U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Left-Field

HEROS Number: 900000010217947

Responsible Entity (RE): DETROIT, PLANNING AND DEVELOPMENT DEPARTMENT
DETROIT MI, 48226

RE Preparer: Kim Siegel

State / Local Identifier: Detroit, Michigan

Certifying Officer: Julie Schneider

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 2610 Cochrane Street, Detroit, MI

Additional Location Information:
N/A

Direct Comments to:

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
The proposed Left Field project is the construction of two new apartment buildings, one six-story and one four-story, just north of the old tiger stadium ballpark in Detroit. The buildings will include 124 new units comprising of studios, one, two-and three-bedroom. Forty-eight of the units will target low-income households. Amenities will include in-unit washer/dryer, community rooftop deck, community room, exercise room, on-site management, access-controls through proximity cards, and security cameras.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:
The proposed development aims to provide quality affordable rental housing to low-income residents of the area. According to the market feasibility analysis conducted by Real Property Research Group on March 2nd, 2020, the market area's household base is projected to grow over the next five years. Stabilized vacancies are low among the surveyed rental communities and the majority of tax credit and deeply subsidized properties reported lengthy waitlists, signaling a tight rental market and suggesting demand for rental housing. This development will help to meet the affordable housing demand for rental units.

Existing Conditions and Trends [24 CFR 58.40(a)]:
According to the above referenced market study, between 2000 and 2010 Census counts, the market area decreased at an annual rate of 923 people (1.6 percent) and 177 households (0.7 percent). Households are estimated to have increased by 209 households (0.9 percent) each year since 2010. Annual household increases in the market area over the next five years are projected at 268 households or 1.0 percent. Renter percentages in 2020 are estimated at 81.7 percent in the market area and 39.7 percent in Wayne County. Renter percentages are projected to increase to 82.2 percent in the market area in 2025, while the county is expected to have its renter share drop slightly to 39.1 percent. The 2020 median household income for all households is estimated at $24,251 for the Fisher Market Area and $48,379 for Wayne County. More than half (51.1 percent) of Fisher Market Area households earn less than $25,000 annually, while 22.5 percent earn $25,000 to$49,999 per year. Median incomes by tenure in the Fisher Market Area are estimated at $19,850 for renters and $54,102 for owners as of 2020. More than half (58.4 percent) of all renter households in the Fisher Market Area earn less than $25,000 and 21.3 percent earn $25,000 to $49,999. The market area's rental stock includes a mixture of market rate, LIHTC, and deeply subsidized communities. The 28 surveyed market rate and tax credit communities are generally performing well with an average stabilized vacancy rate of 2.3 percent, reporting 60 vacant units among a 2,597 unit inventory. Tax credit communities reported a lower aggregate vacancy rate of 1.4 percent with ten of 15 communities reporting no vacancies when surveyed. No vacancies were reported among the seven deeply subsidized communities totaling 1,235 units. Waitlists were reported at six tax

credit communities and six deeply subsidized communities.

Maps, photographs, and other documentation of project location and description:
Attachment 0 - Site Map.pdf

Determination:

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Approval Documents:

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name
M1001	Public Housing	Project-Based Voucher Program
M20MC260202	Community Planning and Development (CPD)	HOME Program

Estimated Total HUD Funded, Assisted or Insured Amount: $1,000,000.00

Estimated Total Project Cost [24 CFR 58.2 (a)(5)]: $16,500,000.00

Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	☐ Yes ☑ No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The Coleman A. Young International Airport (DET) is approximately 5.5 miles from the property. Therefore, the project is in compliance with Airport Hazards requirements. (Attachment A).
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	☐ Yes ☑ No	This project is not located in a CBRS Unit. The property is not located in the Coastal Barrier Resource Area in Wayne County. No coastal barriers will be impacted by the proposed project (Attachment B).
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	☐ Yes ☑ No	The property is located in Zone X, which represents minimal risk outside the 1-percent and 2-percent annual- chance floodplain. The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. The project is in compliance with flood insurance requirements (Attachment C).
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	☐ Yes ☑ No	The entire State of Michigan is designated as "attainment" for carbon monoxide, nitrogen dioxide, sulfur dioxide, PM10, and lead except for small locations in Wayne and Saint Clair Counties with sulfur dioxide non-attainment areas and portions of the state are in non-attainment for ozone. Wayne County is a nonattainment county for ozone. The project is in the non-attainment area for ozone. The project was submitted to the EGLE Air Quality Division and a response was received on February 24th 2021, indicating that the project is in conformance with the state implementation plan and does not require a detailed conformity analysis (Attachment D).
Coastal Zone Management Act Coastal Zone Management Act,	☐ Yes ☑ No	This project does not involve any property or parcel located within the

sections 307(c) & (d)		Coastal Zone Management Area for Wayne County. This project does not require formal consultation with the State of Michigan Coastal Zone Management Program (Attachment E).
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	❒ Yes ☐ No	A Phase I environmental site assessment (ESA), Limited Phase II ESA, Baseline Environmental Assessment (BEA) and Response Activity Plan (ResAP) were completed for this project. A pile of fill is located at the southwest portion of the site from past offsite construction activities. The Michigan Department of Environment, Great Lakes, and Environment (EGLE) Generic Residential Cleanup Criteria (GRCC) used for comparison of the soil analytical for the Subject Property under Part 201 of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as Amended (Part 201) are the drinking water protection, groundwater surface water interface protection, direct contact (DC), soil volatilization to indoor air inhalation, and particulate soil inhalation. In addition, the soil sample results were compared to the EGLE residential volatilization to indoor air pathway screening levels. The laboratory analytical results for the soil samples collected at the site identified benzo(a)pyrene, phenanthrene, arsenic, and mercury exceeding one or more of the EGLE Part 201 GRCC; therefore, the site is a ''facility'' as defined in Part 201. Excavation of all fill soils on the site will be completed following project approval and property acquisition. Based on the soil sampling completed on the site, the urban fill is expected to be confined to the upper 1 to 2 feet below grade. Fill materials are presumed to be present across the entire site at a depth of 2' feet below-ground and all identified fill materials will be removed. Based on the

		dimensions of the site and removal of the urban fill materials to an average depth of two feet below ground surface, the estimated volume of soils to be removed is approximately 4,500 cubic yards. Following excavation, confirmation of remediation sampling will be completed in accordance with the guidance provided in the S3TM for Part 201 Cleanup Criteria (MDEQ 2002). The size of the site is approximately 61,000-square feet or 1.37-acres. Based on the future use for multi-family residential, the site will be divided into six approximately 10,160 square-foot exposure units for collection of confirmation of remediation samples. Each of the exposure units will be approximately 50 feet wide by 200 feet deep. Following the formula provided in section 2.2.1.2 of the S3TM for a small sized remediation areas (defined as less than 0.25-acre), the grid interval for the excavation was calculated to be 28 feet. To allow for the required minimum of nine samples per exposure unit, a 25-foot grid interval was used yielding a sampling grid of 2 by 8 grids within each exposure unit. Nine sample locations were randomly selected within each exposure unit. Post excavation, one surface soil sample (0-0.5 feet) will be collected from the floor of the excavation within each selected grid. For QA/QC purposes, six duplicate soil samples will also be collected. All collected soil samples will be analyzed for PNAs and the Michigan 10 metals. The monitoring of the fill removal will be completed through the use of visual observation (the fill materials are comprised primarily of sand with native materials being primarily clay). It is anticipated that the excavation will require approximately three weeks to complete. Soils excavated from the

		ground will be removed from the Subject Property for offsite disposal at a licensed Type II Municipal Landfill. Following the completion of the response activities proposed in this ResAP, all contaminated soils exceeding the applicable GRCC for the relevant pathways and or the SSVIAC for the VIAP will have been removed from the site. The property is currently vacant land: asbestos containing materials and lead based paint are not concerns at the site. The property is located in a Zone 3 area for Radon. There is low potential for Radon to be present at unacceptable levels. A Radon survey is not required for projects within Zone 3 of the EPA map of Radon Zones. (Attachment F).
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☐ Yes ☑ No	This project does not involve activities which may disturb natural vegetation or critical habitat. The project area is in an established residential and commercial corridor and is not likely to contain any critical habitats. Therefore, this project will not likely affect a listed or proposed endangered or threatened species. Consultation with the U.S. Fish and Wildlife Service or the State of Michigan Department of Natural Resources is not required (Attachment G).
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☑ No	Review of AST licensing information revealed 14 ASTs located within 1-mile of the project. The largest size diesel tank is 8,000 gallons and the ASD is +/- 660' for people and +/- 132' for buildings. All the diesel tanks are located at greater distance; therefore, they have acceptable ASD. Contents of some tanks have unknown content. Different scenarios were considered to determine the highest potential for a threat to the site. The largest sized unknown tank is 13,500 gallons and the ASD is +/- 818' for people and +/- 168' for buildings. All the unknown tanks are located at a greater distance; therefore,

		they have acceptable ASD. The site is located at an Acceptable Separation Distance (ASD) from any above-ground explosive or flammable fuels or chemicals containers according to 24 CFR 51C (Attachment H).
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	☐ Yes ☑ No	This project does not include any prime or unique farmland. The property is located within an ''urbanized area'' and, therefore, are not subject to the statutory or regulatory requirements identified above, per 7 CFR 658.2(a) (Attachment I).
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	☐ Yes ☑ No	The property is located in FEMA Flood Map Panel 26163C0280E not printed for the City of Detroit. The property is located in Zone X, which represents minimal risk outside the 1-percent and 2-percent annual- chance floodplains. Floodplain management is not required (Attachment C).
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	☐ Yes ☑ No	Due to the ground disturbing nature of new construction and per the programmatic agreement between the City of Detroit and the State Historic Preservation Office (SHPO), the project was submitted to the City of Detroit Preservation Specialist for review. The City of Detroit Preservation Specialist Ryan Schumaker reviewed the application and found a determination of no historic properties affected in the project area by the undertaking. The City has given the project a No Historic Properties Affected determination. Also, since the project is larger than 1/2 acre, the project was sent to the State archeology for review. The Archaeologist concurred with the No Historic Properties Affected determination made by the City of Detroit Preservation Specialist. If artifacts or bones are discovered, work will be halted and the Preservation Specialist will be contacted immediately for further guidance on how to proceed

		(Attachment J).
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	❒ Yes ☐ No	A noise assessment was completed for the site on March 26, 2020. The combined source day-night average sound level (DNL) was calculated at three different locations based on site layout contributing noise sources. The DNLs were determined to be 71.1, 74.2 and 75.7 dB, which were categorized as normally unacceptable and unacceptable. Although one of the noise assessment locations was found to be unacceptable, HUD allows for a one decibel variance and as this is less than 76 dB it will be acceptable with approved noise attenuation. STraCAT calculations were conducted for the site and the exterior wall materials provide the necessary attenuation to bring the interior noise down to 34 dB. No further mitigation is required.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	☐ Yes ❒ No	The project is not located on a sole source aquifer area. There are no sole source aquifers located in Detroit or Wayne County, Michigan. Therefore, the project is in compliance with Sole Source Aquifer requirements (Attachment L).
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	☐ Yes ❒ No	No wetlands are present on the property according to the National Wetlands Inventory Map (Attachment M).
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	☐ Yes ❒ No	There are no sole source aquifers located in Detroit or Wayne County, Michigan. The project is in compliance with the Wild and Scenic Rivers Act (Attachment N).
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	☐ Yes ❒ No	This project entails the construction of two new apartment buildings providing needed affordable and market rate housing. This project is intended to improve the present environment of low-income citizens in Detroit. The

		project will not have a disproportionately high adverse-effect on human health or environment of minority populations and/or low-income populations (Attachment O).

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.
(1) Minor beneficial impact
(2) No impact anticipated
(3) Minor Adverse Impact – May require mitigation
(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project area is zoned for general business, the developer has requested a variance from the board of zoning appeals. The site is compatible with surrounding land uses, which consist of new construction properties including townhomes, rental apartments, and an athletic facility, as well as paved lots and I-75. The scale and design of the buildings will not be incompatible with the surrounding structures.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	According to the Detroit Quadrangle 7.5-minute Topographic map, the site falls into the 600-foot contour. The property is relatively flat and no drainage or slope issues are anticipated. There was no visual evidence of slides or slumps on the property. The project is not located near an erosion sensitive area and will not create slopes. The proposed grading work at the site will allow for very little erosion. The project will be connected to the municipal storm sewer service. Service already exists for the property. The Detroit Water and Sewerage Department provides service to the project area.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The project is not adversely affected by on-site or off-site hazards or nuisances. There will be adequate on-site parking for residents, and lighting. The property will also have security cameras monitoring walkways and parking areas and access controls through proximity cards.	
Energy Consumption/Energy Efficiency	2	The project area will be served by electrical and gas utilities provided by DTE Energy. There is adequate capacity to serve the new construction building. The project will be pursuing Enterprise Green Communities Criteria.	
SOCIOECONOMIC			
Employment and Income Patterns	2	There will be a temporary increase in jobs related to the construction of the project. Other than construction related changes, the project will not result in a change to employment and income patterns in the area. The project will provide permanent jobs for the on-site management staff. The project could be beneficial to local businesses because there will be an increase in households requiring goods and services.	
Demographic Character Changes / Displacement	2	The project will not change the demographics of the general area. It will provide much needed affordable housing to residents of the area. The project aims to assist low-income citizens by providing affordable Studio, one-, two and three-bedroom units.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	The area is served by the Detroit Public Schools Community District. This project will not impact the capacity of any of these schools. For in neighborhood schools' students would be served by Burton International Academy (k-8) and Detroit Collegiate Preparatory High School at Northwestern for 9-12. Regular education students in grades K-8 who	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		reside more than 3/4 of a mile from their neighborhood school and attend their neighborhood school will receive yellow bus transportation from a designated corner stop determined by the Office of Student Transportation. Regular education students in grades 9-12 are provided City of Detroit Department of Transportation bus passes, provided that they attend their neighborhood school and live more than 1.5 miles away. The schools should have adequate capacity for the potential new students. No educational facilities will be negatively affected by the proposed project. The project site is approximately 1/2 mile from downtown Detroit, so there are many cultural facilities near the property. The Michigan Sports Hall of Fame, The Filmore, The Fox Theatre, City Theatre, Detroit Women's City Club, and the Colony Club are all within approximately 1 mile of the property. There are also many civic groups with active branches in Detroit including the Masons, the Lions Club, Kiwanis Club, the VFW and the American Legion. There are a variety of churches, social organizations and other cultural activities available to residents as well. No cultural facilities will be negatively impacted by the proposed project.	
Commercial Facilities (Access and Proximity)	2	Commercial corridors are present to the south of the property on Michigan Ave. and Bagley Street. Along and between these corridors are restaurants, a pharmacy and a market. No commercial facilities will be negatively affected by the proposed development.	
Health Care / Social Services (Access and Capacity)	2	The project area is served by a full range of health care professionals. Henry Ford Medical Center-Harbortown, Vibra Hospital of Southeastern Michigan, The	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		Michigan State University-Detroit Medical Center and the John Dingell VA Hospital are all within three miles from the project site. No health care services will be negatively impacted by this project. No social services will be negatively impacted by the project activities. There is not likely to be an increase in the demand for social services as a result of the project activities. Affordable housing options could potentially reduce the number of people requiring social services.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Dumpsters will be provided for residents to dispose of their trash. Solid waste disposal will be taken care of via a professional disposal company under contract. Recycling will also be available for residents.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The project will be connected to the municipal sanitary sewer service. The Detroit Water and Sewerage Department provides service to the project area.	
Water Supply (Feasibility and Capacity)	2	The project will be connected to the municipal water service. The Detroit Water and Sewerage Department provides service to the project area.	
Public Safety - Police, Fire and Emergency Medical	2	The Detroit Police Department covers the city with the 4th Precinct covering the project location. The precinct offices are located at 4700 W. Fort Street, approximately two miles from the property. No police services will be negatively impacted by the proposed project. The Detroit Fire Department provides fire department services to the city along with basic first responder medical assistance from paramedics. No fire services will be negatively impacted by the proposed project.	
Parks, Open Space and Recreation (Access and Capacity)	2	The proposed project is located near multiple parks. Within approximately a mile of the property there is Nagel Park, Roosevelt Park, The Detroit Dog Park,	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		Ralph C. Wilson Centennial Park and West Riverfront Park. As the site is approximately a 1/2 mile from downtown Detroit there are several recreational facilities near the property. The MGM Grand Detroit, Little Caesars Area, Comerica Park, Ford Field, and Greek Town Casino are all within 1.5 miles of the Property.	
Transportation and Accessibility (Access and Capacity)	2	Bus service in the city is provided by the Detroit Department of Transportation. The nearest bus stop is at Trumbull. and Cherry just east of the project area. There are also several bus stops along Michigan Ave. to the south. The City of Detroit is divided by a number of main expressways that also provide access to the rest of the state. The nearest highway near the project area is the I-75 Expressway, which connects to the I-94 Expressway and I-96 Expressway.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	The project location does not contain any unique natural features of agricultural lands. The City of Detroit is an urban city with few unique natural features or agricultural lands.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The project site is currently a dirt vacant lot, no vegetation or wildlife is expected to be impacted by the proposed project.	
Other Factors	2	No other factors were present to be considered.	

Supporting documentation

Additional Studies Performed:

Field Inspection [Optional]: Date and completed by:

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:
1.Ryan Schumaker, Preservation Specialist, City of Detroit Housing and Redevelopment Department, 2 Woodward Avenue, Suite 908, Detroit, MI 48226, 313-224-1508, rschumaker@detroitmi.gov 2. Federal Emergency Management Agency-Map Service for Flood Rate Insurance Maps https://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&ca talogId=10001&langId=-1 3. U.S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper; http://www.fws.gov/wetlands/data/mapper.html 4. U.S. Fish & Wildlife Service, Endangered Species, Michigan County Distribution of Federally-Listed Threatened, Endangered, Proposed, and Candidate Species, http://www.fws.gov/midwest/endangered/lists/michigan-cty.html 5. Michigan Department of Environmental Quality, Michigan Coastal Zone Boundary Maps, http://www.michigan.gov/deq/0,4561,7-135-3313_3677_3696-90802--,00.html 6. Michigan Department of Environmental Quality, Air Quality Division, http://www.michigan.gov/deq/0,1607,7-135-3310_30151_31129---,00.html 7. US EPA Map of Radon Zones, Washtenaw County, Michigan, http://www.epa.gov/radon/states/michigan.html 8. Kenneth Ertman, American Community Developers Inc., 20250 Harper Avenue, Detroit, Michigan 48225, (313) 881-8150.

List of Permits Obtained:

Public Outreach [24 CFR 58.43]:
All historical, local and federal contacts on the attached 2021 Interest Parties List were sent a copy of the Notice of Intent to Request for Release of Funds to use HUD funding for the project and were asked to comment on the project.

Cumulative Impact Analysis [24 CFR 58.32]:
The proposed low-income housing construction will not adversely impact the City Detroit or neighborhoods surrounding the site. The activity is compatible with the surrounding neighborhood and land use and will have minimal impact on existing resources or services in the area.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]
No other sites were considered for this project; however, unit number, size and pricing

have been adapted to provide the most successful absorption rate in the current market.

No Action Alternative [24 CFR 58.40(e)]
One alternative is No Action. The No Action alternative would be to allow the subject property to remain an uninhabited space in the City of Detroit. No distinguishable benefits to the human environment would be gained by not choosing to initiate the project. The potential adverse impacts to the human environment of not implementing the project include ongoing security of the vacant overgrown property, safety concerns for adjoining residences, potential for illicit dumping, potential as an attractive nuisance, and potential depreciation of surrounding properties.

Summary of Findings and Conclusions:
Based on the information provided, there is a need to low-income housing in this area of Wayne County. The project will provide several benefits to the region and no adverse impacts have been identified.

Mitigation Measures and Conditions [CFR 1505.2(c)]:

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Contamination and Toxic Substances	The remedial actions that will be conducted on the site to address the potential for unacceptable risks as part of the new construction are excavation and removal of impacted fill. This will be completed prior to occupancy.	N/A		
Noise Abatement and Control	A Noise Assessment for the site was completed. The assessment found an unacceptable level of noise of 75.7 was present at the location of the northern end of the western building due to the nearby highway. To address this level of noise, the building was arranged with the elevator lobbies	N/A		

	on the north end of the building to provide a buffer between the highway and the residential portions of the building. Appropriate construction materials will assist in mitigating noise levels within the acceptable range.			

Project Mitigation Plan

See the attached Mitigation Plan.

Left Field Mitigation Plan.pdf

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ **No**

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The Coleman A. Young International Airport (DET) is approximately 5.5 miles from the property. Therefore, the project is in compliance with Airport Hazards requirements. (Attachment A).

Supporting documentation

Attachment A - RCZ Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

1. Is the project located in a CBRS Unit?

✓ No

Document and upload map and documentation below.

Yes

Compliance Determination

This project is not located in a CBRS Unit. The property is not located in the Coastal Barrier Resource Area in Wayne County. No coastal barriers will be impacted by the proposed project (Attachment B).

Supporting documentation

Attachment B - Coastal Barrier Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

2. Upload a FEMA/FIRM map showing the site here:

Attachment C - FEMA FIRMETTE.pdf

The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

✓ No

Based on the response, the review is in compliance with this section.

Yes

Screen Summary

Compliance Determination

The property is located in Zone X, which represents minimal risk outside the 1-percent and 2-percent annual- chance floodplain. The structure or insurable property is not

located in a FEMA-designated Special Flood Hazard Area. The project is in compliance with flood insurance requirements (Attachment C).

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

✓ Yes

No

Air Quality Attainment Status of Project's County or Air Quality Management District

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

No, project's county or air quality management district is in attainment status for all criteria pollutants.

✓ Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Carbon Monoxide

Lead

Nitrogen dioxide

✓ Sulfur dioxide

✓ Ozone

Particulate Matter, <2.5 microns

Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Sulfur dioxide	100.00	ppb (parts per billion)
Ozone	100.00	ppb (parts per million)

Provide your source used to determine levels here:
The source used to determine the level of ozone is the EPA's National Ambient Air Quality Standards table. Since the project is outside of the ozone transport region, the project is in the "other" category.

4. Determine the estimated emissions levels of your project. Will your project exceed any of the de minimis or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Sulfur dioxide	0.00	ppb (parts per billion)
Ozone	0.00	ppb (parts per million)

Based on the response, the review is in compliance with this section.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary
Compliance Determination
The entire State of Michigan is designated as "attainment" for carbon monoxide, nitrogen dioxide, sulfur dioxide, PM10, and lead except for small locations in Wayne and Saint Clair Counties with sulfur dioxide non-attainment areas and portions of the state

are in non-attainment for ozone. Wayne County is a nonattainment county for ozone. The project is in the non-attainment area for ozone. The project was submitted to the EGLE Air Quality Division and a response was received on February 24th 2021, indicating that the project is in conformance with the state implementation plan and does not require a detailed conformity analysis (Attachment D).

Supporting documentation

Attachment D - Air Quality Map.pdf
Attachment D - Air Quality EGLE Letter.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

Yes

✓ No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary

Compliance Determination

This project does not involve any property or parcel located within the Coastal Zone Management Area for Wayne County. This project does not require formal consultation with the State of Michigan Coastal Zone Management Program (Attachment E).

Supporting documentation

Attachment E - Coastal Zone Management Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)

1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.

- ✓ American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
- ✓ ASTM Phase II ESA
- ✓ Remediation or clean-up plan
- ✓ ASTM Vapor Encroachment Screening

None of the Above

2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

No

✓ Yes

3. Mitigation

Document and upload the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental effects cannot be mitigated, then HUD assistance may not be used for the project at this site.

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated.

✓ Yes, adverse environmental impacts can be eliminated through mitigation. Document and upload all mitigation requirements below.

4. Describe how compliance was achieved in the text box below. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls, or use of institutional controls.

The remedial actions that will be conducted on the site to address the potential for unacceptable risks as part of the new construction are excavation and removal of impacted fill. This will be completed prior to occupancy.

If a remediation plan or clean-up program was necessary, which standard does it follow?

✓ Complete removal

Risk-based corrective action (RBCA)

Screen Summary

Compliance Determination

A Phase I environmental site assessment (ESA), Limited Phase II ESA, Baseline Environmental Assessment (BEA) and Response Activity Plan (ResAP) were completed for this project. A pile of fill is located at the southwest portion of the site from past offsite construction activities. The Michigan Department of Environment, Great Lakes, and Environment (EGLE) Generic Residential Cleanup Criteria (GRCC) used for comparison of the soil analytical for the Subject Property under Part 201 of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as Amended (Part 201) are the drinking water protection, groundwater surface water interface protection, direct contact (DC), soil volatilization to indoor air inhalation, and particulate soil inhalation. In addition, the soil sample results were compared to the EGLE residential volatilization to indoor air pathway screening levels. The laboratory analytical results for the soil samples collected at the site identified benzo(a)pyrene, phenanthrene, arsenic, and mercury exceeding one or more of the EGLE Part 201 GRCC; therefore, the site is a ''facility'' as defined in Part 201. Excavation of all fill soils on the site will be completed following project approval and property acquisition. Based on the soil sampling completed on the site, the urban fill is expected to be confined to the upper 1 to 2 feet below grade. Fill materials are presumed to be present across the entire site at a depth of 2' feet below-ground and all identified fill materials will be removed. Based on the

dimensions of the site and removal of the urban fill materials to an average depth of two feet below ground surface, the estimated volume of soils to be removed is approximately 4,500 cubic yards. Following excavation, confirmation of remediation sampling will be completed in accordance with the guidance provided in the S3TM for Part 201 Cleanup Criteria (MDEQ 2002). The size of the site is approximately 61,000-square feet or 1.37-acres. Based on the future use for multi-family residential, the site will be divided into six approximately 10,160 square-foot exposure units for collection of confirmation of remediation samples. Each of the exposure units will be approximately 50 feet wide by 200 feet deep. Following the formula provided in section 2.2.1.2 of the S3TM for a small sized remediation areas (defined as less than 0.25-acre), the grid interval for the excavation was calculated to be 28 feet. To allow for the required minimum of nine samples per exposure unit, a 25-foot grid interval was used yielding a sampling grid of 2 by 8 grids within each exposure unit. Nine sample locations were randomly selected within each exposure unit. Post excavation, one surface soil sample (0-0.5 feet) will be collected from the floor of the excavation within each selected grid. For QA/QC purposes, six duplicate soil samples will also be collected. All collected soil samples will be analyzed for PNAs and the Michigan 10 metals. The monitoring of the fill removal will be completed through the use of visual observation (the fill materials are comprised primarily of sand with native materials being primarily clay). It is anticipated that the excavation will require approximately three weeks to complete. Soils excavated from the ground will be removed from the Subject Property for offsite disposal at a licensed Type II Municipal Landfill. Following the completion of the response activities proposed in this ResAP, all contaminated soils exceeding the applicable GRCC for the relevant pathways and or the SSVIAC for the VIAP will have been removed from the site. The property is currently vacant land: asbestos containing materials and lead based paint are not concerns at the site. The property is located in a Zone 3 area for Radon. There is low potential for Radon to be present at unacceptable levels. A Radon survey is not required for projects within Zone 3 of the EPA map of Radon Zones. (Attachment F).

Supporting documentation

Attachment F -Signed Remedial Action Approval.pdf
Attachment F - Phase II ESA.pdf
Attachment F - Phase I ESA.pdf
Attachment F - Summary of Soil Analytical Results.pdf
Attachment F - Limited Phase II ESA Exerpts.pdf
Attachment F - BEA.pdf
Attachment F - Radon Maps.pdf

Are formal compliance steps or mitigation required?

✓ Yes

No

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service ("FWS" and "NMFS" or "the Services").	The Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq*.); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect specifies or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

2. Are federally listed species or designated critical habitats present in the action area?

✓ No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below. Documentation may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.

Yes, there are federally listed species or designated critical habitats present in the action area.

Screen Summary

Compliance Determination

This project does not involve activities which may disturb natural vegetation or critical habitat. The project area is in an established residential and commercial corridor and is not likely to contain any critical habitats. Therefore, this project will not likely affect a listed or proposed endangered or threatened species. Consultation with the U.S. Fish and Wildlife Service or the State of Michigan Department of Natural Resources is not required (Attachment G).

Supporting documentation

Attachment G - Endangered Species List.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

✓ No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

✓ Yes

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- **Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR**
- **Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.**

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

No

✓ Yes

4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?

✓ Yes

Based on the response, the review is in compliance with this section.

No

Screen Summary

Compliance Determination

Review of AST licensing information revealed 14 ASTs located within 1-mile of the project. The largest size diesel tank is 8,000 gallons and the ASD is +/- 660' for people and +/- 132' for buildings. All the diesel tanks are located at greater distance; therefore, they have acceptable ASD. Contents of some tanks have unknown content. Different scenarios were considered to determine the highest potential for a threat to the site. The largest sized unknown tank is 13,500 gallons and the ASD is +/- 818' for people and +/- 168' for buildings. All the unknown tanks are located at a greater distance;therefore, they have acceptable ASD. The site is located at an Acceptable Separation Distance (ASD) from any above-ground explosive or flammable fuels or chemicals containers according to 24 CFR 51C (Attachment H).

Supporting documentation

Attachment H - Explosive and Flammable Hazards.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

✓ Yes

No

2. Does your project meet one of the following exemptions?

- Construction limited to on-farm structures needed for farm operations.
- Construction limited to new minor secondary (accessory) structures such as a garage or storage shed
- Project on land already in or committed to urban development or used for water storage. (7 CFR 658.2(a))

✓ Yes

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

No

Screen Summary

Compliance Determination

This project does not include any prime or unique farmland. The property is located within an ''urbanized area'' and, therefore, are not subject to the statutory or regulatory requirements identified above, per 7 CFR 658.2(a) (Attachment I).

Supporting documentation

Attachment I - Farmland Classification Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55

1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]

55.12(c)(3)
55.12(c)(4)
55.12(c)(5)
55.12(c)(6)
55.12(c)(7)
55.12(c)(8)
55.12(c)(9)
55.12(c)(10)
55.12(c)(11)
✓ None of the above

2. Upload a FEMA/FIRM map showing the site here:

Attachment C - FEMA FIRMETTE.pdf

The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use **the best available information** to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site.

Does your project occur in a floodplain?

✓ No

Based on the response, the review is in compliance with this section.

Yes

Screen Summary

Compliance Determination

The property is located in FEMA Flood Map Panel 26163C0280E not printed for the City of Detroit. The property is located in Zone X, which represents minimal risk outside the 1-percent and 2-percent annual- chance floodplains. Floodplain management is not required (Attachment C).

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html

Threshold

Is Section 106 review required for your project?

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)

No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

✓ Yes, because the project includes activities with potential to cause effects (direct or indirect).

Step 1 – Initiate Consultation

Select all consulting parties below (check all that apply):

✓ State Historic Preservation Offer (SHPO) Not Required

✓ Advisory Council on Historic Preservation Not Required

✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

✓ Other Consulting Parties

✓ City of Detroit Preservation Specialist Completed

Describe the process of selecting consulting parties and initiating consultation here:

Under the authority of the National Historic Preservation Act (NHPA) of 1966, as amended, and the Programmatic Agreement between the Michigan State Historic Preservation Office and the City of Detroit, Michigan as amended, dated November 9, 2016, the City of Detroit has reviewed the above-cited project and has determined it to be an undertaking as defined by 36 CFR 800.16(y).

Document and upload all correspondence, notices and notes (including comments and objections received below).

Step 2 – Identify and Evaluate Historic Properties

1. **Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**
   The APE for direct effects is defined as the area where construction and ground disturbance will occur. The APE for indirect effects can be described as starting from the SE corner of Cochrane St. and W. Fisher Service Dr. heading east towards Trumbull, then south down Trumbull to the southern end of the current ball park, then west to Cochrane St. and north to the point of beginning.

   In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

   Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information

   Additional Notes:

2. **Was a survey of historic buildings and/or archeological sites done as part of the**

project?

Yes

✓ No

Step 3 –Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

✓ No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

Document reason for finding:

✓ No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

Due to the ground disturbing nature of new construction and per the programmatic agreement between the City of Detroit and the State Historic Preservation Office (SHPO), the project was submitted to the City of Detroit Preservation Specialist for review. The City of Detroit Preservation Specialist Ryan Schumaker reviewed the application and found a determination of no historic properties affected in the project area by the undertaking. The City has given the project a No Historic Properties Affected determination. Also, since the project is larger than 1/2 acre, the project was sent to the State archeology for review. The Archaeologist concurred with the No Historic

Properties Affected determination made by the City of Detroit Preservation Specialist. If artifacts or bones are discovered, work will be halted and the Preservation Specialist will be contacted immediately for further guidance on how to proceed (Attachment J).

Supporting documentation

Attachment J - Section 106.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

✓ New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
None of the above

4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

✓ Noise generators were found within the threshold distances.

5. Complete the Preliminary Screening to identify potential noise generators in the

Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

✓ Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Is your project in a largely undeveloped area?

✓ No

Indicate noise level here: 74.2

Document and upload noise analysis, including noise level and data used to complete the analysis below.

Yes

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Indicate noise level here: 74.2

Document and upload noise analysis, including noise level and data used to complete the analysis below.

6. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or

effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.

✓ Mitigation as follows will be implemented:

A Noise Assessment for the site was completed. The assessment found an unacceptable level of noise of 75.7 was present at the location of the northern end of the western building due to the nearby highway. To address this level of noise, the building was arranged with the elevator lobbies on the north end of the building to provide a buffer between the highway and the residential portions of the building. Appropriate construction materials will assist in mitigating noise levels within the acceptable range.

Based on the response, the review is in compliance with this section. Document and upload drawings, specifications, and other materials as needed to describe the project's noise mitigation measures below.

No mitigation is necessary.

Screen Summary

Compliance Determination

A noise assessment was completed for the site on March 26, 2020. The combined source day-night average sound level (DNL) was calculated at three different locations based on site layout contributing noise sources. The DNLs were determined to be 71.1, 74.2 and 75.7 dB, which were categorized as normally unacceptable and unacceptable. Although one of the noise assessment locations was found to be unacceptable, HUD allows for a one decibel variance and as this is less than 76 dB it will be acceptable with approved noise attenuation. STraCAT calculations were conducted for the site and the exterior wall materials provide the necessary attenuation to bring the interior noise down to 34 dB. No further mitigation is required.

Supporting documentation

Attachment K - Noise Analysis and StraCAT.pdf

Are formal compliance steps or mitigation required?

✓ Yes

No

Sole Source Aquifers

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

✓ No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

Screen Summary

Compliance Determination

The project is not located on a sole source aquifer area. There are no sole source aquifers located in Detroit or Wayne County, Michigan. Therefore, the project is in compliance with Sole Source Aquifer requirements (Attachment L).

Supporting documentation

Attachment L - Sole Source Aquifer Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order

No

✓ Yes

2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."

✓ No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

Screen Summary
Compliance Determination

No wetlands are present on the property according to the National Wetlands Inventory Map (Attachment M).

Supporting documentation

Attachment M - Wetland Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

✓ No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.
Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary
Compliance Determination
There are no sole source aquifers located in Detroit or Wayne County, Michigan. The project is in compliance with the Wild and Scenic Rivers Act (Attachment N).

Supporting documentation

Attachment N - Wild and Scenic RIvers Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?

Yes

✓ No

Based on the response, the review is in compliance with this section.

Screen Summary

Compliance Determination

This project entails the construction of two new apartment buildings providing needed affordable and market rate housing. This project is intended to improve the present environment of low-income citizens in Detroit. The project will not have a disproportionately high adverse-effect on human health or environment of minority populations and/or low-income populations (Attachment O).

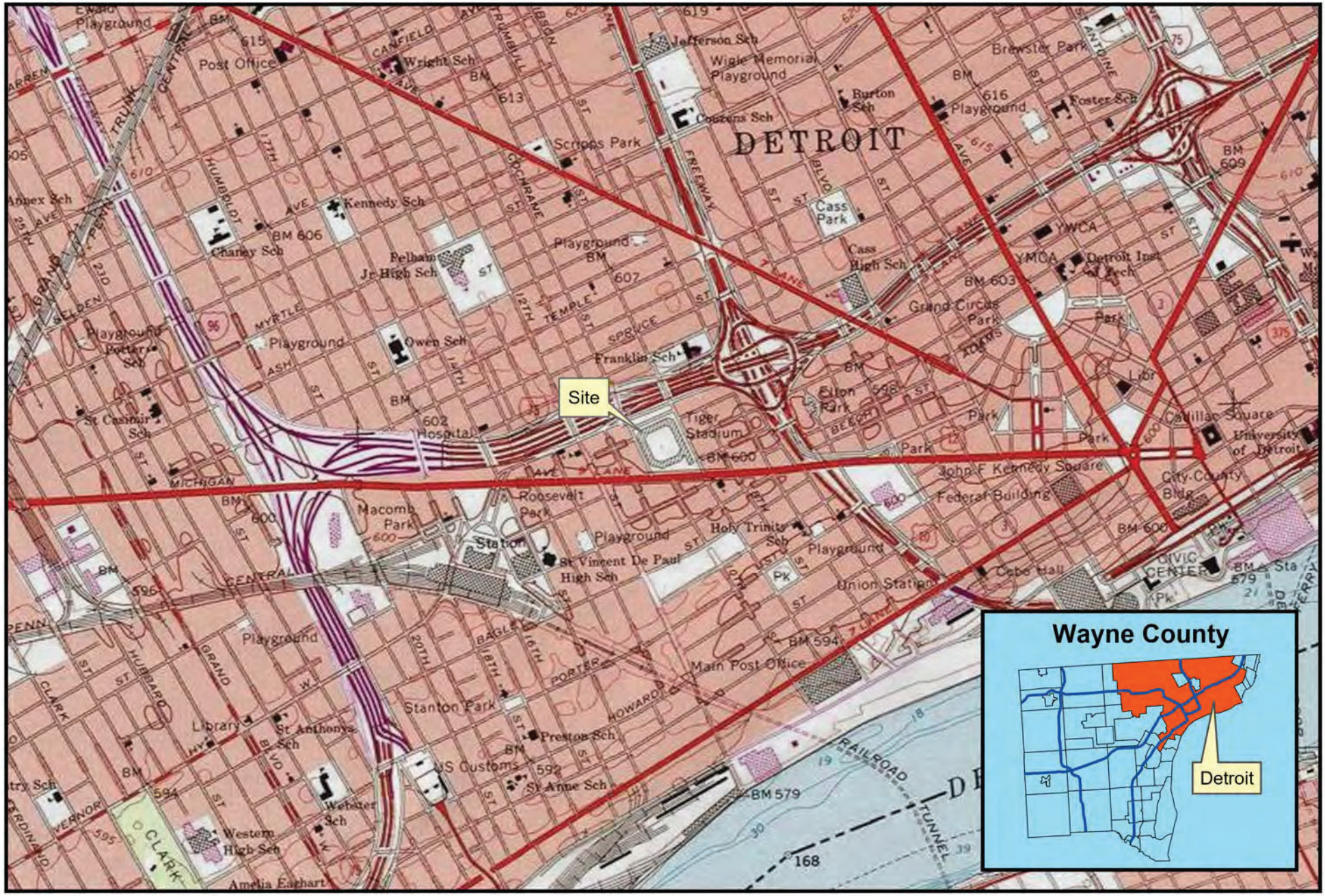
Supporting documentation

Attachment O - EPA EJ Screen.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No



Left Field

2610 Cochrane,
Detroit, MI

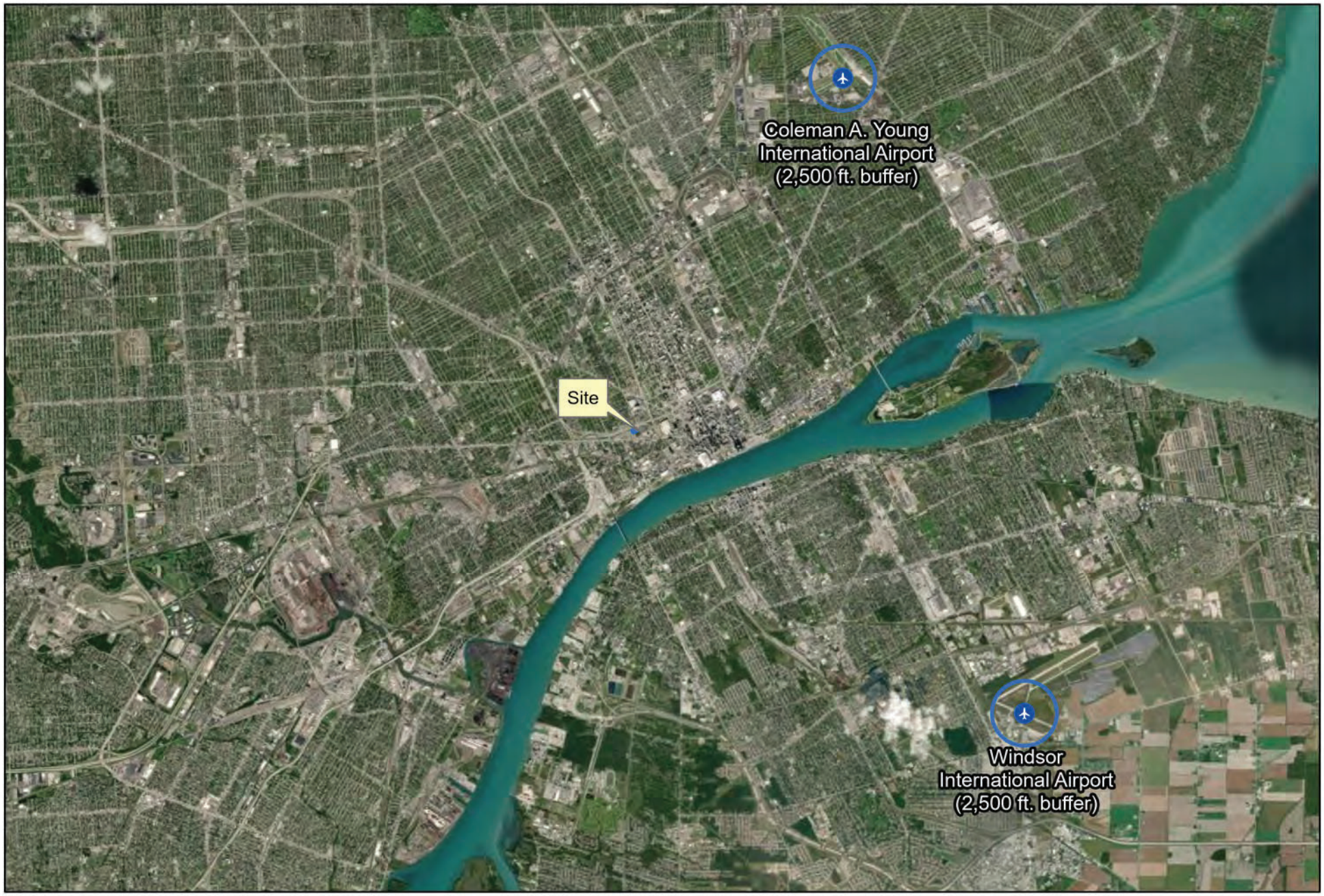
2,000 1,000 0 2,000 Feet

N

ASTI Environmental

Created for: American Community Developers
Created by: RMH, January 4, 2021, ASTI Project 2-11456

Site Location Map



Left Field

2610 Cochrane,
Detroit, MI

10,000 5,000 0 10,000
Feet

N

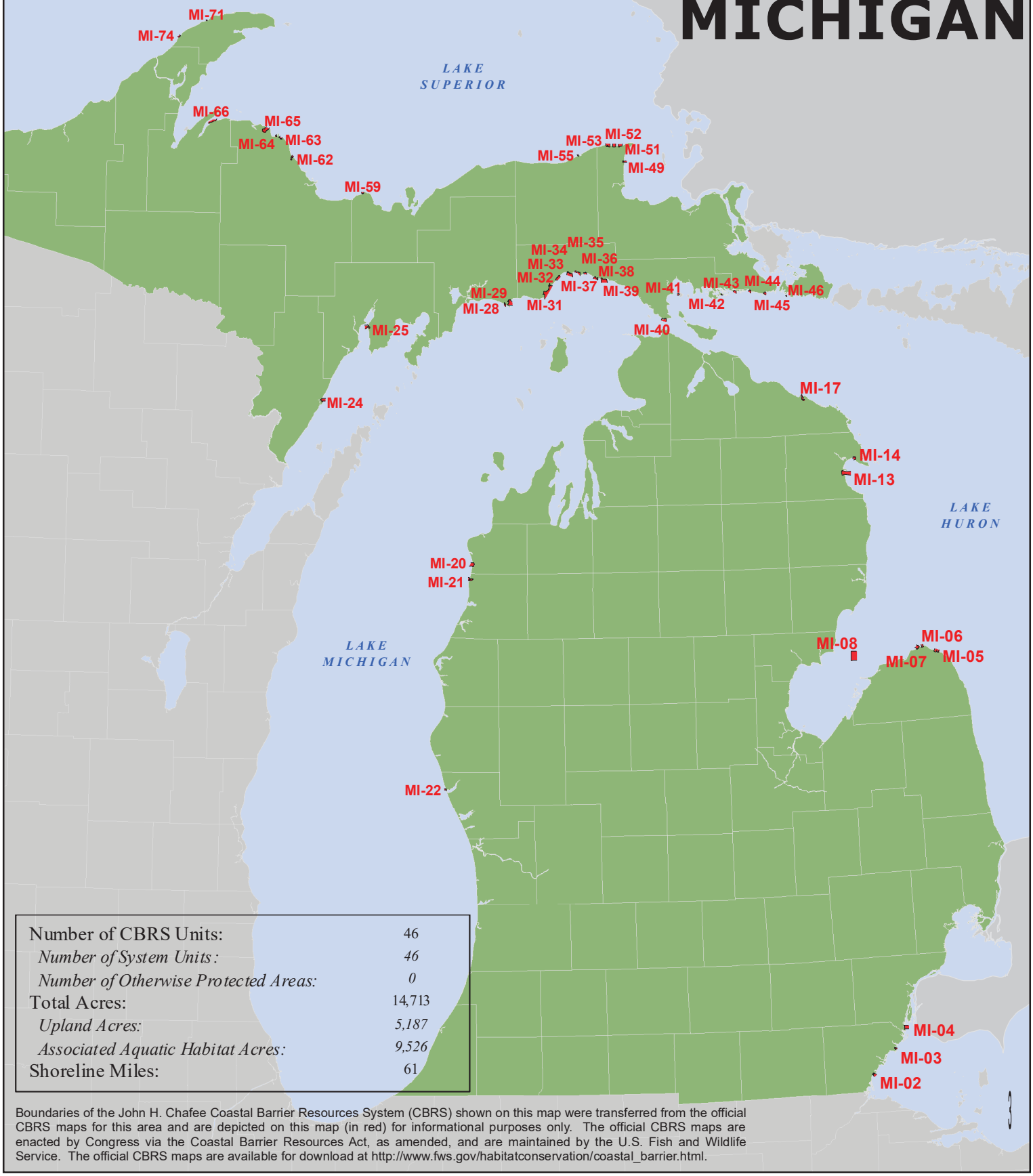
ASTi
Environmental

Created for: American Community Developers
Created by: RMH, January 4, 2021, ASTI Project 2-11456

Airport Location Map

JOHN H. CHAFEE COASTAL BARRIER RESOURCES SYSTEM

MICHIGAN



Number of CBRS Units:	46
Number of System Units:	*46*
Number of Otherwise Protected Areas:	*0*
Total Acres:	14,713
Upland Acres:	*5,187*
Associated Aquatic Habitat Acres:	*9,526*
Shoreline Miles:	61

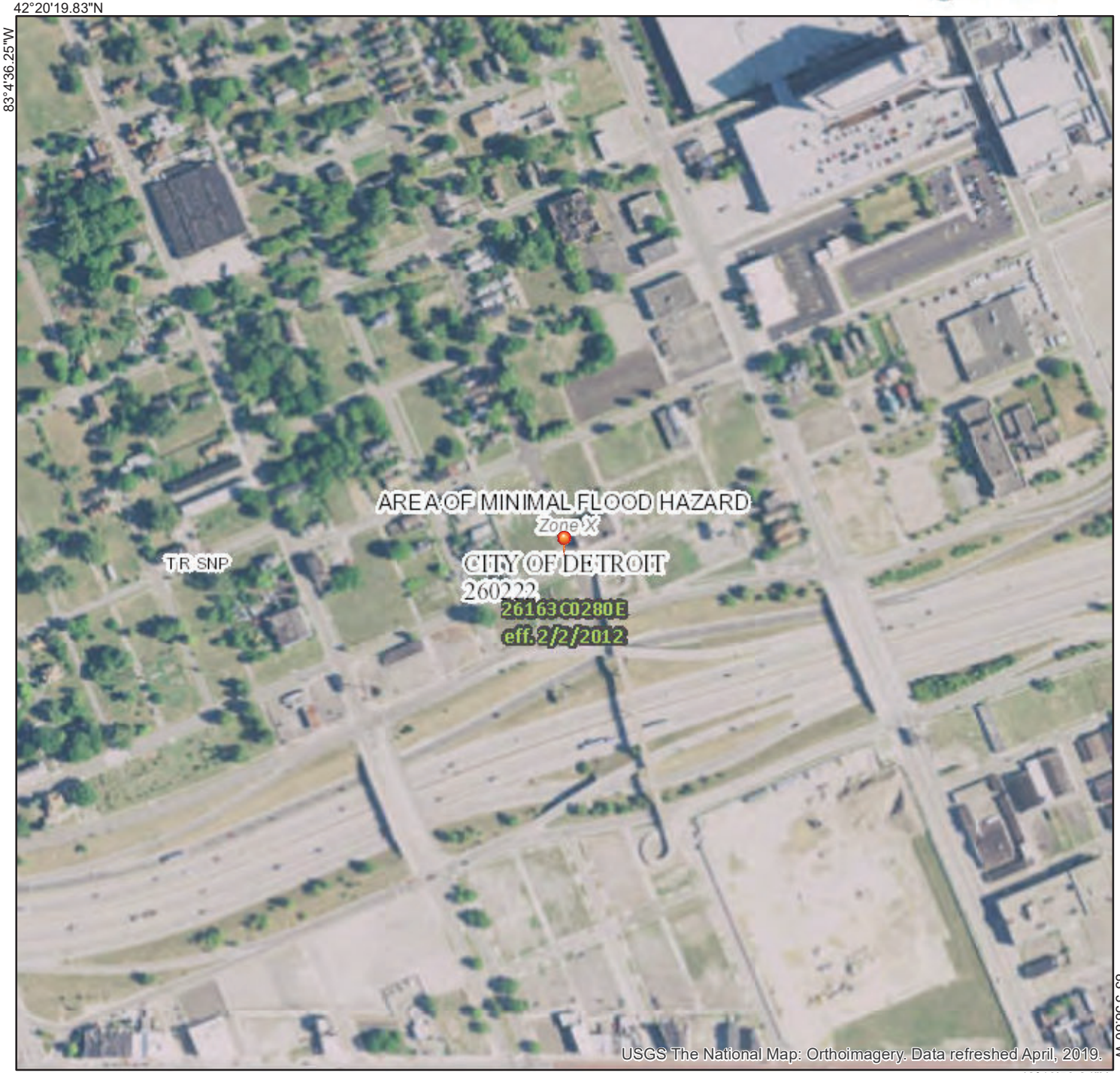
Boundaries of the John H. Chafee Coastal Barrier Resources System (CBRS) shown on this map were transferred from the official CBRS maps for this area and are depicted on this map (in red) for informational purposes only. The official CBRS maps are enacted by Congress via the Coastal Barrier Resources Act, as amended, and are maintained by the U.S. Fish and Wildlife Service. The official CBRS maps are available for download at http://www.fws.gov/habitatconservation/coastal_barrier.html.

National Flood Hazard Layer FIRMette

FEMA

42°20'19.83"N

83°4'36.25"W



83°3'58.80"W

42°19'53.24"N

Feet

0 250 500 1,000 1,500 2,000

1:6,000

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 / 17.5 Cross Sections with 1% Annual Chance / Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 3/10/2020 at 8:56:58 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING

GRETCHEN WHITMER
GOVERNOR

LIESL EICHLER CLARK
DIRECTOR

February 24, 2021

Ms. Ashleigh Czapek
ASTI Environmental
10448 Citation Drive
Brighton, Michigan 48116

Dear Ms. Czapek:

Subject: Left Field Project, City of Detroit

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) has reviewed the federal regulations related to general conformity of projects with state implementation plans (SIP) for air quality. In particular, 40 Code of Federal Regulations (CFR) Section 93.150 et seq, which states that any federally funded project in a nonattainment or maintenance area must conform to the Clean Air Act requirements including the State's SIP if they may constitute a significant new source of air pollution.

On August 3, 2018, Wayne County was designated nonattainment for the 2015 ozone standard; and thus, general conformity must be evaluated when completing construction projects of a given size and scope. EGLE is currently working to complete the required SIP submittal for this area; therefore, an alternative evaluation was completed to assess conformity. Specifically, EGLE considered the following information from the United States Environmental Protection Agency's (USEPA) general conformity guidance, which states "historical analysis of similar actions can be used in cases where the proposed projects are similar in size and scope to previous projects."

EGLE has reviewed the Left Field project proposed to be completed with federal grant monies, including the construction of two new apartment buildings: one six-story and one four-story building, for a total of 124 units. The project will be constructed just north of the former Tiger Stadium ballpark on currently vacant land at 2610 Cochrane Street in Detroit, Michigan. Project construction is expected to commence in June 2021 and will be completed prior to the end of December 2022.

In reviewing the *"Air Quality and Greenhouse Gas Study: Uptown Orange Apartments in Orange, California,"* dated December 2012, prepared for KTGY Group, Inc. by UltraSystems Environmental, Inc., it was determined that emission levels for the project were below the de minimis levels for general conformity. The Uptown Orange Apartments project and related parking structure construction was estimated to take 33 months to complete, would encompass an area of 5.57 acres, and included two four-story residential units with a total of 334 apartments, and two parking structures with a total of 494 and 679 parking stalls, respectively.

The size, scope, and duration of the Left Field construction project proposed for completion in Wayne County is much smaller in scale than the Uptown Orange Apartments project described above and should not exceed the de minimis levels included in the federal general conformity requirements. Therefore, it does not require a detailed conformity analysis.

If you have any further questions regarding this matter, please contact me at 517-648-6314; BukowskiB@Michigan.gov; or EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

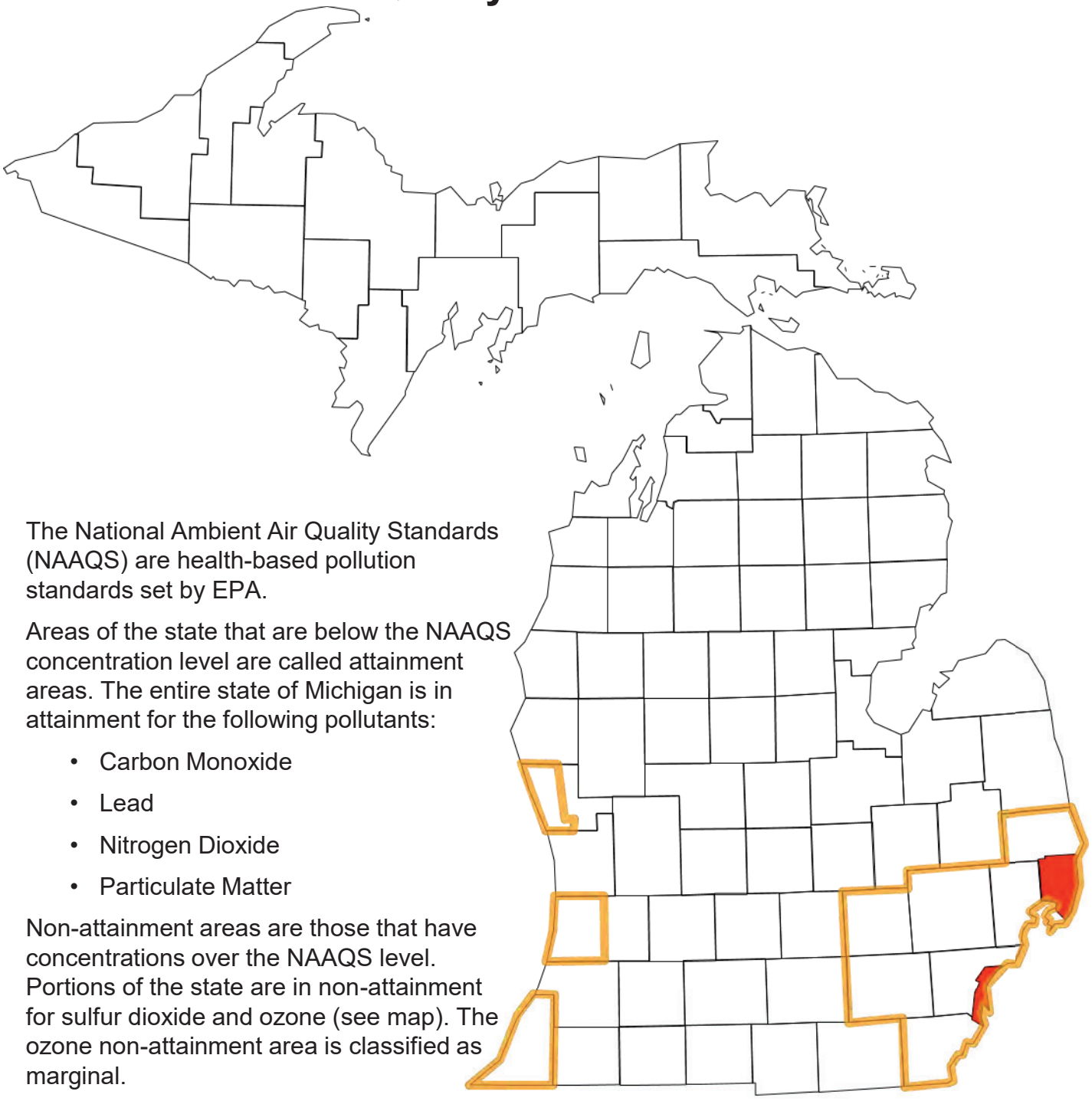
Sincerely,

Breanna Bukowski

Breanna Bukowski
Environmental Quality Analyst
Air Quality Division

cc: Mr. Michael Leslie, USEPA Region 5
Ms. Carmen E. Reverón-Rondón, U.S. Department of Housing and Urban Development
Ms. Mary Weidel, City of Detroit

Attainment Status for the National Ambient Air Quality Standards



The National Ambient Air Quality Standards (NAAQS) are health-based pollution standards set by EPA.

Areas of the state that are below the NAAQS concentration level are called attainment areas. The entire state of Michigan is in attainment for the following pollutants:

- Carbon Monoxide
- Lead
- Nitrogen Dioxide
- Particulate Matter

Non-attainment areas are those that have concentrations over the NAAQS level. Portions of the state are in non-attainment for sulfur dioxide and ozone (see map). The ozone non-attainment area is classified as marginal.

LEGEND

Sulfur Dioxide Nonattainment Area

Ozone Nonattainment Area

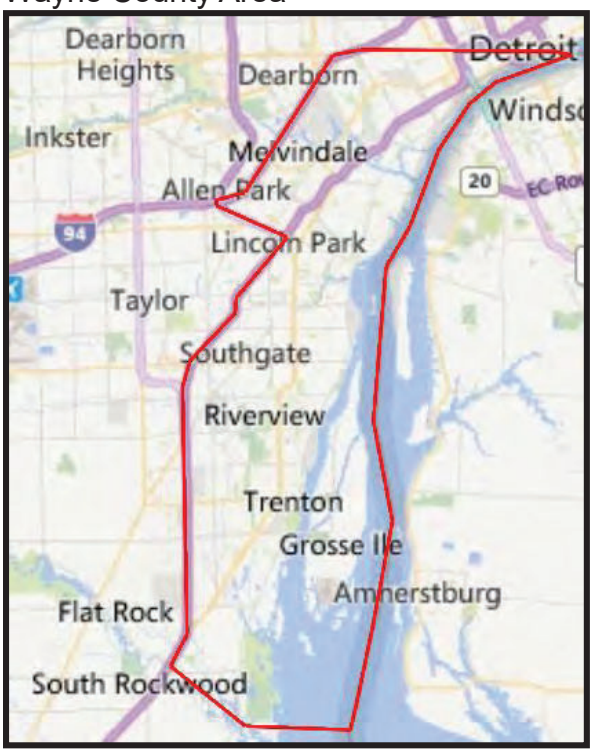
See Page 2 for close-up maps of partial county nonattainment areas

Updated July 23, 2019
Prepared by MDEQ, Air Quality Division, State Implementation Plan Unit

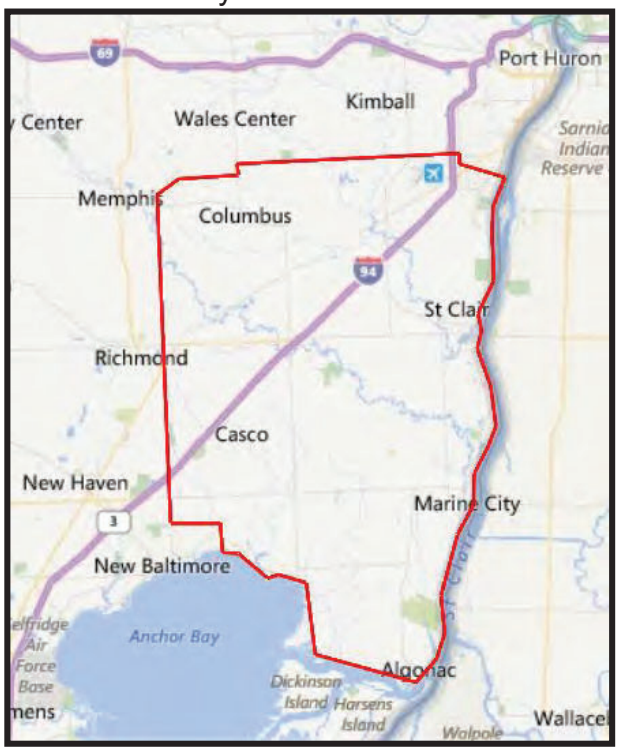
Close-Up Maps of Partial County Nonattainment Areas

Sulfur Dioxide Nonattainment Areas

Wayne County Area

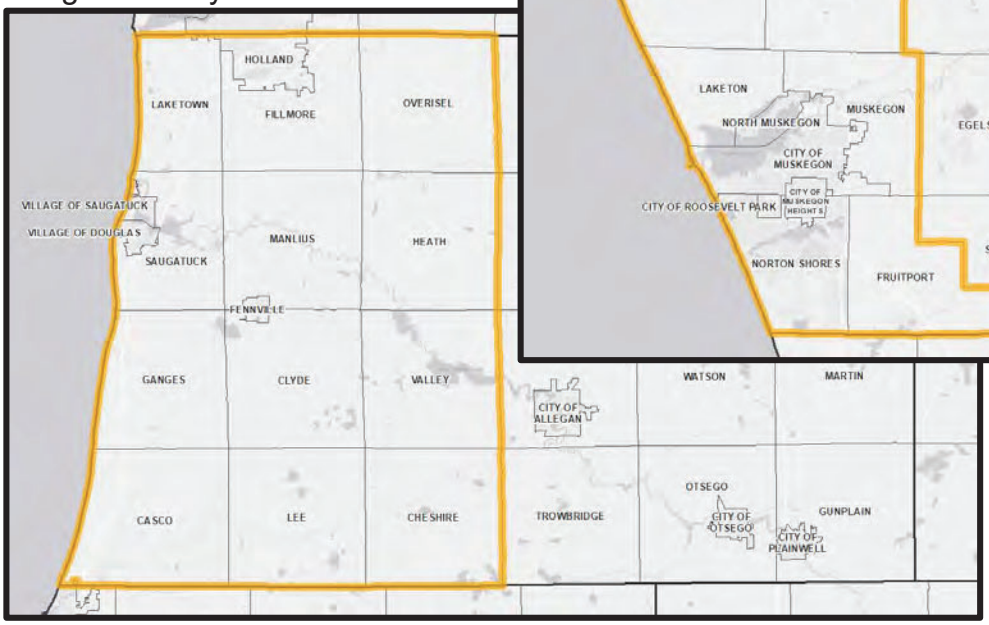


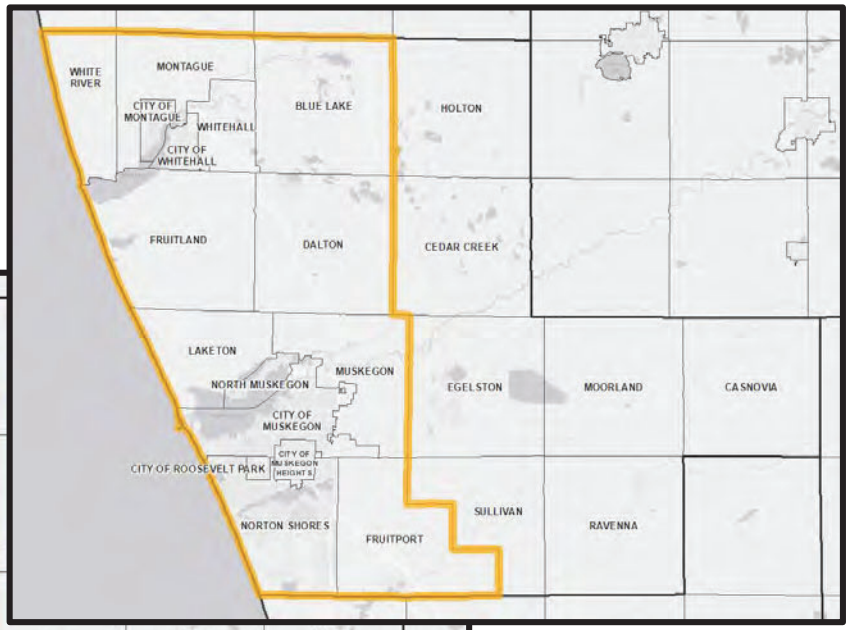
St. Clair County Area



Ozone Nonattainment Areas

Allegan County Area





Muskegon County Area

Updated July 23, 2019

Prepared by MDEQ, Air Quality Division, State Implementation Plan Unit

Wayne County
Grosse Point Township, Grosse Point Woods, Grosse Point Farms
Grosse Point, Grosse Point Park, and Detroit, T1S R14E
Detroit, T1S R14E, T2S R13E, andT2S R12E
River Rouge, T2S R11E

The heavy red line is the ***Coastal Zone Management Boundary***
The red hatched area is the ***Coastal Zone Management Area***.

Michigan
Federally-listed Endangered and Threatened Species

Updated October 2018

SPECIES	STATUS	COUNTIES	HABITAT
MAMMALS			
Canada lynx *(Lynx canadensis)*	Threatened	**Current distribution:** A Canada lynx was recently documented in the Upper Peninsula. The counties listed here have the highest potential for Lynx presence: Alger, Baraga, Chippewa, Delta, Dickinson, Gogebic, Houghton, Iron, Keweenaw, Luce, Mackinac, Marquette, Menominee, Ontonagon, Schoolcraft.	Northern forests
Gray wolf *Canis lupus*	Endangered	Alger, Baraga, Chippewa, Delta, Dickinson, Gogebic, Houghton, Iron, Keweenaw, Luce, Mackinac, Marquette, Menominee, Ontonagon, Schoolcraft	Northern forested areas
Indiana bat *(Myotis sodalis)*	Endangered	Allegan, Barry, Bay, Benzie, Berrien, Branch, Calhoun, Cass, Clinton, Eaton, Genesee, Gratiot, Hillsdale, Ingham, Ionia, Jackson, Kalamazoo, Kent, Lapeer, Leelanau, Lenawee, Livingston, Macomb, Manistee, Mason, Monroe, Montcalm, Muskegon, Oakland, Oceana, Ottawa, Saginaw, St. Joseph, Sanilac, Shiawassee, St. Clair, Tuscola, Van Buren, Washtenaw, and Wayne	Summer habitat includes small to medium river and stream corridors with well developed riparian woods; woodlots within 1 to 3 miles of small to medium rivers and streams; and upland forests. Caves and mines as hibernacula.
Northern long-eared bat *Myotis septentrionalis*	Threatened	Statewide	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. Roosts and forages in upland forests during spring and summer.
BIRDS			
Kirtland's warbler *Setophaga kirtlandii*	Endangered	Alcona, Alger, Antrim, Baraga, Chippewa, Clare, Crawford, Delta, Grand Traverse, Iosco, Kalkaska, Luce, Marquette, Montmorency, Ogemaw, Oscoda, Otsego, Presque Isle, Roscommon, Schoolcraft	Breeding in young jack pine
Piping plover *(Chradrius melodus)*	Endangered	Alger, Alpena, Benzie, Berrien, Charlevoix, Cheboygan, Chippewa, Delta, Emmet, Leelanau, Luce, Mackinac, Manistee, Mason, Muskegon, Presque Isle, Schoolcraft	Beaches along shorelines of the Great Lakes
Piping plover *(Chradrius melodus)*	Critical Habitat	Alger, Benzie, Charlevoix, Cheboygan, Chippewa, Emmet, Iosco, Leelanau, Luce, Mackinac, Mason, Muskegon, Presque Isle, Schoolcraft	Beaches along shorelines of the Great Lakes

SPECIES	STATUS	COUNTIES	HABITAT
Rufa Red knot *(Calidris canutus rufa)*	Threatened	**Only actions that occur along coastal areas during the Red Knot migratory window of MAY 1 - SEPTEMBER 30 for the following counties:** Alcona, Alger, Allegan, Alpena, Antrim, Arenac, Baraga, Bay, Benzie, Berrien, Charlevoix, Cheboygan, Chippewa, Delta, Emmet, Gogebic, Grand Traverse, Houghton, Huron, Iosco, Keweenaw, Leelanau, Luce, Mackinac, Macomb, Manistee, Marquette, Mason, Menominee, Monroe, Muskegon, Oceana, Ontonagon, Ottawa, Presque Isle, Sanilac, Schoolcraft, St. Clair, Tuscola, Van Buren, Wayne **Only actions that occur in large wetland complexes during the Red knot migratory window of MAY 1 - SEPTEMBER 30 for the following counties:** Midland, Saginaw, Shiawassee	Coastal areas and large wetland complexes
Whooping crane ** (*Grus americanus*)	Non-essential experimental population	Allegan, Barry, Berrien, Jackson, Kent, Lenawee, Macomb, Oceana, Ottawa	Open wetlands and lakeshores
REPTILES			
Copperbelly water snake *(Nerodia erythrogaster neglecta)*	Threatened	Branch, Calhoun, Cass, Eaton, Hillsdale, St. Joseph	Wooded and permanently wet areas such as oxbows, sloughs, brushy ditches and floodplain woods
Eastern massasauga (*Sistrurus catenatus*)	Threatened	Alcona, Allegan, Alpena, Antrim, Arenac, Barry, Berrien, Branch, Calhoun, Cass, Cheboygan, Clare, Clinton, Crawford, Eaton, Emmett, Genesee, Grand Traverse, Hillsdale, Huron, Ingham, Ionia, Iosco, Jackson, Kalamazoo, Kalkaska, Kent, Lake, Lapeer, Lenawee, Livingston, Mackinac, Macomb, Manistee, Mason, Missaukee, Montcalm, Montmorency, Muskegon, Newaygo, Oakland, Oscoda, Presque Isle, Saginaw, St. Joseph, Shiawassee, Van Buren, Washtenaw, Wayne	Graminoid dominated plant communities (fens, sedge meadows, peatlands, wet prairies) open woodlands and shrublands
INSECTS			
Hine's emerald dragonfly *(Somatochlora hineana)*	Endangered	Alcona, Alpena, Mackinac, Menominee, Presque Isle	Spring fed wetlands, wet meadows and marshes; calcareous streams & associated wetlands overlying dolomite bedrock
Hungerford's crawling water beetle *(Brychius hungerfordi)*	Endangered	Charlevoix, Cheboygan, Crawford, Emmet, Montmorency, Oscoda, Otsego, Presque Isle	Cool riffles of clean, slightly alkaline streams; known to occur in five streams in northern Michigan.
Karner blue butterfly *(Lycaeides melissa samuelis)*	Endangered	Allegan, Ionia, Kent, Lake, Mason, Mecosta, Monroe, Montcalm, Muskegon, Newaygo, Oceana	Pine barrens and oak savannas on sandy soils and containing wild lupines *(Lupinus perennis)*, the only known food plant of larvae.
Mitchell's satyr *(Neonympha mitchellii mitchellii)*	Endangered	Barry, Berrien, Branch, Cass, Jackson, Kalamazoo, St. Joseph, Van Buren, Washtenaw	Fens; wetlands characterized by calcareous soils which are fed by carbonate-rich water from seeps and springs

SPECIES	STATUS	COUNTIES	HABITAT
Poweshiek skipperling (*Oarisma poweshiek*)	Endangered Critical Habitat	Hillsdale, Jackson, Lenawee, Livingston, Oakland, and Washtenaw Maps of proposed critical habitat in Michigan at www.fws.gov/midwest/endangered/insects/posk/fCHmaps/poskchMI.pdf	Wet prairie and fens
MUSSELS			
Clubshell *(Pleurobema clava)*	Endangered	Hillsdale	Found in coarse sand and gravel areas of runs and riffles within streams and small rivers
Northern riffleshell *(Epioblasma torulosa rangiana)*	Endangered	Monroe, Sanilac, Wayne	Large streams and small rivers in firm sand of riffle areas; also occurs in Lake Erie
Rayed Bean (*Villosa fabalis*)	Endangered	Oakland, St. Clair	Belle, Black, Clinton and Pine Rivers
Snuffbox (*Epioblasma triquetra*)	Endangered	Gratiot, Ionia, Kent, Livingston, Oakland, St. Clair, Washtenaw	Small to medium-sized creeks in areas with a swift current and some larger rivers
PLANTS			
American hart's tongue fern *(Asplenium scolopendrium* var. *americanun = Phyllitis japonica* ssp. *a.)*	Threatened	Chippewa, Mackinac	Cool limestone sinkholes in mature hardwood forest
Dwarf lake iris *(Iris lacustris)*	Threatened	Alpena, Charlevoix, Cheboygan, Chippewa, Delta, Emmet, Mackinac, Menominee, Presque Isle, Schoolcraft	Partially shaded sandy-gravelly soils on lakeshores
Eastern prairie fringed orchid *(Plantathera leucophaea)*	Threatened	Bay, Cheboygan, Clinton, Eaton, Genesee, Gratiot, Huron, Livingston, Monroe, Saginaw, St. Clair, St. Joseph, Tuscola, Washtenaw, Wayne	Mesic to wet prairies and meadows
Houghton's goldenrod *(Solidago houghtonii)*	Threatened	Charlevoix, Cheboygan, Chippewa, Crawford, Emmet, Kalkaska, Mackinac, Presque Isle, Schoolcraft	Sandy flats along Great Lakes shores
Lakeside daisy *(Hymenoxy acaulis var. glabra)*	Threatened	Mackinac	Dry, rocky prairie grassland underlain by limestone
Michigan monkey-flower *(Mimulus michiganesis)*	Endangered	Benzie, Charlevoix, Cheboygan, Emmet, Leelanau, Mackinac	Soils saturated with cold flowing spring water; found along seepages, streams and lakeshores
Pitcher's thistle *(Cirsium pitcheri)*	Threatened	Alcona, Alger, Allegan, Alpena, Antrim, Arenac, Benzie, Berrien, Charlevoix, Cheboygan, Chippewa, Delta, Emmet, Grand Traverse, Huron, Iosco, Leelanau, Mackinac, Manistee, Mason, Muskegon, Oceana, Ottawa, Presque Isle, Schoolcraft, Van Buren	Stabilized dunes and blowout areas

SPECIES	STATUS	COUNTIES	HABITAT
Small whorled pogonia *(Isotria medeoloides*)	Threatened	Berrien	Dry woodland; upland sites in mixed forests (second or third growth stage)

Acceptable Separation Distance (ASD) Electronic Assessment Tool

The Environmental Planning Division (EPD) has developed an electronic-based assessment tool that calculates the Acceptable Separation Distance (ASD) from stationary hazards. The ASD is the distance from above ground stationary containerized hazards of an explosive or fire prone nature, to where a HUD assisted project can be located. The ASD is consistent with the Department's standards of blast overpressure (0.5 psi-buildings) and thermal radiation (450 BTU/ft^2 - hr - people and 10,000 BTU/ft^2 - hr - buildings). Calculation of the ASD is the first step to assess site suitability for proposed HUD-assisted projects near stationary hazards. Additional guidance on ASDs is available in the Department's guidebook "Siting of HUD- Assisted Projects Near Hazardous Facilities" and the regulation 24 CFR Part 51, Subpart C, Sitting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature.

Note: Tool tips, containing field specific information, have been added in this tool and may be accessed by hovering over the ASD result fields with the mouse.

Acceptable Separation Distance Assessment Tool

Is the container above ground?	**Yes:** ☑ **No:** ☐
Is the container under pressure?	**Yes:** ☐ **No:** ☑
Does the container hold a cryogenic liquified gas?	**Yes:** ☐ **No:** ☐
Is the container diked?	**Yes:** ☐ **No:** ☑
What is the volume (gal) of the container?	8000
What is the Diked Area Length (ft)?	
What is the Diked Area Width (ft)?	
Calculate Acceptable Separation Distance	
Diked Area (sqft)	

ASD for Blast Over Pressure (ASDBOP)	
ASD for Thermal Radiation for People (ASDPPU)	657.70
ASD for Thermal Radiation for Buildings (ASDBPU)	131.49
ASD for Thermal Radiation for People (ASDPNPD)	
ASD for Thermal Radiation for Buildings (ASDBNPD)	

For mitigation options, please click on the following link: Mitigation Options **(/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/)**

Providing Feedback & Corrections

After using the ASD Assessment Tool following the directions in this User Guide, users are encouraged to provide feedback on how the ASD Assessment Tool may be improved. Users are also encouraged to send comments or corrections for the improvement of the tool.

Please send comments or other input using the **Contact Us (https://www.hudexchange.info/contact-us/)** form.

Related Information

- **ASD User Guide (/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/)**
- **ASD Flow Chart (/resource/3840/acceptable-separation-distance-asd-flowchart/)**

Acceptable Separation Distance (ASD) Electronic Assessment Tool

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Acceptable Separation Distance Assessment Tool

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Is the container under pressure?	**Yes:** ☑ **No:** ☐
Does the container hold a cryogenic liquified gas?	**Yes:** ☑ **No:** ☐
Is the container diked?	**Yes:** ☐ **No:** ☑
What is the volume (gal) of the container?	13500
What is the Diked Area Length (ft)?	
What is the Diked Area Width (ft)?	
Calculate Acceptable Separation Distance	
Diked Area (sqft)	

ASD for Blast Over Pressure (ASDBOP)	
ASD for Thermal Radiation for People (ASDPPU)	817.89
ASD for Thermal Radiation for Buildings (ASDBPU)	167.48
ASD for Thermal Radiation for People (ASDPNPD)	
ASD for Thermal Radiation for Buildings (ASDBNPD)	

For mitigation options, please click on the following link: Mitigation Options **(/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/)**

Providing Feedback & Corrections

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Related Information

- **ASD User Guide (/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/)**
- **ASD Flow Chart (/resource/3840/acceptable-separation-distance-asd-flowchart/)**

Left Field

2610 Cochrane,
Detroit, MI

ASTI Environmental

Created for: American Community Developers
Created by: RMH, January 21, 2021, ASTI Project 2-11456

Acceptable Separation Distance Map

Soil Map—Wayne County, Michigan
(Left Field)

Map Scale: 1:789 if printed on A landscape (11" x 8.5") sheet.

N

Meters
0 10 20 40 60

Feet
0 35 70 140 210

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 17N WGS84

MAP LEGEND

Area of Interest (AOI)
- Area of Interest (AOI)

Soils
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points

Special Point Features
- Blowout
- Borrow Pit
- Clay Spot
- Closed Depression
- Gravel Pit
- Gravelly Spot
- Landfill
- Lava Flow
- Marsh or swamp
- Mine or Quarry
- Miscellaneous Water
- Perennial Water
- Rock Outcrop
- Saline Spot
- Sandy Spot
- Severely Eroded Spot
- Sinkhole
- Slide or Slip
- Sodic Spot
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

Water Features
- Streams and Canals

Transportation
- Rails
- Interstate Highways
- US Routes
- Major Roads
- Local Roads

Background
- Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:12,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Wayne County, Michigan
Survey Area Data: Version 6, Jun 1, 2020

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: May 31, 2014—Jun 7, 2014

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
MidaaA	Midtown gravelly-artifactual sandy loam, 0 to 2 percent slopes	1.0	77.9%
UrbapB	Urban land-Fortress family complex, dense substratum, 0 to 4 percent slopes	0.1	7.7%
UrbarB	Urban land-Riverfront complex, dense substratum, 0 to 4 percent slopes	0.2	14.3%
Totals for Area of Interest		**1.3**	**100.0%**

Housing and Revitalization Department
CITY OF DETROIT

Coleman A. Young Municipal Center
2 Woodward Avenue. Suite 908
Detroit, Michigan 48226

Phone: 313.224.6380
Fax: 313.224.1629
www.detroitmi.gov

March 31, 2021

Ashleigh Czapek
ASTI Environmental
10448 Citation Drive
Brighton, Michigan 48116

RE: **Section 106 Review of the City of Detroit HOME Funded Left Field New Construction Project Located at 2610 Cochrane Street in the City of Detroit, Wayne County, Michigan (Section 106 ID #42767)**

Dear Ashleigh,

In accordance with the National Historic Preservation Act (NHPA) of 1966, as amended, and the "Programmatic Agreement between the Michigan State Historic Preservation Office and the City of Detroit, Michigan…," dated November 9, 2016, as amended by a First Amendment to Programmatic Agreement dated May 4, 2020, the City of Detroit has reviewed the above-cited project and has determined it to be an undertaking as defined by 36 CFR 800.16(y).

Based on the information submitted to this office on February 19, 2021 by ASTI Environmental, we have concurred with their recommendation that there are no properties listed or eligible for listing in the National Register of Historic Places (NRHP) located with the Area of Potential Effects for the undertaking. Therefore, we also concur with the recommendation that ***no historic properties will be affected*** by this undertaking.

Additionally, per Stipulation VI.C and VII of Programmatic Agreement (PA), the proposed undertaking qualifies for review by the State Historic Preservation Office (SHPO) archaeologist since the site is larger than ½-acre and will include ground disturbing activities. A report was submitted to the SHPO for review electronically on February 26, 2021. In an email dated March 2, 2021, the SHPO Archaeologist determined the following:

"Thank you for providing this project for our review. We concur with ***No Historic Properties Affected***."

Although no archaeological sites were found on file, during ground disturbing activities, if artifacts or bones are discovered, work will be halted and the Preservation Specialist will be contacted immediately for further guidance on how to proceed.

Please be advised that this Section 106 review is not a substitute for a review for the Local Historic District Commission or for projects applying for Federal Historic Preservation Tax Credits. These reviews are conducted independently of the Section 106 review process. If you have any questions you may Preservation Specialist by email at

rschumak@detroitmi.gov. Please reference the project name and Section 106 ID number in all communications with this office.

Sincerely,

Ryan M. Schumaker
Lead Preservation Specialist
City of Detroit
Housing & Revitalization Department

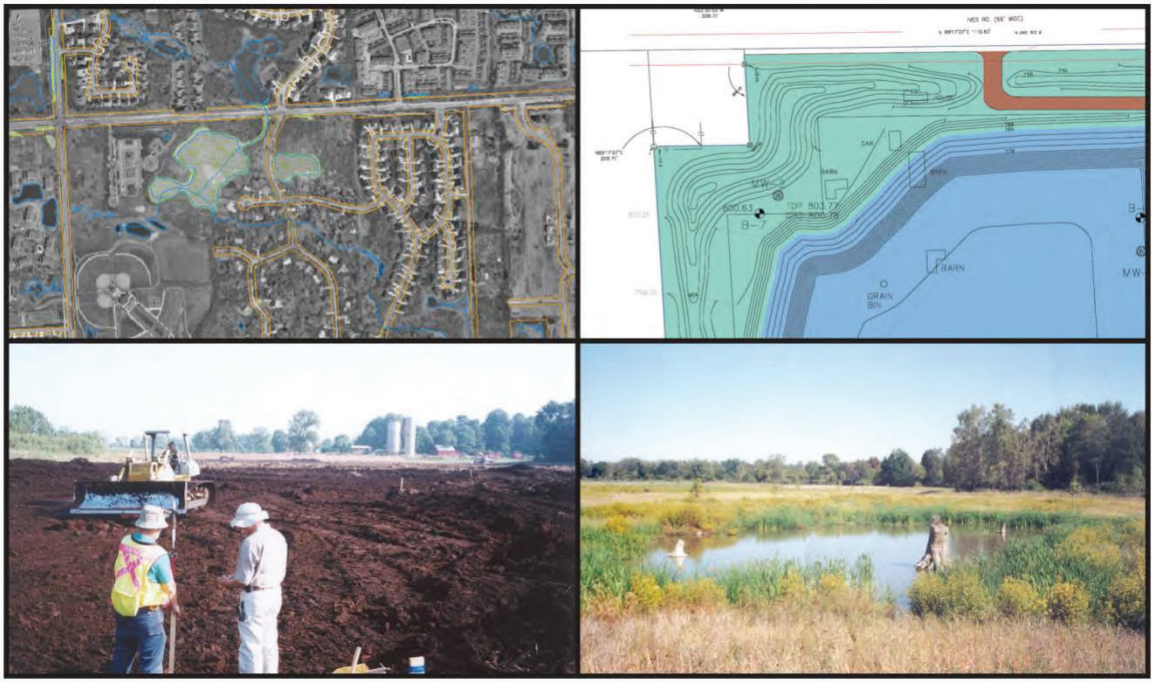
Cc: File
Penny Dwoinen, HRD
Kim Siegel, HRD
Tiffany Rakotz, HRD
Kenneth Ertman, American Community Developers
Larry Catrinar, HRD
Zach Ormsby, HRD

Noise Assessment
Left Field
2610 Chochrane
Detroit, Michigan

American Community Developers

March 26, 2020

ASTI ENVIRONMENTAL



ASTI ENVIRONMENTAL

Noise Assessment
Left Field
2610 Cochrane
Detroit, Michigan

March 26, 2020

Report Prepared For:

American Community Developers
20250 Harper Ave.
Harper Woods, Michigan 48225

Report Prepared By:

ASTI Environmental
10448 Citation Drive, Suite 100
Brighton, Michigan 48116
800-395-ASTI

ASTI Project No. 11456

Report Prepared by:

Ashleigh Czapek
Associate I

Report Reviewed by:

Pamela Chapman, PE, EP
Phase I Group Leader

ENVIRONMENTAL

TABLE OF CONTENTS

1.0 INTRODUCTION

American Community Developers proposes the new construction utilizing funding provided from the Michigan State Housing Development Authority (MSHDA) of the Left Field Residences at 2610 Cochrane, Detroit, Michigan, referred to herein as “Subject Property”.

This assessment was conducted to provide the noise level and associated noise category at each designated Noise Assessment Location (NAL) at the Subject Property. This assessment does not include an evaluation of noise attenuation but general guidance is provided at the end of this assessment.

This evaluation was conducted per guidelines set forth in 24 CFR 51B. This noise analysis evaluates the Subject Property’s exposure to three major sources of noise: aircraft, roadways, and railways. If identified, additional non-transportation noise sources such as loud impulse sounds from nearby industry are also evaluated.

The following three sources of transportation noise and their applicable search distances are outlined below when evaluating noise at a site.

1. Aircraft - All military and FAA-regulated civil airfields within 15 miles of the Subject Property.
2. Roadways - Major roadways and limited access highways/freeways within 1,000 feet of the Subject Property utilizing a 10-year projection. Roadways considered are generally based on number of lanes, speed limit, presence of stop signs or lights, overall traffic counts, and/or number of medium or heavy trucks.
3. Railroad - All active railroads within 3,000 feet of the Subject Property.

The noise level calculated at a NAL is known as the day-night average sound level or DNL. A calculated DNL can fall within three categories as follows.

1. Acceptable - DNL not exceeding 65 decibels (dB)
2. Normally Unacceptable - DNL above the 65 dB threshold but not exceeding 75 dB
3. Unacceptable - DNL above 75 dB

Three NALs (NAL #1, NAL #2 and NAL #3) were selected on the Subject Property for this analysis based on proximity to noise sources. A map with the Subject Property boundaries and NAL locations is included as Attachment A.

The following is a summary of the applicable noise sources identified at the NALs.

NAL #1

Noise Source with Applicable Distance	Name	Distance to NAL
Airport(s)	Coleman A Young International Airport	5.5 miles
	Windsor International Airport	6.5 miles
Busy Road(s)	W. Fisher Service Dr.	54 feet
	I-75 off ramp to the Lodge	130 feet
	I-75	308 feet
	I-75 on ramp from the Lodge	477 feet
	Trumbull	574 feet
	Rosa Parks Blvd.	687 feet
	Michigan Ave.	690 feet
Railroad(s)	None	NA
Non-Transportation	None	NA

NAL #2

Noise Source with Applicable Distance	Name	Distance to NAL
Airport(s)	Coleman A Young International Airport	5.5 miles
	Windsor International Airport	6.5 miles
Busy Road(s)	W. Fisher Service Dr.	77 feet
	I-75 off ramp to the Lodge	151 feet
	I-75	320 feet
	I-75 on ramp from the Lodge	487 feet
	Trumbull	485 feet
	Michigan Ave.	676 feet
	Rosa Parks Blvd.	758 feet
Railroad(s)	None	NA
Non-Transportation	None	NA

NAL #3

Noise Source with Applicable Distance	Name	Distance to NAL
Airport(s)	Coleman A Young International Airport	5.5 miles
	Windsor International Airport	6.5 miles
Busy Road(s)	W. Fisher Service Dr.	198 feet
	I-75 off ramp to the Lodge	275 feet

Noise Source with Applicable Distance	Name	Distance to NAL
	I-75	450 feet
	Trumbull	576 feet
	Michigan Ave.	559 feet
	I-75 on ramp from the Lodge	619 feet
	Rosa Parks Blvd.	661 feet
Railroad(s)	None	NA
Non-Transportation	None	NA

2.0 EVALUATION OF NOISE SOURCES

2.1 Airports

Coleman A. Young International Airport is approximately 5.5 miles distant. Based on the Noise Contour Map for the airport (Attachment B), the site is not within a distance of concern.

Windsor International Airport is approximately 6.5 miles distant. Based on the Noise Contour Map for the airport (Attachment B), the site is not within a distance of concern.

Other small airfields were identified within 15 miles, but these airfields have no commercial traffic and are not likely FAA-regulated. They are not considered to represent a noise concern.

2.2 Busy Roadways

The major roadways are:

- W. Fisher Service Dr.
- I-75 (plus on and off ramps)
- Trumbull
- Rosa Parks Blvd.
- Michigan Ave.

W. Fisher Service Dr. is a 2-lane one-way road heading east and the speed limit is 25 mph near the Subject Property. The roadway is an approximate effective distance of 54 feet from the northwestern corner of the proposed residential building (NAL #1).

The I-75 off ramp to the Lodge is a 2-lane one-way road heading east and the speed limit is 40 mph near the Subject Property. The roadway is an approximate effective distance of 130 feet from the northwestern corner of the proposed residential building (NAL #1).

I-75 is a 6-lane highway and the speed limit is 55 mph near the Subject Property. The highway is an approximate effective distance of 308 feet from the northwestern corner of the proposed residential building (NAL #1).

The I-75 on ramp from the Lodge is a 2-lane one-way road heading west and the speed limit is 40 mph near the Subject Property. The roadway is an approximate effective distance of 477 feet from the northwestern corner of the proposed residential building (NAL #1).

Trumbull is a 4-lane road with a center turn lane and the speed limit is 35 mph near the Subject Property. The roadway is an approximate effective distance of 485 feet from the northeastern corner of the proposed lobby building (NAL #2).

Rosa Parks Blvd. is a 4-lane road and the speed limit is 30 mph near the Subject Property. The roadway is an approximate effective distance of 661 feet from the southwestern corner of the proposed residential building (NAL #3).

Michigan Ave. is a 4-lane road with a center turn lane and the speed limit is 35 mph near the Subject Property. The roadway is an approximate effective distance of 559 feet from the southwestern corner of the proposed residential building (NAL #3).

Traffic counts for roadways were obtained through MDOT. Projections were done through 2030. A growth rate of 1% per year compounded was judged appropriate as traffic levels are expected to remain relatively stable. Traffic projections are included in Attachment C.

2.3 Railroads

Not applicable.

2.4 Non-Transportation Sources

Not applicable.

3.0 CALCULATIONS

A Noise DNL calculator worksheet for the NALs are provided in Attachment D.

Using the HUD DNL calculator, the noise level at NAL #1, as predicted in 2030, is calculated to be 75.7 dB and within the Unacceptable range. However, HUD allows for a one decibel variance and as this is less than 76 dB it will be acceptable with approved noise attenuation.

Using the HUD DNL calculator, the noise level at NAL #2, as predicted in 2030, is calculated to be 74.2 dB and within the Normally Unacceptable range.

Using the HUD DNL calculator, the noise level at NAL #3, as predicted in 2030, is calculated to be 71.1 dB and within the Normally Unacceptable range.

4.0 CONCLUSIONS

The following is a summary of the findings of this assessment.

NAL #	Combined Source DNL (dB)	Category
1	75.7	Unacceptable
2	74.2	Normally Unacceptable
3	71.1	Normally Unacceptable

5.0 REFERENCES

- 24 CFR Part 51 Subpart B
- The Noise Guidebook, U.S. Department of Housing and Urban Development,
- U.S. DOT
- https://mdot.ms2soft.com/
- https://www.hudexchange.info/programs/environmental-review/dnl-calculator/

HUD ATTENUATION GUIDANCE

https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/

All sites whose environmental or community noise exposure exceeds the day night average sound level (DNL) of 65 decibels (dB) are considered noise-impacted areas. For new construction that is proposed in high noise areas, grantees shall incorporate noise attenuation features to the extent required by HUD environmental criteria and standards contained in Subpart B (Noise Abatement and Control) of 24 CFR Part 51. The interior standard is 45 dB.

The "Normally Unacceptable" noise zone includes community noise levels from above 65 dB to 75 dB. Approvals in this noise zone require a minimum of 5 dB additional sound attenuation for buildings having noise-sensitive uses if the day-night average sound level is greater than 65 dB but does not exceed 70 dB, or a minimum of 10 dB of additional sound attenuation if the day-night average sound level is greater than 70 dB but does not exceed 75 dB.

Locations with day-night average noise levels above 75 dB have “Unacceptable” noise exposure. For new construction, noise attenuation measures in these locations require the approval of the Assistant Secretary for Community Planning and Development (for projects reviewed under Part 50) or the Responsible Entity’s Certifying Officer (for projects reviewed under Part 58). The acceptance of such locations normally requires an environmental impact statement.

The environmental review record should contain **one** of the following:

- Documentation the proposed action is not within 1000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles of a military or FAA-regulated civil airfield.
- If within those distances, documentation showing the noise level is *Acceptable* (at or below 65 DNL).
- If within those distances, documentation showing that there’s an effective noise barrier (i.e., that provides sufficient protection).

- Documentation showing the noise generated by the noise source(s) is *Normally Unacceptable (66 – 75 DNL)* and identifying noise attenuation requirements that will bring the interior noise level to 45 DNL and/or exterior noise level to 65 DNL.

ATTACHMENT A

NAL Location Map

Service Layer Credits: Google Earth

Left Field

2610 Cochrane,
Detroit, MI

0 37.5 75 150 Feet

N

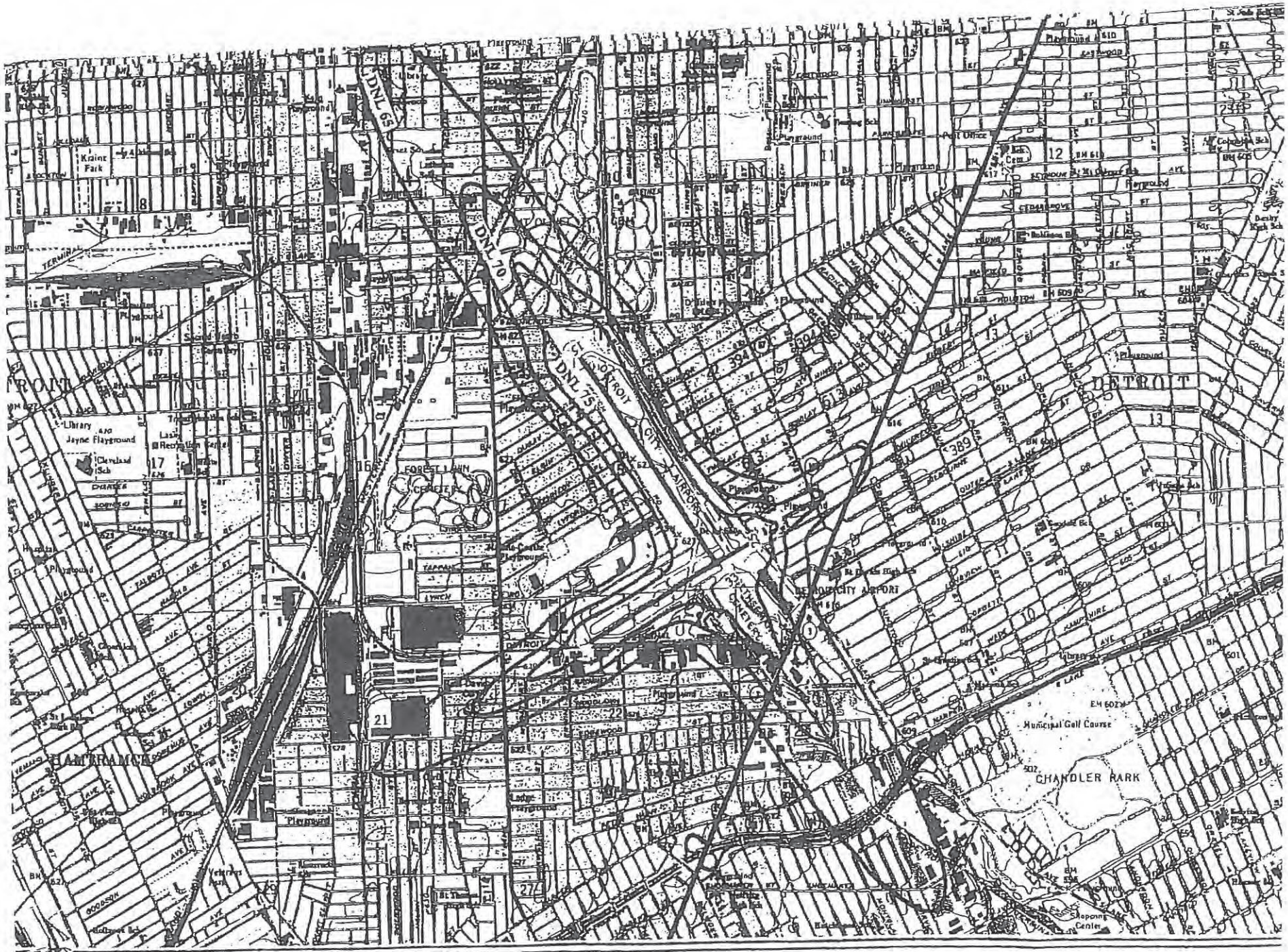
ASTI Environmental

Client: American Community Developers
Created by: RMH, March 27, 2020, ASTI Project 11456

Noise Assessment Location Map

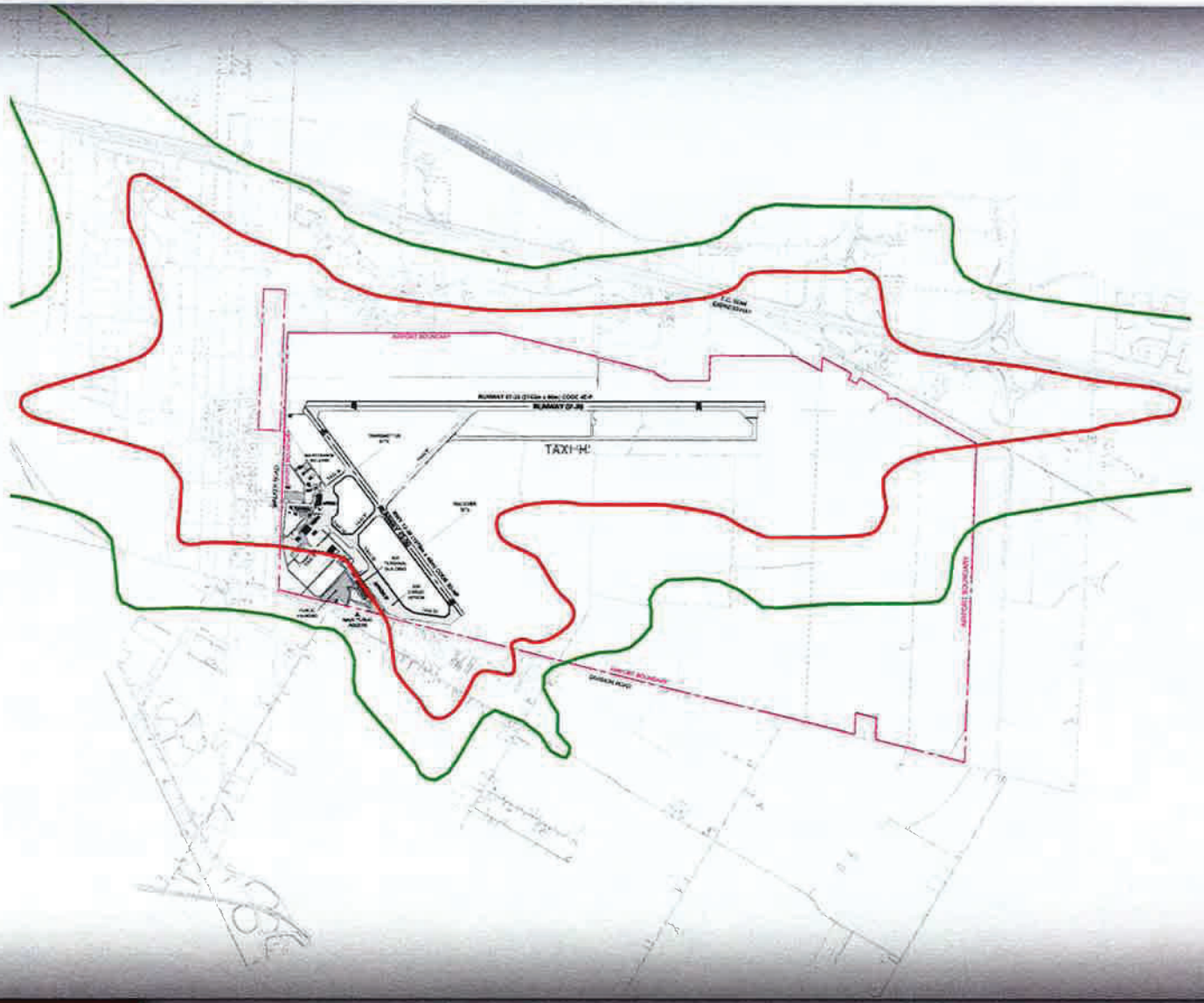
ATTACHMENT B

Airport Noise Contour Maps



CITY OF DETROIT
AIRPORT DEPARTMENT

1996 BASE
NOISE EXPOSURE CONTOURS



WINDSOR AIRPORT MASTER PLAN

FIGURE 3-4 - AIRPORT NOISE EXPOSURE FORECAST CONTOURS

30 NEF (NOISE EXPOSURE FORECAST)

25 NEF

Notes

1. Conceptual Layout
2. All dimensions approximate
3. Noise Exposure Forecast provided by Windsor Airport Management

YQG YOUR QUICK GATEWAY
WINDSOR INTERNATIONAL AIRPORT

DILLON CONSULTING

Base data provided by City of Windsor Official Plan
Map created by EDH
Map checked by EGL

File Location: \\20dillon.dillon.ca\toronto data\PROJECTS\DRAFT\09\092665 Windsor Airport Master Plan

Map Projection: n/aTAXI 'H'

Project #: 09-2665
Status: n/a
Date: December 2010

N E W S

ATTACHMENT C

AADT Information

Auto and Heavy Truck 10-year ADT Projections

W. Fisher Service Drive

	Cars	% Change	Trucks	% Change
2016	8278		719.84	
2017	8618	4.1	749.36	4.1
2018	8618	0.0	749.36	0.0
2019	8574	-0.5	745.6	-0.5
	% Change/Year Assumption	1	**%/Year Change Assumption**	1

2030 Projections

	Cars	Trucks
2019	8574	746
2020	8660	753
2021	8747	761
2022	8834	768
2023	8923	776
2024	9012	784
2025	9102	791
2026	9193	799
2027	9285	807
2028	9378	815
2029	9471	824
2030	9566	832

Predicted 2030 Auto ADT	Predicted 2030 Truck ADT
9566	832

Auto and Heavy Truck 10-year ADT Projections

I-75 off ramp to the Lodge

	Cars	% Change	Trucks	% Change
2015	13464		1664.08	
2016	13464	0.0	1664.08	0.0
2017	13612	1.1	1682.34	1.1
2018	12074	-11.3	1492.26	-11.3
2019	12013	-0.5	1484.78	-0.5
	Avg % change:	-2.7	Avg % change:	-2.68
	Avg % change (Last 5-yr Trend):	-2.7	Avg % change (Last 5-yr Trend):	-2.68
	% Change/Year Assumption	1	**%/Year Change Assumption**	1

2030 Projections

	Cars	Trucks
2019	12013	1485
2020	12133	1500
2021	12255	1515
2022	12377	1530
2023	12501	1545
2024	12626	1561
2025	12752	1576
2026	12880	1592
2027	13009	1608
2028	13139	1624
2029	13270	1640
2030	13403	1657

Predicted 2030 Auto ADT	Predicted 2030 Truck ADT
13403	1657

Auto and Heavy Truck 10-year ADT Projections

I-75

	Cars	% Change	Trucks	% Change
2014	95693		11827.2	
2015	75027	-21.6	9273	-21.6
2016	73252	-2.4	9053.66	-2.4
2017	74058	1.1	9153.21	1.1
2018	74058	0.0	9153.21	0.0
	Avg % change:	0.0	Avg % change:	-5.72
	Avg % change (Last 5-yr Trend):	-5.7	Avg % change (Last 5-yr Trend):	-5.72
	% Change/Year Assumption	1	**%/Year Change Assumption**	1

2030 Projections

	Cars	Trucks
2018	74058	9153
2019	74798	9245
2020	75546	9337
2021	76302	9431
2022	77065	9525
2023	77835	9620
2024	78614	9716
2025	79400	9813
2026	80194	9912
2027	80996	10011
2028	81806	10111
2029	82624	10212
2030	83450	10314

Predicted 2030 Auto ADT	Predicted 2030 Truck ADT
83450	10314

Auto and Heavy Truck 10-year ADT Projections

I-75 On-ramp from the Lodge

	Cars	% Change	Trucks	% Change
2015	18548		2292.51	
2016	17638	-4.9	2179.98	-4.9
2017	17832	1.1	2203.96	1.1
2018	11478	-35.6	1418.67	-35.6
	% Change/Year Assumption	1	**%/Year Change Assumption**	1

2030 Projections

	Cars	Trucks
2018	11478	1419
2019	11593	1433
2020	11709	1447
2021	11826	1462
2022	11944	1476
2023	12064	1491
2024	12184	1506
2025	12306	1521
2026	12429	1536
2027	12554	1552
2028	12679	1567
2029	12806	1583
2030	12934	1599

Predicted 2030 Auto ADT	Predicted 2030 Truck ADT
12934	1599

Auto and Heavy Truck 10-year ADT Projections

Trumbull Ave.

	Cars	% Change	Trucks	% Change
2016	7156		622.24	
2017	7449	4.1	647.76	4.1
2018	7449	0.0	647.76	0.0
2019	7412	-0.5	644.56	-0.5
	% Change/Year Assumption	1	**%/Year Change Assumption**	1

2030 Projections

	Cars	Trucks
2019	7412	645
2020	7487	651
2021	7561	658
2022	7637	664
2023	7713	671
2024	7791	677
2025	7868	684
2026	7947	691
2027	8027	698
2028	8107	705
2029	8188	712
2030	8270	719

Predicted 2030 Auto ADT	Predicted 2030 Truck ADT
8270	719

Auto and Heavy Truck 10-year ADT Projections

Rosa Parks Blvd.

	Cars	% Change	Trucks	% Change
2016	22806		1983.12	
2017	8595	-62.3	747.36	-62.3
2018	8595	0.0	747.36	0.0
2019	10109	17.6	879.04	17.6
	% Change/Year Assumption	1	**%/Year Change Assumption**	1

2030 Projections

	Cars	Trucks
2019	10109	879
2020	10210	888
2021	10312	897
2022	10415	906
2023	10519	915
2024	10625	924
2025	10731	933
2026	10838	942
2027	10947	952
2028	11056	961
2029	11167	971
2030	11278	981

Predicted 2030 Auto ADT	Predicted 2030 Truck ADT
11278	981

Auto and Heavy Truck 10-year ADT Projections

Michigan Avenue (US-12)

	Cars	% Change	Trucks	% Change
2017	11707		1018	
2018	11707	0.0	1018	0.0
2019	11648	-0.5	1012.88	-0.5
	% Change/Year Assumption	1	%/Year Change Assumption	1

2030 Projections

	Cars	Trucks
2019	11648	1013
2020	11765	1023
2021	11882	1033
2022	12001	1044
2023	12121	1054
2024	12242	1065
2025	12365	1075
2026	12488	1086
2027	12613	1097
2028	12739	1108
2029	12867	1119
2030	12995	1130

Predicted 2030 Auto ADT	Predicted 2030 Truck ADT
12995	1130

ATTACHMENT D

Day-Night Level Electronic Assessments

DNL Calculator

WARNING: HUD recommends the use of Microsoft Internet Explorer for performing noise calculations. The HUD Noise Calculator has an error when using Google Chrome unless the cache is cleared before each use of the calculator. HUD is aware of the problem and working to fix it in the programming of the calculator.

The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the **Day/Night Noise Level Calculator Electronic Assessment Tool Overview (/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/)**.

Guidelines

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- **Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- **Note #2:** DNL Calculator assumes roadway data is always entered.

DNL Calculator

Site ID	11456
Record Date	03/25/2020
User's Name	ASTI Environmental NAL 1

Road # 1 Name:	**W. Fisher Service Dr.**

Road #1

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	54	54	54
Distance to Stop Sign	35	35	35
Average Speed	25	25	25
Average Daily Trips (ADT)	9566	416	416
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	52.5236	58.9072	72.9826
Calculate Road #1 DNL	73.225	Reset	

Road # 2 Name: **I-75 off ramp to the Lodge**

Road #2

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	130	130	130
Distance to Stop Sign			
Average Speed	40	40	40
Average Daily Trips (ADT)	13403	1355	302
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	60.5147	60.5621	63.3158
Calculate Road #2 DNL	66.4271	Reset	

Road # 3 Name: **I-75**

Road # 3 Name:	I-75

Road #3

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	308	308	308
Distance to Stop Sign			
Average Speed	55	55	55
Average Daily Trips (ADT)	83450	8441	1873
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	65.6039	65.6536	66.4293
Calculate Road #3 DNL	70.6689	Reset	

Road # 4 Name:	I-75 on ramp from the Lodge

Road #4

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	477	477	477
Distance to Stop Sign			
Average Speed	40	40	40
Average Daily Trips (ADT)	12934	1308	291
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	51.8914	51.9402	54.686
Calculate Road #4 DNL	57.8009	Reset	

Calculate Road #4 DNL	57.8009	Reset

Road # 5 Name:	**Trumbull**

Road #5

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	574	574	574
Distance to Stop Sign			
Average Speed	35	35	35
Average Daily Trips (ADT)	8270	360	359
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	47.5834	43.9714	54.3922
Calculate Road #5 DNL	55.5537	Reset	

Road # 6 Name:	**Rosa Parks Blvd.**

Road #6

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	687	687	687
Distance to Stop Sign			
Average Speed	30	30	30
Average Daily Trips (ADT)	11278	491	490
Night Fraction of ADT	15	15	15
Road Gradient (%)			2

Road Gradient (%)			2
Vehicle DNL	46.4211	42.8096	54.5725
Calculate Road #6 DNL	55.4655	Reset	

Road # 7 Name:	**Michigan Ave.**

Road #7

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	690	690	690
Distance to Stop Sign			
Average Speed	35	35	35
Average Daily Trips (ADT)	12995	565	565
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	48.3471	44.7298	55.1626
Calculate Road #7 DNL	56.3225	Reset	

Add Road Source | Add Rail Source

Airport Noise Level	
Loud Impulse Sounds?	○ **Yes** ◉ **No**
Combined DNL for all Road and Rail sources	**75.7465**
Combined DNL including Airport	**N/A**

	N/A
Site DNL with Loud Impulse Sound	

Calculate

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative**: Cancel the project at this location
- **Other Reasonable Alternatives**: Choose an alternate site
- **Mitigation**
  - **Contact your Field or Regional Environmental Officer (/programs/environmental-review/hud-environmental-staff-contacts/)**
  - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
  - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
  - Incorporate natural or man-made barriers. See ***The Noise Guidebook (/resource/313/hud-noise-guidebook/)***
  - Construct noise barrier. See the **Barrier Performance Module (/programs/environmental-review/bpm-calculator/)**

Tools and Guidance

Day/Night Noise Level Assessment Tool User Guide (/resource/3822/day-night-noise-level-assessment-tool-user-guide/)

Day/Night Noise Level Assessment Tool Flowcharts (/resource/3823/day-night-noise-level-assessment-tool-flowcharts/)

DNL Calculator

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The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the **Day/Night Noise Level Calculator Electronic Assessment Tool Overview (/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/)**.

Guidelines

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- **Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- **Note #2:** DNL Calculator assumes roadway data is always entered.

DNL Calculator

Site ID	11456
Record Date	03/25/2020
User's Name	ASTI Environmental NAL 2

Road # 1 Name:	**W. Fisher Service Dr.**

Road #1

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	77	77	77
Distance to Stop Sign	35	35	35
Average Speed	25	25	25
Average Daily Trips (ADT)	9566	416	416
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	50.2121	56.5957	70.6712
Calculate Road #1 DNL	70.9136	Reset	

Road # 2 Name: **I-75 off ramp to the Lodge**

Road #2

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	151	151	151
Distance to Stop Sign			
Average Speed	40	40	40
Average Daily Trips (ADT)	13403	1355	302
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	59.5392	59.5866	62.3403
Calculate Road #2 DNL	65.4516	Reset	

Road # 3 Name: **I-75**

Road # 3 Name:	I-75

Road #3

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	320	320	320
Distance to Stop Sign			
Average Speed	55	55	55
Average Daily Trips (ADT)	83450	8441	1873
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	65.3549	65.4046	66.1803
Calculate Road #3 DNL	70.4199	Reset	

Road # 4 Name:	I-75 on ramp from the Lodge

Road #4

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	487	487	487
Distance to Stop Sign			
Average Speed	40	40	40
Average Daily Trips (ADT)	12934	1308	291
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	51.7563	51.805	54.5509
Calculate Road #4 DNL	57.6658	Reset	

Calculate Road #4 DNL	57.6658	Reset

Road # 5 Name:	**Trumbull**

Road #5

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	485	485	485
Distance to Stop Sign			
Average Speed	35	35	35
Average Daily Trips (ADT)	8270	360	359
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	48.681	45.0689	55.4897
Calculate Road #5 DNL	56.6512	Reset	

Road # 6 Name:	**Rosa Parks Blvd.**

Road #6

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	758	758	758
Distance to Stop Sign			
Average Speed	30	30	30
Average Daily Trips (ADT)	11278	491	490
Night Fraction of ADT	15	15	15
Road Gradient (%)			2

Road Gradient (%)			2
Vehicle DNL	45.7804	42.1689	53.9318
Calculate Road #6 DNL	54.8248	Reset	

Road # 7 Name:	**Michigan Ave.**

Road #7

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	676	676	676
Distance to Stop Sign			
Average Speed	35	35	35
Average Daily Trips (ADT)	12995	565	565
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	48.4806	44.8633	55.2962
Calculate Road #7 DNL	56.456	Reset	

Add Road Source | Add Rail Source

Airport Noise Level	
Loud Impulse Sounds?	○ **Yes** ◉ **No**
Combined DNL for all Road and Rail sources	**74.2807**
Combined DNL including Airport	**N/A**

	N/A
Site DNL with Loud Impulse Sound	

Calculate

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative**: Cancel the project at this location
- **Other Reasonable Alternatives**: Choose an alternate site
- **Mitigation**
  - **Contact your Field or Regional Environmental Officer (/programs/environmental-review/hud-environmental-staff-contacts/)**
  - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
  - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
  - Incorporate natural or man-made barriers. See ***The Noise Guidebook (/resource/313/hud-noise-guidebook/)***
  - Construct noise barrier. See the **Barrier Performance Module (/programs/environmental-review/bpm-calculator/)**

Tools and Guidance

Day/Night Noise Level Assessment Tool User Guide (/resource/3822/day-night-noise-level-assessment-tool-user-guide/)

Day/Night Noise Level Assessment Tool Flowcharts (/resource/3823/day-night-noise-level-assessment-tool-flowcharts/)

DNL Calculator

WARNING: HUD recommends the use of Microsoft Internet Explorer for performing noise calculations. The HUD Noise Calculator has an error when using Google Chrome unless the cache is cleared before each use of the calculator. HUD is aware of the problem and working to fix it in the programming of the calculator.

The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the **Day/Night Noise Level Calculator Electronic Assessment Tool Overview (/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/)**.

Guidelines

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- **Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- **Note #2:** DNL Calculator assumes roadway data is always entered.

DNL Calculator

Site ID	11456
Record Date	03/25/2020
User's Name	ASTI Environmental NAL 3

Road # 1 Name:	**W. Fisher Service Dr.**

Road #1

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	198	198	198
Distance to Stop Sign	35	35	35
Average Speed	25	25	25
Average Daily Trips (ADT)	9566	416	416
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	44.0595	50.4431	64.5186
Calculate Road #1 DNL	64.761	Reset	

Road # 2 Name: **I-75 off ramp to the Lodge**

Road #2

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	275	275	275
Distance to Stop Sign			
Average Speed	40	40	40
Average Daily Trips (ADT)	13403	1355	302
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	55.6339	55.6813	58.435
Calculate Road #2 DNL	61.5463	Reset	

Road # 3 Name: **I-75**

Road # 3 Name:	I-75

Road #3

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	450	450	450
Distance to Stop Sign			
Average Speed	55	55	55
Average Daily Trips (ADT)	83450	8441	1873
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	63.134	63.1837	63.9593
Calculate Road #3 DNL	68.199	Reset	

Road # 4 Name:	I-75 on ramp from the Lodge

Road #4

Vehicle Type	Cars	Medium Trucks	Heavy Trucks
Effective Distance	619	619	619
Distance to Stop Sign			
Average Speed	40	40	40
Average Daily Trips (ADT)	12934	1308	291
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	50.1938	50.2426	52.9885
Calculate Road #4 DNL	56.1034	Reset	

Calculate Road #4 DNL	56.1034	Reset

Road # 5 Name:	**Trumbull**

Road #5

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	574	574	574
Distance to Stop Sign			
Average Speed	35	35	35
Average Daily Trips (ADT)	8270	360	359
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	47.5834	43.9714	54.3922
Calculate Road #5 DNL	55.5537	Reset	

Road # 6 Name:	**Rosa Parks Blvd.**

Road #6

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	661	661	661
Distance to Stop Sign			
Average Speed	30	30	30
Average Daily Trips (ADT)	11278	491	490
Night Fraction of ADT	15	15	15
Road Gradient (%)			2

Road Gradient (%)			2
Vehicle DNL	46.6724	43.0609	54.8238
Calculate Road #6 DNL	55.7168	Reset	

Road # 7 Name:	**Michigan Ave.**

Road #7

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	559	559	559
Distance to Stop Sign			
Average Speed	35	35	35
Average Daily Trips (ADT)	12995	565	565
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	49.7186	46.1013	56.5342
Calculate Road #7 DNL	57.694	Reset	

Add Road Source | Add Rail Source

Airport Noise Level	
Loud Impulse Sounds?	○ **Yes** ◉ **No**
Combined DNL for all Road and Rail sources	**71.138**
Combined DNL including Airport	**N/A**

	N/A
Site DNL with Loud Impulse Sound	

Calculate

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative**: Cancel the project at this location
- **Other Reasonable Alternatives**: Choose an alternate site
- **Mitigation**
  - **Contact your Field or Regional Environmental Officer (/programs/environmental-review/hud-environmental-staff-contacts/)**
  - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
  - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
  - Incorporate natural or man-made barriers. See ***The Noise Guidebook (/resource/313/hud-noise-guidebook/)***
  - Construct noise barrier. See the **Barrier Performance Module (/programs/environmental-review/bpm-calculator/)**

Tools and Guidance

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Sound Transmission Classification Assessment Tool (STraCAT)

Overview

The Sound Transmission Classification Assessment Tool (STraCAT) is an electronic version of Figures 17 and 19 in The HUD Noise Guidebook. The purpose of this tool is to document sound attenuation performance of wall systems. Based on wall, window, and door Sound Transmission Classification (STC) values, the STraCAT generates a composite STC value for the wall assembly as a whole. Users can enter the calculated noise level related to a specific Noise Assessment Location in front of a building façade and STraCAT will generate a target required attenuation value for the wall assembly in STC. Based on wall materials, the tool will state whether the composite wall assembly STC meets the required attenuation value.

How to Use This Tool

Location, Noise Level and Wall Configuration to Be Analyzed
STraCAT is designed to calculate the attenuation provided by the wall assembly for one wall of one unit. If unit exterior square footage and window/door configuration is identical around the structure, a single STraCAT may be sufficient. If units vary, at least one STraCAT should be completed for each different exterior unit wall configuration to document that all will achieve the required attenuation. Additionally, if attenuation is not based on a single worst-case NAL, but there are multiple NALs which require different levels of attenuation around the structure, a STraCAT should be completed for each differing exterior wall configuration associated with each NAL.

Exterior wall configurations associated with an NAL include those with parallel (facing) or near-parallel exposure as well as those with perpendicular exposure. When a façade has parallel or perpendicular exposure to two or more NALs, you should base the required attenuation on the NAL with the highest calculated noise level. For corner units where the unit interior receives exterior noise through two facades, the STraCAT calculation should incorporate the area of wall, window and door materials pertaining to the corner unit's total exterior wall area (i.e., from both walls).

Information to Be Entered
Users first enter basic project information and the NAL noise level that will be used as the basis for required attenuation. This noise level must be entered in whole numbers. STraCAT users then enter information on wall, window and door component type and area. Again, as noted above, the wall, window and door entries are based on one unit, and one wall (except for corner units as discussed above). The tool sums total wall square footage based on the combined area of walls, doors and windows for the façade being evaluated.

Users may input STC values for materials in one of two ways. The tool includes a dropdown menu

of common construction materials with STC values prefilled. If selected construction materials are not included in this dropdown menu, the user may also enter the STC for a given component manually. Verification of the component STC must be included in the ERR. Documentation includes the architect or construction manager's project plans showing wall material specifications. For new construction or for components that will be newly installed in an existing wall, documentation also includes the manufacturer's product specification sheet (cut sheet) documenting the STC rating of selected doors and windows.

Required STC Rating and Determination of Compliance
Finally, based on project information entered the tool will indicate the required STC rating for the wall assembly being evaluated and whether or not the materials specified will produce a combined rating that meets this requirement. Note that for noise levels above 75 dB DNL, either HUD (for 24 CFR Part 50 reviews) or the Responsible Entity (for 24 CFR Part 58 reviews) must approve the level and type of attenuation, among other processing requirements. Required attenuation values generated by STraCAT for NALs above 75 dB DNL should therefore be considered tentative pending approval by HUD or the RE.

Part I - Description

Part I - Description

Project

Left Field

Sponsor/Developer

ACD

Location

1680 Michigan Ave, Detroit, MI 48216

Prepared by

Trent James

Noise Level

76

Date

3/12/2021

Primary Source(s)

Road, Train, Airport

Part II - Wall Components

Part II - Wall Components

Wall Construction Detail	Area	STC
4" face brick one course; 1/2" air space; 3/4" insulation board; 2"x4" wood studs 16"O.C.; 1/2" gypsum board on resilient channels; 3 1/2" fiber glass insulation	11149	**56**
7/8" stucco; #15 building paper and wire mesh; 2"x4" wood studs 16"O.C.; 1/2" gypsum board on resilient channels; 3 1/2" fiber glass insulation	11507	**57**

Select a Diagram Enter my Own

Add new wall

	22,656 Sq. Feet	**56.48**

Window Construction Detail	Quantity	Sq Ft/Unit	STC
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	99	**10**	**31**
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	99	**10**	**31**
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	99	**10**	**31**
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	99	**10**	**31**
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	99	**10**	**31**
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	99	**10**	**31**
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	99	**10**	**31**

Add new window

Window Construction Detail	Quantity	Sq Ft/Unit	STC
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	99	10	31
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	99	10	31
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	99	10	31
30"x48" wood-framed aluminum clad casement window one 3/32" and one 1/8" glass panels 13/16" air space	31	10	31
6'x5' wood-framed picture window single panel glazed double strength with storm sash 3 3/4" air space	77	30	38

Add new window

Door Construction Detail	Quantity	Sq Ft/Unit	STC
6'x6' sliding glass door 3/4" insulating glass (double pane 1/8" each with 1/2" air space) one door opens and one fixed	3	36	28
3'x7' solid-core wood door 1 3/4" thick; aluminum storm door glazed single strength	18	21	34

Add new door

Part III - Results

Part III - Results

Wall Statistics

Stat	Value
Area:	22656 ft²
Wall STC:	56.48

Aperture Statistics

Aperture	Count	Area	% of wall
Windows:	1,098	**ft²**	**55.26%**
Doors:	21	**486 ft²**	**2.15%**

Evaluation Criteria

Criteria	Value
Noise source sound level (dB):	**76**
Combined STC for wall assembly:	**34.1**
Required STC rating:	**34**
Does wall assembly meet requirements?	**Yes**

Print

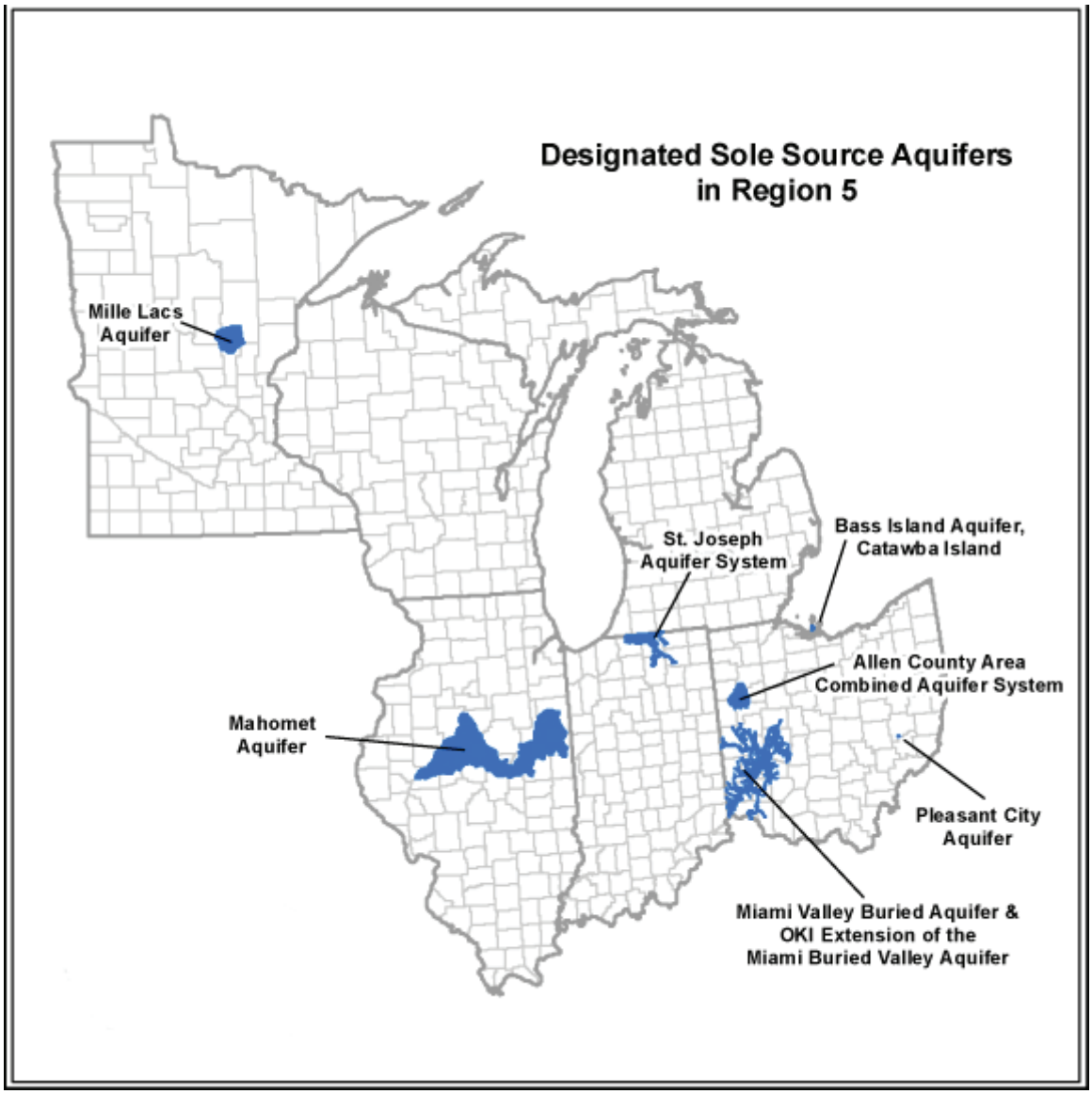
Part 4 - Tips

Part 4 - Tips

What do you do if the preferred wall design is not sufficient to achieve the required attenuation? Another wall design with more substantial materials will work, but may not be the most cost-effective solution. Try adding some other elements for just a little more attenuation.

For example:

- Staggering the studs in a wall offers approximately 4dB of additional protection.
- Increasing the stud spacing from 16” on center to 24” can increase the STC from 2-5dB.
- Adding a 2” air space can provide 3dB more attenuation.
- Increasing a wall’s air space from 3” to 6”can reduce noise levels by an additional 5dB.
- Adding a layer of ½” gypsum board on “Z” furring channels adds 2dB of attenuation.
- Using resilient channels and clips between wall panels and studs can improve the STC from 2-5dB.
- Adding a layer of ½” gypsum board on resilient channels adds 5dB of attenuation.
- Adding acoustical or isolation blankets to a wall’s airspace can add 4-10dB of attenuation.
- A 1” rockwool acoustical blanket adds 3dB to the wall’s STC.
- Filling the cells of lightweight concrete masonry units with expanded mineral loose-fill insulation adds 2dB to the STC.


Designated Sole Source Aquifers
in Region 5
Mille Lacs
Aquifer
St. Joseph
Aquifer System
Bass Island Aquifer,
Catawba Island
Allen County Area
Combined Aquifer System
Mahomet
Aquifer
Pleasant City
Aquifer
Miami Valley Buried Aquifer &
OKI Extension of the
Miami Buried Valley Aquifer

U.S. Fish and Wildlife Service

National Wetlands Inventory

2610 Cochrane, Detroit

March 10, 2020

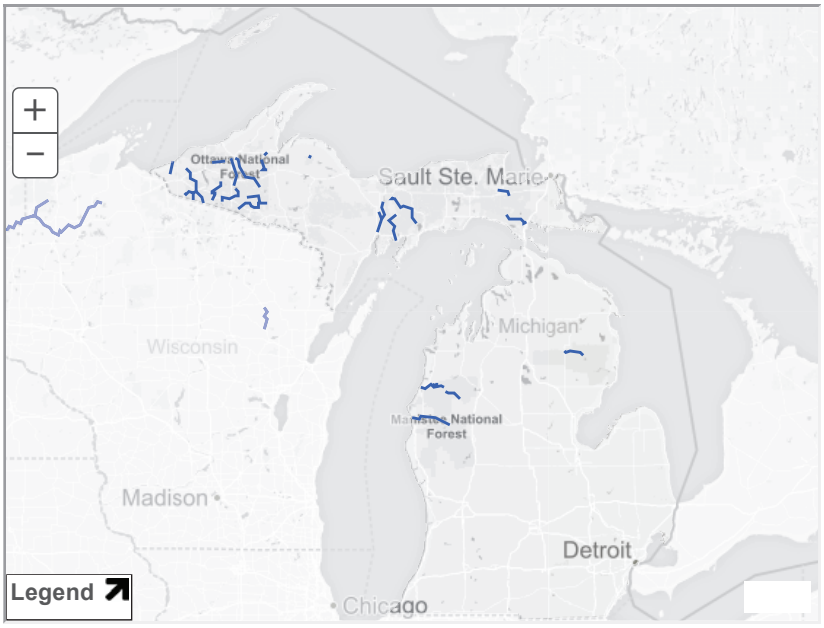
Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

MICHIGAN

Michigan has approximately 51,438 miles of river, of which 656.4 miles are designated as wild & scenic—just a bit more than 1% of the state's river miles.



+ View larger map

Choose A State Go

Choose A River Go

Nourished by the fertile soils of the region, rivers of the Midwest explode with life, from great avian migrations to ancient fishes.

AuSable River
Bear Creek
Black River
Carp River
Indian River
Manistee River
Ontonagon River
Paint River
Pere Marquette River
Pine River
Presque Isle River
Sturgeon River (Hiawatha National Forest)
Sturgeon River (Ottawa National Forest)
Tahquamenon River (East Branch)
Whitefish River
Yellow Dog River

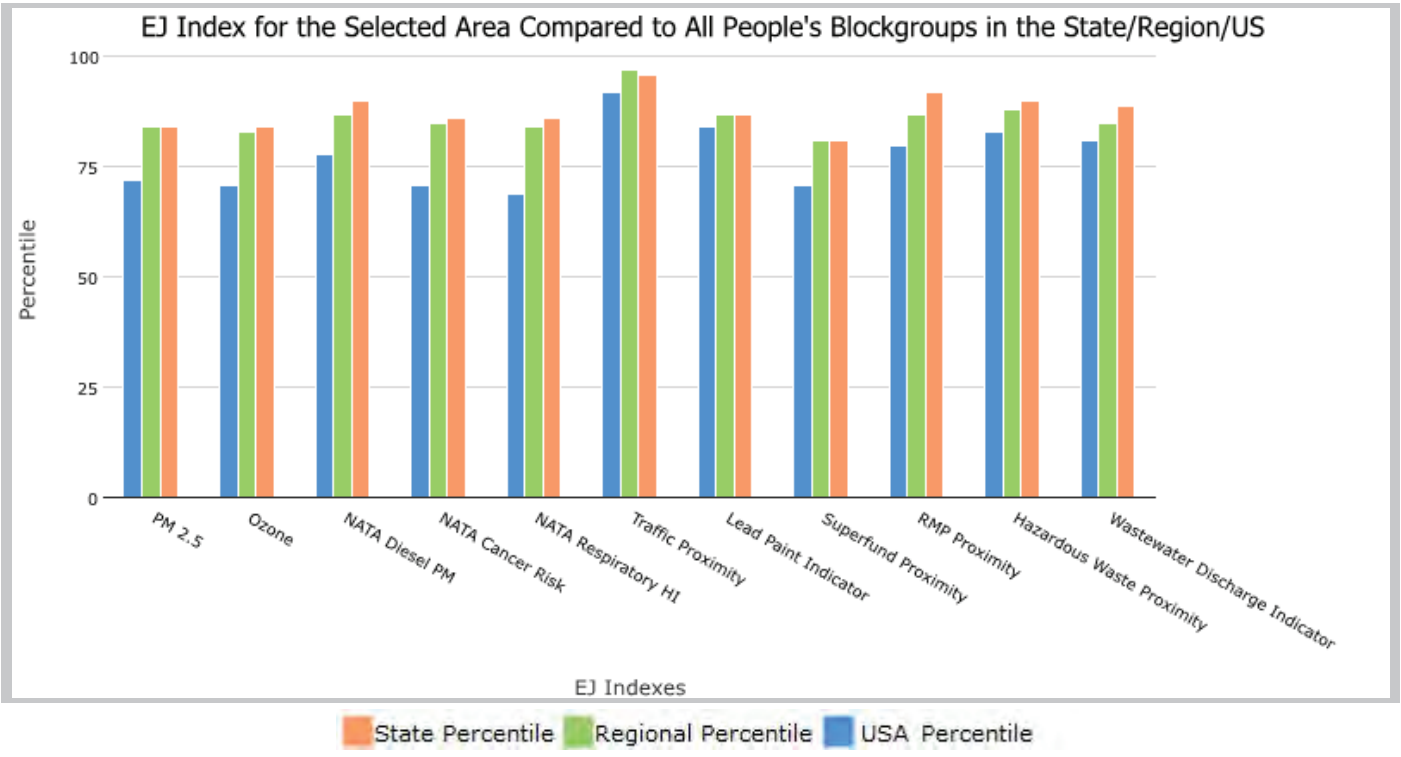
EJSCREEN Report (Version 2019)

.5 miles Ring around the Corridor, MICHIGAN, EPA Region 5

Approximate Population: 1,734

Input Area (sq. miles): 0.85

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	84	84	72
EJ Index for Ozone	84	83	71
EJ Index for NATA* Diesel PM	90	87	78
EJ Index for NATA* Air Toxics Cancer Risk	86	85	71
EJ Index for NATA* Respiratory Hazard Index	86	84	69
EJ Index for Traffic Proximity and Volume	96	97	92
EJ Index for Lead Paint Indicator	87	87	84
EJ Index for Superfund Proximity	81	81	71
EJ Index for RMP Proximity	92	87	80
EJ Index for Hazardous Waste Proximity	90	88	83
EJ Index for Wastewater Discharge Indicator	89	85	81



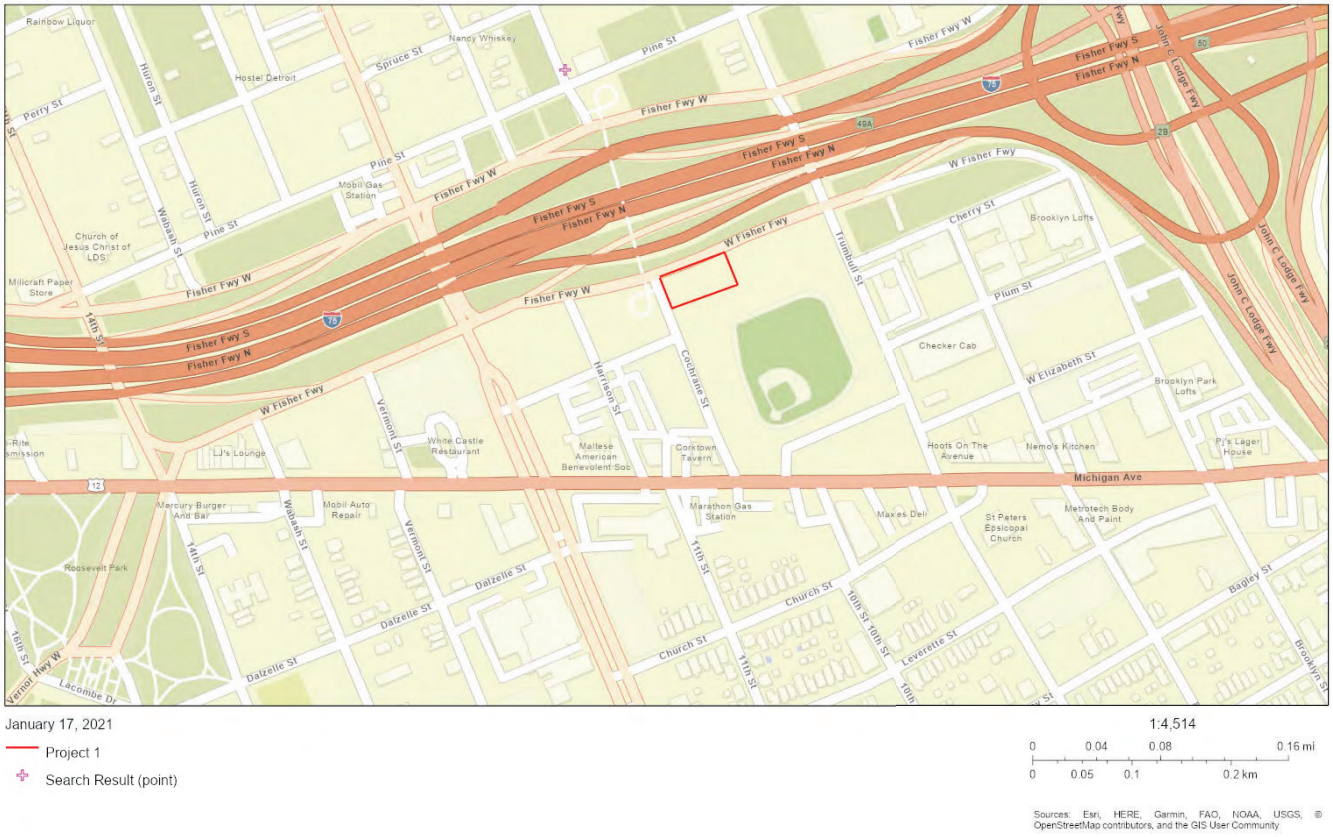
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

EJSCREEN Report (Version 2019)

.5 miles Ring around the Corridor, MICHIGAN, EPA Region 5

Approximate Population: 1,734

Input Area (sq. miles): 0.85



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJSCREEN Report (Version 2019)

.5 miles Ring around the Corridor, MICHIGAN, EPA Region 5

Approximate Population: 1,734

Input Area (sq. miles): 0.85

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m^3)	9.66	8.56	92	8.63	87	8.3	83
Ozone (ppb)	45.1	44	75	43.4	67	43	64
NATA* Diesel PM (µg/m^3)	0.84	0.338	99	0.446	90-95th	0.479	80-90th
NATA* Cancer Risk (lifetime risk per million)	35	24	99	26	90-95th	32	60-70th
NATA* Respiratory Hazard Index	0.41	0.29	99	0.34	80-90th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	4500	660	97	530	98	750	96
Lead Paint Indicator (% Pre-1960 Housing)	0.64	0.38	77	0.38	77	0.28	84
Superfund Proximity (site count/km distance)	0.048	0.15	35	0.13	41	0.13	41
RMP Proximity (facility count/km distance)	1.1	0.53	85	0.82	75	0.74	79
Hazardous Waste Proximity (facility count/km distance)	3	1	91	1.5	84	4	84
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.00019	0.23	61	0.82	47	14	57
Demographic Indicators							
Demographic Index	54%	29%	86	28%	86	36%	77
Minority Population	55%	25%	86	25%	84	39%	70
Low Income Population	53%	33%	81	31%	83	33%	81
Linguistically Isolated Population	1%	2%	72	2%	67	4%	52
Population With Less Than High School Education	11%	10%	67	10%	67	13%	57
Population Under 5 years of age	6%	6%	55	6%	51	6%	49
Population over 64 years of age	14%	16%	43	15%	47	15%	52

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: https://www.epa.gov/national-air-toxics-assessment.

For additional information, see: www.epa.gov/environmentaljustice

ASTI ENVIRONMENTAL

Investigation • Remediation
Compliance • Restoration

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www.asti-env.com

September 23, 2021

Mr. Michael Essian
Left Field 2020 Limited Dividend Housing Association L.L.C.
20250 Harper
Detroit, Michigan 48225

RE: Mitigation Plan, Left Field, 2610 Cochrane Street, Parcel ID 0800580-3, Detroit, (ASTI Project #1-11456)

Dear Mr. Essian:

This letter has been prepared as a Mitigation Plan to document the response activities that will be conducted to address potential environmental impacts for the Left Field project development located at 2610 Cochrane Street in Detroit, Wayne County, Michigan (Subject Property). This Mitigation Plan has been developed at the request of the City of Detroit (the responsible entity).

Impacted Soil Mitigation

As discussed in the August 9, 2021 Response Activity Plan (RespAP) prepared by ASTI Environmental (ASTI), the remedial actions that will be conducted on the Subject Property to address the potential for unacceptable risks as part of the redevelopment of the Subject Property are excavation and removal of impacted fill materials and confirmation of remediation sampling.

Excavation of Fill – Excavation of all fill soils on the Subject Property will be completed following project approval and property acquisition. Excavation of the fill soils will be completed by the excavation sub-contractor (TBD) under the direction of the General Contractor (St. Clair Construction Company). The Environmental Consultant (ASTI) will monitor the excavation to ensure all fill materials are removed. The monitoring of the fill removal will be completed through the use of visual observation (the fill materials are comprised primarily of sand with native materials being primarily clay). It is anticipated that the excavation will require approximately three weeks to complete. Soils excavated from the ground will be removed from the Subject Property for offsite disposal at a licensed

Type II Municipal Landfill.

Confirmation of Remediation Sampling – Following completion of the excavation, verification of soil remediation (VSR) soil samples will be collected from the remaining native soils to confirm that all impacted fill soils have been removed from the Subject Property. Samples will be collected from the native soils following removal of fill materials. The confirmation samples will be collected by the environmental consultant (ASTI). Sampling will be conducted following the completion of excavation within each exposure unit. The samples will be submitted to a laboratory for analysis of the contaminants of concern described in the RespAP. Sample analysis will require up to two weeks following submission of the final confirmation samples.

Noise Impacts

ASTI completed a Noise Assessment for the Subject Property on March 26, 2020. The assessment found an unacceptable level of noise was present at the location of the northern end of the western building due to the nearby highway. To address this level of noise, the building was arranged with the elevator lobbies on the north end of the building to provide a buffer between the highway and the residential portions of the building. Appropriate construction materials will assist in mitigating noise levels within the acceptable range.

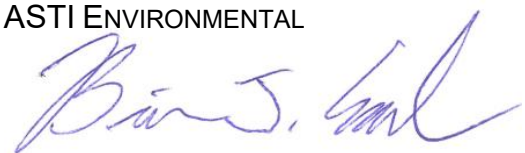
The adjustment to the building design has already been implemented by the architect and will be constructed under the supervision of the general contractor (St. Clair Construction Company) during completion of the building.

If you have any questions or comments, please do not hesitate to call me at **800.395.ASTI**.

We greatly appreciate the opportunity to work with you on this project.

Sincerely yours,

ASTI ENVIRONMENTAL



Brian J. Earl, EP
Hydrogeologist