

Detroit Water & Sewerage Department
Brightmoor Stormwater Improvement Project S104d

Section 104(d) of the Housing and Community Development Act of 1974 (the “HCDA”) applies whenever lower-income dwelling units are being demolished or converted to a use other than lower-income dwelling units as a result of a federally-assisted project. In these situations, the City of Detroit’s Residential Anti-Displacement and Relocation Assistance Plan (RARAP), prepared by the Housing and Revitalization Department, requires the City to publicly share certain details of the project.

The following information pertains to the Detroit Water & Sewerage Department (DWSD)
Brightmoor Stormwater Improvement Project:

To read the RARAP in full, please contact Eric Andrews at eric.andrews@detroitmi.gov or visit <https://detroitmi.gov/sites/detroitmi.localhost/files/2026-02/signed%2025-12%20RARAP%20all%20attachments.pdf>

1. A description of the proposed assisted project

*The **Brightmoor Stormwater Improvement Project** is a large-scale green stormwater infrastructure project which will utilize 16 acres to build a stormwater detention basin to manage stormwater runoff from a 500-acre drainage area to reduce basement backups and street flooding and improve the water quality of the Rouge River. DWSD is purchasing properties acquire land to build the stormwater detention basin. The project is expected to begin construction in 2026.*

2. The address, number of bedrooms, and location on a map of lower-income dwelling units that will be demolished or converted to a use other than as lower-income dwelling units as a result of an assisted project

Three three-bedroom rental properties will be demolished in order to construct the stormwater detention basin. They are as follows:

Units to be Converted			
Properties	Bedroom Size	AMI	Replacement Unit
14554 Greydale	3 Bedroom	35%	Preston Townhomes
21610 Lyndon	3 Bedroom	50%	900 Tuscola
21634 Lyndon	3 Bedroom	60%	Preston Townhomes

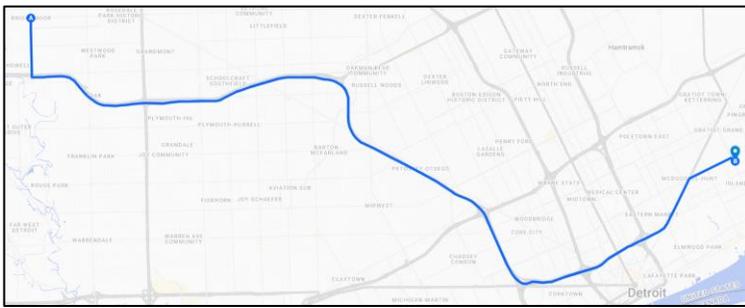
3. A time schedule for the commencement and completion of the demolition or conversion

The units are expected to be demolished in summer 2026. The timeline is based on completion of an environmental assessment which is expected to begin in April 2026.

4. To the extent known, the address, number of lower-income dwelling units by size (number of bedrooms) and location on a map of the replacement lower-income housing that has been or will be provided

The following units have been identified as replacements for the **three** units in the **Brightmoor project area**:

Address	Property/Project Name	Unit Size	AMI	Units Available	Units Utilized for Replacement
7250 Mack Ave, Detroit, MI 48214	Preston Townhomes	3 Bedroom	30%	2	1
7250 Mack Ave, Detroit, MI 48214	Preston Townhomes	3 Bedroom	60%	5	1
900 Tuscola, Detroit, MI 48201	900 Tuscola	3 Bedroom	40%	3	1



Brightmoor to Preston Townhomes



Brightmoor to 900 Tuscola

5. The source of funding and a time schedule for the replacement dwelling units

Replacement dwelling units will be provided through the following funding sources:

Preston Townhomes

- HOME funds from the City of Detroit
- EPA grant from the City of Detroit
- Community Development Block Grant from City of Detroit
- The time schedule for the provision of the replacement dwelling units is Q3 2026. The affordability duration for the units is at least 20 years.

900 Tuscola

- 9% Low-Income Tax Credits from the City of Detroit
- The time schedule for the provision of the replacement dwelling units is Q3 2027. The affordability duration for the units is at least 15 years.

6. The basis for concluding that each replacement dwelling unit is designated to remain a lower-income dwelling unit for at least 10 years from the date of initial occupancy;

HOME funds come with a requirement that new construction units remain affordable at no more than either 50% AMI or 60% AMI for at least 20 years.

Projects that receive Low Income Housing Tax Credits (LIHTC) require affordability below 60% (or 50% in some cases) for at least 15 years, often longer.

Compliance is enforced by the Asset Management team of the City's Housing and Revitalization Department.

7. Information demonstrating that any proposed replacement of lower-income dwelling units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units), or any proposed replacement of efficiency or single-room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the HUD-approved Consolidated Plan and 24 CFR 42.375(b)

Not applicable - all lower-income dwelling units are being replaced with dwelling units of the same size.