jefferson Chalmers neighborhoodS and surrounding neighborhoods.	The Jefferson-Chalmers community is the ONLY community and the entirety of the community is in the floodplain. It is singular, not plural and there are no other "surrounding neighborhoods."
. . . Phillip . . .	The Lakewood and Philip canals are southern extensions of streets with the same name and Philip is spelled incorrectly.
. . . include earthwork . . ."	Any earthwork must meet engineering performance standards including stability, seepage and settlement. Work proposed by

	the Detroit Building Authority in other areas of the community has not met these standards.
These measures are intended to mitigate flood damages in the short term, until a more permanent solution is developed and implemented in the Jefferson-Chalmers region.	The Program Description twice states that the stop logs are "permanent fixtures," therefore, these measures are not "short-term." This comment contradicts earlier statements. The use of the term "region," is inaccurate. Neighborhood or community would be more appropriate.
Reducing Barriers for Assistance (page 52)	
The City of Detroit will conduct proactive, strategic communication and program outreach throughout the life cycle of the program to ensure that barriers will be readily identified and reduced. The success of this communication and outreach will heavily depend on the levels of engagement from key community stakeholders and the City's responsiveness to any and all identified issues.	<p>The Corps began its FPMS work in August 2019. The community first learned of its efforts and conclusions in May 2022. No community consultation occurred during its efforts and while the community challenged its conclusions and the Options presented, the final report published in July 2022 was unchanged.</p> <p>Over 500 residents attended the October 11, 2022 meeting at Hope Community Church and spoke with one voice in opposition to the proposal.</p> <p>The DBA failed to comply with two (2) of its own funding agreements (07.21.22, Exhibit A and contracts (Giffels-Webster's Professional Services Agreements Scope of Services 12.15.22 – Exhibit A, pages 2 and 3) and conduct community meetings as required.</p> <p>The City has demonstrated its inability to conduct any kind of effective communication with any stakeholder and no amount of additional outreach will change the community's position regarding this matter. Failure to respond to and comply with the community's posture could likely result in litigation and delay removing the floodplain.</p>
Hazard Mitigation (page 24-25)	
Hazard Mitigation Assessment, Hazard Risk Charts on page 24 and 25	The Charts provide no insight on the basis for scoring. In addition, the absence of an explanation and no key for scoring make them impossible to interpret, understand, or challenge the conclusions and content. Additional details and/or explanation should be provided.
More importantly, Chart 2 and comments that accompany the charts state, "flooding is at the forefront of Detroit's hazard risks"	The proposed flood protection solution is incomplete and will not effectively mitigate that risk.
"reduce the potential of losses" and do not "prevent Detroit's vulnerability to flood disaster events."	Because the mitigation activities are incomplete, they actually fail to meet the prescribed goal.
USACE Floodplain Management Services Study (FPMS) (page 49)	
The Plan quotes the FPMS Study and states: "the these efforts (referring to sand bags and Tiger Dams) were successful in mitigating all damages."	As noted in the photos below, the Tiger Dams caused damage to property and failed to protect the community from flooding. It took over three (3) years to remove them after they failed. This reference is inaccurate and should be stricken.



Damage from Tiger Dam



Failed and Relocated Tiger Dams



Tiger Dam Removal

The Plan references the FPMS and states: "In preparation for 2020 flooding, the City of Detroit employed additional temporary flood protection defenses, including HESCO barriers . . ."	There were no HESCO barriers installed. This reference is inaccurate and should be stricken.
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Design + Engineering Feasibility – The topographical and water level statistics are important because the closing of the canals and construction of a flood wall will cause greater damage to a larger portion of the community when surface flooding caused by underground infrastructure failures are made worse by massive CSO discharges that breach the Fox Creek shoreline. Any flood protection investment must be part of a comprehensive solution that protects the entire community from all of the various flooding threats.

At the same time, a parcel-by-parcel focused approach will ensure the most effective use of limited public resources through the selection of natural/rip-rap seawall sections appropriate for the size of the canal and scale of watercraft. In the DBA's Detroit Lower East Side Flood Mitigation Project (Project 20370.00D [2023]), the DBA and Giffels-Webster specified a 9.43' sheet pile section more than THREE times the size required for residential development and small watercraft shoreline application (3.125').

Additionally, any earthwork must meet engineering performance standards, including stability, seepage and settlement. Work proposed by the above noted DBA Project in other areas of the community in the past has not met these standards.

Finally, City officials have asserted that FEMA is requiring a publicly-owned flood protections solution. Written proof of the requirement has been requested and should be provided.

Environmental Impact – Prior to Detroit's Bankruptcy, the Water and Sewerage Department conducted a backwash of Fox Creek nearly every week, and after each CSO discharge. This occurred by opening the Fox Creek Gates at Jefferson and Ashland, which lowered the level of the canal and drew fresh water into it. This helped improve the water quality of a waterway that no longer has a water shed to feed it. The Great Lakes Water Authority (GLWA) has only completed this operation once following the catastrophic storm in June 2021.

Stop logs will stagnate the water, undermine the urban waterway's unique ecosystem, exacerbate and worsen water quality, cause significant environmental degradation, and turn Fox Creek and linked canals into a cesspool. Preventing the constant flow of water encouraged by watercraft of all kinds will create conditions where insects will thrive and become a nuisance.

At the same time, CSO discharges, will have two detrimental impacts. First, raising the water level in Fox Creek as much as three (3') feet, causing a likely breach of the shoreline with flooding filled with sewage settling in the center of the neighborhood. Secondly, the trapped sewage will function as fertilizer causing an overgrowth of algae, consuming oxygen. When the algae eventually dies, the oxygen in the water is consumed and the lack of dissolved oxygen makes it impossible for aquatic life to survive.

Economic Impact – With the exception of Victoria Park and Clairpointe Woods, waterfront properties in the Jefferson-Chalmers are some of the highest valued throughout the neighborhood. Beyond the environmental degradation that will occur during stop log and flood wall operation, limiting access to the water will undermine property values and have a negative ripple effect throughout the entire neighborhood.

In addition, even a temporary blockage of any kind will permanently damage and destroy the economic vitality of water-based businesses that benefit from expenditures by visitors, boaters and fisherman from throughout metropolitan Detroit. This includes residents that rent boat slips, entrepreneurs offering fish tackle, fuel purchases, watercraft rental, tours, Gregory Boat Club and more notably, KAM Marine and Bayview Yacht Club.

The stop logs and flood gates will also undermine any incentive individual property owners may have to upgrade their shoreline or invest in their property.

Operations + Maintenance – The Tiger Dam failures combined with damages done to property during their installation as well as delays associated with their removal demonstrate that City agencies responsible for these matters were unable to protect property owners during and after the flooding events of 2019 and 2020. As discussed earlier, the breaches following the massive CSO associated with the June 25, 2021 event destroyed and pushed the Tiger Dams over 100' from their installed location.

The lack of coordination, combined with apparent failures in technical expertise from various City agencies and its consultants, along with ignoring the community and reversing its position on the subject of canal closures and floodwalls, undermines our confidence and trust in the City.

Additionally, while The Corps and State's Department of Environment, Great Lakes and Energy have regulatory authority over construction in water ways, they have no jurisdiction of shoreline height and materials. The City has no authority to regulate the shoreline of residential waterfront properties.

Further, the Jefferson-Chalmers community's floodplain is a unique and complex matter. The proposed closure structures require technical skills, expertise that does not exist within any City agency. Given potential shoreline vulnerabilities, it is possible that the closure structures may have to be deployed for as long as 10-11 months. This would have a catastrophic and detrimental impact on the community and therefore, this approach should be abandoned.

Alternative Proposal – Over six months, twenty-seven design, engineering, environmental and construction professionals contributed to an Engineering Report (Report) issued in March 2023. A collection of projects contained within the Report, when taken provide a *parcel-by-parcel focused solution with a variety of alternatives*. This Flood Protection Projects includes natural shoreline, rip-rap and appropriately sized seawalls that will create a single line of defense of future Great Lakes, protect against CSO flooding while also **ensuring unrestricted access to the water everywhere 24/7/365**.



Natural/Rip-Rap



Seawalls



Comprehensive parcel-by-parcel Focused solution

This comprehensive approach was used to secure a \$1M appropriation from the State Legislature with funds to be used to assist low-income property owners improve their shoreline.

DWSD Flood Mitigation Projects, Under Study – East, Jefferson-Chalmers Direct Discharge System, \$73.0M (page 29) – DWSD should learn from the lessons and mistakes from GLWA and their proposed Freud Pump Station. According to the referenced chart, this project is the highest priority and already under design. The community should be engaged immediately.

In closing, we are unified in our desire to remove the Jefferson-Chalmers neighborhood from the FEMA 100-Year Floodplain and are confident residents and stakeholders are committed to work with the City to find a reasonable solution to overcome this challenge.

Again, we thank you for this opportunity comment on the Draft Action Plan and look forward to your response. If you have any questions, please feel free to contact me at 313.802.2294 or info@jeffersonchalmerswaterproject.org.

Sincerely yours,

Jay C. Juergensen
Lead Organizer and Technical Expert

Response to Questions/Comments: Thank you for your feedback.

Why does the Administration continue to advance a flood protection concept rejected by the community and contradict their prior commitment made to the community? We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal

closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

The FPMS Report suggests the cost to be between \$161-170 million. While there are less expensive solutions, \$30 million is certainly not adequate. What other source of funding has been identified to provide comprehensive flood protection? Currently, CDBG-DR funding is the only funding available for a project of this kind.

Stop logs have a greater chance of causing more flooding from CSO discharges breaching the shoreline than from the chance of the Detroit River encroaching into the system decades from now. - There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

The Jefferson-Chalmers community is the ONLY community and the entirety of the community is in the floodplain. It is singular, not plural and there are no other “surrounding neighborhoods.” – The neighborhood north of E. Jefferson Ave is also included in a floodplain.

As noted in the photos below, the Tiger Dams caused damage to property and failed to protect the community from flooding. It took over three (3) years to remove them after they failed. This reference is inaccurate and should be stricken. – Tiger Dams and sandbags did protect the local and regional sewer systems against canal overtopping. The City received complaints about potential damage caused by the Tiger Dams but was unable to verify those claims.

There were no HESCO barriers installed. This reference is inaccurate and should be stricken. – HESCO barriers were installed around part of the Harding Canal in the Jefferson Village neighborhood.

Finally, City officials have asserted that FEMA is requiring a publicly-owned flood protections solution. Written proof of the requirement has been requested and should be provided. - Because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight https://www.fema.gov/sites/default/files/documents/fema_meeting-criteria-accrediting.pdf

Stop logs will stagnate the water, undermine the urban waterway's unique ecosystem, exacerbate and worsen water quality, cause significant environmental degradation, and turn Fox Creek and linked canals into a cesspool. Preventing the constant flow of water encouraged by watercraft of all kinds will create conditions where insects will thrive and become a nuisance. At the same time, CSO discharges, will have two detrimental impacts. First, raising the water level in Fox Creek as much as three (3') feet, causing a likely breach of the shoreline with flooding filled with sewage settling in the center of the neighborhood. Secondly, the trapped sewage will function as fertilizer causing an overgrowth of algae, consuming oxygen. When the algae eventually dies, the oxygen in the water is consumed and the lack of dissolved oxygen makes it impossible for aquatic life to survive. - There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

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- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Economic Impact – With the exception of Victoria Park and Clairpointe Woods, waterfront properties in the Jefferson- Chalmers are some of the highest valued throughout the neighborhood. Beyond the environmental degradation that will occur during stop log and flood wall operation, limiting access to the water will undermine property values and have a negative ripple effect throughout the entire neighborhood. In addition, even a temporary blockage of any kind will permanently damage and destroy the economic vitality of water-based businesses that benefit from expenditures by visitors, boaters and fisherman from throughout metropolitan Detroit. This includes residents that rent boat slips, entrepreneurs offering fish tackle, fuel purchases, watercraft rental, tours, Gregory Boat Club and more

notably, KAM Marine and Bayview Yacht Club. The stop logs and flood gates will also undermine any incentive individual property owners may have to upgrade their shoreline or invest in their property. - There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

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- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.
- In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

Operations + Maintenance – A detailed final operations and maintenance plan will be developed by the City as part of the project pre-construction process as approved by FEMA. It is our intent to remove the temporary stop logs as soon as Great Lakes water levels are trending downward below canal overtopping flood levels.

Questions/Comments: (Email) To whom it may concern:

I strongly oppose the stop log and flood walls proposal and demand that flood protection must include unrestricted access to the water everywhere.

The USACE Floodplain Management Services (FPMS) July 22 Report options have been overwhelmingly rejected by the community at Hope Community Church on October 11, 2022.

- City Officials are on record stating: *"We heard the residents loud and clear. We are not going to look at that option," said Tyrone Clifton, director of the Detroit Building Authority and one of the city officials who spoke to residents at the Tuesday meeting. "The community was strongly against it, and we should listen to the community."* Detroit News – 10.12.22

- https://jeffersonchalmerswaterproject.org/723_DetroitNews_10.12.22.pdf

WHY IS THIS BACK ON THE TABLE??

The Plan states: This permanent fixture will **AID** in the removal of the floodplain designation in the Jefferson-Chalmers neighborhood, but without a complete solution, this unacceptable proposal will NOT remove the community from the floodplain.

- The Corps estimates were between \$160-171 million. But without the remainder of the funds to support a complete solution, this expenditure will be a waste of precious public funds. Closing the canals will result in water stagnation and environmental degradation. - Made worse by trapping raw sewage following discharges from the Fox Creek Combined Sewage Outfall, causing flooding filled with sewage to top the shoreline and potentially infiltrate the center of the community.

Limiting access to the water will undermine property values, permanently damage and destroy the economic vitality of water-based businesses that benefit from expenditures by visitors, boaters and fisherman from throughout metropolitan Detroit.

There are less expensive and more acceptable proposals.

I endorse the \$41.25 parcel by parcel focused solution - Public Responsibility for Flood protection.

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

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GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email)

KLENK ISLAND NAVIGATION & PROPERTY OWNER'S ASSOCIATION
14663 KLENK ISLAND
DETROIT, MICHIGAN 48215
pedurand@comcast.net, (248)495-6777

March 25, 2025

**OBJECTIONS TO THE CDBG DISASTER RECOVERY DRAFT ACTION PLAN
WITH RESPECT TO CANAL IMPAIRMENTS**

The *Klenk Island Navigation & Property Owners Association* ("Association") is comprised of 35 properties on Klenk Island. The properties include businesses involved in traditional maritime activities, income-producing properties, recreational boating properties and single/multiple family residences. Klenk Island is benefitted by the Fox Creek, Philip & Lakewood canals ("the canals").

Please count this as 35 objections on multiple grounds to the impairment of navigation and property values that would occur with the installation of the Stop-Log structures proposed in the CDBG Plan at pages 49-51.

THE JEFFERSON-CHALMERS DEVELOPMENT PLAN

We start with the Jefferson-Chalmers Development Plan adopted by the City of Detroit (as recorded in the Wayne County Records) which was in place when many property owners purchased along the canals. The Plan specifies the following regarding the canal system:

4. To provide public improvements which will make the community a safer, attractive, and desirable place to live.

13. To develop waterfront areas and inland canals to their fullest potential for both neighborhood and city-wide usage.

(WCR L24139 P884-886)

HUD WAIVER

Tremendous effort is being expended to facilitate the spending of HUD funds in the Jefferson-Chalmers Neighborhood. HUD apparently has a regulation that prohibits spending HUD funds in a floodplain. The simple solution is to petition HUD to waive the regulation for this project. This would preserve allocated monies for use in Jefferson-Chalmers on the valuable projects the City wants to complete. You can't get an exemption unless you ask.

CITY OF DETROIT ENGINEERING LEVEE

In the high-water event in 1952, the City of Detroit Engineering Department developed a levee plan on the north side of the canals which would be a better solution to removing the area above the canals from the floodplain. See Exhibit 3. The only place stable soils exist is above Riverside, Klenk and Harbor Island.

Separate the storm drains on Riverside, Klenk & Harbor and leave them in the floodplain. No one on Riverside, Klenk or Harbor cares about being in the floodplain. Put a Stop-Log at Korte Street in connection with the Detroit Engineering Department Levee Plan (see below) and let the Jefferson-Ashland pumping station maintain the high end of Fox Creek.

WAYNE COUNTY DRAIN

As admitted by the CDBG Plan (and those commenting in the Public Hearings), the real problem that needs to be addressed is sewer backups during rain events. Fox Creek is actually a Wayne County drain that is permitted to discharge combined wastewater during storms. Obstructing Fox Creek and the other canals will increase flooding in Detroit, Grosse Pointe Park, Grosse Pointe and Grosse Pointe Farms during rain events.

HIGH WATER

The CDBG Plan raises the issue of flooding of storm drains in high-water years. There have been minor breaches in seawalls (mostly on the 17 City-owned properties in 2020-2021) that have flooded parts of streets for a matter of hours. However, individual property owners have always remedied any breaches promptly.

The high volume of water handled at the Conner Creek CSO Plant in 2020-21 was NOT due to storm drain flows from seawall breaches. Instead, it was caused by the opening (and failure to close) of huge basin gates from the Detroit River at the entry of the Conner Creek CSO Plant. Incorrect procedures were followed in opening the basin gates resulting in Detroit River inflow, instead of outflow, from the Plant. The inflow was undetected for many months. The pumps at the Plant are designed to handle maximum storm sewer flow, but they are not designed to pump out the Detroit River through the (many times larger) basin gates.

If storm drain flooding is a real concern, the remedy is NOT a \$20mm Stop-Log. Instead, the flow can be minimized by reducing storm drain openings. Exhibit 2 shows reduced flow manhole covers. There are approximately 34 storm drain manholes bordering the canals. The CSO plant kept up with these drain flows in 2020-2021, even when many of the CSO plant pumps were out-of-service for maintenance and the basin gates at the CSO Plant were left open. Better yet, separate the storm drains.

The Fox Creek drain and CSO Plant are at the bottom of the system. As long as Detroit accepts the revenue and the combined flow from over 78 communities, all the way up to Flint, any large rainstorm in the entire tri-county area will create more flow than small temporary canal breaches in high water periods.

IMPAIRMENT OF A NAVIGABLE WATERWAY

The canal system is classified as a "Navigable Waterway" by the United States Army Corps of Engineers ("USACE") and the Michigan Environment Great Lakes & Energy ("EGLE") Department. See description attached as Exhibit 1. The impairment of navigation is a legal issue that is taken seriously by both the Federal Courts and the Michigan State Courts. Earlier attempts to obstruct the canals were rejected by the Michigan Supreme Court and the Wayne County Courts. For an example, see *Lepire v Klenk*, 180 Mich 481 (1914).

The Stop-Log structures represent an impairment rather than an improvement. Even when not in use, the Stop-Log structures would narrow the canals by more than half their width. The narrowing represented by the

Stop-Logs would severely impair navigation by creating an area where traffic has to stop, in an already restricted area, to assess clearance, and then engage in a dangerous passing situation, especially at night.

Water levels rise and fall on a 30-year cycle. It is doubtful that a Stop-Log would be still be serviceable when needed (26 or so years in the future) when the water levels might trend up again.

Moreover, even the CDBG Plan admits that the Stop-Log structures will not remove any area from the floodplain, because neither the Federal Emergency Management Agency (FEMA) or the EGLE, recognize such a structure as an impervious barrier in a floodplain.

The area represented by the canal system was originally part of Lake St. Clair and the Detroit River in the late 1800's. See 1900 chart of area attached as part of Exhibit 1. The area was drained and partially filled in the early 1900's. As shown by the soil borings completed as part of the A.B. Ford Park (a/k/a Lakewood Park East) bridge reconstruction in the 1990's, there is no solid soil substrate in the canal area for 180 feet down. Walling off the outside of the area will not stop water infiltrations as the water table fills in from below.

PUBLIC HIGHWAY

When the Lighthouse Plat was recorded by the City of Detroit, the canals created with it were dedicated to public use. (WCR L25 P78). This means that, in addition to their own property, all canal-side owners have an easement in the Fox Creek, Philip and Lakewood Canals. This easement was acknowledged by the City of Detroit in accepting the Lighthouse Plat and in constructing Lakewood Park East. (WCR L21541 P862-863).

WASTE

Waste is a legal term meaning "mismanagement or omission of duty touching on real estate by one rightfully in possession." See Black's Law Dictionary p. 1760. "Permissive Waste" is a matter of omission. Since taking the area called Lakewood Park East in 1963 (by eminent domain), the City has engaged in Permissive Waste by failing to maintain the canal system; leaving the property owners the task of maintaining navigation and removing debris, fallen trees and fighting invasive weeds.

Impairing navigation with Stop-Logs will turn omission into commission, and constitute "Voluntary Waste" for which the property owners and those using the public highway may have legal remedy.

INVERSE CONDEMNATION

The system needs the Fox Creek Canal and Lakewood Canals to be unobstructed for flow and use purposes. Otherwise, the water will not be refreshed and the area will return to being a muddy swamp. When the Stop-Logs are in place, there will be no flow and the water level will recede, eliminating navigation and creating cesspools when the Fox Creek drain is used. This will constitute an inverse condemnation situation for the nearly 200-plus canal-side riparian property owners and likely for other property owners near the canals.

DEVELOPMENT TO FULLEST POTENTIAL

Detroit should never let an area that can be developed like Marina Del Rey in California, be allowed to Waste or be considered for further closure. Canal side properties are a development boon. Currently, properties

along the canals are delivering giant gains in tax revenue for the City. Canal-side properties sell for an average of \$168 per square foot as compared to \$93 per square foot for other properties in the floodplain.

A recent example of the tax gain is 14719 Riverside Avenue, a 2,300 square foot house built in 1922, which sold in 2023 for \$870,000.00. Prior to the sale, the total property tax being paid was \$1,310. At the City tax rate of 67 mills, the sale means the new property tax will be \$29,145.00. Klenk Island had sales in 2023 and 2024 that raised the property tax received by the City from a total of \$1,887.00 to \$33,500.00. Improving the canals is obviously something the City of Detroit should pursue if the Jefferson-Chalmers Development Plan is to be realized.

REAL RELIEF

The Klenk Island Association is mindful of Detroit's desire to spend HUD grants in the floodplain, but suggests that the way to accomplish that desire is not through an expensive and ineffective Stop-Log system that will impair navigation, health and property values (for no return and possible legal exposure) and will cause the City to assume additional operating, maintenance and administration costs. Instead, the City should pursue a properly engineered and constructed system of levees and gates that would improve the canals and might actually qualify to get the area out of the floodplain. We say "might" because constructing this infrastructure below Scripps (in former bay areas) might be futile due to the unstable soils. The Klenk Island Association would support the following:

APPROPRIATE GATES & LEVEES AND A CANAL AUTHORITY

The Fox Creek and Philip canals should use Tainter Gates because those canals are used by smaller craft that could navigate through a Tainter gate. See pictures of USACE-type Tainter gates attached as Exhibit 4.

The Lakewood canal would need a miter gate to allow larger craft and sailboats to pass and to maintain the width of the canal for navigation purposes. See picture of USACE-type miter gate attached as Exhibit 5. USACE levees could be constructed between the gates from Fox Creek to Grayhaven.

This assumes that somehow the GLWA discharges from the Fox Creek drain could be "engineered" around a gate. In the Public Hearings the City claimed this could be accomplished. Also, that a system could be devised to keep water refreshed and moving in the canals, and kept to a reasonable height to protect the existing seawalls. If the water level recedes too far, then the seawalls risk "dishing" out from the weight of the soils behind them that are no longer opposed by the water.

It would also be necessary to constitute a "Canal Authority" of riparian owners to manage closures via a written and recorded agreement. The Klenk Island Association would be part of that Authority. Harbor Island, Riverside, Scripps and Ashland could be added. Gates would be closed when Lake levels met or exceeded a certain height, or a levee or seawall breach was causing a flow.

The Canal Authority is necessary because the City is just one of approximately 200 riparian property owners. The property owners suffered though the Tiger Dam experience. The Tiger Dams only went up after the high-water levels went down. The Tiger Dams remained up, doing nothing except acting as a physical nuisance, for

at least a year too long. The Tiger Dams were not legally challenged. Ultimately, individual property owners had to clear them.

Respectfully, Klenk Island Navigation & Property Owners Association

Response to Questions/Comments: Thank you for your feedback.

HUD Waiver – Please note that HUD waivers as described in the CDBG-DR universal notice do not apply to environmental review, they pertain specifically to 24 CFR Part 570 which are the regulations for the Community Development Block Grant program. The floodplain management process is not a HUD regulation.

1952 Engineering Levee Study - From the attachment, it appears the City was contemplating acquiring all of the abutting properties on Fax Creek and Ashland to construct a levee.

Wayne County Drain/Inverse Condemnation - There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

High Water - In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, “flooding” means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

Real Relief / Appropriate Gates & Levees and Canal Authority – As part of the preliminary engineering efforts, the City is open to consideration of other flood control measures, not just the stop log concept.

Questions/Comments: (Email) To whom it may concern:

I am a resident of District 6. However, I have been working with various organizations on the East Side as part of community research partnerships around flooding issues. I am very concerned about proposed stop log on the Jefferson Chalmers Canals. The proper functioning of the canals is essential for the residents and businesses in the area.

I attended the original town hall on Oct. 11th, 2022 at Hope Community Church. Residents rejected this proposal for several reasons. 1. Several long term residents pointed out that the canals rarely overflow as a result of overbank flooding. The flooding of homes and streets is typically due to heavy rainfall. 2. The residents expressed concerns about the ongoing sewer discharge permits into the canals. 3. It was not clear how the city would manage ongoing operations of the stop gap dam.

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

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- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

A detailed final operations and maintenance plan will be developed by the City as part of the project pre-construction process as approved by FEMA. It is our intent to remove the temporary stop logs as soon as Great Lakes water levels are trending downward below canal overtopping flood levels.

Questions/Comments: (Email) I 100% oppose the proposal to block access to the canals. This is a horrible plan. Please contact me by phone with updates if possible at the number below or at XX. I am 84 years old and do not know how to do zoom calls. I would like to attend any and all future meetings related to this plan.

Response to Questions/Comments: Thank you for your feedback.

Please note that all updates related to this project and the others proposed using CDBG-DR can be found here: <https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programming-and-information/cdbg-disaster-recovery/2023-cdbg-dr-allocation>

This comprehensive webpage includes all meetings, contracts and procurement, applications, and general information for CDBG-DR. If there is a zoom call you would like to attend, please email us and we will contact you to assist with logging on.

We also recommend you subscribe to the City's email list for notices. That can be done here: <https://detroitmi.gov/> Scroll to the bottom of the page and add your email address here:

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Please let us know if you need any further assistance.

Questions/Comments: (Email) We are against the inclusion of stop logs in the Jefferson Chalmers proposal, which would devalue our neighborhood and waterways and not ensure, and support properly engineered levees and sewer and storm drain infrastructure instead.

Response to Questions/Comments: Thank you for your feedback.

Questions/Comments: (Email) Closure of canals/Is unacceptable by any means!!

Response to Questions/Comments: Thank you for your feedback.

Questions/Comments: (Email):

Develop Detroit

1452 Randolph St., Ste 300
Detroit, MI 48226

March 28, 2025

Disaster Recovery Team
Housing and Revitalization Department
2 Woodward Ave., Suite 908
Detroit, MI 48226

Dear Disaster Recovery Team,

I am writing to provide feedback on the 2023 Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan for Detroit, Michigan. As a key affordable housing stakeholder, I appreciate the opportunity to contribute to the planning process and commend the efforts made to outline strategies for community development and the long-term recovery and mitigation efforts following severe storms and flooding in 2023.

Develop Detroit (DDI) is a mission-based community and real estate development organization operating predominately in Detroit. DDI builds, renovates, and preserves affordable and middle-income housing and currently operates a rental housing portfolio that spans multiple Detroit neighborhoods. Over 75% of our 400+ unit rental housing portfolio serves families at or below 60% of Area Median Income (AMI). As a leading producer and provider of affordable housing, DDI was pleased to see that:

"the primary objective of this plan is to meet the needs of low- and moderate-income neighborhoods by preserving, rehabbing, and/or constructing affordable housing units in the City of Detroit."

However, the Action Plan as presented fails to consider a key area of urgency and concern:

The CDBG-DR Fails to Acknowledge and Mitigate Ongoing Deterioration in Recently Produced and/or Preserved Affordable Housing Rental Units. DDI has repeatedly raised concerns about persistent and unfavorable post-pandemic conditions in the Detroit affordable housing market. Following the pandemic, Detroit's city government implemented policies intended to protect against a mass wave of tenant displacement amid a public health emergency. However, financial resources diverted to this cause failed to adequately cover the broad scope of need for rental assistance. Additionally, these policy changes failed to adequately anticipate the removal of moral hazard.

As a result of these policy changes and the related lack of supportive funding, the local affordable rental housing market, which includes government-subsidized, unsubsidized, and rent-controlled units, has been forced to bear responsibility for markedly increased tenant delinquencies. The Detroit housing market is now plagued with high levels of uncollectible debt, threatening the viability of many affordable rental housing communities. This induced financial strain also severely limits the affordable housing operator's ability to make climate resiliency property investments.

Detroit now faces a looming crisis as a critical segment of its housing sector teeters on the verge of financial insolvency. DDI has identified over 3,000 affordable housing units across Detroit – including ones owned by nonprofit operators – that are exposed to crippling uncollectable debt and, therefore, future insolvency. Additionally, DDI itself has directly struggled with this issue. In April 2024, DDI was forced to completely close a 27-unit rental community that served 30% and 60% AMI residents exclusively after over ½ of the previously income-earning residents stopped paying rent during the extended 36th District Court eviction moratorium. Our experience should be both a cautionary tale of the current state of the existing affordable rental housing environment in Detroit and a call to action. Without governmental intervention and action to alleviate the root causes of this precarious situation, our city will suffer diminished housing stock, a reduction in affordable housing options, and the displacement of vulnerable low-income residents – therefore reversing over a decade of intentional investment and support.

Recommendation: Commit at least 20% of the planned \$75M affordable housing investment to preserve existing regulated and unregulated affordable housing units that have experienced ongoing economic vacancy and deferred property maintenance and investment. This financial commitment to preserving existing affordable units should be made available through the City's existing NOFA process and should prioritize property owners who are able to demonstrate urgency and need.

Thank you for considering my comments. I appreciate the opportunity to participate in the planning process and look forward to seeing how community feedback is incorporated into the final Action Plan.

Sincerely,



Sonya S. Mays
President & CEO,
Develop Detroit



Response to Questions/Comments: Thank you for your feedback.

We agree that addressing the ongoing issues of deferred maintenance of affordable housing is important, however the use of CDBG-DR funding to address these issues is not eligible. We will continue to maintain conversations with stakeholders such as Develop Detroit on alternative ways to address these concerns.

Questions/Comments: (Email) Funding from the \$346.8M HUD DECLARATION Must be Allocated to Detroit Residents with transparency in the following areas per household damages & home repairs. All services performed must concentrate on future Disasters:

Residential Infrastructure/Foundation

Roof/ Gutter Replacements

Window/Doors

Siding Damages: Dings, Dents, & Chips caused by flying debris

Siding Panels Torn Away causing large gaps in the exterior walls

Interior Walls cracked or Bowing caused by water damage & force of winds

Debris Removal: Fallen trees, branches may need to be removed from property

Outdoor Appliances:

Window Air Conditioning

Roof Decking pieces torn away causing exposure to the elements

Flood Mitigation to include Basement Mold Remediation

Note: Critical, our Seniors & most Residential families are living w/mold since the 2021/2023 Floods

Cityofdetroit Health Department's Health Inspectors and/or StateofMichigan Health&Human Services report requested regarding health issues caused by home conditions.

Furnish Residential Households with Home Generators

Furnishing Residential households with Infiltration systems

Monetary compensation for homeowners' spending cost as approved by HUD in January, 2025

Requesting report on \$17M Administration Cost Plans. Will staffing opportunities be made available for Detroit Neighbors? If so, using what hiring methods?

In what Quarter in 2026 can the Job Titles& Salaries be made public through HRD and/or Human Resources?

Response to Questions/Comments: Thank you for your feedback.

- The largest impact on residents for the 2023 disaster was basement flooding based on FEMA Individual Assistance Data. The City used this information to inform its use of CDBG-DR funding to assist with repairing failed sewer lateral lines to prevent future basement flooding.
- CDBG-DR regulations require homeowners to “tie-back” to the disaster. Serving households directly with home repairs such as roof replacements and siding damage for example, would create a burden for every applicant applying for assistance. 1. They would have to demonstrate they income qualify for the program. 2. They would need to be able to prove that the damage itself was caused by the storm (before and after pictures, insurance claims, etc.). In addition, only around 5,000 households are determined to have experienced serious damage based on the FEMA Individual Assistance Data. Using funds for area benefit through the sewer alley repair program allows us to double that impact (approx.. 12,000 households).
- Purchasing temporary fixtures such as window air conditioners and generators is not an eligible use of CDBG funding.
- Providing monetary compensation using CDBG-DR funds is not eligible.
- The City of Detroit posts all positions here (including CDBG-DR positions): <https://detroitmi.gov/departments/human-resources-department/apply-job> Typically all positions posted include the salary ranges. Detroit residents are encouraged to apply. HR provides FAQs on the webpage describing the recruitment process.

Questions/Comments: (Email)



3/17/2025

To: Housing & Revitalization Department
City of Detroit

Subject: PETOSKEY-OTSEGO NEIGHBORHOOD ASSOCIATION COMMENTS ON THE
COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY
(CDBG-DR) ACTION PLAN

The Petoskey-Otsego Neighborhood Association (PONA) and its constituents support the proposed plan with the following comments and recommendations. Our priorities are:

1. Ensuring that sewer repairs are made throughout the neighborhood to address ongoing infrastructure issues.
2. To the extent possible, allocating funds to programs that assist existing homeowners in making critical repairs to their aging homes, particularly for those who have not received support funding for repairs indirectly related to the 2023 disaster.
3. Allocating funds to upgrade commercial corridors that support neighboring residential communities like Petoskey-Otsego to include services delivered by small businesses (e.g., full-service grocery stores, full-service drug stores, restaurants, and other retail stores).

HOUSING:

4. Homeownership Program Funding:
 - a. Will the allocated \$10 million sufficiently meet the demand for the homeownership program?
 - b. If not, is there an anticipated shortfall, and how will it be addressed?
5. Homeownership Support Through Housing Choice Vouchers:
 - a. The State of Michigan's "Keys to Homeownership Program" has historically lacked adequate funding, preventing Section 8 Housing Choice Voucher participants from using their vouchers toward home purchases. We have residents that would benefit from the use of these funds combined with Section 8 to move them to homeownership status.
 - b. Maximize funds for homeownership programs to help transition more residents from renters to tax contributing homeowners.
6. Roofing Repairs for Homeowners:
 - a. Allocate funds as an "indirect" cost to offset the financial burden on homeowners that require loans for major repairs and system upgrades (e.g., roofing, storm windows/doors, siding, plumbing, heating/cooling, electrical upgrades, tree removals) consistent with allowable CDBG expenses.

- b. Alternatively, allocate funds for fixed price repair services for residents while supporting economic development for nonprofits and small businesses that can ensure the delivery of quality repair services to their residents. Offset the cost of repairs for residents on fixed incomes that currently do not meet home repair income requirements but are disproportionately paying to replace legacy systems (e.g. boilers). This alternative provides greater equity of funds for the residents of Detroit.

INFRASTRUCTURE:

- 7. Private Sewer Connection Coverage:
 - a. Ensure the funds cover the connectivity of the private sewer line connection repairs with the city's main sewer line replacements at no additional costs to the residents.
- 8. Sewerage Improvements and Flooding Mitigation:
 - a. Include allocated funds for sewer improvements on flooded streets. In 2024 Petoskey-Otsego reported severe street flooding at the following locations: 4000 and 4300 blocks W. Philadelphia, 4100 block Vicksburg, 3700 block Whitney, 7600 block W. Grand River
- 9. Transparency on Infrastructure Funding:
 - a. Create a City-wide dashboard that provides the status of infrastructure spending for the city with basic key performance indicators understandable for the public. Basic information would include issues to be addressed city wide, how much money has been received (or requested), the source of the funds (Federal vs State vs City funded), and if the programs/projects are on time and within budget. Such dashboards should show "unmet" or major infrastructure issues that have no funding source. Currently, there is no easily accessible media that reports on City funds and the health of our funded or unfunded programs. In the interim, neighborhood leadership should be given a directory of where to publicly access information on the other infrastructure funding sources, particularly the "Billions" being spent on infrastructure in the city. Having such information helps neighborhoods with its strategic planning and program initiatives.
 - b. It is difficult to distinguish the various funding sources for infrastructure projects, and while we support this plan, we want to ensure that there is no duplication of funding sources to address the issues in this plan.
- 10. Permanent Infrastructure Resiliency:
 - a. Consider funding permanent solution for power infrastructure, such as moving power lines underground or converting traffic signal power sources to backup solar generated power.
- 11. Street Sewer Drain Maintenance:
 - a. Allocate funding for the removal of debris and overgrowth from existing street sewer drains to improve water flow and reduce localized flooding. Existing street cleaning vehicles do not adequately remove trash, debris, and years of accumulated overgrowth, necessitating a more targeted approach to

maintaining drainage systems and addressing street flooding within the neighborhoods in some instances.

ECONOMIC DEVELOPMENT:

12. Economic Development Initiatives:

- a. The initial slides highlight "Housing, Infrastructure, and Economic Development," yet the presentation primarily addresses housing and infrastructure projects.
- b. Are there specific projects within this plan aimed at fostering economic development?

PUBLIC ENGAGEMENT:

13. Public Access to Plan Revisions:

- a. How will revisions to the plan under review be communicated and provided to the public?
- b. Will there be an opportunity for further community input after revisions are made?

For further correspondence, please include our community at petoskeyotsego@gmail.com. Thank you for your consideration of our suggestions and comments.

Beverly Jones, President
Petoskey-Otsego Neighborhood Association

Cc:
L. Pitts, President
Columbus Hogarth Whitney Block Club

H. Smith, President
The Woods Block Club

S. Poole, President
The Montgomery Street Block Club

K. Butler, Manager, District 5, DON

J. Roberson, Deputy Director, DON

P. Johnson, President, Motown Glory Partners CDC

Response to Questions/Comments: Thank you for your feedback.

- The City is proposing to use \$175M (50%) of the \$346M specifically for sewers. \$252M is being used for infrastructure.
- While we understand home repairs are needed, the City as elected to use funds to serve households impacted by flooding through the sewer repair program. This is because CDBG-DR regulations require significant documentation from households when providing home repairs, include income documentation and proof that the repairs

needed are from direct impacts from the 2023 storm. For example, homeowners would have to have before and after pictures, insurance claims, FEMA claims, all of which become incredibly burdensome.

- Commercial corridor support would require funds to be used to assist businesses impacted by the 2023 storm. Based on data used to inform the use of CDBG-DR funding, we believe housing and infrastructure is the greatest need, which is why economic development activities were not included. If and when additional data is received, we will re-evaluate at that time. We have requested data from the Small Business Administration and we are waiting to receive that data.
- \$10M for the Down Payment Assistance program will not sufficiently meet the demands of the program, however the City continues to identify additional resources to support this demand, including our annual CDBG funding.
- CDBG-DR cannot be used for housing choice vouchers, this is a program through the Detroit Housing Commission. However, we are proposing using CDBG-DR to rehabilitate and bring online additional public housing units.
- All revisions to the plan can be found here: <https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programming-and-information/cdbg-disaster-recovery/2023-cdbg-dr-allocation> Please note that any substantial amendments to the plan require a 30 day public comment period and 2 public hearings, In the event that an substantial amendment occurs, all information related to that amendment will also be on the webpage, and shared through various other means such as the City's email blasts and social media sites. Further comment can always be made to this email (disasterrecovery@detroitmi.gov) however, only comments received within the 30 day comment periods will be published with the Action Plan and subsequent amendments.
- Feedback related to an infrastructure dashboard will be provided to the administration.

Questions/Comments: (Email) While my house is not directly on any of the creeks, I strongly oppose the plan to create permanent fixtures for temporary stop logs. The end of my block will be affected, and demand that any flood protection must include unrestricted access to the water everywhere, every day all day.

Blocking the flows of the creeks to the river will bring down property values, stagnate water, which, to my understanding, now has raw sewage from Grosse Pointe being dumped into it. We have already had to deal with backups caused by excessive rain bringing raw sewage into the basement of our houses, but to have it flowing through the streets or smelling it constantly due to the closures of these creeks is unacceptable.

We moved here 14 years ago. My husband grew up on this block and did not want to leave the city to live somewhere else. I told him as long as we found a good neighborhood that was safe

for my children to grow up in, then I would be willing to live in the city. We fell in love with our house, the location, and the people around us and have been relatively happy here with a few small annoyances (like raw sewage coming up through the basement). Our property value is going up, I enjoy being able to walk to the river from my home (and cannot wait to again once the park is finished). Imagine if you lived in a neighborhood where they closed a creek that had raw sewage dumped into it, and you had to wake up every day smelling that.

I'm sure there are other solutions. Instead of going for the first solution that seems the cheapest, but in the long run will be worse for the city and the residents/businesses in the neighborhood, please consider solutions that will be beneficial to all living here.

Response to Questions/Comments: Thank you for your feedback.

We received a number of detailed questions for which we currently do not have the answers. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email) We would like to express our opposition to the City of Detroit's plan to use \$20 million of federal disaster aid to build three stop log structure and a flood wall to "temporarily" close the canals and access to Bayview/KAM during periods of high water levels.

Erecting a flood wall that would bar access to Bayview, even if only during high water seasons, would be detrimental for the club and their employees who would suffer from layoffs. The club would lose membership and the subsequent loss of membership dues , revenue from well rentals, and usage of the dining and other facilities.

As a member of both Bayview Yacht Club and an owner of a Gregory River Club condo, we have never experienced water levels high enough to overflow Bayview's seawalls affecting use of its access road, parking lot, or the clubhouse. Water from the Detroit River and/or Conner Creek

has not overflowed Bayview's or KAM's property into the surrounding neighborhood, even during the recent flood.

Shutting off Bayview, KAM Marine and Gregory River Club will not solve the greater problems of limited storm water & sewer capacity; insufficient green stormwater infrastructure; leaking seawalls; and aging pipes. It will limit access to the neighborhood's greatest asset, the water; and will create severe hardships for local businesses. It makes more sense to raise the elevation of Clairpointe to a level that would satisfy FEMA for flood plain purposes.

Response to Questions/Comments: Thank you for your feedback.

We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

Questions/Comments: (Email) I am writing to express my concerns regarding the proposed installation of stop log structures as part of the Jefferson Chalmers Flooding and Floodplain Mitigation Program. While I acknowledge that this approach is preferable to the previously suggested permanent closures of the canals, I cannot support this initiative without a clearly communicated and well-defined operational plan.

Specifically, I have the following concerns that need to be addressed before moving forward:

1. **Closure Thresholds** – What specific water level threshold will trigger the closure of our canals?
2. **Duration of Closure** – Once closed, how long must the water level remain below that threshold before the stop logs are removed?
3. **Extended Closures** – If the canals remain closed for months due to prolonged high water levels, what measures will be in place to address:
 - a. The health risks associated with stagnant water?
 - b. The impact on wildlife that inhabits the canals?
 - c. The management of water flowing down Fox Creek—where will this water be diverted during closures?

Without clear answers to these critical questions, moving forward with construction feels premature. "Figuring it out as we go" is not an acceptable approach for a project of this magnitude, particularly when it affects residents, the environment, and the overall long-term viability of our community.

I urge the city and project leaders to provide a detailed operational plan that outlines how these stop log structures will be managed before the project continues. Transparent communication with the community is essential to ensuring that this solution truly addresses flooding concerns without creating new issues.

I appreciate your time and look forward to your response.

Response to Questions/Comments: Thank you for your feedback.

In response to each of your questions, here are our responses:

There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

A detailed final operations and maintenance plan will be developed by the City as part of the project pre-construction process as approved by FEMA. It is our intent to remove the temporary stop logs as soon as Great Lakes water levels are trending downward below canal overtopping flood levels.

Questions/Comments: (Email) To whom it may concern,
I/we oppose the stop log and flood walls proposal and DEMAND that flood protection measures must include unrestricted access to the water everywhere. 24/7. 365 days a year. The USACE floodplain management services options have been overwhelmingly rejected by this community. On October 11, 2022 a town hall meeting was held. On Oct,12 2022 the Detroit news published a story on the town hall meeting. "We heard the residents loud and clear. We are not going to look at that option (canal closure). The community was strongly against it." Said Tyrone Clifton, director of the Detroit building authority.

Less than three years later, this issue has magically returned. This time, only a zoom meeting was to be scheduled and comments were not easily heard from residents and property owners who wish to oppose this again. This was due to the accessibility and infrastructure issues associated with using zoom for a public forum. This is not satisfactory for the degree of community engagement that's required for such a drastic expenditure and change to the community.

This federal money is to be used for improvements, not for activity or action that will harm residents or the community. This will decimate property values, create stagnant water that will have negative health impacts and expedite environmental degradation. It will also cause irreparable damage to the aquatic habitats of native animal and plant species. The plan states that this permanent fixture will only AID in the removal of the floodplain designation. A official on the zoom meeting openly admitted that there was no certainty that this expansive, drastic and irreversible action would gain any results to that effect. The official attempted to reassure everyone via zoom that this will only be temporary and during dire circumstances. When a resident asked, "Who will open and close these stop logs? Would those in control of these stop logs be the same government agents that essentially abandoned the tiger damn system here? Why were they never removed to this day?", the agent responded with "Yes they will be, and I don't have an answer or excuse for that, that's our fault".

Obviously, this proposal is looking for the fastest, quickest way for a solution. It is not the proper or best solution for the community. The city has neglected its duty in overseeing that the canals be properly maintained for the last century. Now, during a time of low water, is not the time to all of a sudden rush and hurry into an even worse situation.

Without a complete solution that includes an avenue for residential sea wall construction or construction assistance, this unacceptable proposal will not achieve anything. It will go down in history as a total and utter waste of public funds, as it will not complete the objective of removing the neighborhood from the floodplain designation. There are less expensive and more acceptable proposals out now such as the \$41.25m parcel by parcel focused solution, known as the water project.

Closing the canals, even temporarily, would result in the financial ruin of home, business and property owners. It will create water stagnation and massive environmental dilapidation. It will also destroy plant and animal habitats. Limiting water accessibility will not only degrade property values, but will permanently damage and/or destroy the vitality of water-based business in this area.

The property owners, neighbors and businesses of Jefferson-Chalmers benefit from the expenditures of visitors, boaters, and fishermen from the entire region of metropolitan Detroit and Michigan as a whole. Officials have recently said that "an almost \$2 billion annually from boating, fishing, recreational opportunities, real estate and related businesses as well as 17 million visitors are generated from the Detroit river and Lake St. Clair.", according to the Detroit free press, august 1st, 2024.

Citing these reasons, I will not support any form of closure on the Fox creek, Phillip, or Lakewood canal. If any such action to limit access to the water is taken, at any time, that's considered an infringement of my property and I am prepared to sue you.

Response to Questions/Comments: Thank you for your feedback.

1. We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

We received a number of detailed questions for which we currently do not have the answers. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

--Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing --contamination, possible impacts to wildlife, etc.

--Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

2. A detailed final operations and maintenance plan will be developed by the City as part of the project pre-construction process as approved by FEMA. It is our intent to remove the temporary stop logs as soon as Great Lakes water levels are trending downward below canal overtopping flood levels.

3. Please note that the City held a press conference notifying residents of the funding in January when HUD announced it award. HUD requires the city to submit its Action Plan with 90 days of that award notice. The City presented information on how the funds could be spent at two in person city council meetings (one formal and one district specific for D4). The City then advertised both public hearings and the 30 day comment period online, via emails, social media and through neighborhood organizations.

4. Repairs, replacements, and height adjustments to existing public and private seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight

https://www.fema.gov/sites/default/files/documents/fema_meeting-criteria-accrediting.pdf

There are limited options to fund private seawall projects with the public's money, as expending city general funds on private seawalls is a non-starter. It is possible for the community to explore initiating a Special Assessment District (SAD) for private seawall Improvements. The city cannot advocate for (or against) an SAD proposal, but we can help provide guidance and administrate a neighborhood-initiated SAD request.

Questions/Comments: (Email) We here on Harbor Island have ALWAYS been on the flood plain. It is a well accepted aspect of living on the water.

The problem with the sewer backups that occurred in 2022-23 was due to a storm with excessive rain. 5-8 inches in an hour or something like that. It has never been the case that The Detroit river or canals overflowing has caused flooding that your plan proposes to alleviate. I would refer you to the excellent and detailed objection filed by Klenk Island residents to this proposed plan which I join in arguing against the plan.

Blocking the canal, Waters egress to the river as proposed will only make flooding worse and make this whole area of Jefferson Chalmers, a stinking swamp. It WILL no doubt destroy our property and values and of course corresponding tax revenues.

I implore you as a taxpaying resident of this neighborhood since 1985 do not implement this plan which will result in the ruin of this wonderful neighborhood!!

Sincerely submitted as a continuation of my below OBJECTION to this plan.

Thank you for your consideration.

Response to Questions/Comments: Thank you for your feedback.

In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of

river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, “flooding” means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.

- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email) I know there is an underground stream that runs just the other side of my driveway. I discovered it while sinking a 12-foot gate pole about 1977. While driving the pole into the earth water came shooting out the top. Mrs. Bernice who grew up here told me she played in it as a child. Little streams are criss crossing the entire neighborhood. This is a terrible idea that will further destroy foundations and the natural movement of water in this neighborhood.

Further there is no plan for opening the canals so boaters can access the Detroit River and Lake St. Clair. We are a boating/fishing community and this plan disrupts the rights of the property owners that rent docks along the canals and depend on that source of income to pay taxes. Please STOP THIS TERRIBLE IDEA.

Response to Questions/Comments: Thank you for your feedback.

There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email) To Whom It May Concern:

Thank you for the opportunity to provide comments on the plan referenced above. Our comments pertain specifically to the proposal to install stop logs across three canals in the Jefferson Chalmers neighborhood, as outlined on pp. 24-27 and 47-52 of the plan. As long-time residents of that neighborhood, we strongly object to the installation of the stop logs.

While we certainly appreciate the need to address flooding and the desire to remove the floodplain designation from the area, the city has been unable to demonstrate that installation of stop logs would accomplish either of those goals.

In fact, at a recent community meeting, the city admitted that the stop logs would merely “aid” in the removal of the floodplain designation. There has been no further information provided on what additional measures would be required to remove the floodplain designation. The city has not detailed a comprehensive plan to address the floodplain designation and seems content to proceed on a piecemeal basis in hopes that it will all work out eventually. This approach is counterproductive and risks significant expenditures on construction that may all be wasted if additional floodplain requirements cannot be achieved.

Further, the city has provided cost estimates for installation of the stop logs but has not provided cost estimates for maintenance, operation, and storage of the stop logs when not in use. These costs could be significant given the nature of the proposed structure. Failing to consider these costs may lead decision makers to mistakenly believe that the stop log plan is cost effective as compared to other options. Who will install and remove the stop logs whenever water levels fluctuate? What equipment and personnel will be necessary and how often will they be needed? Where will the stop logs be stored when not in use? How much will all this cost? Perhaps the stop log plan is not as economically desirable as it initially appears.

Even if the stop logs are installed correctly, they will not be able to prevent flooding. Historically, flooding in the area has been caused not by rising waters breaching seawalls but by water seeping up from the porous ground on which this neighborhood sits. Trying to stop

flooding by constructing additional seawall type structures is an exercise in futility. It would not be surprising to learn that this area basically is unable to be removed from the floodplain designation due to its essentially porous nature.

After the high-water events of 2019, the city informed us that we would be fined if we did not raise our seawall. We spent over \$50K to comply with the city's demand. Now the city admits that it did not raise the seawalls on its own properties on the canals and that those expenditures would be made unnecessary by the stop log plan currently under consideration. How convenient that the city has been able to save money by forgoing seawall construction while forcing the rest of us to incur that huge expense! When we incurred that expense, we thought that we might be able to recoup some of it due to rising property values for homes on these lovely canals. Now the city promotes a plan that seems likely to turn the canals into mosquito infested swamps by damming the movement of the water in the canals. As a result, property values in the entire Jefferson-Chalmers neighborhood will plummet.

The city is asking us to trust that they will efficiently operate the stop logs so they would only be in place during high-water events. Why would we trust the city when they have already burned us by unnecessarily requiring us to pay for new seawalls? Why would we trust the city when they left Tiger Dams languishing in our yards for years? The city does not have the capacity, expertise or even basic motivation to properly operate the stop logs for the benefit of its citizens.

We urge the city to consider alternative solutions that do not involve obstructing the canals. The Army Corps of Engineers proposed raising all the seawalls in the canal district. While it was not the option with the cheapest up front cost, it remains their best option for long term benefits (financial and otherwise) for all stakeholders. Additionally, the Klenk Island Navigation & Property Owners Association has proposed solutions that would not impair the movement of water or watercraft on the canals. Finally, the Jefferson Chalmers Water Project has proposed environmentally sound solutions based on an extensive engineering report. If the city is truly committed to community engagement, it would seriously consider these realistic solutions put forth by the community. So far, we have heard no feedback from the city on these community supported solutions.

The canal district is a jewel – and a rare one at that. Most cities do not have such unique neighborhoods. It is fitting that the greatest city on the Great Lakes is the one to hold this treasure. We have a responsibility to nurture it and make it the envy of all other cities.

It is impossible to describe the magic of living in the canal district. Of all places that we have lived, this is the one with the greatest sense of community. We are united across race lines and class lines by our love of the water. Neighbor helps neighbor to fix old boats or give navigation advice. Since we share our backyards with everyone who comes up and down the canals, we

chat with people from all over the place who float past us in their kayaks or skate past us in the wintertime. The only way to truly understand how special this area is to experience it for yourself. We invite decision makers to sit in our backyard with us on a beautiful summer evening and see for yourself why this area is becoming so popular because people are discovering its unique value.

Please help us to protect, preserve and promote this precious jewel in the city.
Thank you for taking the time to hear us out.

Response to Questions/Comments: Thank you for your feedback.

In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, “flooding” means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

Repairs, replacements, and height adjustments to existing public and private seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight

https://www.fema.gov/sites/default/files/documents/fema_meeting-criteria-accrediting.pdf

In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

We received a number of detailed questions for which we currently do not have the answers. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE,

USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

The administration attempted to award a contract to repair city-owned city walls, but it was not successfully awarded.

A detailed final operations and maintenance plan will be developed by the City as part of the project pre-construction process as approved by FEMA. It is our intent to remove the temporary stop logs as soon as Great Lakes water levels are trending downward below canal overtopping flood levels.

Please note that we did respond to the Klenk Island Navigation & Property Owners Association.

Questions/Comments: (Email)

Dear Disaster Recovery Staffers,

By way of introduction, I operate Water Infrastructure Co-Lab, LLC. I work on infrastructure issues pertinent to and for Detroiters, the City of Highland Park, service organizations, and faith communities to lend infrastructure expertise to areas that encounter long-standing issues with their stormwater, wastewater related infrastructure.

Recommendation: Do not further modify nor block these channels.

First, there has been no formal study done that establishes the relationship between the stages (water level) of the Detroit River and how the channels respond to change in river stage.

I've worked extensively with residents in coastal Eastside communities on identifying the type(s) of flooding that they have experienced. These types of flooding include: septic backup from residential-business sewer lateral, groundwater intrusion into subgrade structures; runoff entering through ground-level openings in a structure; river incursion into residential areas; and supply line pipes bursting due to interior freezing conditions. **Residents and business owners indicate that river incursion, canal levels rising have not been commonly experienced. The**

floodplain is highly engineered and funds could be better leveraged to shoring up residential areas and associated seawalls.

Each channel has a unique extent of channelization and their adjacent riparian zones can tell us a lot about the behavior of these surface waters. I would recommend a stream geomorphic study, as it appears that at least the canal running between AB Ford Park and Coriander Kitchen is in a dynamic state of bank development. The impact of sewerage on the coastal eastside landscape and drainage pattern has not been well assessed nor incorporated into the present plan. It's not just about correcting septic flows into the Fox Creek. The Fox Creek issues are important and deserve the attention that they are getting, but the interaction of the sewer system infrastructure with drainage, Detroit River, the canal system, and landscapes (incl. impervious area, drainage from streets, etc.) are all interactive and should be assessed comprehensively as a system.

The existing plan is prematurely written, and there is no evidence that the premise, installation, operation and maintenance (and funds to pay for this) of dams have been tested for cost-benefit.

\$20M can be better used in other ways.

Response to Questions/Comments: Thank you for your feedback.

There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

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backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

Questions/Comments: (Email) As a resident of Jefferson Chalmers, I strongly oppose the stop log project that's part of the Disaster Recovery Funding plan. The stop log plan is an expensive, short term proposal, does not actually address flood issues in our neighborhood, negatively affects the residents of this community, and has already been rejected by the community when proposed in 2022.

After seeing how the city handled the Tiger Dam project, I have little confidence in the stop log plan being executed as is proposed, installing them a few months every 10 years during high water. In 2020 we were told the tiger dams would be put in place during high water times and removed/maintained. They were put in place and then never maintained or moved for 4 years, making them ineffective, an impediment in our private spaces, and a blight in our neighborhood.

The flooding in our neighborhood and basements has not been caused by high water or the canals, but by infrastructure failures during weather events. During the June 2021 flood, I personally watched water flowing OUT of the canals and into the river. This proposal to get us off the floodplain quickly does not actually address the real issues of flooding in our neighborhood.

I would also like to voice my disappointment in the handling of the 3/17/25 community meeting. The city representatives running the meeting were seeking out comment from specific people on the zoom call, giving preferential treatment to people the city had identified ahead of the meeting as being in support of the plan, and creating division between neighbors with the provided talking points. The favorable comments were given as much time as they needed and the final comments from the Jefferson Chalmers community against the stop logs were given 30 seconds each. This was divisive and a dishonest way to run a community meeting where all Detroiters should have an equal voice and platform.

While I oppose the stop log portion of the proposal, I am supportive of the rest of the Disaster Recovery Funding plan and hope the plan can be adjusted to where the funds proposed for stop logs go towards long-lasting improvements to the Jefferson Chalmers neighborhood, like seawall and improved drainage/sewer infrastructure.

Response to Questions/Comments: Thank you for your feedback.

In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, "flooding" means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

Repairs, replacements, and height adjustments to existing public and private seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight

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Questions/Comments: (Email) I oppose the stop log and flood walls proposal and demand that flood

protection must include unrestricted access to the water everywhere 24/7/365.

- The USACE Floodplain Management Services (FPMS) July 22 Report options have been overwhelming rejected by the community at Hope Community Church on October 11, 2022.
- City Officials are on record stating: *"We heard the residents loud and clear. We are not going to look at that option,"* said Tyrone Clifton, director of the Detroit Building Authority and one of the city officials who spoke to residents at the Tuesday meeting. *"The community was strongly against it, and we should listen to the community."*
Detroit News – 10.12.22

https://jeffersonchalmerswaterproject.org/723_DetroitNews_10.12.22.pdf

The Plan states: This permanent fixture will **AID** in the removal of the floodplain designation in the Jefferson-Chalmers neighborhood, but without a complete solution, this unacceptable proposal will NOT remove the community from the floodplain.

- The Corps estimates were between \$160-171 million, without the remainder of the funds to support a complete solution, this expenditure will be a waste of precious public funds. Closing the canals will result in water stagnation and environmental degradation which is a PUBLIC HEALTH crisis waiting to happen.
- Made worse by trapping raw sewage following discharges from the Fox Creek Combined Sewage Outfall, causing flooding filled with sewage to top the shoreline.
- Limiting access to the water will undermine property values, permanently damage and destroy and the economic vitality of water-based businesses that benefit from expenditures by visitors, boaters and fisherman from throughout metropolitan Detroit.

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

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- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email) We oppose the stop log in the CDBG DR action plan. This was presented to the community several years ago and the city concurred we would not use stop logs. This will have devastating impacts on the local environment. The city also demonstrated incompetence with Tiger Dams that were another environmental hazard as well as health and safety issue not to mention the waste of funds.

The city owns numerous properties that have not been maintained in the Jefferson Chalmers area including properties on the canals. The city has also ruined AFB park which was once a treasured park and now looks like a disaster. There is not much trust or faith in the city and their due diligence with residents on ALL plans.

The stop logs would negatively impact the entire neighborhood property values and use of public water ways which is the reason many people choose to live in the neighborhood.

No to stop logs in the CDBG DR plan.

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

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--Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

The administration attempted to award a contract to repair city-owned city walls, but it was not successfully awarded.

Due to the discovery of contaminated soils, the City is reconstructing/capping AB Ford Park including new amenities.

Questions/Comments: (Email) 1. We STRONGLY oppose the stop log and flood walls proposal and demand that flood protection must include unrestricted access to the water everywhere 24/7/365.

2. The USACE Floodplain Management Services (FPMS) July 22 Report options have been overwhelming rejected by the community at Hope Community Church on October 11, 2022. - - City Officials are on record stating: "We heard the residents loud and clear. We are not going to look at that option," said Tyrone Clifton, director of the Detroit Building Authority and one of the city officials who spoke to residents at the Tuesday meeting. "The community was strongly against it, and we should listen to the community." Detroit News – 10.12.22
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3. The Plan states: This permanent fixture will AID in the removal of the floodplain designation in the Jefferson-Chalmers neighborhood, but without a complete solution, this unacceptable proposal will NOT remove the community from the floodplain. - The Corps estimates were between \$160-171 million. But without the remainder of the funds to support a complete solution, this expenditure will be a waste of precious public funds.

4. Closing the canals will result in water stagnation and environmental degradation. - Made worse by trapping raw sewage following discharges from the Fox Creek Combined Sewage Outfall, causing flooding filled with sewage to top the shoreline and potentially infiltrate the center of the community.

5. Limiting access to the water will undermine property values, permanently damage and destroy the economic vitality of water-based businesses that benefit from expenditures by visitors, boaters and fisherman from throughout metropolitan Detroit.

Closure of the canal for just a few weeks will result in stagnation and turn into a cesspool, Period!! The increase of mosquitos will result in health issues and prevent people in the community from enjoying their backyards, not just on the canal, but in the community at large. Property values will be effected.

Who decides to open and close the canal, for how long? Who will deliver, install, uninstall these stoplogs and the cost involved in doing so and cost for storage? There is no guarantee how long the Stop logs will stay in place. Promises, projections are NO GUARANTEE!!!! Remember the Tiger Dams!!!!

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

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A detailed final operations and maintenance plan will be developed by the City as part of the project pre-construction process as approved by FEMA. It is our intent to remove the temporary stop logs as soon as Great Lakes water levels are trending downward below canal overtopping flood levels.

Questions/Comments: (Email) I am willing to invest in improving the seawalls in our neighborhood. I strongly disagree with closing any of the canals. I feel we should ask our local and state government to challenge FEMMA and the political and scientific reasons behind the floodplain zoning changes made. The environment will suffer and I do not feel this is a long term solution to the threat of flooding.

As you may be aware, water levels in our canal are at historic lows, levels not seen since 1973. This situation presents significant challenges and risks, not only to navigation and commerce but also to the ecological health of our waterway. Low water levels can lead to the degradation of habitats for various aquatic species and disrupt the natural balance of our ecosystem.

Some options to think about:

- **Strengthening Seawalls:** Reinforcing the seawalls will prevent erosion and protect habitats.
- **Upgrading Water Management Systems:** Modernizing our water management infrastructure can help maintain optimal water levels and improve water quality.
- **Enhancing Public Access:** Investing in community-friendly spaces along the canal can promote environmental stewardship and public engagement. Closing the canals up will have the opposite effect on our environment and the public.

Thank you for considering this important matter. I look forward to your thoughts and any further discussions on how we can progress with these initiatives.

Response to Questions/Comments: Thank you for your feedback.

The City appealed the FEMA floodplain designation, and that appeal was denied.

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project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

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Questions/Comments: (Email)

Residents of Harbor Island
Comments/Objections to the Jefferson Chalmers Flooding and Floodplain Mitigation Plan
City of Detroit - Action Plan for Disaster Recovery (Draft)
March 26, 2025

Harbor Island Street is part of the Jefferson Chalmers neighborhood. Our community of 50 households is defined by the water that flows through the canals and surrounding us. We value access to the water that offers us and the broader community the unique opportunity to simply enjoy nature, and to fish and boat. Harbor Island residents are very familiar with the changes in water level of the Great Lakes. Out of necessity we have been resilient and committed to preventing flooding by upgrading seawalls and pitching in with our neighbors in the community to fill sandbags when necessary. This commitment extends to the goal of removing the Jefferson Chalmers neighborhood from the FEMA 100-year Floodplain. We are ready to work with the city to find reasonable and workable solutions to reach this goal.

We are **opposed to the installation and utilization of Stop-Logs** as described in the plan **for the following reasons.**

1. **The plan lacks details** to determine or even estimate the length of time the canals will be closed.
 - For the Stop-logs to work they must be set at a height that keeps water from breaching all properties along the canal including those at the lowest elevations notwithstanding the presence of a seawall. Through visual inspection, it is reasonable to deduct that a minimum 20% of properties along the canal are currently at or under 576.75 ft. above sea level. According to National Oceanic and Atmospheric Administration data taken from a marker of Windmill Point, during the last high-water cycle (2019-2021) there were 336 days the water was at or above 576.75. **We are looking at potential closures that could last 11 months or longer.**
 - The waterway is in constant motion and stifling it will over time create "swamp like" conditions allowing mosquitos and other insects to flourish, and other dangerous environmental situations to metastasize. The free flow of water is critical to the ecological health of the area and the survival of the many species of fish, fowl, and animals that thrive and reproduce in this delicate and unique urban eco system.
 - The plan does not provide a solution or even a process to get pumped storm water discharging into Fox Creek out into the Detroit River and Lake St. Clair while the canals are closed.
 - Stop-Log will have an adverse impact on our property values and the values throughout the Jefferson Chalmers neighborhood. We strongly suggest that the city evaluate this plan to better understand the long-term costs from potential exposure to litigation given the adverse impact.
2. **The navigability of the water way** will be compromised.
 - The canal system is classified as "Navigable Waterway" by the US Army Corps of Engineers (USACE) and The Michigan Department of Environment, Great Lakes, and Energy (EGLE). Stop-logs are an impairment rather than an improvement. The infrastructure will narrow passage lanes and create potentially dangerous situations given the variety of watercraft that navigate the canals. Signage and lighting also need to be addressed.

3. **The City of Detroit will be taking on new and unfamiliar responsibilities.**
 - The operation and maintenance of the Stop-Logs is clearly outside the current capacity of the city. They lack the experience and do not have a track record of operating anything remotely like Stop-Logs.
 - The city was helpful responding to the last high-water event by utilizing Tiger Dams. However, the process of installation and removal was not managed well and has led to skepticism that the city is equipped to manage a project of this magnitude into the future.
4. **There are no guarantees that Stop-Logs will remove Jefferson Chalmers from the flood plain.**
 - The plan simply states that they will aid in the removal and that they are part of a long-term solution.
 - The approval process for the construction and installation of the Stop-Logs will need to pass through multiple state and federal agencies based on their location. In addition, FEMA will need to determine if the use of Stop-Logs will be sufficient to remove the area from the 100-year floodplain.
5. **The City has been inconsistent in engaging with community stakeholders and responding to issues identified by impacted residents.**
 - The plan states that the city will “Reduce Barriers for Assistance” through proactive, strategic communication and outreach. To date, the city has not demonstrated that they can meet this obligation.
 - A variation of this plan was presented to over 500 residents in October of 2022. Residents stated repeatedly and clearly that closing the canals temporally or permanently was not acceptable. After that meeting the city stated that it was not going to implement such a plan.

In closing, the residents of Harbor Island **are committed to finding solutions and to working cooperatively** to remove the Jefferson Chalmers area from the 100-year Floodplain while maintaining unrestricted access to the Great Lakes. We support a **parcel-by-parcel solution** that will meet the needs of residents by using a variety of methods and materials in compliance with governing agencies to create a single line of defense against future Great Lakes water levels.

To build cooperation with canal residents and in particular property owners, we suggest the following issues be addressed with the direct input and involvement of impacted residents.

- Easy access to clear and concise guidance from the bodies that govern/approve waterfront improvements. Multiple entities are involved based on circumstances including the City, FEMA, EGLE, and the USACE.
- Assurance from the city to uniformly and consistently enforce the standing ordinances and building code requirements for properties with canal frontage.
- Assistance to identify and establish mechanisms to provide canal residents financing options for waterfront improvements.
- We request the city consider reallocating some or all the \$20 million dollars identified in the Plan to support canal residents who qualify for assistance within CDBG-DR eligibility.

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match

components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

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Questions/Comments: (Email)

Coriander Kitchen and Farm
14601 Riverside Blvd
Detroit MI 48215

**OBJECTIONS TO THE CDBG DISASTER RECOVERY DRAFT ACTION PLAN
WITH RESPECT TO CANAL IMPAIRMENTS AND STOP LOGS**

03/28/25

Office of Community Development
City of Detroit
Coleman A. Young Municipal Center
2 Woodward Ave, Suite 908
Detroit, MI 48226

Subject: Objection to Proposed Stop-Log Structures in the Canals

To Whom It May Concern,

The Jefferson Chalmers neighborhood is a unique and historically significant part of Detroit. While addressing flooding concerns is necessary, the proposed Flooding and Floodplain Mitigation Plan, which seeks to implement stop logs to control flooding, poses significant threats to the community, businesses, and long-term development of the area. On behalf of the Riverside Blvd Property Owners Association, we are writing to formally object to the proposed stop-log structures outlined in the CDBG Disaster Recovery Draft Action Plan. Our Association represents the property owners along the Riverside Blvd canal, all of whom will be negatively impacted by the proposed installations.

The installation of stop-logs poses several significant concerns, including but not limited to:

1. Impairment of Navigation

The canals serve as vital navigable waterways for both commercial and recreational purposes. The introduction of stop logs will narrow the canals,

obstruct passage, and create hazardous conditions, particularly for larger vessels. Even when not in use, the structures will limit maneuverability and create congestion.

2. Economic Impact

Waterfront properties along the canals contribute substantially to the local tax base and economic development. Any obstruction to navigation and water flow would discourage investment and harm the local economy. Many businesses in the area rely on unimpeded water access for their operations, and any restriction will effectively eliminate their ability to function. This will result in job losses, economic decline, and further disinvestment in the area—outcomes that run counter to the City's stated goals of economic growth and community development.

3. Property Values and Marketability at Risk

Many community members strategically purchased properties in the area with the specific intention of developing businesses along the canal leading to the Detroit River. One example is the 2022 purchase of 14719 Riverside Blvd, which was explicitly marketed as being on a canal that connects to an international waterway. Implementing stop logs would devalue such properties and disrupt a thriving recreational and commercial economy, ultimately discouraging future investment in both business and residential development.

4. Floodplain and Drainage Concerns

The proposed stop-log structures fail to address the real issue of sewer backups during rain events. Fox Creek and its associated canals serve as drainage pathways for stormwater management. Blocking these waterways will likely exacerbate flooding not only in the Jefferson Chalmers neighborhood but also in surrounding areas such as Grosse Pointe Park and other adjacent communities.

5. Environmental and Structural Risks

The canal system sits on unstable soil, and historical evidence suggests that restricting water flow could lead to stagnation, increased debris accumulation, and potential structural failures of existing seawalls. These risks would ultimately create greater maintenance costs for both private property owners and the City.

6. Lack of Comprehensive Planning and Community Engagement

The history of flood mitigation efforts in the area has been marked by ineffective solutions that did not adequately address the issue. The proposed stop logs appear to be another rushed measure, lacking comprehensive planning and due diligence. A more thorough, community-involved process is necessary to ensure that all viable solutions are explored. Community members deserve a seat at the table in decision-making processes that directly impact their livelihoods and investments.

Alternative Solutions

Instead of implementing a costly and ineffective stop-log system, we urge the City to explore alternative flood mitigation measures. A properly engineered levee system, as previously recommended by the Detroit Engineering Department, would provide a more effective, long-term solution without impairing navigation. Additionally, improved storm drainage infrastructure and separation of storm and sanitary sewers would more directly address flooding concerns.

The Jefferson Chalmers community and its residents are deeply invested in the future of this unique part of Detroit. While flood mitigation is essential, the proposed stop logs solution is not the right answer. Given these significant issues, we as owners of a canal based business urges the City of Detroit and relevant agencies to reconsider the stop-log proposal and pursue solutions that align with the Jefferson-Chalmers Development Plan's goal of enhancing waterfront areas for both neighborhood and city-wide use.

We welcome the opportunity to engage in further discussions to identify a more viable flood mitigation strategy that protects both the integrity of our canal system and the interests of property owners.

Response to Questions/Comments: Thank you for your feedback.

There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.

- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

A detailed final operations and maintenance plan will be developed by the City as part of the project pre-construction process as approved by FEMA. It is our intent to remove the temporary stop logs as soon as Great Lakes water levels are trending downward below canal overtopping flood levels.

Regarding the 1952 engineering department study to construct the protection levees, the City would have had to acquire almost all of the canal abutting properties to construct the protection levee and is not deemed viable by this administration.

Questions/Comments: (Email) I am requesting to not include the stop logs of the canals as part of the proposal for disaster recovery for flooding of Jefferson Chalmers. There are many concerns regarding the stop logs. Please see the attached letter from the owners of Coriander restaurant citing in detail the many valid issues that community members have with the stop logs proposal.

Create 1 common sea wall along all canal facing properties. Surely there is some legislation that gives the city of Detroit jurisdiction to make a sweeping flood plain protection like this. It needs to be found and cited. There is a sea wall protecting alter road from the canal flooding and alter road has never flooded. Problem solved!

Also please address the antiquated sewage system which combines rainwater with sewage and then floods our basements with the mixture whenever there's too much rain.

I can assure you this is of greater concern to the majority of Jefferson Chalmers residents who do not live on a canal.

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I can assure you this is of greater concern to the majority of Jefferson Chalmers residents who do not live on a canal.

Questions/Comments: (Email) As a resident of the Jefferson-Chalmers neighborhood, I am firmly opposed to the latest plans of the City to install stop logs. Further, I support the comments and opposition which have been submitted on behalf of the Harbor Island residents.

Response to Questions/Comments: Thank you for your feedback.

Questions/Comments: (Email) Opposition to the Jefferson Chalmers Stop Log project
I would like to add my voice in opposition to the Jefferson-Chalmers Stop Log project.

As a homeowner on the canal (on Harbor Island) my concerns are that nowhere did the city's proposal mention compensation for taking part of our property away from us and the obvious devaluing of our homes. We bought the homes to have to have the convenience of keeping our boat in our backyard and save massive expenses each year in storing our boat in a marina all-year long.

In addition, the city's proposal did non mention where we are to keep and use our boats, which is why most of us bought property here, and if the city is going to provide us with a new marina or pay the fees we would need to pay a marina, if **we can find space at one that has openings.**

Also, how does the city plan on dealing with the smell of stagnant water and increase mold in the air behind our homes?

Finally, why doesn't the city create a seawall ordinance so we know what and how to build seawalls that will be acceptable to city, USACE and FEMA?

Work with us and FEMA to fix this problem without long drawn out lawsuits and decreased city revenues from property, sales and business taxes.

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The City has a commercial property seawall ordinance; however, we have not adopted a similar residential seawall ordinance.

A detailed final operations and maintenance plan will be developed by the City as part of the project pre-construction process as approved by FEMA. It is our intent to remove the temporary stop logs as soon as Great Lakes water levels are trending downward below canal overtopping flood levels.

Questions/Comments: (Email) To whom it may concern,
I am writing as a Detroit resident and business owner, to voice my strong opposition to any plan that will install any barrier, temporary or removable, between the Fox Creek, Scripps, or any canals in the City of Detroit. Jefferson Chalmers's renaissance is directly connected to the work of individual residents that have invested millions of dollars of their own money to rehab homes and businesses, both on and off the water, and created one of the most unique and one of a kind neighborhoods in the city.

I have called Jefferson-Chalmers home for the last 10 years. I was drawn to the neighborhood by the promise of water access in a unique community where I could afford to live and own a home. Over the years I have experienced basement sewage backups, a fire, the birth of my first child, and the complete restoration of a 100 year old home on Fox Creek. My wife and I have invested well over \$300,000 in our home restoration and a vacant lot redevelopment garden project. We have felt safe making the biggest investment in our lives because of our access to the Detroit River through Fox Creek. If the canals are closed to the river and the lake, our property values will be severely impacted, as well as our quality of life. We have many neighbors who have also heavily invested in the area, and will suffer similar problems if stop logs are installed.

I have been through about a dozen major rain storms dating back to 2016, three of which resulted in GLWA pumps failures and subsequent basement sewage backups and flooded streets. I have stood in the streets with a rake clearing storm drains, only to notice that water stopped draining and started backing up because the pumps failed. At that point, water enters the canals and flows out to the river. Fox Creek becomes a fast moving river, with thousands of gallons rushing through it and dumping into the river. If there are stop logs in place when an event like this occurs it will be like plugging the overflow holes on a bathtub with the faucet running, water will overflow the canals, flooding the whole neighborhood. Water will rise to the level that the stop logs, and if that level is higher than the lake levels during a high water year, basements wont be the only thing flooded, many first floors will flood as well.

It is also worth noting that there is no connection between seasonal high lake levels and Jefferson Chalmers basement flooding sewer backups. All of the "floods" going back to at least 2016 have been sewage backups, NOT floods caused by water going over seawalls. Back on July 8, 2016, there was a major rain storm which resulted in sewage backing up into most basements in Jefferson Chalmers. Lake levels were 2 feet below the 2020 high water mark of 577.56 above sea level. Then in April 2020 Tiger dams were installed during record high water levels. There were no sewage backups that year. However on June 26, 2021, lake levels were 1.66 feet below the 2020 high water mark, and there was a major sewage backup throughout the lower east side of Detroit, much of the Pointes, and Harper Woods. **Again, GLWA pump failures were to blame for the sewage backups, not high lake water levels.** There was another sewage backup on July 21, 2022, but lake levels were 1.86 feet below the 2020 high water mark. Lastly, during the major rain storm on Aug 24, 2023 that caused major sewage backups, water levels were 1.7 feet below the high water mark in 2020. I have been outside during all of these storms, and water is always running into the canals and out into the river.

It is unfortunate that funding for this flawed plan is part of a block grant that could have some major benefits for the community. However, the long term harm of spending millions of dollars on a construction project that will not fix our sewage backups and has no guarantee to get us off the floodplain, is greater than the short term benefits of the other elements of the block grant. If possible, the grant should be rewritten and money from the stop logs should be diverted to actual solutions to the sewer backups and infrastructure that will guarantee getting us out of the floodplain.

Please do everything in your power to keep our canals open to the Detroit River. They are freely accessible to the whole city, and in recent years we have seen more and more Detroiters take advantage of this hidden gem.

Response to Questions/Comments: Thank you for your feedback.

In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, "flooding" means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

We want to note that \$175M (50%) of the CDBG-DR proposed uses is to assist in infrastructure (specifically sewers).

Questions/Comments: (Email) 1. I oppose the stop log and flood walls proposal and demand that flood protection must include unrestricted access to the water everywhere 24/7/365.

2. The USACE Floodplain Management Services (FPMS) July 22 Report options have been overwhelming rejected by the community at Hope Community Church on October 11, 2022.

- City Officials are on record stating: "We heard the residents loud and clear. We are not going to look at that option," said Tyrone Clifton, director of the Detroit Building Authority and one of the city officials who spoke to residents at the Tuesday meeting. "The community was strongly against it, and we should listen to the community." Detroit News – 10.12.22
- https://jeffersonchalmerswaterproject.org/723_DetroitNews_10.12.22.pdf

3. The Plan states: This permanent fixture will AID in the removal of the floodplain designation in the Jefferson-Chalmers neighborhood, but without a complete solution, this unacceptable proposal will NOT remove the community from the floodplain.

- The Corps estimates were between \$160-171 million. But without the remainder of the funds to support a complete solution, this expenditure will be a waste of precious public funds.

4. Closing the canals will result in water stagnation and environmental degradation.

- Made worse by trapping raw sewage following discharges from the Fox Creek Combined Sewage Outfall, causing flooding filled with sewage to top the shoreline and potentially infiltrate the center of the community.

5. Limiting access to the water will undermine property values, permanently damage and destroy the economic vitality of water-based businesses that benefit from expenditures by visitors, boaters and fisherman from throughout metropolitan Detroit.

6. There are less expensive and more acceptable proposals.

- Consider endorsing The WATER Project \$41.25M parcel-by-parcel focused solution – Public Responsibility for Flood Protection on page 1 of the website.

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent

(roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

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Questions/Comments: (Email) I'm very irritated and disappointed in the city's plan for spending \$364M from the federal government, specifically the 'temporary' blockages of fox creek and associated canals.

This is a bad plan.

I saw no evidence of the city seeking input from citizens while creating the proposal. The city is advertising this proposal as if there is a guarantee that the flood zone designation will be removed, and I've seen no evidence of this. They've proposed a plan that requires a significant amount of future funds to maintain and operate, when the city's budget is uncertain. This plan also penalizes homeowners (very selectively) by removing property features and access instead of enforcing property maintenance on vacant and city-owned properties.

I'm also unhappy with the water department pushing this false narrative that the lake levels have caused the sewer backups. This wasn't true in 2014, 2016, or 2023 (when the disaster money was assigned) and it's not true now.

I'm hoping that the City of Detroit will choose to be smarter and more responsible with available funds.

Response to Questions/Comments: Thank you for your feedback.

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We received a number of detailed questions for which we currently do not have the answers. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

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connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.

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Repairs, replacements, and height adjustments to existing public and private seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight

https://www.fema.gov/sites/default/files/documents/fema_meeting-criteria-accrediting.pdf

Questions/Comments: (Email)

Riverside Blvd Property Owners Association
14601 Riverside Blvd
Detroit MI 48215

**OBJECTIONS TO THE CDBG DISASTER RECOVERY DRAFT ACTION PLAN
WITH RESPECT TO CANAL IMPAIRMENTS AND STOP LOGS**

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Regarding the 1952 engineering department study to construct the protection levees, the City would have had to acquire almost all of the canal abutting properties to construct the protection levee and is not deemed viable by this administration.

Questions/Comments: (Email) Strongly disagree with the stop logs/flood wall. I thought that you guys heard us a couple years back at the hope church meeting, we'll at least you said you did and said that this option was taken off the table after hearing our opinions for our own neighborhood but I guess what else is new in politics say one thing do another. Don't do this it will severely impact our neighborhood in a negative way.

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

Questions/Comments: (Email) As property owners in the Jefferson Chalmers district, we would like to share our concerns regarding the forthcoming proposals from the city regarding stop log dams, which directly affect our property on Ashland. We rigoursly oppose the plan to install stop logs on the Fox Creek Canal specifically, and the other canals generally. We are very concerned about the dump sewage that occurs in times of heavy rain. We are also concerned with various other fixes and repairs that would need to be done prior to this undertaking. Furthermore, based on our most recent experience with the management of the so called “Tiger Dams”, which was very poorly executed, we are concerned with the general management of these log dams. We insist that recent federally allocated funds for local projects like this be properly used and directed in a way that benefits the residents of Jefferson/Chalmers and are all undertaken in our best interests.

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Questions/Comments: (Email) I was born, raised, educated and employed in and by the city of Detroit, so I have a lot of pride and love for my city and community. It's had an enormous impact on me and who I am today. I went to Cass Tech in the early 80's, in the Cass Corridor, which was not such a nice place, but look at it now. I worked on Belle Isle beach as a lifeguard, when the Island was quite wild and falling into disrepair, but look at it now. Corktown was hardscrabble, but look at it now. The train station was a dilapidated eyesore, but look at it now. Point being, if we value something, like all the aforementioned areas that the city has helped revitalize, why would the City of Detroit want to take a quick fix to try and remedy just SOME of the water issues in the Jefferson Chalmers / Canal district by blocking the water? I own property along Fox Creek, I kayaked today as a matter of fact from that property. It means a great deal to me, as with virtually anyone that chooses to live by water. If you are willing to spend 20 million dollars for the stops, why not put that towards a proper seawall along the

residential shoreline and work with those who need assistance bringing things up to spec? I am sure there would be hoops to jump through and challenges along the way, but we are speaking about an incredible gem that has survived for generations, and needs to be protected and respected, not blocked off and left to stagnate. I have seen numerous floods over the years, but only 2 times where the water came from the canals. There have been many more from the insufficient sewer system during heavy rains, and if given the option, I would prefer to wallow in lake water than sewage from my fellow citizens toilets. It all needs to be addressed, but how about some vision into the next 50 years of property taxes, community expansion and improvement, recreational activities, wildlife preservation, etc., in an area that has the potential to be one of the coolest in the city? The canals are an asset that will pay dividends for generations to come if we take the time and proceed with a view to that future. It's shortsighted to simply block it off to address only an occasional piece of the flooding problem. I urge you to take the longer vision, protect our natural assets, and understand that in the long run, that area will more than pay for itself if done right. It's the waterfront, however humble and in disrepair some of it may be. Who in their right mind eliminates that as the solution to a problem with other options? The canals are our Venice in Detroit, filled with fish, turtles, birds, muskrat, mink, beaver, and more. Do it right and we all reap the rewards. Blocking it off is not doing it right!

Response to Questions/Comments: Thank you for the feedback.

Point being, if we value something, like all the aforementioned areas that the city has helped revitalize, why would the City of Detroit want to take a quick fix to try and remedy just SOME of the water issues in the Jefferson Chalmers / Canal district by blocking the water? - We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

If you are willing to spend 20 million dollars for the stops, why not put that towards a proper seawall along the residential shoreline and work with those who need assistance bringing things up to spec? - Repairs, replacements, and height adjustments to existing public and private

seawalls along the canals may protect against canal overtopping, but that will not get relief from FEMA floodplain designation. Height and condition improvements to the existing canal seawalls will also delay future deployment of the stop logs. Nevertheless, because HUD CBDG-DR funds are federal, FEMA-accredited flood protection rules likely apply (including operation and maintenance plans) necessitating local municipality oversight

https://www.fema.gov/sites/default/files/documents/fema_meeting-criteria-accrediting.pdf

There are limited options to fund private seawall projects with the public's money, as expending city general funds on private seawalls is a non-starter. It is possible for the community to explore initiating a Special Assessment District (SAD) for private seawall Improvements. The city cannot advocate for (or against) an SAD proposal, but we can help provide guidance and administrate a neighborhood-initiated SAD request.

In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, "flooding" means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

We received a number of detailed questions for which we currently do not have the answers. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

--Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.

--Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email) Thank you for your time and for reading this letter. I want to express my deep concern about this project. I have lived on Fox Creek off of Ashland for over 10 years. I moved into my house on Ashland in 2014, which at the time was abandoned and required a complete renovation down to the studs. One of the main reasons for choosing this neighborhood, and this house in particular, was because of the beautiful canal, and ability to dock a boat in the back. I am an artist and muralist, and I take inspiration from the surroundings - the water, the aquatic plants, diverse wildlife, and unique landscape of the winding canals.

If the stop logs are put in, the entire landscape will change, and the distinct quality of life in the neighborhood will be gone. The canals will become stagnant mud pits, with the water lilies dying, and the turtles and night herons gone. This is my forever home that I renovated and made my own, and is a constant source of inspiration for my art, but if this happens, I will be forced to move. I cannot imagine living anywhere else and it breaks my heart that this could happen.

Please do NOT move forward with this project.

Response to Questions/Comments: Thank you for your feedback.

We received a number of detailed questions for which we currently do not have the answers. There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email) I'm a home owner /resident of Jefferson-Chalmers, and live on Marlborough just off of the canals. I VEHEMENTLY OPPOSE the stop log and flood walls

proposal. I demand that flood protection must include unrestricted access to our canals and river.

I purchased my home and side lot specifically because of their location and the immediate and easy access to the water. Limiting or eliminating this access will significantly undermine my property value. It would permanently damage and destroy the economic vitality of this beloved neighborhood and community.

Closing the canals will also result in water stagnation and severe environmental degradation. There is no plan to mitigate what would be trapped raw sewage in the canals following discharges from the Fox Creek combined sewage outfall, which would cause flooding filled with raw sewage to top the shoreline and potentially flood further into the center of Jefferson-Chalmers. There is also a lack of any plan to deal with the explosion of mosquito populations that will directly result from stagnant water - and all the myriad health threats this poses to people, their pets, and other wildlife.

Our community has already voiced overwhelming opposition to this or any other similar plan in late 2022, as was acknowledged and noted then by city officials. Trust us, our feelings have only grown stronger on this matter.

We demand that you hold in-person meetings in our neighborhood to facilitate participation, communication, and feedback from our community regarding this proposal. Zoom meetings are a barrier to actual engaged and healthy community participation!

I await your response to my concerns. Thank you.

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

There are subjects that must and will be studied, addressed and resolved during the project Preliminary Engineering phase because approval by regulatory agencies such as EGLE, USACE, GLWA, etc., are needed prior to proceeding with subsequent permitting and construction. These subjects include, but are not limited to:

- Environmental concerns like canal water stagnation while stop logs are deployed, possible Fox Creek sewer discharge while stop logs are deployed, possible existing sewer connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.
- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email) As a resident and homeowner in the Jefferson-Chalmers neighborhood, I am writing to express my strong opposition to the proposed flood walls that would restrict access to our canals. While I recognize the need for flood protection, any plan must prioritize solutions that preserve our community's unique relationship with the water. Restricting access is not only unacceptable but also unnecessary, as there are more effective, less expensive alternatives that do not threaten our environment, economy, and quality of life.

Closing off the canals will lead to severe environmental consequences, including water stagnation and degradation. This will be further exacerbated by the Fox Creek Combined Sewage Outfall, which releases raw sewage during heavy rain events. If the canals are closed, that contamination will have nowhere to go, increasing the risk of flooding that carries sewage into our community, threatening public health, and worsening existing drainage problems.

Furthermore, restricting water access will cause long-term damage to property values, disrupt local wildlife and vegetation, and severely and negatively impact residents and well as visitors from across the region. Jefferson-Chalmers has historically been defined by its water access—any flood control measure that jeopardizes that access threatens the economic vitality and the history of the neighborhood itself.

It is also crucial to acknowledge that the flooding we have experienced in our neighborhood was not caused by high water levels in the canals, but rather by sewer backups and failures at the pumping stations. Addressing these core infrastructure issues would be a far more effective use of resources than pursuing a flood wall that would only create new problems.

The City of Detroit has a responsibility to protect its residents without destroying the character and livability of our community. I urge you to reconsider this proposal and instead pursue solutions that both mitigate flooding risks and maintain full access to the water for all.

I appreciate your attention to this critical issue.

Response to Questions/Comments: Thank you for your feedback.

We recall previous comments by a number of neighborhood residents in opposition to a similar proposal. However, when the opportunity to fund a flood control/floodplain mitigation project with 100% federal funds available via CBDG-DR, the city administration recognized this historic opportunity and conceived a variation of the previous project, but with no permanent canal closures. This is a rare funding opportunity available now with zero city funds required as a typical local match requirement. We know other federal programs have local match components, and future funding opportunities are speculative, at best. Additionally, costs will definitely be higher in the future. Again, the currently proposed project does not include permanent closure of ANY of the canals. Rather, we are proposing the permanent installation of three stop log closure devices in which the temporary, removable stop log segments will only be deployed during times of high Great Lakes levels when canal overtopping is imminent (roughly once a decade, for a few months of that year). Once Great Lakes levels are observed to be declining, the stop logs will be retrieved and stored until need again.

In 2019-2020, Great Lakes levels hit new record highs causing overland flooding and placing a severe strain on the local and regional sewerage systems. It is estimated that 5 billion gallons of river water overtopped canals and entered the sewerage system, for which GLWA did not seek payment from Detroiters for the additional flow transport and treatment costs. The proposed project primary purpose is to protect the sewer system. For this purpose, “flooding” means measurable flow overtopping the canals. Keeping floodwater out of the sewer system also means more capacity in the sewers during storm events (reducing the probability of basement backups and lessened future rate charge increases on water bills (if floodwater inflow is not prevented). Additionally, the project will protect canal-abutting properties from soil over-saturation and possible resultant structural damage.

In addition to the stop logs, other flood control measures are planned in city parks and road rights-of-way. We are committed to evaluating non-closure alternatives such as site/street regrading and elevation changes at the KAM Marine/Bayview Yacht Club entrance that keep the businesses open and functional (as floodwater water elevations allow.)

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connections to the canals, historic hydrology in the area, existing contamination, possible impacts to wildlife, etc.

- Quality of life and economic issues like recreational enjoyment, watercraft access to the Detroit River, business disruption, etc.

Questions/Comments: (Email)



Detroit Area Disaster Recovery Group

2050 15th, Detroit MI 48216

TO: City of Detroit

Housing and Revitalization Department

Via Electronic Mail to: disasterrecovery@detroitmi.gov

Thank you for the opportunity to provide comment on the state's CDBG-DR Draft Action Plan. The Detroit Area Disaster Recovery Group (DADRAG) compiled the following comments and recommendations based on our members' first-hand experience working in communities during disaster recovery efforts. These comments also complement separate submissions from several of our members.

In reviewing the draft Plan, we are encouraged to see a number of provisions that align with the principles of a full and wide-ranging recovery for all Detroit residents. In the interest of brevity, we highlight just a few of those provisions here:

1. **Commitment To Equity-** Ensuring that the AMI requirement is aligned with the disaster funding, so that residents are not being unfairly disqualified based on the City's decision to use an AMI at 80%, not the full allowable 120% allocation.. Also, to retroactively use the AMI the resident was at at the time of disaster. Our call to action is for the City of Detroit to begin the work and use CDBG -DR funding immediately considering the Disaster Declaration for 2023 occurred over 170 days after the incident.
2. **Commitment To engagement.** The City of Detroit is NOT exceeding the minimum required public engagement sessions. We encourage the City of Detroit to view public engagement as an investment in building wide-ranging, meaningful, and long-lasting relationships that will shepherd all disaster recovery activities to success, to include in person Town Hall Disaster Recovery Meetings in all 7 Districts within the City of Detroit.
3. **Commitment To access.** Funding for disaster legal services by public interest law firms such as Greene Law Group, Legal Aid and others will ensure every eligible Detroiters moves efficiently through this program, saving costs otherwise wasted on administrative burden. Additionally, the recipient of the Disaster Case Management Program Grant (DCMP)

- should be the primary entity responsible for providing these crucial case management services in the affected areas in coordination with Local Long Term Recovery Groups.
4. **Commitment To affordability.** In damaging communities, disasters reveal and exacerbate pre-existing and underlying needs, such as the affordability crisis. The Multifamily Construction and Repair (MCR) Program has affordability standards. Funds are allocated to build new affordable homes for purchase workforce housing for LMI households.
 5. **Commitment To mitigation.** The Reconstruction and Rehabilitation of Owner-Occupied Housing also allows Detroit residents to spend grant funding on mitigation activities. Likewise, the Community Infrastructure Program provides funding for infrastructure projects that will help impacted communities become more resilient to current and future natural hazards.

We also offer the following observations and recommendations to strengthen the state's Plan;

1. **Direct Resident(Mitigation) [\$20M]** - Including residential Home Foundation wall repair and sealing in basements along with exterior of home, including concrete walkways and driveways improperly sloped that would continue to create water infiltration incursions that are precursors to mold proliferation and/or potential failures of basement walls as a result of increasingly common heavy precipitation events mitigation and resilience activities above and beyond those integrated into the CDBG-DR Draft Action Plan.
2. **Reimbursement For homeowner repairs**-In addition, many LMI homeowners within the MID Area will have already taken steps to mitigate damage to their homes on their own. These LMI homeowners should not be prevented from receiving funds for actions taken before federal assistance for such costs became available. It punishes LMI homeowners who took proactive steps to remain in their community. As a result, where homeowners previously utilized private funds to procure construction materials and utilize contractors or other means of repairing their homes,
3. **Commitment To accessibility** -The Plan should allow for the reimbursement of eligible costs if the homeowner would otherwise be eligible to receive funds under the R&R program. These reimbursements should occur in accordance with HUD's requirements surrounding Duplication of Benefits. These reimbursements are permitted under the rules of the Universal Notice published by HUD in January of 2025.
4. **Quality control.** The program will pay contractors directly, and no funds will be paid to homeowners. We ask the state to consider issues experienced by Detroit residents of contractor fraud and quality concerns, including basic things like gutters not being installed correctly, but with lengthy times to remedy. Residents should have the power to select contractors that are properly licensed and/or certified for the work to be completed. This prevents failure of trust from HRD or City of Detroit selecting contractors that underperform and the poor quality is spread by word of mouth which leads to low program

participation and distrust of sincerity of the City of Detroit to fully support the residents affected.

5. **Commitment To resilience- Creation of Disaster Recovery Hubs for Equitable Relief**

Distribution - To ensure equitable access to disaster relief resources, we propose the development of Disaster Recovery Hubs—one on the East Side, the Southwest Side, and one on the West Side of Detroit. These hubs would serve as central locations for the storage and distribution of emergency supplies, case management, and educational programs on disaster preparedness. Establishing these hubs will improve coordination efforts and ensure that resources reach those in need efficiently.

6. **Maintaining affordability for Workforce Housing for Ownership homes.** The goal of the Workforce Housing Program is to build affordable homes for people with low and moderate incomes. To qualify to buy these homes, a household's income can't be more than 80% of the area's median income. However, the plan doesn't define "affordable" in terms of the price of these homes. We suggest that the prices of these homes should be set so that people earning 80% of the area's median income don't have to spend more than 30% of their income on housing costs, per standard definitions of cost-burdened housing.

7. **Program accessibility - case management, plain language, legal services.** Many individuals living with a disability will require additional assistance navigating both the application process, and the additional administrative burdens for acquiring housing via the program. Case management conducted by organizations familiar with assisting individuals with disabilities should be made available to assist applicants in navigating this process. Detroit Disability Network - this would be the Non-Profit/NGO that should be considered for this role with appropriate budget requirements developed by them to service affected residents across the CDBG-DR neighborhoods.

8. **Ensuring transparency.** The City of Detroit should also prioritize transparency, and ensure that information on the progress of funded projects and activities is available to the public in an accessible format. In addition to program-specific information, aggregate information on the households being served, including the most granular geographic data possible, household income, gender, race, and ethnicity should be publicly accessible on the city of Detroit HRD website to ensure that funds are reaching those most impacted by Detroit Disasters. None of this information should contain personally identifiable information.

Finally, we recognize that this \$346.8 Million in federal disaster recovery funding is insufficient to address the City's damage estimate. Even after accounting for other funding sources like state

money, other federal aid, and insurance payouts, we're still left with unfunded recovery costs. This means the \$346.8 Million will only cover less than the remaining infrastructure needs, even though that's exactly what these funds are supposed to do. We encourage the City to seek additional federal and state allocations to ensure a full recovery for everyone and every community in Detroit.

If you have any questions about the recommendations outlined here, I welcome the opportunity to connect you with members of our network with both academic and lived expertise in these areas of recovery.

Thank you for your consideration in this matter

Respectfully,

LeJuan Council-Director
Detroit Area Disaster Recovery Group

This letter is co-signed by the following members of DADRG Community Team:

Detroit Action, Detroit MI
East Village Association, Detroit MI
Yorkshire Woods Community Organization, Detroit MI
Chandler Park Neighborhood Association, Detroit MI
EcoWorks, Detroit MI
Riverbend Community Association, Detroit MI
Eastside Colts, INC, Detroit MI
Charlevoix Village Association, Detroit MI
McDougall Hunt Neighborhood Association, Detroit MI
Bailey Park Neighborhood Development Corporation
Greene Law Group, Southfield MI
Good Stock Detroit, Detroit MI
Brilliant Detroit, Detroit MI
Hydrate Detroit, Detroit MI
Refuge Place, Detroit MI
Grandmont Rosedale Community Association, Detroit MI
Winship Community Improvement, Detroit MI
Feed Your Neighborhood, Detroit MI
Climate Justice Nurse, Detroit MI
Michigan Clinician for Climate Action- MICCA- Traverse City, MI
GneissLife Innovations, Detroit MI
Field Street Block Club Detroit MI
Mack Avenue Community Church Detroit MI

Response to Questions/Comments:

Questions/Comments: (Email)



The Climate Justice Nurse
Newlab @ Michigan Central
March 27, 2025

City of Detroit
Housing and Revitalization Department

Subject: Recommendations for Community Development Block Grant - Disaster Recovery (CDBG-DR) Allocations

On behalf of The Climate Justice Nurse, I appreciate the opportunity to provide recommendations for the City of Detroit's allocation of Community Development Block Grant - Disaster Recovery (CDBG-DR) funds. Disaster recovery funding is crucial to ensuring the health, safety, and resilience of our communities, and I urge the City to consider the following initiatives in its funding decisions:

1. Healthy Homes Mean Healthy Residents

Flooding, mold, and deteriorating infrastructure have direct negative health impacts on Detroit residents. To mitigate these hazards, investments must prioritize home repairs, sewer system upgrades, sump pump installations, and backflow prevention devices to prevent flooding-related illnesses. Improving housing conditions will contribute to long-term public health and climate resilience.

2. Community Engagement, Resident Education, and Disaster Recovery Planning for Vulnerable Residents

Education is a powerful tool in strengthening community resilience. Funding should support educational initiatives that provide residents with the knowledge and resources to adapt to climate-related challenges, including flood preparedness, energy efficiency, and health impacts of climate change. Workshops, training programs, and accessible multilingual resources should be made available to ensure all residents are informed and prepared.

Additionally, disaster recovery planning must specifically address the needs of residents with disabilities and those who are bedbound. Evacuation plans should be developed to ensure that these individuals are not left behind during disasters. Families with disabled members should be identified and included in individualized disaster recovery plans that account for their specific needs, ensuring their safety and well-being during and after climate-related emergencies.

3. **Energy Equity Through Solar-Powered Generators for Vulnerable Residents**

Extreme weather events have resulted in power outages that disproportionately affect residents who rely on electrically powered medical equipment. To safeguard public health, we urge the City to allocate funding for solar-powered generators and battery storage solutions for our most vulnerable residents. Unlike gas-powered generators, solar-powered solutions reduce carbon emissions, alleviate the burden on our struggling ecosystem, and provide a sustainable means of energy security. While gas-powered generators may have a lower upfront cost, they end up being more expensive over time due to the need for fuel and regular maintenance, which solar generators do not require. Additionally, gas generators may be unreliable during extended power outages, as gas stations often shut down, making fuel difficult to access. Investing in solar-powered generators ensures that vulnerable residents have a more sustainable and dependable energy source in times of crisis.

Furthermore, many essential medications are heat-sensitive and require refrigeration for optimal efficacy. For example, insulin must be stored at a controlled temperature to remain effective. Other medications, such as intravenous Flolan, a prostacyclin used for pulmonary hypertension, are not only heat-sensitive but also have a half-life of less than six minutes—meaning any interruption in administration can be fatal. Ensuring proper storage of these medications during power outages is critical to the safety and well-being of affected residents.

4. **Creation of Disaster Recovery Hubs for Equitable Relief Distribution**

To ensure equitable access to disaster relief resources, we propose the development of two Disaster Recovery Hubs—one on the East Side and one on the West Side of Detroit. These hubs would serve as central locations for the storage and distribution of emergency supplies, case management, and educational programs on disaster preparedness. Establishing these hubs will improve coordination efforts and ensure that resources reach those in need efficiently.

5. **Expanding Detroit's Green Canopy to Combat Extreme Heat Exposure**

Detroit's increasing heat waves pose significant health risks, especially for vulnerable populations. Expanding the city's green canopy through strategic tree planting and maintenance initiatives will reduce the urban heat island effect, improve air quality, and promote overall community well-being. These efforts should be geared to community-led initiatives like the GCA tree-pruners who take the initiative to care for young trees in their neighborhood to ensure a healthy canopy in the future. Beyond community-led initiatives, these efforts will grow to support workforce development opportunities for local residents to maintain as they learn to care for newly planted trees.

6. Support for Climate and Health Education Resources

To build a climate-resilient Detroit, funding must be allocated to support educational resources that highlight the intersection of climate change and health. Investments in public health campaigns, research initiatives, and partnerships with healthcare providers will equip residents with the knowledge to safeguard their health in the face of climate-related challenges.

7. Food Security Initiatives

Climate change-related disasters disrupt food supply chains and threaten food security for many residents. We encourage the City to invest in the specific needs and challenges faced by community-based food resilience programs including urban agriculture initiatives, community gardens, and to support local food distribution networks. Strengthening local food systems will ensure that residents have access to fresh, healthy, and affordable food during and after climate-related disasters.

By prioritizing these initiatives, the City of Detroit can ensure that CDBG-DR funding is used to build a healthier, more resilient, and equitable future for all residents. Thank you for considering these recommendations. I look forward to collaborating with the City to implement solutions that protect and strengthen our communities.

Sincerely,
Mary-Jacqueline K. Muli
The Climate Justice Nurse
Mary-Jacqueline@TheClimateJusticeNurse.org

The above statement is fully supported by:



Dr. Lisa Del Buono, Founder and Board Chair *Email: Lisa@michigancca.com*

Lauren Church, Executive Director *Email: Lauren@michigancca.com*

Response to Questions/Comments: Thank you for your feedback.

Please note the following in response to the Detroit Area Disaster Recovery Group:

1. CDBG-DR does allow for grantees to go up to 120% AMI with an approved waiver from HUD. However, there must be justification for this waiver, and based on the number of households 80% AMI and below that still need to be served, the priority of the city is to ensure that resources are distributed to our most vulnerable residents before

considering requesting that waiver. HUD does not allow for income to be viewed retroactively; it must be completed at the time of assistance.

2. The City held two in-person CDBG-DR presentations (1/27/25 at the District 4 Meeting and 2/18/25 at the District 3 City Council Evening Community Meeting) prior to the two public hearings (both held on City-Wide DONcasts virtually to allow for ease of access) as required by the HUD regulations. Due to time constraints, additional meetings were not scheduled.
3. CDBG-DR cannot be used to reimburse households for expenses already incurred, it is not eligible.
4. Home Repairs must have a tie-back to the 2023 disaster itself. That means that the burden is on the homeowners to demonstrate that any repairs were caused as a result of the storm, directly or indirectly. It is important to note that only approx. 5,000 homeowners were documented as applying for FEMA Individual Assistance and almost all of them reported basement flooding. The City's approach to provide repairs from the public side of the alleyways allows us to address approx. 12,000 households and removes the burden from homeowners to demonstrate their income, tie-back and duplication of benefits (around 13 pieces of documentation). This program also addresses issues with basement flooding. \$175MM or 50% of the funding is proposed for this activity and we believe also assists with mitigate future risks.
5. The City must follow local and federal procurement regulations related to contractor selection. If there are known instances of Fraud, Waste and Abuse, we encourage residents to contact:

To the City of Detroit Office of the Inspector General:

- Online/Anonymous Email: Fill out the Complaint Form, available at <https://detroitmi.gov/government/office-inspector-general> or email at Suggestions@DETOIG.org
- Phone: 313-628-2517
- Postal Mail: Office of Inspector General, 615 Griswold, Suite 1230, Detroit, MI 48226
- In person: 615 Griswold, Suite 1230, Detroit, MI 48226

Contact HUD's OIG Fraud Hotline via phone 1-800-347-3735 or via email at hotline@hudoig.gov.

and the FWAB policy for CDBG-DR can be found here:

[https://detroitmi.gov/sites/detroitmi.localhost/files/2024-09/HRD%20CDBG-DR%20Procedures%20to%20Detect%20Fraud %20Waste%20and%20Abuse%20of%20Funds%2005.24.24%20-%20CURRENT.pdf](https://detroitmi.gov/sites/detroitmi.localhost/files/2024-09/HRD%20CDBG-DR%20Procedures%20to%20Detect%20Fraud%20Waste%20and%20Abuse%20of%20Funds%2005.24.24%20-%20CURRENT.pdf)

6. Transparency – please note that CDBG-DR requires grantees to maintain a website for all things CDBG-DR. We encourage residents to visit our webpage to review progress report, procurements, policies and procedures, program information and updates, Action Plans and subsequent amendments, video recordings, presentations, etc. - <https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programming-and-information/cdbg-disaster-recovery>

7. Case management – If a homeowner or tenant impacted by the storm requires an emergency response they can call the Detroit Housing Resources HelpLine at 866-313-2520 to see if they are eligible for assistance by pressing #2, If a homeowner is requesting home repairs, they can go through Detroit Housing Network to check for resources available by choosing option #3. The City of Detroit does not provide direct legal services, but there are various service providers such as Lakeshore Legal Aid who offer legal assistance to Detroit residents <https://lakeshorelegalaid.org/>.

Please note the following in response to the Climate Justice Nurse:

1. Generators are considered temporary fixtures and therefore are not an eligible CDBG expense.
2. Disaster Recovery Planning for Residents - Funding from the 2021 Disaster CDBG-DR is funding the Climate Resilience Manager within the Office of Sustainability whose role is to engage and educate residents and support in developing a climate resilience network.
3. Energy Equity through Solar Generation - the Office of Sustainability is working to increase resources for energy efficiency and renewable energy generation in Detroit. Please see the Climate Strategy and visit the Office of Sustainability website for more details.
4. Creation of Disaster Relief - The Office of Sustainability is working to establish a resilience network to support community organizations and better equip recreation centers as places that can serve residents across the City equitably during disasters.
5. Expanding Green Canopy - The General Services Department - Forestry Division is working to increase tree canopy on residential streets and parks. Please visit the GSD website for details
6. Climate and Health - The Detroit Climate Strategy under the priority strategy prioritizing vulnerable residents and adapting change is working closely with Environmental Affairs and the Health Department to improve data collection, analysis and program delivery based the intersection of climate risks and health.
7. Food Security - The Urban Agriculture and Nature Based Solutions Division under the Office of Sustainability is working to provide resources and improve the process for urban agriculture to take place across the City. Please visit their website to learn more about these efforts.

City of Detroit
Housing & Revitalization Department
Record of Public Hearing

Purpose: To receive citizen comments on the 2023 CDBG-Disaster Recovery Action Plan

Participants: Housing & Revitalization Department, Department of Neighborhood, Detroit Water and Sewerage Department, General Service Department, and Detroit Housing Commission

CITIZEN PARTICIPANTS

243 Participates 3/17/25

Location: Virtual Citywide DON Cast Meeting (Zoom)

Date & Time: March 17th 5:00 pm – 7:00 pm

Summary and Response of Public Comments

Questions/Comments: Flood insurance is too high, and I don't think it will be much of an inconvenience for stop logs to be placed to keep the water out once every 10 or few years. If you don't have flood insurance, it could disqualify you from Federal assistance in the future. The few people on the canal should not dictate what most residents must go through. It's different for everyone and everybody should be represented

Questions/Comments: The presentation was very well explained and dictated how the funds will be used and allocated. I think it is a very good opportunity, especially in our area where we have the sewer line backup, the sewer lines in our alleys that do flood at times, and it's very difficult, and the down payment assistance will be very good for everyone who's looking to purchase a home or 1st time home buyer. That's a good thing for a lot of people that's out there. So, I really hope that this gets passed so that you pass on this fund, and we can get this money for our communities.

Questions/Comments: I'm for a stop log mitigation and down payment assistance. Flood insurance is entirely too high. We have other costs in the city. And for something that we can

control possibly and not be as inconvenient. It would be nice to stop laws to be placed in the water about once every 10 years for a few months. And if you don't keep flood insurance, it could disqualify us, I believe, from Federal assistance in the future. So again, keeping our city growing in the right direction and not having things to set us back, especially in case something happens, we still want to be able to get Federal funding. I don't want to disqualify us in any type of way, but the few people on the Canal shouldn't dictate what the majority of the residents have to go through, and I'm hoping that those few people are actually included in the city, and they don't just have property, but they actually live there, but those few shouldn't speak for the majority. But that's all I have, man, I appreciate your time. Thank you so much for letting me speak.

Questions/Comments: I just wanted to share my support on behalf of a good Life Community Association in District 4. Just want to say that we support the proposal. I'm really excited about the down payment assistance. That is something that's going to be beneficial to a lot of people and increase the population over here, and, you know, bring us some new neighbors. So, I'm all for that. Also really looking forward to seeing the work that's going to be done with regard to the alleys. So that's something that I've been working on for quite some time, you know, as an association member, just, you know, getting the alleys cleaned up and being able to maintain them. And I've always been on the topic of sinkholes. So, to hear, you know that we have got a working solution. Doing something about that is exciting. So, I'm all for it. Thank you for the presentation, too.

Questions/Comments: It was very thorough, and I'm super excited and hopefully that we can pass this grant opportunity in its entirety, especially like echoing a lot of what people said about it being, you know, really, across the entire city. I do specifically want to give some comment on the Jefferson and Chalmers for the stop logs. I really grew up in that neighborhood, and a lot of my family is still there. They have lived there for years, so, as you can imagine it does. You know they are in a position where they can't really afford to fix as much of their infrastructure. And you know the flooding, and with the increase we continue to see trends. I really do just want to say that I do think that this would be great. I'm in full support and really would like to see this pass in its full entirety for the city of Detroit.

Questions/Comments: I represent century partners as well as serving as the president of the Real Estate Association of Developers. I think we're tremendously excited about these significant resources being able to be deployed into our city. And we've got a lot of aging infrastructure. This, this money will be critical toward addressing a lot of that deferred maintenance. And obviously we're in a critical, affordable housing shortage, not just in the city, but across the country I think we would love to see a little bit more, but as much as much affordable housing money we can get, so that every Detroiter gets an opportunity to live in safe, clean, habitable, habitable areas or housing. It's critical for Detroit's future. We're excited to see this coming fruition, and you can count on our support, particularly on the housing infrastructure side.

Questions/Comments: I appreciate the very thorough presentation. It was awesome, and I am excited to see money go towards so many of these housing endeavors, particularly improving the homeless shelters and even more, creating more affordable housing. I just want to make sure that some of that money goes to the nonprofits. I know the last time we had ARPA funding it didn't and would love to see that happen, for those who are in the nonprofit world doing affordable housing and would really like to see a report on the Arpa funding that happened with improving public housing before we invest more money there.

Questions/Comments: I'm a Detroit resident local business owner, also a member of READ, and want to voice my support for the proposed allocation. We commend commitment to home ownership and affordable housing, but we want to urge the city to go further. We would propose reallocating some of those funds for a tropical signal back up again to support the homeownership and the affordable housing initiatives. We know that we're in a housing crisis, and we would love to see more of those resources allocated there rather than preparation for things that may happen. I'd love for it to see us address those things that we absolutely do not need to happen which include more affordable housing and more homeownership in our community. We simply think that these changes will create more homeowners stabilizing the community and ensure long-term, economic resilience for our city. So, we certainly would love to see more money going into those buckets? But aside from that, certainly supportive, I do have one question, and that was will. These infrastructures support the seawall meet the Army Corps engineers requirements. Specifically, we know that FEMA up their requirements. We know that that put this entire district in the floodplain. Will these repairs finally get our residents away from the need to even own flood insurance. And then can we then develop in this geography? Or are those proposed repairs not going to be enough, but overall supportive love to hear. Answer to my question. Thank you for your time.

Response to Questions/Comments: So, to answer the question simply is, yes, the project as proposed, with all of its various elements, the stop logs, the earthwork, the seawall. The work at the Camry will close off any of the points of possible inundation, and it will be very supportive of our application to FEMA for D designation. Once we do get relief from the floodplain designation, then we will be open to a lot more funding opportunity.

There are 2 things that the floodplain from a regulatory standpoint causes what the effects of it? For the homeowners and the residents in those areas when receiving Federal assistance. The 1st is, of course, the requirement of flood insurance to receive assistance. So, in order to receive that Federal assistance in some cases, in order to get a mortgage, especially one backed by the Federal government. It does require flood insurance. The other issue is that there's an environmental review and specifically around floodplain management. And so, when we get into that environmental review. The main issue that we currently run into is HUD and not HUD. But the environmental review requires us to demonstrate that we do not have any alternative places to put projects such as affordable housing, and that question is difficult. To say no to, because we, in fact, do have other places where we can make those investments. And so, we want to take away those bottlenecks, those hindrances to the Jefferson Chalmers, Chalmers area by getting them out of the flood plain. Hopefully, with this project

Questions/Comments: I'm in full support of the proposed budget for the allocation. And again, just to echo some of the other comments. I would like to see an increase in the down payment assistance program as well as just kind of maybe reallocating the funds and looking at the Detroit at home as well program as well.

Questions/Comments: The presentation was thorough, and I am in support of it. It's good that there's going to be funding to address the outdated sewer infrastructure. Because it is causing a lot of issues in our alleys and in our basements. And then the last thing I'd like to say is, you know that? You know there definitely needs to be you know, fair allocation to all impacted neighborhoods because of a lot of neighborhoods. Over on the lower East Side. We're not given the attention that they needed during the large sewer backup and flooding. That happened a few years

ago. So, you know, it's just there needs to be fair distribution. But you know, like I said, I am in support Of this.

Questions/Comments: I'm a resident in the Jefferson and Chalmers area, and I support the stop logs for mitigation. Flood insurance is too high, and I don't think it would be much of an inconvenience for stop logs to be placed to keep the water out once every 10 years for a few months. I also just learned from this presentation that if I don't keep flood insurance. It could disqualify me from this. Well, Federal assistance in the future. So, I think that's about it. Thank you for this information and have a great evening.

Questions/Comments: I always appreciate you guys, for having conversations with us in the Block Club as we absolutely support this initiative and just for my brothers and sisters at the Jefferson charmers. So did I hear that correctly. If you don't have flood insurance, you can't receive support, Or did I misinterpret something? How did that work or does this program minimize the premium.

Response to Questions/Comments: I'm happy to clarify that a little bit. So, if you are in a floodplain and you are impacted by a disaster, and you receive Federal assistance. You do have to get flood insurance. and not only do you have to obtain flood insurance, but you must keep flood insurance from then on in perpetuity on the property. That means, if you go to sell your home, you must notify the person buying your home, that they also must maintain flood insurance. If the flood insurance lapses at any time, that property is no longer eligible for Federal assistance. If there is another disaster. so that is, the requirement begins with the 1st time that you receive assistance. So, for the folks who may already have received FEMA in Jefferson, Chalmers for the 2021, or 2023 storms. At this point they would have had to have maintained flood insurance on the property, and if they have not, there is another storm, they would not be able to receive any Federal assistance for that property. The other thing is that in most cases. If you have a mortgage on your home, you will also be required to have flood insurance, so, especially if that mortgage is backed by the Federal Government. They will require flood insurance in that case as well. So, there's 2 kinds of triggers to that flood insurance requirement.

Questions/Comments: I'm with the Sheridan Community Black Club Association. I am for this proposal of CDBG funds for the down payment for the homes which would increase our quality of housing and increase our quality of life and our city. For the residents who live here, or who plan on coming to live here. So, I am definitely with it. I did. I have 2 questions. My one question is, who will make sure that all of these funds are allocated properly like they say, and like they're broken down because I see where we have, like, maybe, like 25 million dollars going to the homeless shelters and being an educator for the Detroit public school system, I go to the board meetings, and there are over 3,000 homeless students that we have. So that's families that are homeless. I'm not saying we need a whole lot of money just to open a bunch of homeless shelters. But we did lose some children to homelessness because of the weather conditions, and because they had no place to go, or we didn't have any place to service them. So, my question is not only how we will make sure that these funds are allocated properly, but also, excuse me how we are improving the homeless shelters, and what improvements do we plan on making expanding? Do we plan on opening any other? Maybe some schools that were closed and made them homeless. How is the money allocated for the homeless shelters? And who's going to make sure all the funds are allocated properly?

Response to Questions/Comments: HRD is the administrator of HUD funding for the city of Detroit. So, each year we receive an allocation of community development block grant funds, emergency shelter grants. So we have really extensive experience in managing Federal funds really

work to improve our performance over the years and make sure that we are in full compliance with HUD, and have been able to achieve that, and we'll continue to do so as a part of this process, we identify the uses HUD then approves, would approve the action plan, and so when we go to, when we go to spend any dollars it has to align with what we said we're going to do in this plan. And that's true of any year. Is this action plan process that we're going through in this public comment process we're having here really relates to when we're doing any invoicing and spending any dollars. So, when it comes to the homelessness shelters, we will put out an application process and either existing shelters or new providers would apply for those dollars. We'd be looking to make improvements to the existing shelters. upgrading them, trying to make them so that they're not kind of congregate settings or big rooms, and we do that to help make them more a better place for families to be in, for example, and just to improve the conditions, we would look to try to expand capacity so that we can. We can add beds. And then, oh, your last question was about location certainly, that's a possibility. But it would really be dependent upon kind of zoning in a neighborhood, and conversations with residents of those neighborhoods is we want to make sure that we're being good neighbors within a community. And so that would be future conversations we would have if there were any new shelters.

Questions/Comments: Thank you so much for a wonderful presentation and thank you for this opportunity. I am a Detroit resident, and I am the homeowner, and I am 100%. If I can, I can say a thousand percent approval and support to this proposed plan. I was affected by the flood along with the electrical outage. So, I am in support of the stop logs again, like so many other people have indicated, I don't think a few people should be the ones that would be able to make this hard for everyone else. Insurance is expensive across the board. So, flood insurance just takes it to another level. Also, those generators are concerned. A lot of people were without power for days, and that cost families who are already under financial economic stress, even much worse. So, I'm in pursuit. And I am in support of this proposed plan to help bring the city to a place where it needs to be. So, people can continue to come and want to be here in the city of Detroit. Thank you so much for this opportunity

Questions/Comments: Thank you so much for hosting and hosting 2 meetings, and I just want to say thank you to all the city staff for their leadership in trying to identify local solutions for us in the community. I'll start by saying I support the affordable housing shelter and sewers and the alley strategies. I do not support the stop log, and the disaster was due to the sewers and the storm drains, not the sea walls. The city spent over 3 million dollars on tiger dams that were left in yards for years, and quite honestly, they became a health and safety issue for many community members that did have those in their backyard. As I said, I do not support the stop logs to the canals I do not trust that this is a temporary action or strategy. Given the way, the Tiger dams and Aft Park have been handled. Instead of looking at some of those dollars for stop logs. I wonder if there's an opportunity to repair the city owned properties that do not have seawalls and are in major disrepair. The last thing I will say is this, money is not guaranteed. It is likely, if you look at how things are going, it is likely to be rescinded. And I also think that you guys need to like, keep that as a as a reality kind of base point. So, thank you so much for your time.

Questions/Comments: Hi, good evening. Thank you for calling me and Thank you for hosting this meeting, but what I wanted to say is that after hearing it. I've heard the presentation before, and

there were some new things that I didn't hear before where you said that this would open up access to additional Federal resources for residents. That's the part that I really that I'm really looking forward to, and the affordable housing. But we must look at affordable housing as being more than just where you're building more homes because the homes that we're in need of are affordable. They're not affordable because of the repair that they need. So, I, too, like some of the other residents that spoke. So now, with, I would like to see some of those funds also go into home improvement, like everyone else would, but affordable housing for me. You have so many seniors that are here in their homes that have been here. Our homes are over a hundred years old, and there's a dire need for repair, so to know that this will open additional Federal resources for us. I'm truly happy about that, and I would like to just say again, Thank you. and I'm looking forward to the alleys and all the other things that's being done through this program. And I, too, would like to know who's going to guarantee that these funds are used as they're being proposed.

Questions/Comments: I do have a question far as with the insurance for flood insurance, how much do you suppose a resident, a homeowner, to have coverage like? How much coverage like 25,000! 50,000! How much coverage, far as insurance. I'm super excited about the proposal plan because it's much needed, especially like with the sword. The infrastructure of that needs to be done. So yeah, I'm super excited about that. But I just want to know, as far as you know, insurance how much do you think a person should have coverage?

Questions/Comments: I just wanted to say as a senior, what in using the HUD is doing a lot of great things around the country and have been doing some things. I moved away and moved to Florida. And there's 2 things I agree with the lady who said that. You know there needs to be some checks and balances, and don't get your hopes up about the funds yet. But the biggest issue is making sure that the citizens stay aware and stay active in the process. And the other thing is that I lived on the bay. And what happens eventually, when you live near the water, ends up that they make everybody get flood insurance because your regular insurance is not going to cover any kind of rescinding of water. So, you get everybody gets flood insurance, and it's somewhat of a game across the country. No doubt everybody suddenly has flood insurance. But I also agree with the infrastructure that the older homes cause a lot of issues, and that we have got to build our infrastructure. We have seniors like me, who never qualify for affordable housing, and I have to work. It's not like I don't. You know. I don't have to work. I must work. My retirement doesn't cover all my expenses, and especially nowadays, so I never qualify for anything that could assist me when technically, I should not pay more than 1,100 a month for my housing, so I really would love them to take a plan back, that HUD is doing all kinds of programs that don't. Even people in the Midwest in the South don't even know about. But if you research California, they've done some work, living in places inner city in parts of California. And I know that our seniors shouldn't, you know, be forgotten? But our homeless situation is even worse. With all these abandoned buildings and all our people and our men on the street. It doesn't make sense. And so that should be a priority in this money. That should be a priority is to get people housed because they they're doing all kinds of little programs where people in tiny houses and giving them a start and giving them services. And that is very important to get our people back on the back, on their feet, after drugs and poverty, and everything else and mental health. So that's my take

Questions/Comments: I just think it's a great opportunity. It sounds powerful for the city. I guess. My question is, what is the plan to hire local hire local contractors and make sure that Detroiters have jobs in these big projects. That's it. Thank you.

Response to Questions/Comments: I can help because this is Federal money, federal procurement rules apply, and we are not allowed to have local preferences. All. The contractors who normally compete on this type of work in Detroit are all Detroit based firms that regularly hire Detroiters, and we highly and strongly encourage them to hire Detroiters, whether as direct employees or subcontractors. And we've been very successful with the Federal money ensuring that we still have Detroit majority participation in those contracts.

Questions/Comments: I'm a little concerned about equitable distribution from 21 to 24 when the 100-year flood occurred, and extreme flooding happened in Jefferson, Chalmers and the East Side and Grosse Point. It highlighted an ongoing problem in the city of Detroit. Here in southwest, Detroit, 42, 1, 7, the lower end of District 6. Our streets have been flooding for years, due to the infrastructure being designed wrong after they built the Oakwood Central sewage overflow on Bassett, and I mean Littersdale and Beatrice. We've talked to Glwa. We've talked to the Detroit Water and sewage department regarding the fact that I see most of this money seems to be allocated already for an area that in later years has seen extreme flooding. I want to know how I can advocate for dollars to come to District 6 south of District 4, 8, 2, 1, 7, which we have been flooding for many, many years due to the poor design of the infrastructure drainage system on our residential streets. and we I thought I heard that you said it had to be declared by FEMA as a flood zone. Well, areas in Southwest Detroit. They're already a flood zone, but they were not declared in my I think my understanding as a flood zone FEMA set up a command center here in Southwest Detroit, at Kemeny Recreation Center, and over 90% of the people that applied were denied. So, I want to know how I can advocate that money should be more equitably spent in areas that have been flooding for at least 15 years.

Response to Questions/Comments: We're going to work. In every single council district. There are income qualifiers where we can work. We have over 30,000 data points for failing lateral connections in every council district. We will develop the plan, and we made a commitment to review that plan with the Council members before finalizing. So, we will be in every single Council district

Questions/Comments: So, shout out to the city for doing this incredibly impactful work. Just a quick question about Jeff Chalmers and piece, and I know that you spoke to next steps. But I'm wondering if we can drill down a little bit into the timeline, or what you anticipate might be timeline for the work right? Anticipating that if everything goes well, but then I'm also just curious if you're able to share timeline on when you anticipate engaging more, you know, doing more discussions in public, or whether that be with council or like, you know, just kind of want to know what the next steps are, or in terms of timeline

Response to Questions/Comments: In summertime we are finally given an award that it's at that point where we could begin to put out a request for proposals for engineering and design services for the Jeff Chalmers project, and I expect that Sam would probably be ready to roll out with his alley program about the same time. Once they really have it put together. But the earliest we could even consider reengaging in any kind of detailed discussion is probably going to be sometime this fall.

Yeah, I would just add to what you just mentioned. There's also environmental review required. We're already moving forward with some of that within DWSD. But all these projects will require environmental review

Questions/Comments In reviewing the slides earlier, and thanks for sending those out in advance. There were 3 points covered for housing, infrastructure and economic development. You

spend a lot of time on the 1st 2. But I'm not clear about what's being what specific projects would address economic development fund usage for this program

Response to Questions/Comments: That's a good question. Right now. We are still waiting on data from Fema and HUD about the actual disaster. We received some high-level data, but that all pointed to housing needs. And so, we used the little bit of data we received from HUD and FEMA, and then some local data to really drive the proposed activities with the disclaimer that if at any point, we received additional data around economic development, we would revisit the proposed activities and make necessary adjustments as applicable. Once we receive that data. But a lot of what we're showing as far as unmet needs related to the disaster. And this is consistent with what we saw in 2021, because that majority of the unmet needs were around housing and infrastructure

Questions/Comments: I'm a Jefferson Chalmers Resident. And with the stop logs. Has anybody done an environmental study as far as the 65 different kinds of fish in aquatic life, including birds, turtles, minks, beavers, and the demise of those animals. When that stop block would be put into place. as well as the effect on the current sea walls. When there's no back pressure to hold those sea walls up. The second part of that question is with the with the plan of redoing the sewer system. Would that lift the \$57 a month that I pay for the sewage drain in the front of my house that I'm that I need to clean every time it rains. Would that alleviate any of that? Those funds that we pay per month. For the storm drains themselves.

Response to Questions/Comments: Answer So, as I mentioned earlier, there, there's a lot of things that have not been looked at preliminarily yet, but they will be covered, and I'm sure fish and wildlife will be a part of those items that need to be addressed before any permitting happens. There's never the intention to have the canals dry, so there should always be some type of water that we intend to keep circulating so that there is pressure up against the sea walls.

Questions/Comments: I'm in total support of down payment assistance and sustainable price housing on improvement initiatives. My question 1st question here is, can portions of the block grant be reallocated to these popular plans? If we were to scrap the stop log plan. Can anyone on this call? Explain why we did not have any flooding in 2020, when the tiger dams were installed when we had our peak water levels, however, in 2016, when water was 2 feet below that peak level in 2021 June of 2021 water was 1.8 6 feet below that peak level, and then again, in 2023, we were 1.7 feet below that peak level we had major flooding. I guess. What I'm alluding here is to here is the idea that we had a major infrastructure, failure that is being rebranded as a natural disaster.

Response to Questions/Comments: So, HUD is expecting that when we submit the action plan it will have every dollar allocated as a part of it in order for their approval. So, we really believe this is a rare opportunity for us to do a couple of things to address some of these large stormwater issues that we're having through the Sewer Alley repair programs, some larger infrastructure projects, but also to get Jefferson Chalmers out of the floodplain, as we know that there are persistent issues over there. So, if any of those programs are not carried forward, then we would then need to reallocate funds. But we've put a put a plan together that we really believe balances the some of the larger stormwater needs in the city, with 175 million going towards those Sewer Alley projects, and 20 is proposed to get Jefferson Chalmers out of the floodplain.

Response to Questions/Comments: The 2016 flood was storm driven, whereas, as was noted, the high river level did not necessarily cause widespread water and basement events from overtopping that was thankfully stopped or mitigated by the tiger dam. But over 5 billion gallons of river water entered the sewer system that then had to be transported and treated by the Great

Lakeswater authority. Which is a significant expense that we need to avoid. Luckily there wasn't a large rainstorm at that same time.

Questions/Comments: Hi, I just want to thank you for such an incredible and ambitious program and really spreading this wealth to several areas where it needs to be needed. My question is, what is the quality control plan or the resident oversight plan for the Sewer Alley repair program. I think it's important that there's a strong, strong quality control program to ensure that the dollars can go their absolute, farthest

Response to Questions/Comments: We will have Dwsd inspectors on site. We are going to video the sewers before the contractor does their work, and we will video the sewers after the contractor does their work. The videos tell all. If there's any defects in any of their work, that's it.

Questions/Comments: I'm concerned about the basement infrastructure. Our infrastructure is terrible. We need that money to be top priority for that first, st before housing before the rental thing, because we're the ones that really suffered through this whole situation, and Macomb and Saint Clair County, when they flush their toilets. When we have these floods, their feces come in our basements. Are they going to deal with that also and I'm representing all the Presidents all the way down Lakewood, from the river all the way across. Jefferson. Thank you so much.

Response to Questions/Comments: Yes, DWSD which is a part of GLWA regularly and aggressively reminds Glwa and other users of the regional sewer system that they have a limited contract capacity, and that Detroit is serious about making sure that those contract capacity limits are not exceeded. Everyone needs to use the system fairly and within their legal rights, and we're prepared to take action to make sure that that happens so that Detroiters aren't unfairly burdened

Questions/Comments: That \$25,000 down payment for a house in the city of Detroit that equals to a mortgage of about \$220,000 mortgage, and then I also would like to make a statement that they have forgotten all about the seniors and all these allocations which 50% of the homeowners in Detroit are senior citizens, and that we do need some help trying to bring our neighbors neighborhoods up and keep them up. And someone needs to look at HUD for not to recognize the seniors anymore.

Response to Questions/Comments: So, 12,000 households being affected by these 1,800 miles of alley sewer lines also is inclusive of seniors and those homeowners that you mentioned, and so I would just highlight that for you and the \$25,000 down payment assistance will make 400 renters into homeowners. If we're talking about 10 million dollars that is divided amongst 400 new homeowners, and we've seen that in this last year and a half, and it has improved home ownership. And now home ownership percentages have flipped from homeowners being the primary instead of renters. But thank you so much for your comment and your question.

Questions/Comments: Thank you for the presentation. I appreciate all the work that you guys are doing. My question has to do with the shelters, you guys. Nicole mentioned some dollars going to the shelters. What does that mean? Does it mean it's going to the shelter for them to upgrade for them to add new things for them to add new beds. Is it a way of them, you know, maybe hiring more people? What? What are the dollars going to the shelter because we know they need it. But can you explain, please.

Response to Questions/Comments: These dollars would go for rehabilitation of existing shelters where we are looking to make improvements to the shelter conditions. Many of them have not had major capital improvements in extensive periods of time. We'd like to add beds where there's capacity to do so at those shelters. If there's an opportunity to bring on new shelters, we would do

that. But primarily this will go to make improvements to the existing shelters, add beds and capacity where we can, and we would like to move to less congregant settings. So fewer people in rooms which tends to be a more positive experience in shelters for people

Questions/Comments: I live in the aviation subdivision. We feel that quite frequently we get the short end of the stick, because we have our basements flooding, our streets flooding, and nothing is dramatically being done. We need assistance, we need help. It looks like it is most of the time. You're only looking at the people that live near the river, but there are a lot of us that's not near the river, but we still have our basements flood for years also, and we need help for seniors in general improving our homes but also have y'all given any thought to having more smaller retention bases to temporary hold. Some of this excess storm water.

Response to Questions/Comments: Yeah, let me answer his 1st comment, though. We won a 3.2 million dollars, grant for aviation and Warrendale subdivisions for basement backup that will televise your sewer lateral will disconnect downspouts, will repair portions of your sewer lateral all the way up to the point of connection we are actively accepting waivers that we need to get for Fema to use that money. So, I'd be happy to reach out to you and get you more information on that. DSWD has completed 19 green stormwater infrastructure projects all around the periphery along the rouge. And now we're looking along the Detroit River. Also, again, our strategy is to either slow the water down, or, better yet, get it out of the sewer system altogether, like we're doing on the far West side, like we're doing in Brightmoor. We're looking at corner Lot GSI, to intercept that storm water to slow it down from getting into the sewer system

Questions/Comments: I think, in terms of this Sewer Alley repair program. It looks like, he said. It's going to be kicking off in the Brightmoor area. What must happen for us to have them consider one of the Lower East Side neighborhoods, because that is one of the older sections of the city. So, there are a lot of issues in that neighborhood.

Response to Questions/Comments: Yeah. So, Brightmoor is a large stormwater project that will create a 30-acre pond. The Sewer Alley repair is going to occur in every council district. We will develop a plan based on income qualifying neighborhoods. We have the data, and then we will work with each council member to validate or verify the plan, see if any adjustments are needed. So, the Sewer Alley will happen in every council district

Questions/Comments: All right. Wonderful, wonderful. First, I just want to say that the programs when it comes to the homelessness population as well as the alley back way program sound really, amazing. I'm glad that we had a chance to go through that information. However, I'm a little bit worried and concerned about the stop logs, a temporary solution for a permanent problem and it's exacerbation needs that could result in other areas for DSWD to manage and to uphold that definitely worries me a bit, especially in an area where there are over 270 residents that have amazing ideas to help Jefferson Chalmers get out of the floodplain while also preserving the natural wildlife as well. I'm also worried that there isn't a lot of change from this plan from the previous plan that was proposed to the community and vehemently denied about a couple of years ago. So, I just would like to find a way to work together. I know that we're on a timeline, as was mentioned before, but proposing, perhaps, that some of the community leaders and members kind of get together and

Response to Questions/Comments: We're always looking for opportunities for collaboration. So, you know, once we kick off the process again. We'll re-engage

Questions/Comments: My comment is that we need to build this thing. I'm tired of bailing out water out of my basement right? And if the if the people don't want to vote on it, don't worry

because I'm going to build it myself now. Not a problem. Thank you very much. And wildlife. I hope they live

Questions/Comments: I've been a lifelong 40 plus year resident in Jefferson Chalmers. My comment is, I'm against the stop logs in the Jefferson Chalmers area for the canals. I had a front row seat of how this works and how the city has been working on some of these projects around here, and I'm against it. My question is about these stop logs. I'm not completely understanding how this really works. The water that's already in the canal. If you stop the water from coming in for a couple of months, do we just have sitting water in the canal? How does that affect the entire community in Jefferson Chalmers. Health wise also. What does this do to property values in Jefferson Chalmers? I know that a lot of people move over here to be close to the water, and I'm wondering what these stop logs are, how this will affect property values and health in our community. Thank you.

Response to Questions/Comments: Yeah. So, the same national problem, as I said, is an unknown issue that will have to be worked out before any of the permitting or construction can even take place. So, I don't have details for you right now, but it will be worked out in part of the preliminary engineering phase.

Questions/Comments: I'm 75 years old, senior, with some health challenges, mobility problems. I want to know if some of this money can be used to help us seniors and people with disabilities to be able to stay in their homes to help their homes become handicapped, accessible meaning. We need walk-in showers. I am not able to lift my legs high enough to get into my traditional bathtub. I need help from my family, and it is very painful. And don't tell me about, please, the Detroit Home Accessibility program. I'm aware of that. I'm aware of the senior accessibility home repair program. I advocated with the Council last year. Their budget every day, and they created the senior accessibility home repair. And there was money allocated, I think 2 million dollars, or 2.5 million dollars was supposed to include those walk-in showers, but the Administration felt it was too expensive. We need those walk-in showers. Do not forget the seniors.

Questions/Comments: Yeah, I just have some comments on what I've heard and how it affects. Second is that 11 million in administrative fees for this project number 2. When you talk about taking us out of the flood zone with the stop log engineering the chart said intention had no, there was nothing on that chart that said it would take us out of the flood zone. Number 2 How is there any way waiting? Guarantee the discharge that comes from Ashland and from those other communities? Could you put a stop log there? If you're going to put in. Stop Longs. The other thing is it seems like there's a pit from the city against Jefferson Chalmers. And I really object to that. We need to find funding to help everybody. The issue here has you said not the issue in Jefferson Chalmers is not flooding. It is a backup drainage. I've been here since 1971. I've been through all of them and if it was clear water coming out, I would say, yes, it's coming from the river. It's coming over the canal.

Response to Questions/Comments: So after, I think the 2016 event DSWD has cleaned and televised all of Jefferson Chalmers. We won 11.3 million dollars. Competitive, nationally competitive grant to upsize 19,000 linear feet of sewers. In Jefferson Chalmers we have significantly increased our maintenance of sewers and catch basins Glwa is taking a lot of actions to increase the resiliency of that area, rebuilding or replacing the Connor pump station and the fruit pump station. They've made significant electrical upgrades. So, there are a lot of people working hard to improve the Jefferson Chalmers Resiliency

Questions/Comments: So, calling into support of many aspects of the program, but specifically not in support of the stop logs, I am a resident of Jeff Chalmers. I live along the canal, and I would like folks to stress the fact that houses lots along the canal come in varying different sizes and varying different conditions. There are low, moderate-income folks living there. It's not a monolith and just sort of responding, maybe back to the comments earlier about not letting a few who live on the canal dictate what happens. I don't get any sense here living on the canal. If that's the case. I think we all, I think many people on the canal want to get the entire floodplain remediate and see it in the best interest of this broader community. The real challenge here is dealing with folks who live conditions of properties along the canal, and we're only as good as this sort of the strongest defense here. So, I know the idea of stopping logs being in place for a couple of months every 10 years. according to numbers put together, we see potential for stop logs to be in place at least 11 months a year. Excuse 11 months long. This is based on the high watermark between 2019 and 2022. So, I just want to urge Jeff Chalmers folks on the call. Let's work together and let's get to the real challenge here, and let's not throw, you know. Good money after bad. There's a lot of hard work going on here.

Questions/Comments: Yes, sir, I want to advise against these stop logs because we still have those underground creeks that are going to be running. Jeff Chalmers is at the bottom of the hill. You're not going to stop the water from running. And you need to have advisory committees in the community. When we did the pumping station at Connor and fruit, the Government called for community advisory committees and you need that in place on this, and they need to come up with a better plan than putting stop logs across the 3 creeks because the water is not going to stop running. You're going to increase the size of the underground streams, they will erode more soil, and it's going to ruin the housing stock here, Jefferson Chalmers, because you're going to get water up around people's foundations. We need to do more research on that. You need advisory committees and more thought on this. Okay, community. Folks need to be involved. We've been here longer than you guys 60 years.

Response to Questions/Comments: Yes, as I noted on one of the slides there we will be looking at all historic hydrologic data and information we can find as part of the preliminary engineering process.

Questions/Comments: I'd like to know how often you clean out the sewers around the area of James, Cousin Marlo, Outer Drive and Hubble, because every time there is heavy, heavy rain our church basement floods.

Response to Questions/Comments: We have about 2,400 miles of sewers that are 24 inches, and below in diameter. Last year our DSWD crews cleaned 650 miles. So, what that means is, we're going to clean the entire sewer system every 4 years. We also cleaned over 6,000 catch basins, which is about 3 times more than we did the year before. So DSWD is making a significant investment and increasing the level of maintenance. If you're having specific issues. It gets into our work order system, and we'll make sure that we address.

Questions/Comments: I live in Southwest Detroit, right by the water main break disaster, and I know it's still under investigation. And you know they don't know if sewer was sewers is an issue. It seems to me like it is, because otherwise it wouldn't have stayed flooded. But in any case, I hope funds can be focused on sewer repairs in Southwest Detroit based on the results of that investigation into the sewer quality or infrastructure of the sewers, because I know we do have some problems here.

Questions/Comments: I'm sorry for our friends at Jeffrey Chalmers, but I also have a condo at the one Jefferson that happened at the River House. Our heated garage is flooded. The other thing is, it's a difference between low income and affordable home. Are they making that distinction? And the other question I got is because I also own a home with my daughter on field when the water backed up in her basement. FEMA came out there and gave her gave us like 7 \$800 and said that was it because they didn't. So, we call them back to come for a review. They never did that. I wind up personally. 75-year-old woman, fixing the basement myself

Response to Questions/Comments: If we can get her information offline for the FEMA thing, we may be able to help her out. I probably need more details, to be able to help her.

Questions/Comments: Jefferson Chalmers, about stop logs and canal closures and stagnant water. I think this message would or question, I guess, really would go to Ken. As I understand it, there is absolutely no plan in place at this point for stagnant water and the Fox Creek, CSO. That dumps sewage into the Ashland Canal. So please confirm that that is the case, that there is no plan for that, so we would be dealing with stagnant sewage water if there were ever a closure of all 3 dams, and secondly we mentioned he, I've heard it mentioned that that would need to be addressed is that addressed in the funding to have that CSO closed to have water circulation is the funding encompassed in this money, to correct those problems. Once you lock us into a stagnant water, health, risk situation and then the final part of my question would be, Has the city. Why has the city done nothing with their 17 owned lots that they promised to create sea walls, proper sea walls on

Response to Questions/Comments: So to address the existing condition. There isn't a management plan per se, but we do know that Great Lakes water authority opens up the gates to allow the Fox Creek to flush into the Detroit River interceptor at certain points during the summer to help give some relief to the residents I don't have an any plan or a system in mind to deal with it in the, in the future condition, like, I said, that will all have to be worked out in. In cooperation with GLWA. Nothing's going to be built until all our regulatory agencies are satisfied that we are addressing all the potential negative impacts. So, we won't know until we get into the actual engine. Preliminary engineering. Looking at those issue resolutions regarding the city owned seawalls. The Detroit Building authority did let a contract or I'm sorry they solicited bids for a contract to repair all the city owned seawalls. It was submitted to the council for consideration but was ultimately not approved. As I'm not in DBA, I don't have the details as to why, but the attempt was made when there was funding available. Not sure if there's currently any funding around to reinstitute that. But it's a known issue that we need to get fixed

**City of Detroit
Housing & Revitalization Department
Record of Public Hearing**

Purpose: To receive citizen comments on the 2023 CDBG-Disaster Recovery Action Plan

Participants: Housing & Revitalization Department, Department of Neighborhood, Detroit Water and Sewerage Department, General Service Department, and Detroit Housing Commission

**CITIZEN PARTICIPANTS
183 Participants 3/10/25**

Location: Virtual Citywide DON Cast Meeting (Zoom)

Date & Time: March 10th 5:00 pm – 7:00 pm

Summary and Response of Public Comments

Questions/Comments: I'm with Jeff Chalmers, Citizen District Council. Some 12 or 13 years ago I was part of the crew that built the new pumping plant at Connor. At that time the Army Corps Engineers came in and took us to school on the geographics of this area. This area was built over swamp from Essex to the river was swamped. What we have underground is we have 3 or 4 creeks that run underground. They're all connected to the Connor Creek and the Fox Creek ecosystem. If you block up some of the big creeks on top, you're going to cause the smaller creeks down below that you can't see swell up and have more water in them. We have folks out here that have water running up under their homes. It's been that way for years. Many of them can hear and see them see the water. If you block up those bigger creeks up on top. You're going to swell up those smaller creeks in turn you're probably going to ruin quite a few people's foundations around their homes. Now you can check with the Army Corps Engineers. They took us to school on this stuff that's been 12 or 13 years ago, and I don't believe any of that stuff has changed.

Response to Questions/Comments: The Army Corps study that was done in 2005 as well as their latest fpms reports, and while I don't recall any mention of underground creeks as part of our preliminary engineering for this proposed project, we'll be doing extensive survey and historical reviews on watersheds.

Questions/Comments: I know these are Federal funds. I'm currently a Federal employee. So, with all the high things that are going on right now, Budget talks for this is going on this week for them to decide on the budget. Is this money already allocated, or does it have to be voted on with the current administration? When it comes down to the alleyways who are going to benefit first, which departments or different people. So that's what I want to know. How is this going to affect? And how is it going to be prioritized? Who gets the 1st service for it.

Response to Questions/Comments: The funding that was appropriated to us was appropriated in December of 2024 by Congress. The money has already been appropriated. However. You know we are trying to move as quickly as possible to get the action plan into HUD so that we can get an actual signed grant agreement so we can move forward with the funding. I know that for your second question you had asked about the Alley sewer, Sewer Alley repair program right now. We have over 30,000 data points. Showing where these failed Lateral connections are we know that there's a lot more. We will be able to run a camera through a sewer. If we don't have that data point well, while we're there, we'll be able to pick it up. So, we have the outline of a plan, but we did commit to the council that we would work with each Council member prior to executing the final plan.

Questions/Comments: I'm on the corner of Nottingham and Linville and I am on the 13th floor. Even as we as we speak right now it started happening in 2021, and no matter what's going on. I'm still getting I every time it rains now every time it clouds up my basement with all the poop on the east side of Detroit, comes into my basement.

Response to Questions/Comments: We have an existing program for those that are income qualified under CDBG-DR. From the 21 storms. It's called the Private Sewer repair program. I would highly encourage anyone who's having sewer issues to go to HRDs website, where more information can be found about the program that we have going right now.

Questions/Comments: I see that you said you were allocating 75 million dollars to affordable housing, in which you've already identified some of those funds to go to DHC Public housing. So how much of that funding is going to the housing projects that you've already identified, and what's going to be left. So, with the \$31,000 going towards the public housing. Is that for improvements to the house is that for vouchers? Is that too what is that money going to do? How are you guys going to utilize it?

Response to Questions/Comments: The goal here is to ensure that all the existing public housing units that are owned by the Detroit Housing Commission are rehabilitated and available for rent. The money will be allocated towards the projects that we've identified to be able to address, you know, deferred maintenance and capital repairs.

Questions/Comments: Are you splitting the pipes into 2 pipe systems, because that's the issue our sewers and our stormwater drains are combined outside of our homes. So, if we've got a large downpour and the city can't handle it with the pumping stations. Failing, we get sewage mixed in with that, and it gets into our basements. That's the cause of our flooding. The catch base into the street can't keep up with this, and they flood the streets with the sewage. It's not coming from the perimeter of the canals. The canals have a seawall issue which is separate, and if this money isn't going to repairing the seawalls, you're missing the point. The next question is about the stop logs. What's the point of that? And if it's temporary what are you trying to accomplish with that? Are you repairing the sea walls? Because at that time you could repair 366 houses and sea walls for \$11 million dollars. That's the math you've got \$20 million allocated for that. The parks never flood. Their

sea walls are tall enough. They're not tall enough on the canals. You guys are missing the point again. You brought this up several years ago, and it's wrong again.

Response to Questions/Comments: So, the stop logs would only be installed during times of high great lakes levels where the water is overtopping the canals and getting into the local and regional sewage systems. That's the only time they will be installed. So might be a few months out of the year, every 10 years or so has been the rough, cyclical nature of that, but that is the intent is just for those as well as to along with the other improvements that we had mentioned get the city out of floodplain designation.

Questions/Comments: With the Stormwater Improvement and Sewer Alley repair proposals are those in addition to GLWA.

Response to Questions/Comments: Yes, the Sewer Alley repair is a DWSD/HRD Project, so that is separate from the Great Lakes Water authority. The Brightmoor Stormwater Project is also outside of the Great Lakes water authority. However, we may be able to get additional assistance from GLWA, because we are reducing the amount of stormwater in the system, helping to reduce CSO and providing additional capacity for larger storms within the system. So, they're both separate for the most part.

Questions/Comments: For those who are on the home repair program through the city of Detroit. I noticed because I'm in that program right now, and you know there's things that I need done on my house. They exceed \$25k. So even when the contractors get done there are some things that are still going to be lingering around that's not going to be fixed. So, I want to know, like, what is the precaution, precaution that I should take to get those projects done to prevent disasters.

Response to Questions/Comments: This funding specifically is only for it can only address needs tied to the specific disaster for which it was approved for so we can't go in and do this. This funding would not be the funding to address your existing conditions for your house, unless, of course, the flood caused that condition.

Questions/Comments: I'm a Jefferson Chalmers resident. And obviously, we're all very, you know, worried, and would very much prefer our canals to not be for the nature in which we enjoy them, to not be altered and so I see you know 2 things are going right. There's obviously all the talk about. You know the need to separate stormwater from wastewater. I know gross points doing a lot of that work. And as a resident my experience of flooding has been more from sewer backups than anything over land right? Looking at it is like the funding around the stop logs, and, like the desire to do that project. Is it more aimed at trying to, as seen as the simplest way to get this zone of the city out of the flood map, and therefore make available affordable housing funds via Federal grants And is that somewhat separate from the overall? Greater, you know, concern of overland flooding? Because to you know harkens to a previous resident's comment about the fact that, like working with sea walls and spending money on sea walls and giving people assistance related to sea walls could potentially also take us out of the flood plain. And then I think, just, I just want to reiterate that I think, as Jefferson Chalmers. Residents are, you know, the main concern is that although this, the

stop logs are deemed temporary, and only during like levels of you know, high, you know high levels, etc. I haven't seen any details around like how you know when it would be cited. Those would be put in what authority we'd be putting them in and taking them out. What power do we have as a community if they end up being stuck in for a lot longer than you know what is necessary via the water level. And I think if there was clarification on that, there might be more receptivity and people directly near the canals.

Response to Questions/Comments: There's a lot of detail that still must be worked out regarding the operation of the whole system. You know this way we're still at concept level. Regarding a lot of the details, I will say that this program is probably one of the most expedient to get relief from the floodplain designation, since the stop logs would be owned, operated, and maintained by the city, or we wouldn't have to worry about private folks keeping up their seawalls, and we could present an argument to FEMA that this could get us out of the floodplain, as it would be owned, from the public agency, and they would have just us to deal with not a whole bunch of individual landowners, and would therefore probably think de-designate the floodplain regarding like I said, a lot of those other details. It's still to be determined. We're still at concept level, and a lot of this will come out through the preliminary engineering process.

Questions/Comments: Understanding that the concept is that the project is still at the concept level? Is it likely that the sewer is going to be separated? So, it no longer will be a combined sewer and stormwater system, and then also there is green infrastructure, like the pavers that were installed in the Grandmont Rosedale area. There is also potential to be part of this project to reduce some of that impermeable pavement and reduce some of the stormwater runoff.

Response to Questions/Comments: So, the green infrastructure will not help at all. When it comes to the times of high great Lakes levels when the canals are overtopping and getting into the sewer system. It does help with it, you know, to absorb precipitation level runoff and as far as sewer separation and Jefferson Chalmers, I don't believe that any is currently planned on at this moment. And it's difficult to separate the stormwater from Sewer and Jefferson Chalmers because of the elevations. It would require a new pump station to be constructed in that area. We are looking at some green, some GSI options for Jefferson Chalmers on some vacant properties. We may be able to put up some rain gardens and some detention basins to help with the smaller storms. But we're not able to look at full separation currently, or as part of this project.

Questions/Comments: Someone was talking about the unmet needs regarding the recent floods. That those unmet needs could be used for the seawalls in the Jeff Chalmers area. Regarding the Camarine and Bayview Yacht Club Understand that you're talking about putting a flood wall there? Is that something that the city does? The city owns those 2 marinas now. Or is that privately owned? And if so, why are we using those monies to do something private? If we're not doing anything private in Jeff Chalmers regarding sea walls or flood walls?

Response to Questions/Comments: So, I'll start with the Camarine Bayview Yacht Club entrance. The flood wall is just kind of a placeholder for to be determined as to what exactly could be constructed there as a little bit of background. Great Lakes, water authority. During the last time we

had high great Lakes levels, noticed seepage coming through and under the Connor Creek berm and installed a steel sheet pile cutoff wall that went across their frontage And frankly, what we're probably considering is an extension of that wall. So, you get to the entrance of Camarine and Yacht Club and then figure out from there what to do. So, we have that there as a placeholder. We don't know if we're going to have to get an easement from them, or you know, whatever the solution is yet to be determined. But frankly, we just don't know. At this point

Questions/Comments: The 1st question was regarding these \$25,000 low interest loans or grants that could be used in the Jeff Chalmers areas to help residents with the unmet needs regarding the recent floods, especially the ones that have no sea wall or sea walls that are really in disrepair.

Response to Questions/Comments: The funds are strictly for new homeowners, for down payment, assistance, to purchase new homes. So, if someone wanted to purchase a home in Jeff Chalmers, they would be able to in the city of Detroit, but those funds are only being used to purchase homes for those homeowners, future homeowners.

Questions/Comments: I wanted to find out with the CDBG Dr funding in essence to a homeowner, having already spent the money. I was supposed to come down the line for the sewer repair. Is there a way for them to recoup that funding through that CDBG DR. They didn't have flood insurance, but they did pay out of pocket, and thought there was a stipulation there for that, and if so, how do they get the funding back in essence. The second question is with the sewer department and do you? Well, the insurance does. If a person has insurance homeowners. Insurance is a way also to get that repaired. If you're not covered up under the income threshold and get those funds recouped through the CBDG DR.

Response to Questions/Comments: Unfortunately, we cannot reimburse individuals for expenses paid out because of the disaster. That is an ineligible expense for CDBG DR Funding.

Questions/Comments: I want a question about the treatments of facilities being built on through. We already have an overflow of waste coming into our community from gross points. We have many answers this of sewer backups, not flood, because the sewage backup is an infrastructure problem with the city and GLWA. They took over after the fake bankruptcy, so they were put in place to do this thing to it. I want to know what the real problem is, do not address because we don't need to be the floodplain. We don't have a flood, so gross pointe, not in a flood plain anymore. They didn't go through this vigorous policy do that you've given us. You are doing a dog and pony show without having any credibility regarding what you're doing. You have already started draining our crease already Ashton and Jefferson, that's the start of it. I'm saying that y'all giving us a dollar coding show with what's going on, because we could easily get out of the club planes just like girls. Points did already. We know how to do this creek shutdown and make our area more susceptible to disease and mosquito overflow and we need running water through the streets that grow through our neighborhood. We don't need a big old facility to treat our water. We need the sustainability to be updated that already exists. We need Macomb County to have their own treatment center to treat their own wastewater. All these numbers you have on this budget don't count for nothing. You are not doing anything to help us properly download. You have plummeted since 2016. They were

starting to go up and now they are plummeting again. So, I want to know what the real issue is, because it sounds like a deep GLWA. Problem to me not a not neighborhood problem. You are trying to take over our neighborhood cheaply and give our property values away to other people.

Response to Questions/Comments: I will say this city of Detroit property values have gone up rapidly, even over cities like Miami, that has been proven even by the study for the University of Michigan, and I will also say that the down payment, assistance, and the things that have been allocated. This money has been allocated for is very important. We just recently turned 400 renters into homeowners in the last year and half through this down payment assistance. So, I hear you we can talk offline, get your information and have some more dialogue with you, but I just want us to be sure that we know that these monies are in the best interest of our residents, and we're trying to get us the biggest bang for our buck for the allocation.

Questions/Comments: I'm probably reiterating what some comments other people on the call have asked but would increase the residents. Sea walls on the canal take us out of the flood zone. where can we get more information on what the log structures are going to be? Functionality, maintenance, and thresholds. And the reason I'm bringing this up is because the tiger dams were just left in residents' yards for years. So, the concern for me living on the canal is that those log structures are going to be kept closed permanently. If it's anything like what we saw with the tiger dams.

Response to Questions/Comments: According to FEMA, they would want a publicly owned entity to control the sea walls much like the alter road Seawall. That is the city's responsibility to own and maintain.

If you Googled, stop logs, you'll you can see all types of different installations. Some of them are applicable to this situation. Others aren't. If you can imagine garage door panels roughly the size of a garage door panel individually gets lifted and slides into place into a holding mechanism and those stack up to eventually make the temporary dam. And when those segments are no longer needed, due to the lowering of the water levels. Those would just be retrieved and stored until the next time they're used the temporary tiger dams. Yeah, those did get left out a while, and I don't have a good answer for that.

Questions/Comments: I live in the aviation subdivision, and our home prices have gone up, but I think our home prices would have went up even more if we didn't have flooding in our basements and flooding in our streets, you know, you know, like I worked for the water department, you know, for 34 years, though our streets didn't used to flood like they do now, you know, like I say, it seems like some things are worse also. It should be more funds available to help homeowners. That may be slightly above, you know what y'all call that they, you know, the income guidelines, especially looking at city chart, retirees like me. I haven't had a, you know, increase in my pension, you know. In fact, my pension was cut to 12, you know, 11 years ago, and I haven't had any increase, you know, so there's a lot of people in my, you know, me in my group. I'm also president of Retire group, too, for the city, you know. So, I think more needs to be done to help. You know, residents that's above that.

More needs to be done to help City. Detroit retirees, especially city retirees, to work for the water department. Those are my comments and questions.

Response to Questions/Comments: DSWD, did get a 3.2 million dollars, grant to do backwater valves and private sewer repair in both aviation and Warrendale neighborhoods. So, we are working with FEMA on that right now. The Great Lakes water authority is doing a 7 year. 10 million dollars study to look at areas. And we have made it really clear to them that we need to know what's happening on your side of town, especially with aviation and some of the surrounding neighborhoods because in the 21 storm those sewers were completely full. So, they're going to look at that and the discharge impact that our Rouge River elevations may have on.

Questions/Comments: I want to talk regarding the awr program. The cost has increased, and it's going to become effective April first, because I received my notification, but it's still good. A good thing to have. The cost is still lower than if you had gone. Go through some other company. But I attended a meeting where Mr. Gary Brown was doing a presentation, and a young lady spoke about an experience she had had with Awr regarding. She used the program in regards to a Seward, or whatever being backed up, and they did digging in her yard, or whatever, and the problem was resolved, but she said, you have to read, or whatever the small print, because they told her it was not in the coverage to fill the hole and that created a problem for her, because when she started getting estimates to get the whole refill, it was just ridiculous, the cost. And so, Mr. Brown at that time stated that he wasn't aware of that problem, and he was going to get back to her, or whoever to find out if that was true, or what the issue was. So, does anybody on the panel know? Or if the DON Cast can get that information for us? And at one of these DON Cast meetings let us know what the deal is.

Response to Questions/Comments: I am aware that the awr contract does not include hard surface restoration. So, if they must remove asphalt or concrete from a sidewalk or a driveway that they do not replace, they should be backfilling their holes so that there's not a safety hazard. But we'd be happy to get more information and respond more in detail.

Questions/Comments: Can you provide more guidance and details around? I heard a couple people ask, like what was glee was responsibility and DSWD's responsibility as far as our water line and infrastructure. So, can you provide a little bit more guidance around that like? Where is that? The power lines between Detroit water and sewage department and glee were responsibly.

I know that. DSWD, Mr. Brown said at a meeting that DSWD. Gets a portion of that contract the dollars from that contract. What is that money used for, and how much has DSWD gotten from that contract so far.

Response to Questions/Comments: Generally, the Great Lakes. Water authority operates, maintains, and improves the larger diameter. Sewer mains and water transmission mains. They also operate, maintain, and improve the Cso. Satellite treatment facilities, the water treatment plants and the Cso. Treatment facilities like Connor Creek, one that was mentioned earlier DSWD

operates, maintains, and owns the smaller distribution system. Some water transmission mains, but generally all the assets that are in the neighborhoods, bring the water to the houses.

I think that we got \$20,000 last year. If I'm wrong, I would respectfully suggest that we use our remaining time to talk about CDBG-DR, because there's a lot of questions on that. But we'd be happy to get you more information on awr.

Questions/Comments: I just wanted to ask the proposal that you've got here looks a whole lot like the one that was put forward before the proposal for the stop logs and closing the canals, looks a whole lot like what we saw before. And I was wondering is this essentially what it was before? Where, when you talked about the stop log, the plans for the stop logs are like at the Lakewood Canal.

Response to Questions/Comments: It was thought that rather than having any permanent closures of any canals having the temporary installations would be more acceptable rather than having any permanent closures 2 permanent closures and one stop log installation. So, this time it's 3 stop logs, which means they're all temporary in nature and there are no permanent closures.

Questions/Comments: I was wondering specifically about the sump pump installation part of the CDBG program. I have contacted a few people in the water department, and I haven't been able to get a clear answer on whether they're still doing some pump installations, and who to talk to about that.

Response to Questions/Comments: We are doing sump pumps in a very limited number of applications, because we cannot eject sanitary waste onto the street or elsewhere. So, there's very limited neighborhoods where sump pumps are applicable. But we are doing backwater valves. We are televising sewer laterals. We are correcting any defects that we find, including connections to the public main as part of the current CDBG DR program. Nicole put the link in the chat. The alley program that we're talking about here will just be fixing those connections in the alleys.

The PSRP program recently expanded into about 70 plus neighborhoods. So please note that your neighborhood may be eligible. And that you should check out that link to see if you're not part of the additional neighborhoods that that that program was extended to, and again the link is in the chat.

Questions/Comments: This process should have started with us first, we are more than capable of understanding parameters, and then following those parameters, and then making suggestions and decisions around those parameters. What is to be done with our money? Contact your city council as they are the people and the mayor that we have hired to put in charge of our money.

Questions/Comments: When are we going to get an explanation of how floodwater will be dealt with during major rain events during years when stop logs are in place before you answer the question, I just like to make a comment that I've been present for 4 of the last floods and During every one of those floods Stormwater was entering the canals and exiting through them, not coming in to town. It was going out into the river. I understand that there was some pressure put on the stormwater system from Seawall leaks. Even that year, during those events, water was exciting. So

how are you guys going to make it to where you're not turning us into a gross cesspool, making things worse.

Response to Questions/Comments: So, the last time we did have canal overtopping was in 2021, I believe, and that again wasn't due to precipitation. It was due to the high Great Lakes basins, levels and if the stop logs were in place during those events when Fox Creek made discharge again, that's still to be determined. However, you know we're not intending on changing the flow of the canals at all during normal years. It'll still flow outward toward the river.

Questions/Comments: I must challenge myself with many of the comments made by the various representatives and offer some clarification. The over-the-top canal flooding that occurred in 2021 was a result of the Fox Creek discharge, not because the Detroit River or the Great Lakes were high. The community continues to challenge options one and 3 that are offered in the flood page management study. We found these solutions unacceptable and when is the administration going to start listening to the community and start proposing projects that we support. The core's estimate for the floodplain solution in one in 3 is between 160 and 170 million dollars. So, a. I'm wondering. So, my 1st question is, when are you going to stop listening, start listening to us, and stop proposing unacceptable solutions. My second question is, where are you getting the rest of the 161 to 171 million dollars to complete the options proposed in the corn study. And can Mr. Cosell provide written documentation that FEMA is requiring a publicly owned solution to solve the floodplain management problem.

Response to Questions/Comments: There is guidance in FEMA documentation regarding ownership and maintenance responsibility. So, we can get that posted. Regarding the Fox Creek discharge that has nothing to do with high Great lakes, level, and all, to do with precipitation events and issues well possible issues within the local and regional sewer system. So again, Fox Creek discharge has nothing to do with high great lakes, level overtopping. Those are 2 very separate things. So, we're trying to fix both the canal overtopping problem as well as get out of the floodplain designation.

Questions/Comments: I'm a little confused about the disaster recovery funds being used for affordable housing. I need clarity around like, what income bracket are those funds to be distributed under the affordable housing section. Tonight, you know, all the community members have been identifying what they think might be more beneficial in their areas you know, in which may be more efficient or creative, and also sounds like they believe it might be permanent, permanent fixes to their issues, you know, and it might be different than what's a normal go to for the contractors that that the city of Detroit normally work with, you know, they normally leech off our public coffers, you know, at a low attachment rate to how our future would be. So, my question is, will the community be able to participate? You know, in the types of recovery solutions the replacements and things. You know that that fits into the requirements. We know that there is a list of requirements, but there is many of, you know, even New Age things eco-friendly, like all types of different things that could fit into that, because this fund technically came from the Biden when the Biden Administration was here. So, it was very broad. So, I'm asking, When will the community be

able to, or will they be able to participate when it comes to the types of things that you know that will be replaced.

Response to Questions/Comments: So, I can answer the affordable housing question. So CDBG, DR funding does allow us to serve households up to 80% of the area Median income. However, generally, our affordable housing. That we see through HRD, is usually no more than 50 to 60% AMI, and that is likely due to our own local regulations around affordable housing as well as LITHC, and other leverage funds for those for those units. So, I hope that answers the question that you asked about affordable housing.

Questions/Comments: I needed more clarity on that private sewer Alley repair program. I don't understand. Are they saying that the sewer lines only run from like the rear of your house to the alley, and then also there are sewer lines in the front like in the street. And Josh, I'm also in your district, so like the caller earlier every time it rains, my basement gets water in as well. So, contacting places like foundation system of Michigan places like that waterproofing companies. They're ridiculously high. As a result of that 21 flood. So, my basement, for lack of better words is buckling, the floor is rising. I've had company come out, and I thought it was a tree, so I got rid of the tree. They said that there's no root growing there. Is it? Coming from the sewer line? Is what I want to know. If there's anybody from the department of water and sewage that I could probably get somebody out here to tell me exactly what's going on. I already took advantage of that 0% interest loan to get my front porch and sidewalk fixed. So, you know, I financially can't afford to get these waterproofing companies, especially when they're telling me water is coming into the basement somehow, and I want to know if that somehow is through these sewer lines. and then also part 2. What is meant by low to moderate income? You've got to meet income level on our on our website. What is meant by Low to moderate? I'm retired, and I can't financially afford to give a waterproofing company \$2530. That's the price of another house to get you to get it waterproof when I think it's probably the sewer lines, because I don't know if you guys can remember these that we were told that the city lines are antiquated. They've been antiquated for years, so how can I get help with this? I know you told the other lady to reach out to our district manager. So, I'm going to reach out to you after this. But if anybody could share anything about the Detroit water and sewage that would be greatly appreciated.

Response to Questions/Comments: The Area Median Income is not something that's determined by city. It's determined by HUD every year, and it does change so though those amounts should be posted on the web page.

In 3 neighborhoods, Cornerstone, North, Rosedale Park and North End, just by way of example, we have done comprehensive televising, inspection and assessment of the sewer system. Every one of these green triangles represents a private sewer lateral connection to the public main that is failing in in one way or another. Either it's falling off the main, or it has collapsed, or it is significantly plugged in with roots. And what we find in going through all the neighborhoods of the city. And this isn't just a Detroit problem. This is an inner ring Wing county system problem that about 1/3 of all, the private connections to the public main are failing, so the large part of infrastructure investment

with this project will reestablish that connection in and of itself is about a \$15,000 to \$20,000. Repair that we realize many of our residents and customers can't afford, which is why there's such a significant investment as part of this program. If you're having repetitive flooding anytime, you have water in the basement, please call 313-267-8000 and report it we will come out and investigate and see if the public system is failing, or if the public system is operating well, you mentioned that the system is antiquated. The public system was built the same time that the private laterals that run 80% of the laterals in the city go from the house out to the alley where they connect to the public sewer main on the west side. We do have some connections out in the street, but that's only about 20%. So, most of these alley problems are what we're starting to approach with this grant.