

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

Project Information

Project Name: 7850-E.-Jefferson-Re-Evaluation

HEROS Number: 900000010260537

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

RE Preparer: Kim Siegel

State / Local Identifier: Detroit, Michigan

Certifying Officer: Julie Schneider, Director

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 7850 E. Jefferson, Detroit, MI 48214

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 project is located at 7850 E. Jefferson in Detroit, Wayne County, Michigan and includes the re-evaluation of the new construction of a 225-unit rental apartment community to be built in two concurrent identical 75-unit phases and one future 75-unit phase on approximately 3.8 acres of vacant land. The purpose is to construct much needed affordable housing in the greater downtown Detroit area, especially with access to the Detroit Riverfront. Each building will offer 23 studio units, 39 one-bedroom units, and 13 two-bedroom units. The project will be targeting residents who are in the annual median income (AMI) ranges between 30% and 60% AMI. 18 units in building 1 and 2 (36 overall) will be subsidized by approved Detroit Housing Commission Project Based Vouchers. The project will also be supported by MSHDA Low-income housing tax credits (LIHTC), as well as HOME funds awarded by the City of Detroit. Additional amenities will include community rooms in each building, office space that will include the leasing office and resident services activities, a rooftop outdoor patio on each building, exercise facilities in each building and shared laundry facilities in each building. Residents will enjoy a landscaped park area near the Detroit River, connections to the Detroit River, as well as connecting sidewalks planned throughout the larger community. The property will have both at-grade and under building parking. This project, with the scope only including the two concurrent buildings, was originally reviewed as HEROS project number 900000010205307 with the Request for Release of Funds signed 8/13/2021 and the AUGF issued on 9/27/2021.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

This project aims to fill the need for safe and affordable housing in the area for low-income residents along the riverfront. The property is currently vacant land. There are no other low income housing developments along the river; therefore, this project would provide low income residents and families direct access to the riverfront.

Existing Conditions and Trends [24 CFR 58.40(a)]:

According to a market study conducted for the property by Shaw Research & Consulting, LLC (provided in the Tab Attachment), overall economic conditions throughout the city of Detroit have improved in recent years, with the number of jobs increasing in each of the last seven years. As such, the city has added approximately 21,900 jobs between 2011 and 2018 (an 11 percent increase), resulting in an annual unemployment rate of 8.2 percent for 2018 - the lowest annual rate for the city in decades. However, the city's 2018 unemployment rate remained significantly above state and national averages (4.1 percent and 3.9 percent, respectively). Occupancy rates for rental housing appear relatively strong at the current time throughout the local rental market. Based on a recent survey of 22 rental developments located within the primary market area, the overall occupancy rate was calculated at 97.5 percent. The improving economic conditions and high rental occupancy rate demonstrate a need for affordable housing in the area that this project aims to provide.

Maps, photographs, and other documentation of project location and description:

[Attachment 0 - Location 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
M19MC260006	Community Planning and Development (CPD)	HOME Program
M20MC260006	Community Planning and Development (CPD)	HOME Program
MI1001	Public Housing	Project-Based Voucher Program

Estimated Total HUD Funded, \$3,432,000.00
Assisted or Insured Amount:

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$27,100,000.00

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)
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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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. 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]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is located in a FEMA-designated Special Flood Hazard Area. The community is participating in the National Flood Insurance Program. However, the developer is going to build a new seawall (as outlined in the Eight Step Process in the Floodplain Management section) and apply for a Letter of Map Revision (LOMR) through FEMA. Therefore, this will take the property out of the floodplain and eliminate the need for flood insurance. Once the seawall is constructed and a LOMR achieved, the developer will submit a copy of the application and FEMA letter to the City of Detroit Environmental Review Officer (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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The entire State of Michigan is designated as "attainment" for carbon monoxide, nitrogen dioxide, PM10, and lead. Portions of the state are in non-attainment for sulfur dioxide and ozone. All of Wayne County in is non-attainment for ozone and a small area along the Detroit River is in non-attainment sulfur dioxide. This project is not in the sulfur dioxide non-attainment area. The project was submitted to the EGLE Air Quality Division and a response was received on October 8th 2019, 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, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The property is located in a Coastal Zone Management area and a request for review was submitted to the EGLE Great Lakes Shorelands Unit. A response was received on October 22, 2019 indicating that no adverse impact to the coastal land will occur as long as all other permits are issued and complied with and it has been determined to be consistent with the State Coastal Management Program with mitigation, identified in the mitigation section of this review (Attachment E).
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, Response Activity Plan, ASTM Vapor Encroachment Screening and a Baseline Environmental Site Assessment. Based on the results of the Phase I (February 21, 2019) & Limited Phase II ESA (April 25, 2017), The \site was determined to be a "facility" as defined in Part 201 of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as Amended (Part 201) of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as Amended (Part 201).. An EGLE approval letter for the Response Activity Plan was received on June 8, 2021. More details regarding the the findings and approved activities are in the ResAP and Contamination Write-Up (Attachment F). Additionally, the Mitigation Plan at the end of the review contains the mitigation measures outlined in the ResAP.
Endangered Species Act Endangered Species Act of 1973,	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Wayne County is home to six endangered/threatened or proposed endangered species. Two bat species,

particularly section 7; 50 CFR Part 402		the Indiana Bat and the Northern long-eared bat, live near river or stream corridors and near caves or mines. These species also inhabit wooded areas. The Eastern Massasauga rattlesnake lives in open woodlands and shrublands. The Rufa Red Knot lives in coastal areas and large wetland complexes. The Northern riffleshell mussel is found in large streams and small rivers in in firm sand of riffle areas. The Eastern prairie fringed orchid can be found in mesic to wet prairies and meadows. The property does not contain the habitat of any of the listed species in the County. 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is located at an Acceptable Separation Distance (ASD) from any above-ground explosive or flammable fuels or chemicals containers according to 24 CFR 51C. A one-mile radius around the Property was searched for ASTs containing hazardous materials and two were found. The first 795 feet to the northwest at 7733 E. Jefferson Avenue and the second 4,614 feet to the northeast at 9666 E. Jefferson Avenue (Attachment H).
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any prime or unique farmland. The property is located within an "urbanized area" that has been previously developed and, therefore, is not subject to the statutory or regulatory requirements (Attachment I).
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Step One: This action is located in a 100-year floodplain. The planned pathway and sea wall is located within AE Zone (special flood hazard area with water surface elevations determined) as indicated on the FEMA Preliminary

		<p>Flood Insurance Rate Map (FIRM) Panel 301 of 575 no. 26163CO301F revised December 21, 2018. The initial scope of the project included project (a) acquisition of property and (b) new construction of affordable multifamily housing of greater than four units and, for these reasons, E.O. 11988-Floodplain Management applies. This project does not meet any of the exceptions at 24 CFR 55.12 and therefore requires an 8-step analysis of the direct and indirect impacts associated with the construction, occupancy, and modification of the floodplain. Step Two: A public notice describing the project was published in the Detroit News, the local and regional paper, on April 28, 2021. Comments regarding this project were received from the HUD Detroit Field Environmental Officer (FEO). The City of Detroit ERO also submitted a written response to the HUD Detroit FEO. Step Three - Five: The City of Detroit Identified and evaluated three different categories of practicable alternatives: Moving the project to a different location outside of the floodplain, alternative project designs to reduce or eliminate impacts to the wetland and the no action or alternative actions. Additionally, the City of Detroit identified the associated direct and indirect impacts of developing the project in the floodplain. Of the many alternatives analyzed, Alternative Method Two was selected as the best option moving forward. This entails constructing a new seawall and modify the floodplain through a conditional Letter of Map Revision (LOMR). This would remove the buildings from the floodplain. This option is the optimal alternative, as it will significantly reduce the project's impact to human life,</p>
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		<p>property, and the floodplain. See Attachment J for detailed information regarding the specific alternatives considered. Step Six - The three alternative categories were re-evaluated. Alternative Two was determined to have the lowest impact to people, property and the environment. The final proposal is the new construction of 225-unit rental apartment community to be built in two concurrent identical 75-unit phases and one future 75-unit phase on approximately 3.8 acres of vacant land. The purpose is to construct much needed affordable housing in the greater downtown Detroit area, especially with access to the Detroit Riverfront. Step Seven - It is the City of Detroit's determination that removing the site from the floodplain to house low-income people is the best practicable alternative. The floodplain will be impacted by the seawall upgrades and future walking path. A final noticed was published and posted that included changes in the scope of the project to reduce impacts to the floodplain. Step Eight - The City of Detroit will assure that the plan is executed as modified and described above. Necessary language will be included in all agreements with participating parties. The City will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken. The project is still pending flood permit approval from the Michigan Department of the Environment, Great Lakes and Energy (EGLE). The proposed plans for work in the floodplain and the EGLE permit are included in the permit (Attachment J).</p>
Historic Preservation National Historic Preservation Act of	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Per the programmatic agreement between the City of Detroit and the

1966, particularly sections 106 and 110; 36 CFR Part 800		State Historic Preservation Office (SHPO). One historic building, the Alden Towers, and one historic district, the West Village Historic Local District, are listed on the National Register of Historic Places. Since National Register-eligible historic properties are listed within the APE, the City has given the project a Conditional No Adverse Effect determination. The conditions are as follows: o Prior to the start of any work, building plans, specifications and photos must be submitted to the Preservation Specialist for review and Conditional Approval o Once construction has started the unanticipated discoveries plan shall be executed for the duration of the project. o If there is a change in the scope of work, those changes will be required to undergo additional Section 106 Review prior to the execution of any work (Attachment K). Additionally, the project was submitted to SHPO for archeological review as the site is larger than 1/2 acre. A response was received dated August 12, 2019, that indicated the following: "Based on the information in our files and that which you've submitted for review, we would not recommend archaeological survey. However, we recommend a strong unanticipated discoveries plan including having an archaeologist accessible in the event construction reveals concentrations of potentially historic artifacts or features (e.g. foundations or other structural remains)." An Unanticipated Discoveries Plan was conducted for the site by Mannik and Smith Group with report Dated October 2019 (Appendix K).
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A Noise Assessment was conducted by ASTI Environmental based on the HUD document titled "The Noise Guidebook." The results of the analysis indicated that noise levels would have a

		Day-Night Average Sound Level (DNL) of 74.4 decibels (dB). This noise level is considered "Normally Unacceptable" for noise levels in residential developments (Attachment L). The HUD Sound Transmission Classification Assessment Tool (STraCAT) was used to determine the noise attenuation for the building walls to bring the noise levels within acceptable levels for interiors. The building materials included 4" face brick, 3/4" insulation board, 2x4 wood studs, redwood siding, single hung vinyl windows and 3'x7' steel-faced rigid polyurethane core doors. The noise attenuation necessary to bring the levels to below 45 dB was found to be 32.4 while the actual combined attenuation for the wall components was found to be 34.74 dB. The wall components will bring noise levels to acceptable interior standards of below 45 dB. These noise attenuation measures will be implemented in the proposed buildings (Attachment L).
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no sole source aquifers located in Detroit or Wayne County, Michigan (Attachment M).
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to the National Wetlands Inventory Map, no wetlands are present on the property (Attachment N).
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Wayne County does not have any Wild and Scenic Rivers. There are no Michigan Natural Rivers in Wayne County (Attachment O).
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project entails new construction of two buildings for low-income tenants. This project will provide one of the only low-income family-friendly areas with access to the riverfront in the City of Detroit. This project is intended to

		improve the present environment of minority and low-income residents 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 P).
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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 is in line with the existing zoning and compatible with the surrounding neighborhood which is a combination of single family dwellings, multi-family buildings, and commercial structures. The project is not anticipated to have any significant impact on the surrounding urban environment and it will be compatible with surrounding land uses. The surrounding land is zoned multi-family, single-family and commercial.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	According to the web soil survey, the soil is described as Midtown gravelly-artifactual sandy loam 0 to 2% slope and Urban land- Riverfront complex, dense substratum, 0-4% slope. This type of soil should be suitable for site redevelopment. According to the Belle Isle Quadrangle 7.5-minute Topographic map, the site falls into the 582 feet contour. The property declines gently to the south towards the Detroit River, no	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		drainage or slope issues are anticipated. The contractor will incorporate soil erosion control measures at the limits of the ground disturbance near the river. The project will be connected to the municipal storm sewer service. The Detroit water and sewage Department provides service to the project area.	
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 intercoms and some underground parking areas.	
Energy Consumption/Energy Efficiency	2	The area is already served by electrical and gas utilities provided by DTE Energy. There is adequate capacity to serve the new construction buildings.	
SOCIOECONOMIC			
Employment and Income Patterns	1	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 employment for the on-site management staff. The project could be beneficial to local businesses, as there will be an increase in households requiring goods and services.	
Demographic Character Changes / Displacement	1	The project will not change the demographics of the general area. It will provide needed affordable housing to residents of the area. The project aims to assist low-income individuals in Detroit, by providing affordable studio, one-bedroom, and two-bedroom units. The project involves new construction on a vacant site, no displacement will occur.	
COMMUNITY FACILITIES AND SERVICES			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
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 Bunche Elementary-Middle School, Nichols Elementary-Middle School for K-8 or Garvey Academy and Martin Luther King Jr. Senior High School or Southeastern High School for 9-12. Moses Field School is also available for children with disabilities and is located 1/4 mile northwest of the property. Regular education students in grades K-8 who 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. Special education students will receive transportation services required by their Individualized Education Plan. The schools should have adequate capacity for the potential new students. No educational facilities will be negatively affected by the proposed project	
Commercial Facilities (Access and Proximity)	2	The project area has a commercial corridor on E Jefferson Avenue, including restaurants, two markets and two pharmacies within a mile of the Property. No commercial facilities will be negatively impacted by this project.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Health Care / Social Services (Access and Capacity)	1	The project area is served by a full range of health care professionals. Henry Ford Medical Center-Harborn town, Vibra Hospital of Southeastern Michigan, The 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. Other social services available to residents are available through a variety of non-profits, government agencies and other entities throughout Wayne County	
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.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The project will be connected to the municipal sanitary sewer service. The Detroit water and sewage Department provides service to the project area.	
Water Supply (Feasibility and Capacity)	2	The project will be connected to the municipal storm sewer service. The Detroit water and sewage Department provides service to the project area.	
Public Safety - Police, Fire and Emergency Medical	2	The Detroit Police Department covers the city with the 7th Precinct covering the project location. The precinct offices are located at 3501 Chene, approximately Two miles from the property. No police services will be negatively impacted by the proposed	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		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. The Emergency Medical Services Division of the Detroit Fire Department provides Emergency Medical Services to residents in the project area. No emergency medical services will be negatively impacted by the proposed project.	
Parks, Open Space and Recreation (Access and Capacity)	2	The proposed project is located near open spaces including parks. Within approximately a half-mile of the property there is Joel Maxwell Park, Gabriel Richard Park and Erma Henderson Park. No open spaces will be negatively impacted by the proposed project. The project is located near downtown Detroit; there are many options for recreation available. The project is located within a few miles of Little Caesars Area, Comerica Park, Ford Field and the Fox Theatre. No recreation facilities will be negatively impacted by the proposed project. There are many museums within a few miles of the property including, the Detroit Institute of Arts, The Detroit Children's Museum, and the Model T Auto Heritage Complex. 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	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
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 E. Jefferson. and Seminole just east of the project area. There are also several other bus stops along East Jefferson Ave. 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 I-375 which connects to the I-75 Expressway, 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. Groundwater will not be affected by the proposed construction project. The city provides municipal water service to the project area. There are no sole source aquifers in the State of Michigan Appendix G. The Michigan DEQ provides information regarding source waters for different areas in the state, according to this map Detroit's source water is likely from the Great Lakes connecting channels. No water resources will be impacted by the proposed project.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	A gravel walking path and new vegetation will be implemented on the lower side of the new seawall to encourage the natural stabilization and native habitat activation of the riverfront area. No vegetation or wildlife is expected to be impacted by the proposed project	
Other Factors	2	The nearest surface water is the Detroit River, which is located at the end of the Subject Property. A drainage system will	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		be installed on the property. No surface water will be impacted by the proposed project.	

Supporting documentation**Additional Studies Performed:**

Market Feasibility Analysis, 7850 East Jefferson Avenue, Detroit, Shaw Research & Consulting, LLC, dated March 15, 2019. Noise Assessment, 7850 East Jefferson Avenue, Detroit, Michigan, GDC-East Jefferson, LLC, ASTI Environmental, 10448 Citation Drive, Suite 100, Brighton, MI 48116, 810-225-2800, dated January 9, 2019. Phase I ESA, 7850 East Jefferson Avenue, Detroit, Michigan, GDC-East Jefferson, LLC., ASTI Environmental, 10448 Citation Drive, Suite 100, Brighton, MI 48116, 810-225-2800, dated February 21, 2019. Phase II ESA, 7850 East Jefferson Avenue, Detroit, Michigan, Shamrock Acquisitions, LLC, ASTI Environmental, 10448 Citation Drive, Suite 100, Brighton, MI 48116, 810-225-2800, dated April 25, 2017. Baseline Environmental Assessment, 7850 East Jefferson Avenue, Detroit, Michigan, GDC-East Jefferson, LLC, ASTI Environmental, 10448 Citation Drive, Suite 100, Brighton, MI 48116, 810-225-2800, dated May 1, 2019. Response Activity Plan, 7850 East Jefferson Avenue, Detroit, Michigan, GDC-East Jefferson, LLC, ASTI Environmental, 10448 Citation Drive, Suite 100, Brighton, MI 48116, 810-225-2800, dated June 4, 2021.

[Attachment 0 - 7850 E Jefferson Market Study.pdf](#)

Field Inspection [Optional]: Date and completed by:

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

1. Stacy Tchorzynski, Archeologist, Michigan State Historic Preservation Office, 300 North Washington Square, Lansing MI 48913, 517-335-9914. 2. Federal Emergency Management Agency-Map Service for Flood Rate Insurance Maps <https://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&catalogId=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, Kent County, Michigan, <http://www.epa.gov/radon/states/michigan.html> 8. Ryan Schmaker, Preservation Specialist, City of Detroit, 2 Woodward Ave., Detroit, Michigan 48226, 313-224-1508 9. Nathan Keup, Representative of Ginosko 41800 W. 11 Mile Road, Suite 209, Novi, MI, 48375, 248-513-4900

List of Permits Obtained:

Public Outreach [24 CFR 58.43]:

A public comment period was held for Step Two of the Eight Step Floodplain Process - Early Public Notice and for Step Seven of the Eight Step Floodplain Process - Final Public Notice. Additionally, the project was originally published on July 28, 2021. Step Seven of the Eight Step Floodplain Process - Final Public Notice and the Combined Notice were re-published in the newspaper on June 20, 2022 to provide the public an opportunity to comment on the revised Eight Step Process and Environmental Assessment. Further, marketing and outreach will be conducted beginning approximately six months prior to initial lease-up of the new development.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed new construction is not anticipated to negatively impact the human health, safety and the environment. The project will create affordable housing for families that does not exist along the riverfront.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

As a portion of this project is located in the 100-year floodplain four sites were considered as practicable alternatives to the project site, 11131 Kercheval Avenue, 1300 McDougall, 14630 Riverside Drive, and 1100 St. Aubin. Selection criteria consisted of: A. For Sale/For Lease B. Scale of property (greater than 2.8 +/- acreage), C. Zoning requirements (i.e. requires no re-zoning to accommodate Multi-Family Apartments), D. Within approximately 0.25 miles of East Jefferson Avenue, east of the Central Business District within the city limits of Detroit, and E. Proximity to similar natural amenities such as the Detroit River. As documented above in the floodplain management section, construction at 11131 Kercheval Avenue, 1300 McDougall, 14630 Riverside Drive and 1100 St. Aubin is not viable because the sites do not meet one or more of the selection criteria.

No Action Alternative [24 CFR 58.40(e)]

The No Action Alternative is to not construct the new housing. This alternative is not preferred as it fails to provide additional housing for Detroit's low-income residents. It would also deprive low-income resident of the rare opportunity to live on the riverfront.

Summary of Findings and Conclusions:

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 zoning and will have minimal impact on existing resources or services in the area.

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
Floodplain Management	Constructing a new sea wall to move the site out of the floodplain. All work shall be completed in accordance with the Eight Step Process and the EGLE-approved Part 31 permit.	N/A	The project will follow the measures outlined in the approved Part 31 permit. Additionally, once the seawall is constructed and a LOMR from FEMA is achieved, the developer will submit a copy of the application and FEMA letter to the City of Detroit	

			Environmental Review Officer.	
Contamination and Toxic Substances	A Response Activity Plan (ResAP) was completed and approved by the State agency. See below for additional information.	N/A	The project will follow the mitigation measures outlined in the approved ResAP.	

Project Mitigation Plan

40 CFR 1505.2(c) outlines decision making for Environmental Impact Statements. This project review is an Environmental Assessment and the mitigation measures will be carried out by the Developer's environmental consultant. The progress will be monitored by the consultant and the City of Detroit's Housing & Revitalization Department's (HRD) Construction and Environmental Review teams. Mitigation measures are expected to be completed. Attached is a copy of the Mitigation Plan, which outlines in detail who is responsible for which activity, when the activity will be carried out and documentation that the City of Detroit's HRD Environmental Review Team should receive when the measure is completed.

[7850 Environmental 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 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

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 - Floodplain Map\(1\).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

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary

Compliance Determination

The structure or insurable property is located in a FEMA-designated Special Flood Hazard Area. The community is participating in the National Flood Insurance Program. However, the developer is going to build a new seawall (as outlined in the Eight Step Process in the Floodplain Management section) and apply for a Letter of Map Revision (LOMR) through FEMA. Therefore, this will take the property out of the floodplain and eliminate the need for flood insurance. Once the seawall is constructed and a LOMR achieved, the developer will submit a copy of the application and FEMA letter to the City of Detroit Environmental Review Officer (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

Ozone 100.00 ppb (parts per million)

Provide your source used to determine levels here:

EPA's De Minimis Table from 40 CFR 93.153(b)(1).

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:

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, PM10, and lead. Portions of the state are in non-attainment for sulfur dioxide and ozone. All of Wayne County is in non-attainment for ozone and a small area along the Detroit River is in non-attainment sulfur dioxide. This project is not in the sulfur dioxide non-attainment area. The project was submitted to the EGLE Air Quality Division and a response was received on October 8th 2019, 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 Maps.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

2. Does this project include new construction, conversion, major rehabilitation, or substantial improvement activities?

☒ Yes

No

3. Has this project been determined to be consistent with the State Coastal Management Program?

☒ Yes, without mitigation

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

Yes, with mitigation

No, project must be canceled.

Screen Summary

Compliance Determination

The property is located in a Coastal Zone Management area and a request for review was submitted to the EGLE Great Lakes Shorelands Unit. A response was received on October 22, 2019 indicating that no adverse impact to the coastal land will occur as long as all other permits are issued and complied with and it has been determined to be consistent with the State Coastal Management Program with mitigation, identified in the mitigation section of this review (Attachment E).

Supporting documentation

[Attachment E - Coastal Zone Map.pdf](#)

[Attachment E - Coastal Zone Letter.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.

A Response Activity Plan (ResAP) was completed and approved by the State agency. See the Mitigation Plan for detailed required steps outlined in the ResAP.

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

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, Response Activity Plan, ASTM Vapor Encroachment Screening and a Baseline Environmental Site Assessment. Based on the results of the Phase I (February 21, 2019) & Limited Phase II ESA (April 25, 2017), The \site was determined to be a "facility" as defined in Part 201 of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as Amended (Part 201) of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as Amended (Part 201).. An EGLE approval letter for the Response Activity Plan was received on June 8, 2021. More details regarding the the findings and approved activities are in the ResAP and Contamination Write-Up (Attachment F). Additionally, the Mitigation Plan at the end of the review contains the mitigation measures outlined in the ResAP.

Supporting documentation

[Attachment F - Contamination Write-Up.pdf](#)

[Attachment F - Phase II FINAL.pdf](#)

[Attachment F - ResAP Approval Letter.pdf](#)

[Attachment F - Phase I ESA FINAL.pdf](#)

[Attachment F - Final Response Activity Plan \(ResAP\).pdf](#)

[Attachment F - Due Care Memo.pdf](#)

[Attachment F - BEA FINAL.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 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect species 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

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

3. What effects, if any, will your project have on federally listed species or designated critical habitat?

- ✓ No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat. in the action area.

Document and upload all documents used to make your determination below. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. 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. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.

Mitigation as follows will be implemented:

- ✓ No mitigation is necessary.

Explain why mitigation will not be made here:

The project will have no effect on listed species.

Screen Summary
Compliance Determination

Wayne County is home to six endangered/threatened or proposed endangered species. Two bat species, the Indiana Bat and the Northern long-eared bat, live near river or stream corridors and near caves or mines. These species also inhabit wooded areas. The Eastern Massasauga rattlesnake lives in open woodlands and shrublands. The Rufa Red Knot lives in coastal areas and large wetland complexes. The Northern riffleshell mussel is found in large streams and small rivers in in firm sand of riffle areas. The Eastern prairie fringed orchid can be found in mesic to wet prairies and meadows. The property does not contain the habitat of any of the listed species in the County. 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.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

The project is located at an Acceptable Separation Distance (ASD) from any above-ground explosive or flammable fuels or chemicals containers according to 24 CFR 51C. A one-mile radius around the Property was searched for ASTs containing hazardous materials and two were found. The first 795 feet to the northwest at 7733 E. Jefferson Avenue and the second 4,614 feet to the northeast at 9666 E. Jefferson Avenue (Attachment H).

Supporting documentation

[Attachment H - Acceptable Separation Distance Measurements and Map.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

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

There is no farmland located in the City of Detroit.

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 include any prime or unique farmland. The property is located within an "urbanized area" that has been previously developed and, therefore, is not subject to the statutory or regulatory requirements (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 - Floodplain Map\(1\).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

✓ Yes

Select the applicable floodplain using the FEMA map or the best available information:

Floodway

Coastal High Hazard Area (V Zone)

✓ 100-year floodplain (A Zone)

500-year floodplain (B Zone or shaded X Zone)

8-Step Process

Does the 8-Step Process apply? Select one of the following options:

✓ **8-Step Process applies**

Document and upload the completed 8-Step Process below. Be sure to include the early public notice and the final notice.

5-Step Process is applicable per 55.12(a)(1-4). Provide documentation of 5-Step Process.

8-Step Process is inapplicable per 55.12(b)(1-5).

Mitigation

For the project to be brought into compliance with this section, all adverse impacts must be mitigated. 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. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.

Constructing a new sea wall to move the site out of the floodplain. All work shall be completed in accordance with the Eight Step Process and the EGLE-approved Part 31 permit.

Which of the following mitigation/minimization measures have been identified for this project in the 8-Step or 5-Step Process? Select all that apply.

Permeable surfaces

Natural landscape enhancements that maintain or restore natural hydrology

Planting or restoring native plant species

Bioswales

Evapotranspiration

Stormwater capture and reuse

Green or vegetative roofs with drainage provisions

Natural Resources Conservation Service conservation easements or similar easements

Floodproofing of structures

Elevating structures including freeboarding above the required base flood elevations

✓ Other

Screen Summary

Compliance Determination

Step One: This action is located in a 100-year floodplain. The planned pathway and sea wall is located within AE Zone (special flood hazard area with water surface elevations determined) as indicated on the FEMA Preliminary Flood Insurance Rate Map (FIRM) Panel 301 of 575 no. 26163CO301F revised December 21, 2018. The initial scope of the project included project (a) acquisition of property and (b) new construction of affordable multifamily housing of greater than four units and, for these reasons, E.O. 11988- Floodplain Management applies. This project does not meet any of the exceptions at 24 CFR 55.12 and therefore requires an 8-step analysis of the direct and indirect impacts associated with the construction, occupancy, and modification of the floodplain. Step Two: A public notice describing the project was published in the Detroit News, the local and regional paper, on April 28, 2021. Comments regarding this project were received from the HUD Detroit Field Environmental Officer (FEO). The City of Detroit ERO also submitted a written response to the HUD Detroit FEO. Step Three - Five: The City of Detroit Identified and evaluated three different categories of practicable alternatives: Moving the project to a different location outside of the floodplain, alternative project designs to reduce or

eliminate impacts to the wetland and the no action or alternative actions. Additionally, the City of Detroit identified the associated direct and indirect impacts of developing the project in the floodplain. Of the many alternatives analyzed, Alternative Method Two was selected as the best option moving forward. This entails constructing a new seawall and modify the floodplain through a conditional Letter of Map Revision (LOMR). This would remove the buildings from the floodplain. This option is the optimal alternative, as it will significantly reduce the project's impact to human life, property, and the floodplain. See Attachment J for detailed information regarding the specific alternatives considered. Step Six - The three alternative categories were re-evaluated. Alternative Two was determined to have the lowest impact to people, property and the environment. The final proposal is the new construction of 225-unit rental apartment community to be built in two concurrent identical 75-unit phases and one future 75-unit phase on approximately 3.8 acres of vacant land. The purpose is to construct much needed affordable housing in the greater downtown Detroit area, especially with access to the Detroit Riverfront. Step Seven - It is the City of Detroit's determination that removing the site from the floodplain to house low-income people is the best practicable alternative. The floodplain will be impacted by the seawall upgrades and future walking path. A final noticed was published and posted that included changes in the scope of the project to reduce impacts to the floodplain. Step Eight - The City of Detroit will assure that the plan is executed as modified and described above. Necessary language will be included in all agreements with participating parties. The City will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken. The project is still pending flood permit approval from the Michigan Department of the Environment, Great Lakes and Energy (EGLE). The proposed plans for work in the floodplain and the EGLE permit are included in the permit (Attachment J).

Supporting documentation

[Attachment J - Eight Step Process Update 6-9-22.pdf](#)
[Attachment J - C-501 Geometric and Paving Plan.pdf](#)
[Attachment J - C-703 Floodplain Impact Cross Sections.pdf](#)
[Attachment J - C-702 Floodplain Impact Plan.pdf](#)
[Attachment J - C-500 Overall Site Plan.pdf](#)
[Attachment J - Final Floodplain Notice 7-28-21.pdf](#)
[Attachment J - 7850 E Jefferson Final Floodplain Notice 6-22-22.pdf](#)

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" https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

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 Officer (SHPO) Completed

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). Additionally, per Stipulation VI.C and VII of the the PA, the proposed qualified for review by the SHPO Archaeologist.

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

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

Yes
No

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:

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

Document and upload surveys and report(s) below.

For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

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

✓ No Adverse Effect

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

Document reason for finding:

One historic building, the Alden Towers, and one historic district, the West Village Historic Local District, are listed on the National Register of Historic Places. See below for additional information.

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

✓ No

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

Adverse Effect

Screen Summary

Compliance Determination

Per the programmatic agreement between the City of Detroit and the State Historic Preservation Office (SHPO). One historic building, the Alden Towers, and one historic district, the West Village Historic Local District, are listed on the National Register of Historic Places. Since National Register-eligible historic properties are listed within the APE, the City has given the project a Conditional No Adverse Effect determination. The conditions are as follows:

- o Prior to the start of any work, building plans, specifications and photos must be submitted to the Preservation Specialist for review and Conditional Approval
- o Once construction has started the unanticipated discoveries plan shall be executed for the duration of the project.
- o If there is a change in the scope of work, those changes will be required to undergo additional Section 106 Review prior to the execution of any work (Attachment K). Additionally, the project was submitted to SHPO for archeological review as the site is larger than 1/2 acre. A response was received dated August 12, 2019, that indicated the following: "Based on the information in our files and that which you've submitted for review, we would not recommend archaeological survey. However, we recommend a strong unanticipated discoveries plan including having an archaeologist accessible in the event construction reveals concentrations of potentially historic artifacts or features (e.g. foundations or other structural remains)." An Unanticipated Discoveries Plan was conducted for the site by Mannik and Smith Group with report Dated October 2019 (Appendix K).

Supporting documentation

[Attachment K- Archaeology Response and Unanticipated Discoveries Plan.pdf](#)
[Attachment K - Section 106 Review Letter.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: 74.4

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: 74.4

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:

✓ No mitigation is necessary.

Explain why mitigation will not be made here:

Noise attenuation measures will be implemented in the proposed building. Therefore, formal mitigation measures are not necessary.

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

Screen Summary

Compliance Determination

A Noise Assessment was conducted by ASTI Environmental based on the HUD document titled "The Noise Guidebook." The results of the analysis indicated that noise levels would have a Day-Night Average Sound Level (DNL) of 74.4 decibels (dB). This noise level is considered "Normally Unacceptable" for noise levels in residential developments (Attachment L). The HUD Sound Transmission Classification Assessment Tool (STraCAT) was used to determine the noise attenuation for the building walls to bring the noise levels within acceptable levels for interiors. The building materials included 4" face brick, 3/4" insulation board, 2x4 wood studs, redwood siding, single hung vinyl windows and 3'x7' steel-faced rigid polyurethane core doors. The noise attenuation necessary to bring the levels to below 45 dB was found to be 32.4 while the actual combined attenuation for the wall components was found to be 34.74 dB. The wall components will bring noise levels to acceptable interior standards of below 45 dB. These noise attenuation measures will be implemented in the proposed buildings (Attachment L).

Supporting documentation

[Attachment L - STraCAT.pdf](#)

[Attachment L - Noise Assessment.pdf](#)

Are formal compliance steps or mitigation required?

7850-E.-Jefferson-Re-
Evaluation

Detroit, MI

900000010260537

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

There are no sole source aquifers located in Detroit or Wayne County, Michigan (Attachment M).

Supporting documentation

[Attachment M - 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

According to the National Wetlands Inventory Map, no wetlands are present on the property (Attachment N).

Supporting documentation

[Attachment O - Wild Scenic Rivers Map.pdf](#)

[Attachment N - 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

Wayne County does not have any Wild and Scenic Rivers. There are no Michigan Natural Rivers in Wayne County (Attachment O).

Supporting documentation

[Attachment O - Wild Scenic Rivers Map\(1\).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

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

Yes

✓ No

Explain:

The adverse environmental impacts do not disproportionately impact low-income and/or minority groups because the land is already vacant and the mitigation will improve the livability of the site. This way, low income/minority groups can live in the housing provided on the property.

Based on the response, the review is in compliance with this section. Document and upload any supporting documentation below.

Screen Summary

Compliance Determination

This project entails new construction of two buildings for low-income tenants. This project will provide one of the only low-income family-friendly areas with access to the riverfront in the City of Detroit. This project is intended to improve the present environment of minority and low-income residents 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 P).

Supporting documentation

[Attachment P - EJ Screen.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

7850 E. Jefferson Mitigation Plan
June 21, 2022

Response Activity or Continuing Obligation	Required Activities	Party Responsible for Completing Activity	Timing of Activity	Required Follow-up or Reporting
Floodplain Mitigation	A new seawall will be constructed to modify the current flood plain such that it is no longer an impediment to the project.	General Contractor	During Construction	Plans sent to the City of Detroit
Floodplain Mitigation	Install 6'x8' of field stone rip-rap at the end section for storm drainage. A layer of filter fabric will be placed under the rip-rap. Storm drainage design will also include back flow prevention	General Contractor	During Construction	Copies of photos and reports
Floodplain Mitigation	Submit to City of Detroit Building Department within 60 days of project completion "as-built" plans, signed and sealed by a qualified design professional licensed by the State of Michigan, certifying that the project, including any required compensating cut and fill, has been completed in accordance with this permit.	Developer/Owner	Within 60 days of project completion	BSEED Approval Letter
Floodplain Mitigation	Obtain a FEMA Letter of Map Revision (LOMR).	Developer/Owner	After Construction	Copy of application and approval letter
ResAP – Clean Fill	The fill material brought to the site will be documented as clean by analytical results from samples collected from the site of origin documenting that the material does not contain metals at concentrations above the applicable generic direct contact criteria.	Contractor	During Construction	Analytical results
ResAP - Hardscape	<p>a) The concrete will range in thickness of 4-8 inches and will have a 6-inch layer of sand or 21 AA base.</p> <p>b) The asphalt will range in thickness of 3.5-4.5 inches and will have a 10.5 to 12.5 inches layer of 21AA base.</p> <p>c) Documented clean fill soil will be imported to the site for the construction of the paved parking areas.</p>	General Contractor, Consultant	During Construction	Analytical Results, inspection reports with photographs

7850 E. Jefferson Mitigation Plan
June 21, 2022

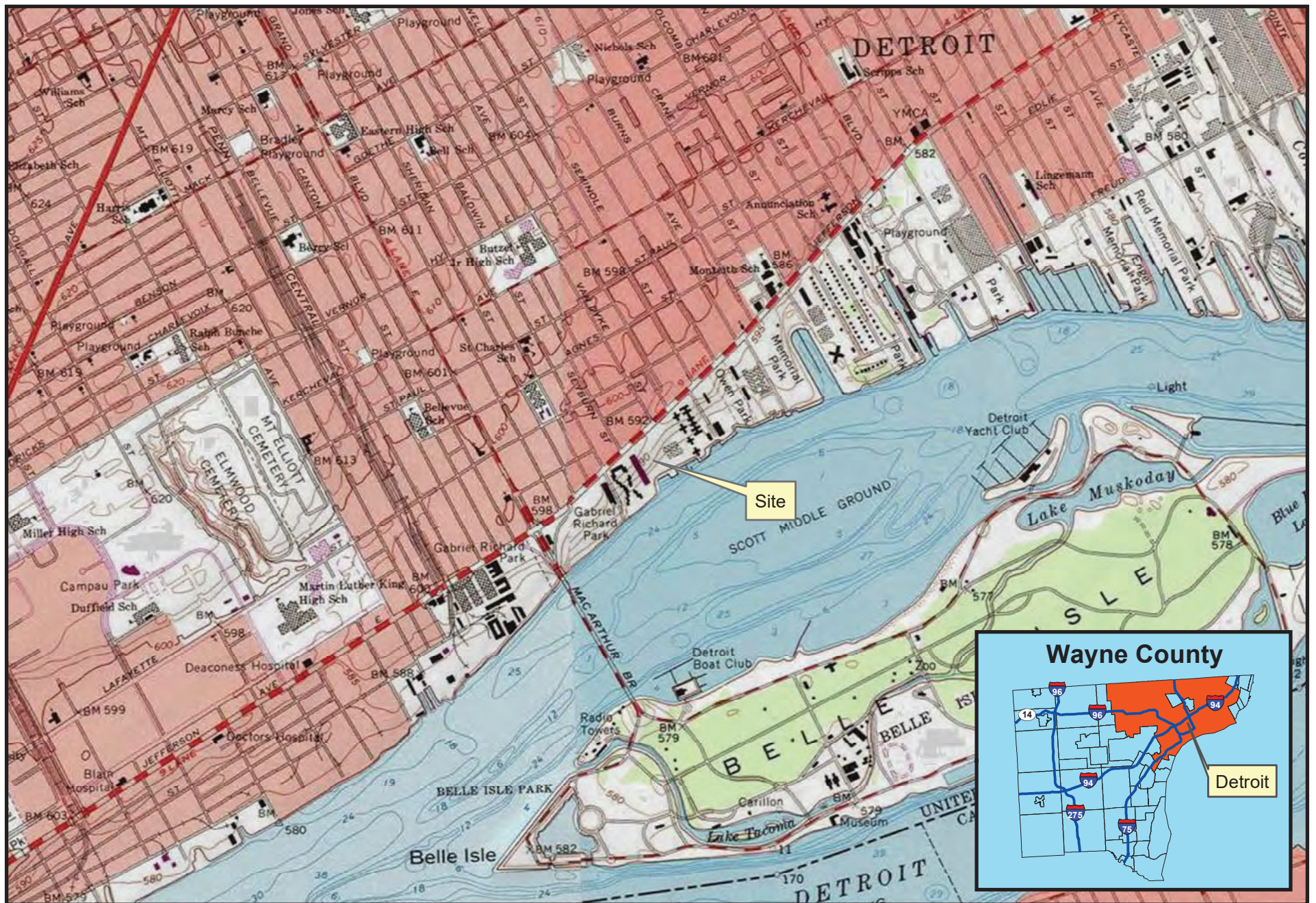
	d) In addition, clean fill soil will be imported for land balancing at the site.			
ResAP - Softscape	<p>a) Demarcation Barrier -</p> <ul style="list-style-type: none"> Brightly colored visual demarcation layer over the contaminated soils, such as TerraTex N04 orange fabric or similar fabric As the demarcation layer is placed within the greenspace areas of the Subject Property photographs will be taken to document the placement of the barrier in all greenspace areas <p>b) Clean Sand - Twelve to fourteen (12-14 inches) of documented clean sand installed over the demarcation layer</p> <p>c) Topsoil - Six inches (6”) of clean, good quality topsoil to support and sustain the growth of a vegetative cover (grass).</p> <p>d) Vegetative cover - The proposed grass for the green space will include a drought resistant strain of grass.</p> <p>Playscape Area – in the area of the Subject Property designated as the Playscape (see Figure 5), a minimum of 24” of clean soil or mulch or combination of both to equal 24” will be placed over the demarcation layer.</p>	General Contractor, Consultant	During Construction	Analytical Results, inspection reports with photographs
Documentation of Due Care Compliance	A. Complete a DDCC report and submit to the City of Detroit Environmental Review Officer for review prior to submitting to EGLE. Engineering controls will require an Operations and Maintenance plan.	Consultant	During Construction	DDCC with appropriate Analytical Results, inspection reports

7850 E. Jefferson Mitigation Plan
June 21, 2022

	B. Additional requirements such as a Restrictive Covenants and/or a recorded Notice to Title may be requested depending on site conditions.			with photographs, and EGLE approval
ResAP – Vapor Mitigation	A. Install sub-slab depressurization system under the building slabs utilizing a system of horizontal piping placed in trenches at least 18” beneath the building slab, along with sump pits in each elevator shaft.	General Contractor	During Construction	Documentation of Due Care Compliance (DDCC) report and EGLE approval
	B. Installation of a VaporBlock Plus 20 barrier to be lapped under the building slab prior to pouring concrete.	General Contractor	During Construction	
	C. The horizontal piping will be exhausted through building to the roof area through 4” PVC piping with negative pressure being achieved through low voltage fans operating with 150 cfm at 1.6” WC.	General Contractor	During Construction	
	D. System alarms, gauges, monitoring points will be installed.	General Contractor	During Construction	
	E. Negative pressure monitoring will occur post construction to evidence system performance to plan.	General Contractor	During Construction	
	F. Resident notification will be provided via Lease Addendum.	Property Manager	Post-Construction	
	G. Documentation of Due Care Compliance report and approval will be achieved once system performance can be verified and approved by EGLE.	Environmental Consultant	Post Construction	
Section 106 – Conditional No Adverse Effect Requirements	A. Prior to the start of any work, building plans, specifications and photos must be submitted to the Preservation Specialist for review and Conditional Approval	General Contractor	Prior to Construction	
	B. If there is a change in the scope of work, those changes will be required to undergo additional Section 106 Review prior to the execution of any work.	General Contractor	At any time	

7850 E. Jefferson Mitigation Plan
June 21, 2022

Section 106 – Unanticipated Discoveries Plan	Once construction has started, the SHPO approved Unanticipated Discoveries Plan shall be followed for the duration of the project.	Construction Crew, Foremen, Developer	During Construction	Unanticipated Discoveries Plan with SHPO approval
Noise Analysis – Unacceptable Noise	Appropriate construction materials will be incorporated in the building to mitigate noise levels within the acceptable range.	Architect, Construction, Crew, Foremen, Developer,	During Construction	Building specs



7850 E. Jefferson Ave.

Detroit, MI

2,000 1,000 0 2,000 Feet



Created for: GDC-East Jefferson LLC
Created by: BJG, January 9, 2019, ASTI Project 5-10105

Figure 1 - Site Location Map



Shaw Research & Consulting

Real Estate Analysis & Market Feasibility Services

**A RENTAL HOUSING
MARKET FEASIBILITY ANALYSIS
FOR THE SOUTHEAST PORTION OF
DETROIT, MICHIGAN**

7850 East Jefferson Apartments

March 15, 2019

Prepared for:

**Michigan State Housing Development Authority
735 East Michigan Avenue
Lansing, MI 48912**

Prepared by:

**Shaw Research & Consulting, LLC
P.O. Box 38
Bad Axe, MI 48413
Phone: (989) 415-3554**

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I. PURPOSE/INTRODUCTION

Shaw Research & Consulting, LLC has prepared the following rental housing study to examine and analyze the southeastern portion of the city of Detroit as it pertains to the market feasibility for the proposed new construction of 7850 East Jefferson Apartments. The subject proposal represents the construction of 225 affordable units to be built in three concurrent phases, targeting low-income singles and family households. As such, it is proposed that each phase consist of 75 units with a mix of studio/efficiency, one, and two-bedrooms - targeted to households between 30 percent and 60 percent of the Area Median Income (AMI). The subject property has frontage along the Detroit River, and is situated along the south side of East Jefferson Avenue approximately one-third mile east of East Grand Boulevard, and 2½ miles east of downtown Detroit.

The purpose of this report is to analyze the market feasibility for the proposed development of the subject proposal based on the project specifications and site location presented in the following section. Findings and conclusions will be based through an analytic evaluation of demographic trends, recent economic patterns, existing rental housing conditions, detailed fieldwork and site visit, and a demand forecast for rental housing within the local market area. All fieldwork and community data collection was conducted on March 3, 2019 by Steven Shaw. A phone survey of existing rental developments identified within the PMA, as well as site visits to those properties deemed most comparable to the subject, was also reviewed to further measure the potential market depth for the subject proposal.

This study assumes the development of the subject rental facility will utilize tax credits, along with the associated rent and income restrictions obtained from the Michigan State Housing Development Authority (MSHDA). As such, it is assumed that the proposal will consist of a total of 225 units (three concurrent phases of 75 units each) restricted to single and family households earning between 30 percent and 60 percent of AMI. In addition, there are no Project-Based Rental Assistance (PBRA) or market rate (unrestricted) units included within the proposal.

II. CONTENT

A. EXECUTIVE SUMMARY

Utilizing information collected and presented within this report, the following summary highlights the key findings and conclusions regarding the proposal and local rental market:

- 1) Based on the information collected and reported within this study, it is evident that demand exists for the development of additional affordable rental units within the PMA. **However, a positive recommendation for the subject proposal, in its present configuration, cannot be forwarded at this time.** As such, a reduction in the number of units is recommended to ensure a timely absorption and viable product over the long term.
- 2) The subject proposal represents the construction of 225 general-occupancy rental units, to be developed in three concurrent phases within the southeastern portion of the city of Detroit. The proposed site is located along the south side of Jefferson Avenue, approximately one-third mile east of Grand Boulevard, with frontage along the Detroit River.
- 3) The proposal consists of three 75-unit phases that will be identical in size and targeting, with each phase containing 23 studio/efficiency units, 39 one-bedroom units, and 13 two-bedroom units. In addition, income targeting for each phase consists of ten units at 30 percent AMI, 18 units at 40 percent AMI, nine units at 50 percent AMI, and 38 units at 60 percent AMI.
- 4) Based on Census figures and ESRI forecasts, overall demographic patterns throughout the Detroit area have been consistently declining over the past several decades. Most recently, the overall population within the PMA decreased by 11 percent between 2010 and 2019, representing a loss of more than 5,000 residents during this time. Similarly, occupied-households declined by eight percent (roughly 1,550 fewer households) within the PMA over the same time frame.
- 5) Overall economic conditions throughout the city of Detroit have improved in recent years, with the number of jobs increasing in each of the last seven years. As such, the city has added approximately 21,900 jobs between 2011 and 2018 (an 11 percent increase), resulting in an annual unemployment rate of 8.2 percent for 2018 – the lowest annual rate for the city in decades. However, the city’s 2018 unemployment rate remained significantly above state and national averages (4.1 percent and 3.9 percent, respectively).
- 6) Occupancy rates for rental housing appear relatively strong at the current time throughout the local rental market. Based on a recent survey of 22 rental developments located within the PMA, the overall occupancy rate was calculated at 94.4 percent. Excluding two properties with vacant units due to renovation, an adjusted occupancy rate of 97.5 percent was determined.

- 7) Furthermore, adjusted occupancy levels are also positive when subdividing the market by financing type – market rate developments are a combined 95.5 percent occupied, tax credit projects average 99.7 percent occupancy, and subsidized properties were 100 percent occupied.
- 8) Considering the 11 LIHTC developments surveyed within the PMA, seven were 100 percent occupied, but only five reported a waiting list – however, most of those waiting lists were quite extensive.
- 9) Demand estimates indicate limited market depth for the subject proposal in its current configuration. As such, the penetration and capture rates (at 4.7 percent and 38.8 percent, respectively) are above MSHDA thresholds, demonstrating a lengthy absorption should be anticipated – estimated at 12 to 13 months.
- 10) Overall, the subject proposal offers a relatively competitive amenity package in relation to other properties throughout the area. However, the only noteworthy amenity lacking in the proposal is an on-site laundry facility.
- 11) When reviewing units sized, the subject proposal contains among the smallest units in the market. As such, efficiency units are approximately 29 percent smaller than market average, one-bedrooms are 18 percent smaller, and two-bedroom units are 12 percent smaller than average.
- 12) The proposed rents for one and two-bedroom units are reasonably competitive with tax credit averages for the PMA, and are also quite affordable relative to overall market rate averages. However, rents for efficiency units are somewhat aggressive. In comparison to tax credit averages at 60 percent AMI (and adjusting for utilities), the proposed rents for efficiency units are approximately 20 percent higher, one-bedroom units are eight percent higher, and two-bedroom units are roughly three percent higher.
- 13) Market-related strengths include positive overall rental conditions throughout the PMA, extremely strong occupancy levels within area LIHTC properties, and a positive site location along the Detroit River and within a relatively short distance to most basic essential services required by residents.
- 14) Market-related weaknesses include a declining population base throughout the PMA and city, although future losses are anticipated to be only marginal over the next five years.
- 15) Utilizing the findings above and within this report, concerns are evident for the timely absorption and viability of the subject proposal. As such, the following recommendations are forwarded:
 - Reduce studio/efficiency rents at 60 percent AMI to \$600;
 - Add on-site laundry facility (and fitness center, if possible);
 - Adjust rents to below LIHTC maximum-allowable limits (see next page);
 - Increase unit sizes, if possible;
 - Reduce total number of units to two phases (125 to 150 maximum units) for initial construction, with subsequent third phase at a later date.

B. PROJECT DESCRIPTION

According to project information supplied by MSHDA and/or the sponsor of the subject proposal, the analysis presented within this report is based on the following development configuration and assumptions.

Project Structure

Project Name:	7850 E. Jefferson Apts	(Phases I, II, and III)							
Project Address:	7850 E. Jefferson Avenue								
Project City:	Detroit, Michigan								
County:	Wayne County								
Total Units:	225								
Occupancy Type:	Family								
Construction Type:	New Construction								
Targeting/Mix	Number of Units	Unit Type	Number of Baths	Square Feet	Contract Rent	Utility Allow.	Gross Rent	Max. LIHTC Rent*	Incl. PBRA
Efficiency/Studio Units	69								
30% of Area Median Income	9	Apts	1.0	405	\$307	\$66	\$373	\$372	No
40% of Area Median Income	18	Apts	1.0	405	\$431	\$66	\$497	\$497	No
50% of Area Median Income	12	Apts	1.0	405	\$555	\$66	\$621	\$621	No
60% of Area Median Income	30	Apts	1.0	405	\$642	\$66	\$708	\$745	No
One-Bedroom Units	117								
30% of Area Median Income	15	Apts	1.0	620	\$326	\$73	\$399	\$399	No
40% of Area Median Income	24	Apts	1.0	620	\$460	\$73	\$533	\$532	No
50% of Area Median Income	15	Apts	1.0	620	\$593	\$73	\$666	\$665	No
60% of Area Median Income	63	Apts	1.0	620	\$686	\$73	\$759	\$798	No
Two-Bedroom Units	39								
30% of Area Median Income	6	Apts	1.0	915	\$390	\$89	\$479	\$479	No
40% of Area Median Income	12	Apts	1.0	915	\$550	\$89	\$639	\$639	No
60% of Area Median Income	21	Apts	1.0	915	\$822	\$89	\$911	\$958	No

*Maximum LIHTC Rents and Income Limits are based on 2018 Income and Rent Limits (effective 4/1/2018) obtained from the Michigan State Housing Development Authority website. It should be noted that any figures in "red" reflect proposed rents above the 2018 maximum-allowable LIHTC program rents.

Project Characteristics

Target Population.....Low-Income Households
\$11,190 to \$38,340 (30% to 60% AMI)
 Number of Residential Buildings.....3
 Number of Non-Residential Buildings0
 Design TypeApartments
 Number of Stories3 Stories
 Parking Type/Spaces.....0.75 Spaces/unit (169 total spaces)

 Total Development Size.....225 units (75 units/phase)
 Number of Affordable Units.....225 units
 Number of Non-Subsidized LIHTC Units.....225 units
 Number of Subsidized LIHTC Units0 units
 Number of Market Rate Units.....0 units
 Number of Employee Units0 unit

MSHDA AMENITIES CHECKLIST		
UNIT AMENITIES		
Ceiling Fan	<input checked="" type="checkbox"/> Garbage Disposal	Self-Cleaning Oven
Coat Closet	Individual Entry	Walk-In Closet
<input checked="" type="checkbox"/> Dishwasher	<input checked="" type="checkbox"/> Microwave	Other: _____
<input checked="" type="checkbox"/> Exterior Storage	<input checked="" type="checkbox"/> Mini-Blinds	Other: _____
<input checked="" type="checkbox"/> Frost-Free Refrigerator	Patio/Balcony	Other: _____
DEVELOPMENT AMENITIES		
Sports Court	Computer/Business Center	Picnic Area
Playground	<input checked="" type="checkbox"/> Elevator	Other: _____
Clubhouse	Exercise Room	Other: _____
<input checked="" type="checkbox"/> Community Room	<input checked="" type="checkbox"/> On-Site Management	Other: _____
AIR CONDITIONING TYPE		
<input checked="" type="checkbox"/> Central A/C	Through-Wall A/C	Through-Wall Sleeve
LAUNDRY TYPE		
Coin-Operated Laundry	<input checked="" type="checkbox"/> In-Unit Hook-Up	In-Unit Washer/Dryer
PARKING TYPE		
<input checked="" type="checkbox"/> Surface Lot	Garage (attached): \$_____	Other: _____
Carpport: \$_____	Garage (detached): \$_____	
SECURITY TYPE		
<input checked="" type="checkbox"/> Security Intercom	Security Gate	<input checked="" type="checkbox"/> Lighting
Other: _____	Other: _____	
UTILITIES INCLUDED IN RENT		
Electricity	Heat	<input checked="" type="checkbox"/> Trash Removal
Gas	<input checked="" type="checkbox"/> Water/Sewer	Other: _____

Project Narrative and Description



7850 E. Jefferson Detroit, MI

Overall Rental Project Description

Ginosko Development Company is proposing to acquire approximately 2.80 acres of vacant land located at 7850 E. Jefferson, Detroit, MI for construction of a new approximately 225 rental apartment community to be built in 3 concurrent phases along the Detroit River. Ginosko Development Company specializes in creating and maintaining multi/single family residential developments from start to finish. Having experience in developing thousands of housing units for every housing interest, Ginosko Development Company is uniquely successful at building the highest quality product while providing both development and management service “under one roof”.

The vacant land is located in a likely identified Qualified Opportunity Zone and is adjacent to an existing 472 unit affordable apartment building called River Towers. The proposed land acquisition is recommended in a combined strategy which includes acquiring River Towers and construction of a new approximately 225 unit apartments which compliments in scale and design the existing building. The larger strategy would include the use of a 4/9 Hybrid low income housing tax credit structure, along with soft funds from both MSHDA and the City of Detroit.

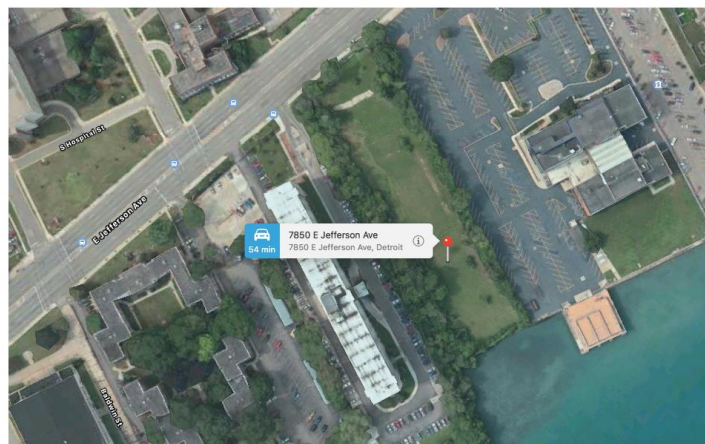
Type of Project

The site is planned for 225 new apartments in mid-rise building construction to compliment the adjacent surrounding area, and enhance the living environment within the community for families. At completion, all of the existing River Tower units will have been renovated (River Towers renovations/acquisitions proforma estimates are not included in this Project Narrative).

Additional site amenities will include a community center, which will include the leasing office and resident services activities, an outdoor patio, exercise facilities and shared laundry facilities. Residents will enjoy a connections to the Detroit River, as well as connecting sidewalks planned throughout the larger community.

The vacant land is surrounded by development to the east, west and north (across E. Jefferson) and the Detroit River to the south. The area is fully developed with larger multifamily communities built along the Detroit River, blending into smaller multifamily development and institutional development heading north into the Detroit neighborhoods. The new construction on this site will further provide economic benefits to the businesses and residents of the City of Detroit and surrounding area through job creation and contracting opportunities.

Development Location: 7850 E. Jefferson, Detroit, MI



C. LOCATION AND MARKET AREA DEFINITION

The Primary Market Area (PMA) is defined as the geographic area from which the subject property (either proposed or existing) is expected to draw the *majority* of its residents. For the purpose of this report, the PMA is comprised of 26 census tracts, and reaches approximately 2¾ miles to the north of the site, two miles to the west, 1¾ miles to the east, and less than ¼ mile to the south. Furthermore, the PMA's limits are generally bounded by the following roadways/features:

North: Interstate 94
South: Detroit River
East: St. Jean Street/Conant Street
West: Dequindre Street/St. Aubin Street

The aforementioned primary market area delineation can be considered as a realistic indication of the potential draw of the subject proposal based on a location within the southeastern portion of the city, the property's tenancy (open), broad income targeting (30 to 60 percent of AMI), and the overall characteristics of the immediate area. In addition, its location near several prominent roadways (including Jefferson Avenue and Grand Boulevard) provide relatively convenient access to downtown Detroit as well as throughout the PMA and region. A visual representation of the PMA can be found in the maps on the following pages, and includes the census tracts listed on the following page:

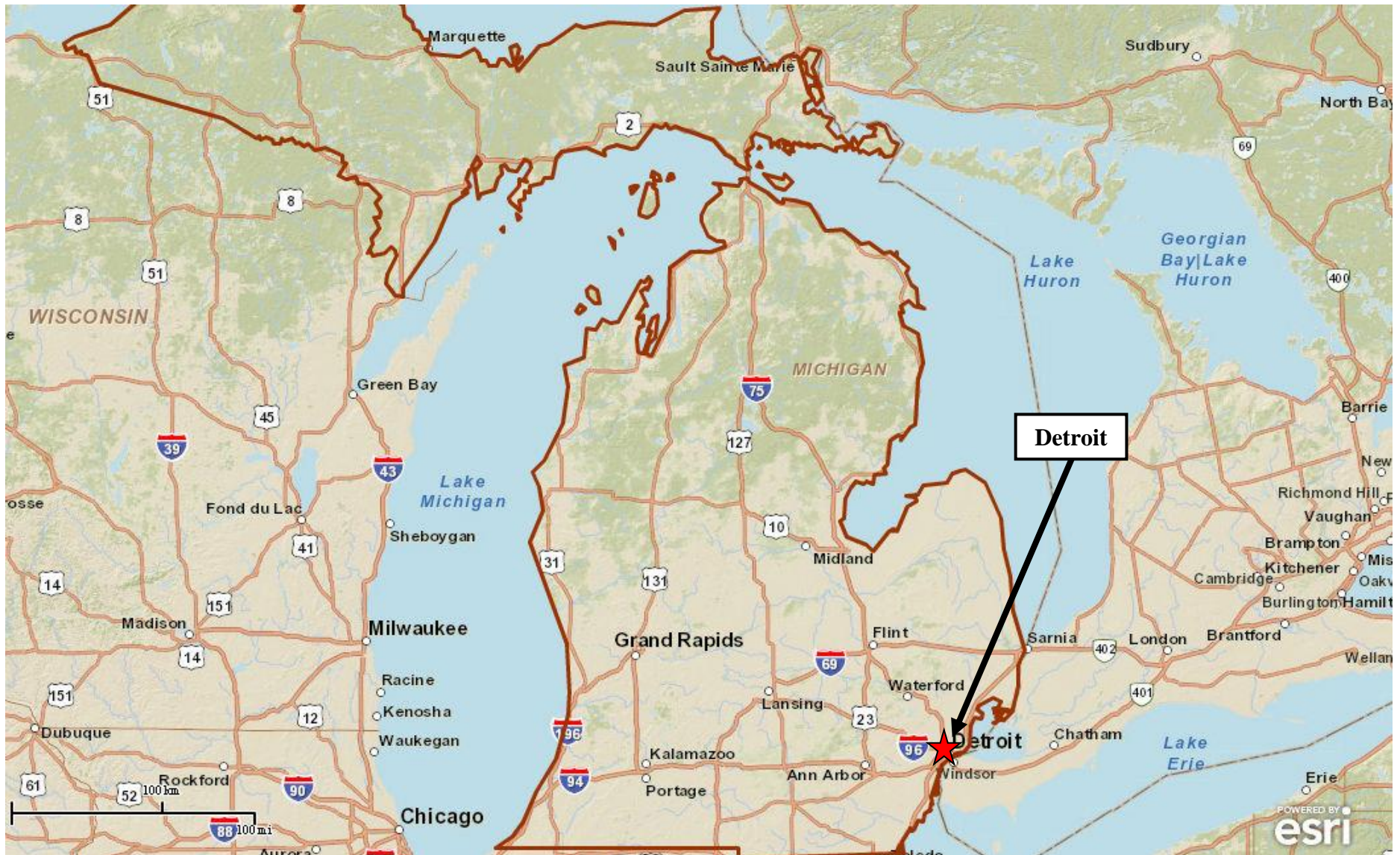
While income characteristics are similar throughout the defined PMA, additional factors such as socio-economic conditions and patterns, local roadway infrastructure, commuting patterns, census tract and physical boundaries, and personal experience were also utilized when defining the primary market area. The following demographic and economic information, comparable properties analysis, and demand calculations are based on the PMA as defined above and highlighted in the following maps. Furthermore, the city of Detroit and Wayne County have also been utilized throughout the analysis for city-wide and regional comparisons.

The following census tracts comprise the defined PMA (*all are in Wayne County*):

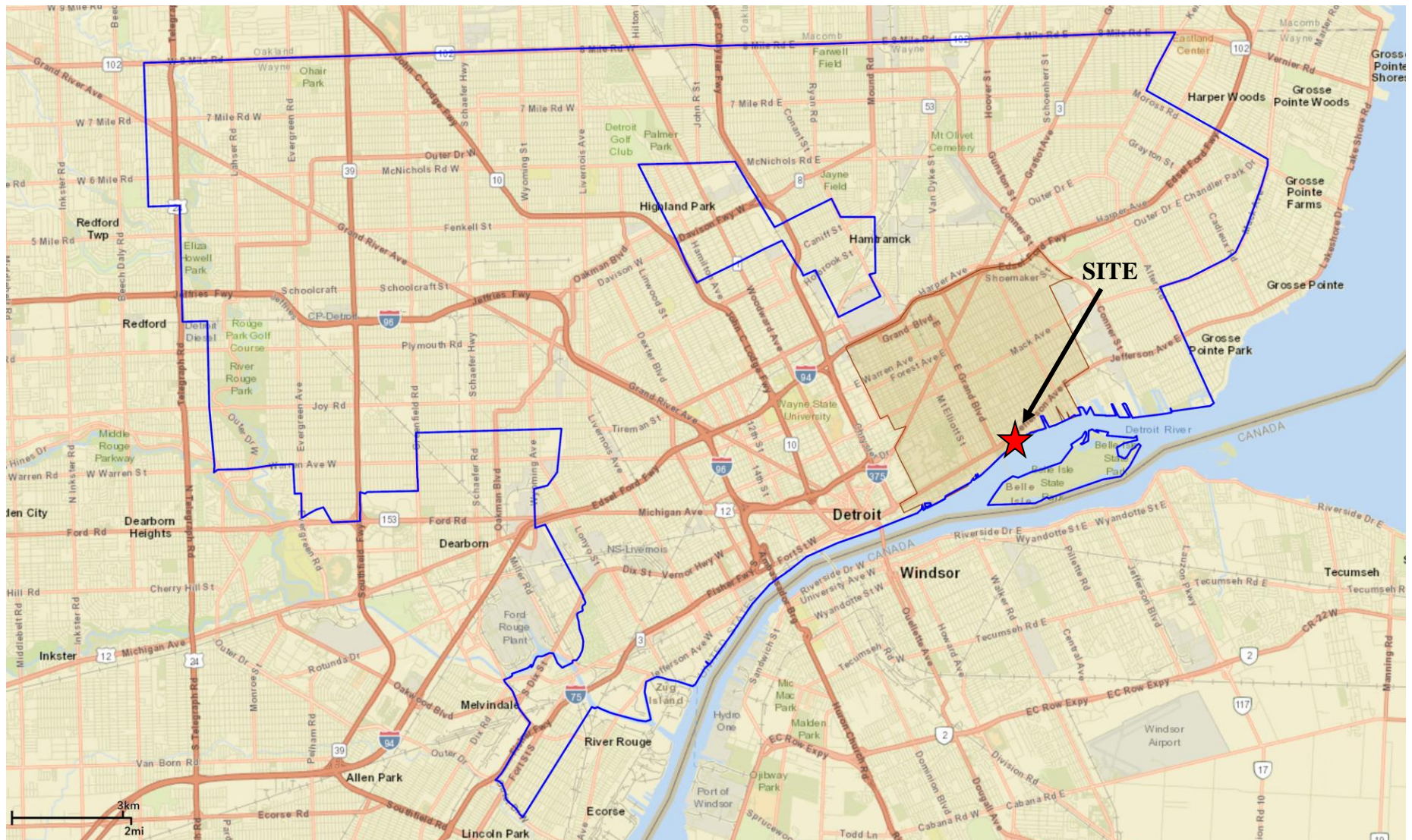
- Tract 5136
- Tract 5139
- Tract 5141
- Tract 5142
- Tract 5143
- Tract 5145
- Tract 5152
- Tract 5153
- Tract 5154
- Tract 5156
- Tract 5157*
- Tract 5159
- Tract 5160
- Tract 5161
- Tract 5162
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- Tract 5164
- Tract 5165
- Tract 5166
- Tract 5167
- Tract 5168
- Tract 5169
- Tract 5184
- Tract 5185
- Tract 5186
- Tract 5188

*Site is located within census tract 5157

Map 1: State of Michigan

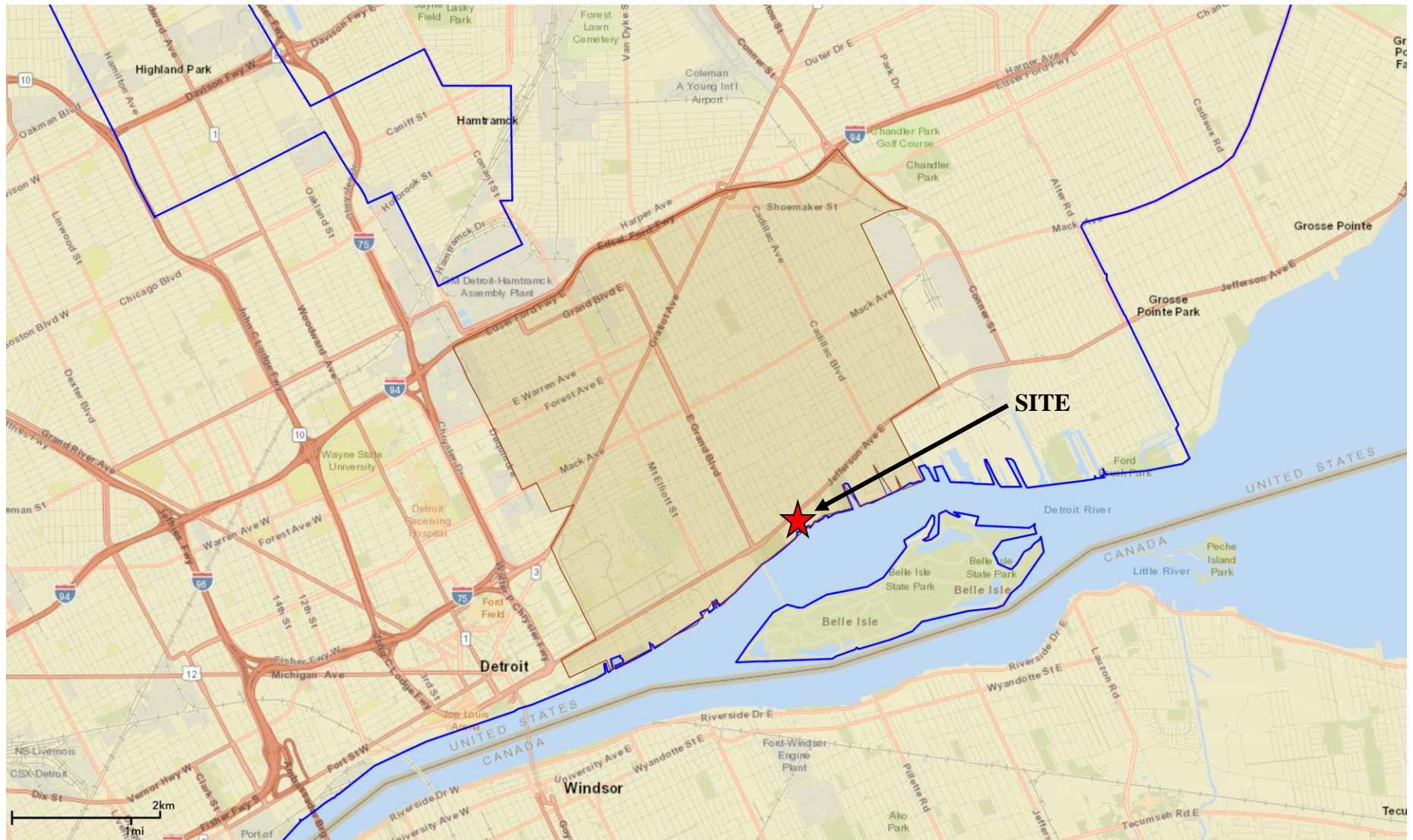


Map 2: Primary Market Area – City of Detroit



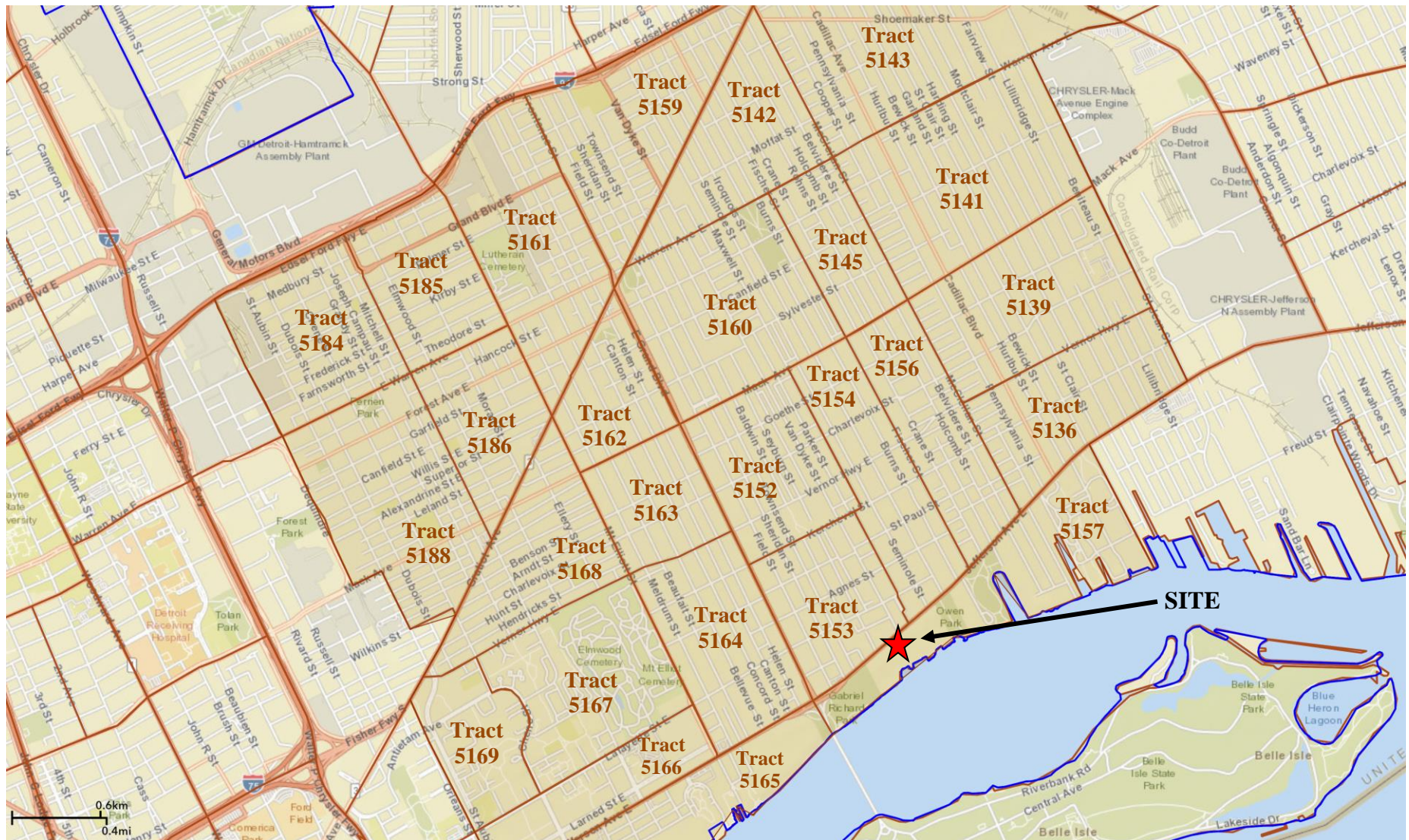
NOTE: Shaded area is PMA; Blue boundary is city of Detroit.

Map 3: Primary Market Area



NOTE: Shaded area is PMA; Blue boundary is city of Detroit.

Map 4: Primary Market Area – Census Tracts



D. SITE FACTORS

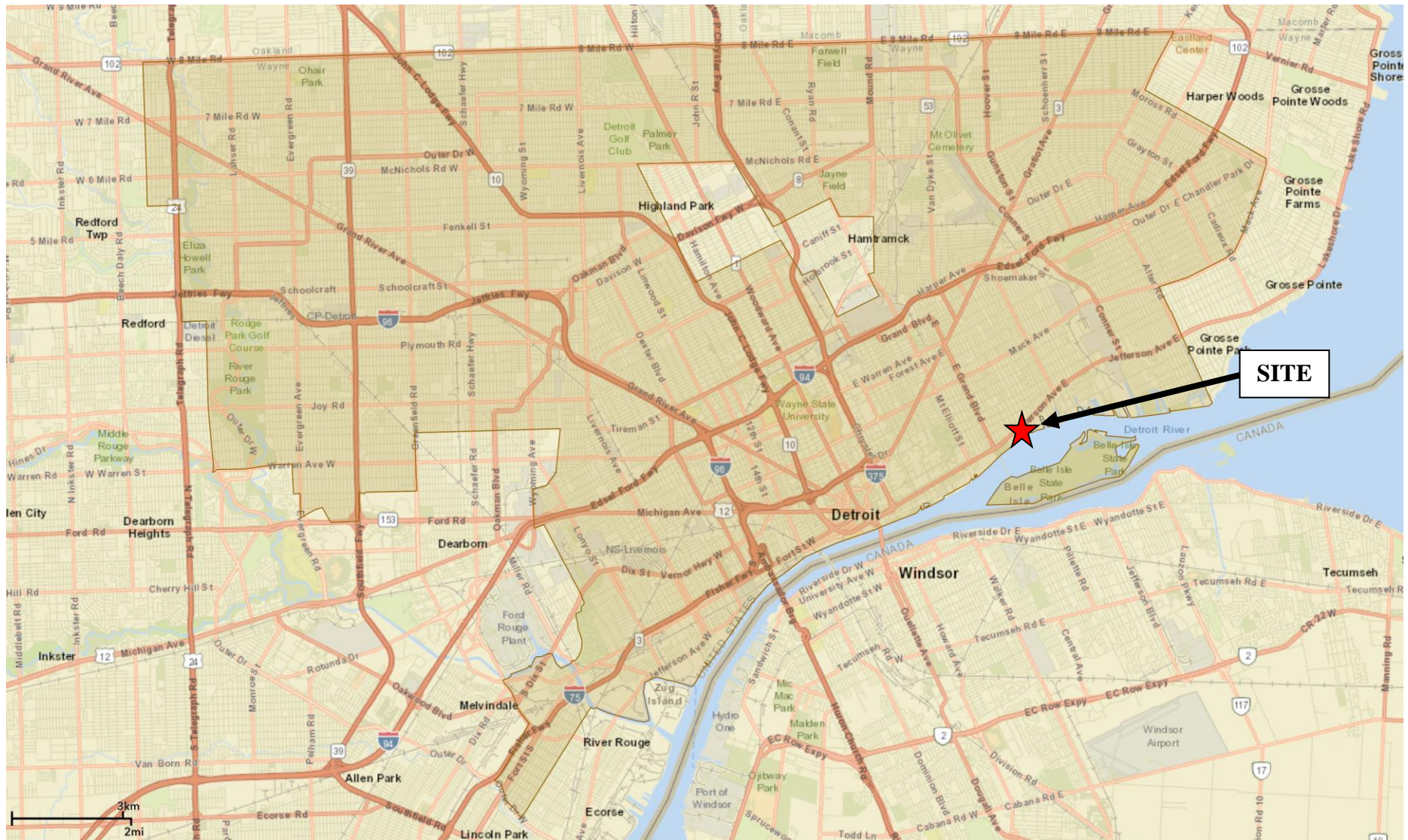
The subject property is located within the southeastern portion of the city of Detroit along the south side of East Jefferson Avenue, just east of Seyburn Street and approximately one-third mile east of East Grand Boulevard. With a physical address of 7850 East Jefferson Avenue, the site is situated roughly 2½ miles east of downtown Detroit, and will have frontage along the Detroit River. As such, the subject property is presently vacant and undeveloped, consisting of mostly grass-covered property with scattered trees around the perimeter. The immediate neighborhood is largely a mix of commercial and residential usages, with a 14-story senior rental property (River Towers) situated adjacent to the west of the site, and the UAW Headquarters (Solidarity House) adjacent to the east. In addition to the Detroit River bordering the property to the south, a parking lot and commercial properties (Belle Isle Pizza and Jefferson Liquor Mart) can be found adjacent to the north along Jefferson Avenue. Additional residential properties are located nearby along the south side of Jefferson Avenue, much of which are market rate apartments and for-sale condominiums. Furthermore, Jefferson Avenue contains a variety of commercial properties near the site, as well as a number of medical facilities – including the Riverview Health and Rehab Center just west of the subject. Overall, the immediate area appears relatively stable, with most properties in fair to good condition.

The site is situated within Census Tract 5157 of Wayne County, with current zoning as R6 (High-Density Residential), which is acceptable for multi-family units. Furthermore, current zoning throughout the neighborhood should not impede or negatively affect the continued viability of the subject proposal. Adjacent land usage is as follows:

North: Jefferson Avenue/Commercial (*in fair to good condition*)
South: Detroit River
East: UAW Headquarters (*in good condition*)
West: Multi-Family - River Tower Senior Apartments (*in good condition*)

Access to the property will be from Jefferson Avenue to the north, representing a seemingly well-traveled five-lane roadway providing direct access to downtown Detroit and also provides residents with relatively easy access to key retail, medical, and other services throughout the area. Overall, the site's location provides a generally positive curb appeal, with most nearby properties in fair to good condition. Further considering the subject property will have frontage along the Detroit River, the site should be considered a positive attribute.

Map 5: Site Location Map – City of Detroit



NOTE: Shaded area is city of Detroit

Map 6: Aerial Site Map – 7850 E. Jefferson Apartments



Nearby Retail

While several smaller neighborhood markets can be found within walking distance of the site, a number of retail/commercial concentrations are a relatively short distance away - many of which are within one mile. The nearest grocery and pharmacy (Indian Village Market and Knight Drugs) are located approximately one-third mile northeast of the site along Jefferson Avenue. Furthermore, the Harbortown Shopping Center is situated roughly one mile southwest of the subject along Jefferson Avenue and just west of Mt. Elliott Street – consisting of Harbortown Market grocery, Rite Aid pharmacy, and more.

Medical Offices and Hospitals

The nearest full-service hospital to the subject property is the Detroit Medical Center main campus in Midtown Detroit, located approximately four miles west along Mack Avenue. However, a number of medical clinics and offices can be found closer to the site along Jefferson Avenue. The closest of these is Detroit Riverview Pediatrics (less than ¼ mile to the west), while several others are situated within one mile – including the Henry Ford Medical Clinic located in the Harbortown Shopping Center.

Other PMA Services

Additional services of note within the market area include a library, community center, and several parks located within two miles of the site. In addition to two several small parks found within ½ mile of the subject along the Detroit River, historic Belle Isle Park can be found less than one mile away. Further, the Elmwood Branch of the Detroit Public Library (1¾ miles from the subject), Butzel Family Center (¾ miles away), and Coleman Young Community Center (two miles away), are all situated within the area. Local fixed-route transit services are provided by the Detroit Department of Transportation (DDOT) and SMART (Suburban Mobility Authority for Regional Transportation), with several bus stops within walking distance of the site along Jefferson Avenue. In addition, both DDOT and SMART offer an ADA Paratransit service for those patrons with mobility disabilities.

Overall, most necessary services are within a relatively short distance of the site, including a grocery, pharmacy, medical, and other necessary services within one mile. Based on a site visit conducted March 3, 2019, overall site characteristics can be viewed as mostly positive. Furthermore, no significant visible nuances were observed that could have a potentially negative effect on the marketability or absorption of the subject property

The following identifies pertinent locations and features within the immediate area, and can be found on the following map by the number next to the corresponding description (*all distances are estimated by paved roadway*):

Retail

1. Grocery – Harbortown Market.....1.0 mile southwest
2. Grocery – Indian Village Market.....0.3 miles northeast
3. Grocery – Family Fair Marketplace.....1.8 miles southwest
4. Pharmacy – Knight Drugs.....0.3 miles northeast
5. Pharmacy – Walgreens0.8 miles southwest
6. Pharmacy – Rite Aid.....1.0 mile southwest
7. Convenience Store – Jefferson Liquor Mart.....adjacent to north
8. Convenience Store – Family Dollar.....1.0 mile northeast
9. Convenience Store – Dollar Daze.....0.9 miles southwest

Medical

10. Hospital – DMC Campus.....4.0 miles west
11. Clinic – Henry Ford Medical Clinic1.1 miles southwest
12. Clinic – Detroit Riverview Pediatrics0.2 miles west
13. Clinic – Team Wellness Center Primary Care.....2.2 miles northwest
14. Urgent Care – Concentra Urgent Care.....1.6 miles southwest

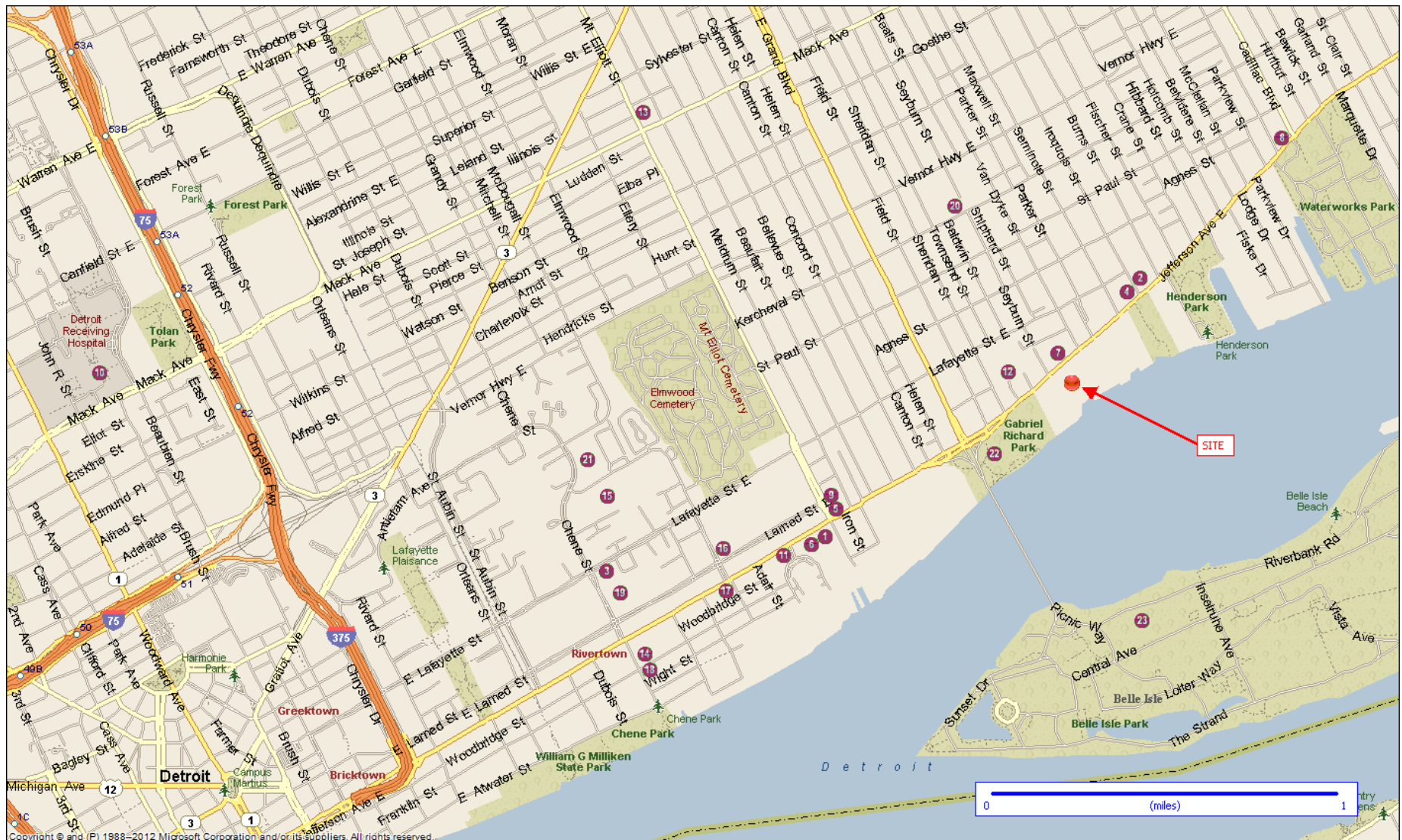
Education

15. School – Bunche Elementary-Middle School.....2.1 miles west
16. School – Martin Luther King Senior High School1.1 miles southwest
17. School – Detroit Academy of Arts (charter).....1.4 miles southwest
18. School – University Prep High School (charter)1.6 miles southwest

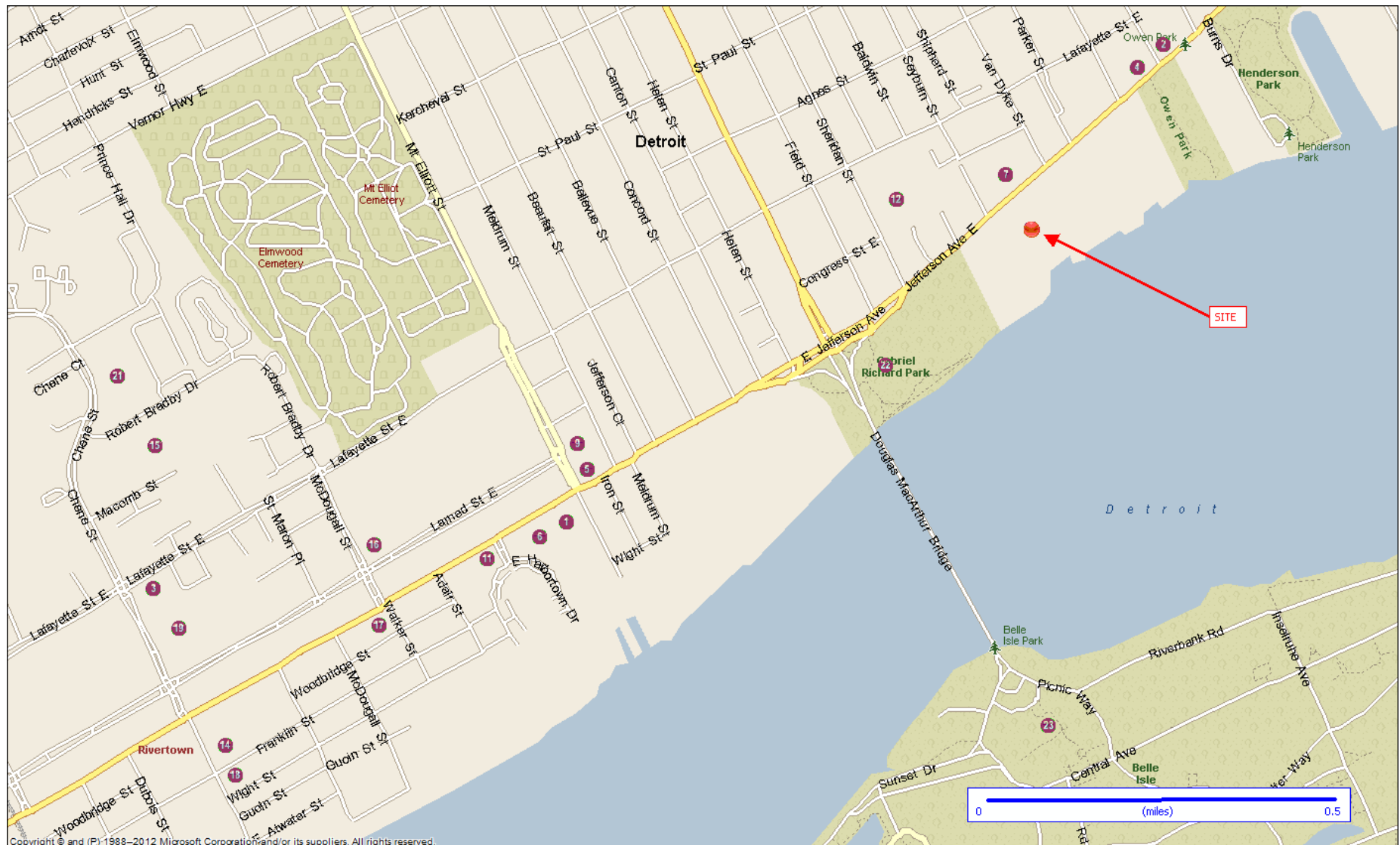
Parks/Recreation/Other

19. Library – Elmwood Branch Library1.7 miles southwest
20. Community Center – Butzel Family Center0.7 miles north
21. Community Center – Coleman Young Community Center.....2.0 miles west
22. Park – Gabriel Richard Park0.2 miles west
23. Park – Belle Isle Park.....0.9 miles southwest

Map 7: Local Features/Amenities



Map 8: Local Features/Amenities (Close View)



Site/Neighborhood Photos

**SITE – 7850 E. Jefferson Apartments
7850 East Jefferson Avenue, Detroit, MI
Facing south from Jefferson Avenue**



**SITE – 7850 E. Jefferson Apartments
7850 East Jefferson Avenue, Detroit, MI
Facing south from Jefferson Avenue**



**SITE – 7850 E. Jefferson Apartments
7850 East Jefferson Avenue, Detroit, MI
Facing west from UAW parking lot
Jefferson Avenue to right**



**SITE – 7850 E. Jefferson Apartments
7850 East Jefferson Avenue, Detroit, MI
Facing east from River Tower Apartments
Jefferson Avenue to left**



EAST – UAW Headquarters adjacent to east of site
Facing southeast from edge of site
Site is to right of building



WEST – River Tower Apartments adjacent to west
Facing south from Jefferson Avenue
Site is to left



NORTH – Parking lot adjacent to north of site
Facing north from Jefferson Avenue
Commercial is to right
Jennings Senior Living is to left



NORTH – Commercial adjacent to north of site
Facing north from Jefferson Avenue



SOUTH – Detroit River adjacent to south of site
Facing southwest from UAW parking lot
Site is to right



STREET – Jefferson Avenue facing west from site
Site is on left



STREET – Jefferson Avenue facing east from site
Site is on right

E. DEMOGRAPHIC FACTORS

Population, Households, and Income

Based on U.S. Census data and ESRI forecasts, most areas throughout the city of Detroit have experienced sharply declining demographic patterns over the past several decades, and are expected to continue to decrease over the next five years - albeit at a much slower pace. As such, the following provides a quick summary of demographic trends for Detroit and the defined market area:

- **Overall Population** – As with many areas throughout Detroit, the PMA has continued to exhibit sharply declining demographic trends, however decreasing at a slightly greater rate than the city as a whole since 2010. As such, the PMA has an estimated overall population of 41,634 persons in 2019, representing a decrease of 11 percent from 2010 (more than 5,000 fewer persons). Future projections indicate declines will slow somewhat for the PMA, decreasing by just two percent over the next five years - accounting for roughly 815 fewer persons between 2019 and 2024. In comparison, the city of Detroit (with a population of 653,449 in 2019) decreased by nine percent between 2010 and 2019, while Wayne County as a whole decreased by three percent.
- **Overall Households** - Similar to population patterns, the number of occupied households within the PMA decreased by eight percent since 2010 (approximately 1,550 fewer household units). However, forecasts indicate an additional decrease of just 150 households through 2024, representing a decrease of less than one percent over the next five years.
- **Overall Renter Households** – In contrast to overall household trends, the number of renter units increased within the PMA since 2010 – growing by two percent (more than 200 rental units) between 2010 and 2019. However, this figure is anticipated to decrease marginally (roughly ten units) between 2019 and 2024.
- **Renter Propensities** - Overall, a particularly large ratio of renter households exists throughout the market area. For the PMA, the renter household percentage was calculated at 69 percent of all occupied units in 2019, notably larger than the city ratio of 54 percent.
- **Age Distribution** – Based on U.S. Census data, the largest population group for the PMA in 2010 consisted of persons between the ages of 45 and 64 years, accounting for 30 percent of all persons. When reviewing distribution patterns between 2000 and 2024, the aging of the population is clearly evident within all three areas analyzed. As such, while the proportion of persons under the age of 45 has steadily declined since 2000, the fastest growing portion of the population base is the older age segments. Within the PMA, persons 55 years and older, which represented 25 percent of the population in 2000, is expected to increase to account for 40 percent of all persons by 2024 – clearly demonstrating the aging of the baby boom generation

- **Overall Household Sizes** - Average household sizes throughout the Detroit area, including the PMA, have demonstrated slightly declining patterns since 2000 – generally consistent with an aging population. Based on U.S. Census information, the PMA contains substantially smaller household sizes as Detroit, on average. In comparison to the PMA average of 2.06 persons per household in 2019, the city had an average household size of 2.54 persons.
- **Median Household Income** - Overall income levels throughout Detroit have experienced little gains over the past decade. While median household income growth for the PMA was somewhat lackluster (0.3 percent annually) between 2010 and 2019, income appreciation is expected to notably improve through 2024 (3.1 percent annually). In comparison, these increases are larger than both the city and county over the next five years (2.7 percent and 2.5 percent annually increase, respectively, between 2019 and 2024).
- **Overall Income Distribution** – According to the U.S. Census Bureau’s American Community Survey, approximately 65 percent of all households within the PMA had an annual income of less than \$35,000 in 2018 – the portion of the population with the greatest need for affordable housing options. In comparison, a similar 59 percent of households had incomes within this range within Detroit itself. With more than one-half of all households within the city (and nearly two-thirds of the PMA) earning less than \$35,000 per year, affordable housing options will undoubtedly continue to be in demand.
- **Non-Senior Renter Income Distribution** – According to the HUD special tabulations, approximately 62 percent of all non-senior renter households within the PMA had an annual income of less than \$35,000 in 2019 – clearly demonstrating the need for affordable rental options locally.

Table 1: Population Trends (2000 to 2024)

	<u>2000</u>	<u>2010</u>	<u>2019</u>	<u>2021</u>	<u>2024</u>
City of Detroit	951,270	713,777	653,449	647,200	637,828
Primary Market Area	68,215	46,671	41,634	41,309	40,820
Wayne County	2,061,162	1,820,584	1,762,968	1,753,618	1,739,593
		<u>2000-2010</u>	<u>2010-2019</u>	<u>2019-2021</u>	<u>2019-2024</u>
		<u>Change</u>	<u>Change</u>	<u>Change</u>	<u>Change</u>
City of Detroit		-25.0%	-8.5%	-1.0%	-2.4%
Primary Market Area		-31.6%	-10.8%	-0.8%	-2.0%
Wayne County		-11.7%	-3.2%	-0.5%	-1.3%
		<u>2000-2010</u>	<u>2010-2019</u>	<u>2019-2021</u>	<u>2019-2024</u>
		<u>Ann. Change</u>	<u>Ann. Change</u>	<u>Ann. Change</u>	<u>Ann. Change</u>
City of Detroit		-2.8%	-1.0%	-0.5%	-0.5%
Primary Market Area		-3.7%	-1.3%	-0.4%	-0.4%
Wayne County		-1.2%	-0.4%	-0.3%	-0.3%
Source: U.S. Census American FactFinder; ESRI Business Analyst; Shaw Research & Consulting, LLC					

Table 2: Household Trends (2000 to 2024)

Overall Households					
	<u>2000</u>	<u>2010</u>	<u>2019</u>	<u>2021</u>	<u>2024</u>
City of Detroit	336,424	269,445	251,408	249,847	247,504
Primary Market Area	26,919	20,889	19,330	19,271	19,182
Wayne County	768,440	702,749	688,241	686,070	682,815
		<u>2000-2010</u>	<u>2010-2019</u>	<u>2019-2021</u>	<u>2019-2024</u>
		<u>Change</u>	<u>Change</u>	<u>Change</u>	<u>Change</u>
City of Detroit		-19.9%	-6.7%	-0.6%	-1.6%
Primary Market Area		-22.4%	-7.5%	-0.3%	-0.8%
Wayne County		-8.5%	-2.1%	-0.3%	-0.8%
Non-Senior Households					
	<u>2000</u>	<u>2010</u>	<u>2019</u>	<u>2021</u>	<u>2024</u>
City of Detroit	267,826	209,677	184,826	180,567	174,252
Primary Market Area	18,616	14,799	12,829	12,420	11,810
Wayne County	600,086	541,534	503,088	492,614	477,008
		<u>2000-2010</u>	<u>2010-2019</u>	<u>2019-2021</u>	<u>2019-2024</u>
		<u>Change</u>	<u>Change</u>	<u>Change</u>	<u>Change</u>
City of Detroit		-21.7%	-11.9%	-2.3%	-5.7%
Primary Market Area		-20.5%	-13.3%	-3.2%	-7.9%
Wayne County		-9.8%	-7.1%	-2.1%	-5.2%
Source: U.S. Census American FactFinder; ESRI Business Analyst; Shaw Research & Consulting, LLC					

Table 3: Overall Renter Household Trends (2000 to 2024)

Overall Renter HHs					2000-2010	2010-2019	2019-2024
	<u>2000</u>	<u>2010</u>	<u>2019</u>	<u>2024</u>	<u>Change</u>	<u>Change</u>	<u>Change</u>
City of Detroit	151,782	131,715	135,921	134,232	-13.2%	3.2%	-1.2%
Primary Market Area	16,674	13,183	13,391	13,383	-20.9%	1.6%	-0.1%
Wayne County	256,603	248,043	267,699	264,439	-3.3%	7.9%	-1.2%
	% Renter	% Renter	% Renter	% Renter			
	<u>2000</u>	<u>2010</u>	<u>2019</u>	<u>2024</u>			
City of Detroit	45.1%	48.9%	54.1%	54.2%			
Primary Market Area	61.9%	63.1%	69.3%	69.8%			
Wayne County	33.4%	35.3%	38.9%	38.7%			
Non-Senior Renter HHs					2000-2010	2010-2019	2019-2024
	<u>2000</u>	<u>2010</u>	<u>2019</u>	<u>2024</u>	<u>Change</u>	<u>Change</u>	<u>Change</u>
City of Detroit	133,532	113,940	116,120	112,447	-14.7%	1.9%	-3.2%
Primary Market Area	13,005	10,215	10,223	9,790	-21.5%	0.1%	-4.2%
Wayne County	219,468	211,147	225,324	217,338	-3.8%	6.7%	-3.5%
	% Renter	% Renter	% Renter	% Renter			
	<u>2000</u>	<u>2010</u>	<u>2019</u>	<u>2024</u>			
City of Detroit	49.9%	54.3%	62.8%	64.5%			
Primary Market Area	69.9%	69.0%	79.7%	82.9%			
Wayne County	36.6%	39.0%	44.8%	45.6%			
Source: U.S. Census American FactFinder; ESRI Business Analyst; Shaw Research & Consulting, LLC							

Table 4: Age Distribution (2000 to 2024)

	City of Detroit				Primary Market Area				Wayne County			
	2010 Number	2000 Percent	2010 Percent	2024 Percent	2010 Number	2000 Percent	2010 Percent	2024 Percent	2010 Number	2000 Percent	2010 Percent	2024 Percent
Under 20 years	218,033	33.9%	30.5%	26.6%	11,081	28.6%	23.7%	20.3%	518,587	30.5%	28.5%	24.9%
20 to 24 years	54,067	6.9%	7.6%	6.4%	3,206	6.0%	6.9%	5.2%	119,980	6.2%	6.6%	5.7%
25 to 34 years	86,390	15.2%	12.1%	13.5%	4,856	13.3%	10.4%	12.0%	218,793	14.8%	12.0%	13.2%
35 to 44 years	92,873	14.4%	13.0%	12.3%	5,318	14.2%	11.4%	10.9%	244,892	15.5%	13.5%	12.6%
45 to 54 years	97,944	12.2%	13.7%	11.8%	7,214	12.9%	15.5%	11.6%	268,999	13.1%	14.8%	12.2%
55 to 64 years	82,545	7.1%	11.6%	12.3%	6,835	7.7%	14.6%	14.5%	218,630	7.8%	12.0%	13.0%
65 to 74 years	43,281	5.6%	6.1%	10.2%	3,773	8.4%	8.1%	14.8%	117,555	6.3%	6.5%	10.9%
75 to 84 years	27,246	3.7%	3.8%	5.1%	3,017	6.6%	6.5%	7.7%	78,829	4.5%	4.3%	5.5%
85 years and older	11,398	1.2%	1.6%	1.7%	1,371	2.3%	2.9%	3.1%	34,319	1.3%	1.9%	2.0%
Under 20 years	218,033	33.9%	30.5%	26.6%	11,081	28.6%	23.7%	20.3%	518,587	30.5%	28.5%	24.9%
20 to 44 years	233,330	36.4%	32.7%	32.2%	13,380	33.4%	28.7%	28.1%	583,665	36.5%	32.1%	31.5%
45 to 64 years	180,489	19.3%	25.3%	24.1%	14,049	20.6%	30.1%	26.1%	487,629	20.9%	26.8%	25.2%
65 years and older	81,925	10.4%	11.5%	17.0%	8,161	17.3%	17.5%	25.6%	230,703	12.1%	12.7%	18.4%
55 years and older	164,470	17.5%	23.0%	29.3%	14,996	25.1%	32.1%	40.1%	449,333	19.9%	24.7%	31.4%
75 years and older	38,644	4.9%	5.4%	6.8%	4,388	8.9%	9.4%	10.8%	113,148	5.8%	6.2%	7.5%
Non-Elderly (<65)	631,852	89.6%	88.5%	83.0%	38,510	82.7%	82.5%	74.4%	1,589,881	87.9%	87.3%	81.6%
Elderly (65+)	81,925	10.4%	11.5%	17.0%	8,161	17.3%	17.5%	25.6%	230,703	12.1%	12.7%	18.4%
Source: U.S. Census American FactFinder; ESRI Business Analyst; Shaw Research & Consulting, LLC												

Table 5: Overall Average Household Size (2000 to 2024)

	<u>2000</u>	<u>2010</u>	<u>2019</u>	<u>2021</u>	<u>2024</u>
City of Detroit	2.77	2.59	2.54	2.53	2.52
Primary Market Area	2.42	2.17	2.06	2.05	2.03
Wayne County	2.64	2.56	2.53	2.52	2.51
		<u>2000-2010</u>	<u>2010-2019</u>	<u>2019-2021</u>	<u>2019-2024</u>
		<u>Change</u>	<u>Change</u>	<u>Change</u>	<u>Change</u>
City of Detroit		-6.3%	-2.0%	-0.4%	-0.9%
Primary Market Area		-10.3%	-5.2%	-0.5%	-1.3%
Wayne County		-3.1%	-1.1%	-0.2%	-0.6%
Source: U.S. Census American FactFinder; ESRI Business Analyst; Shaw Research & Consulting, LLC					

Table 6: Tenure by Age of Householder (2010)

Owner Households								
	<u>Total</u>	<u>15 to</u>	<u>25 to</u>	<u>35 to</u>	<u>45 to</u>	<u>55 to</u>	<u>Non-Senior</u>	<u>Senior</u>
	<u>Owner HH</u>	<u>24 years</u>	<u>35 years</u>	<u>44 years</u>	<u>54 years</u>	<u>64 years</u>	<u>(<65 years)</u>	<u>(65+ years)</u>
City of Detroit	137,730	2,128	11,006	22,121	28,800	31,682	95,737	41,993
Primary Market Area	7,706	113	445	872	1,475	1,679	4,584	3,122
Wayne County	454,706	5,567	42,509	79,644	104,039	98,628	330,387	124,319
	<u>Total</u>	<u>15 to</u>	<u>25 to</u>	<u>35 to</u>	<u>45 to</u>	<u>55 to</u>	<u>Non-Senior</u>	<u>Senior</u>
	<u>Owner HH</u>	<u>24 years</u>	<u>35 years</u>	<u>44 years</u>	<u>54 years</u>	<u>64 years</u>	<u>(<65 years)</u>	<u>(65+ years)</u>
	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>
City of Detroit	51.1%	17.1%	29.0%	43.5%	51.7%	60.0%	45.7%	70.3%
Primary Market Area	36.9%	11.7%	19.2%	29.9%	35.8%	37.5%	31.0%	51.3%
Wayne County	64.7%	21.9%	44.2%	60.0%	68.3%	73.2%	61.0%	77.1%
Renter Households								
	<u>Total</u>	<u>15 to</u>	<u>25 to</u>	<u>35 to</u>	<u>45 to</u>	<u>55 to</u>	<u>Non-Senior</u>	<u>Senior</u>
	<u>Renter HH</u>	<u>24 years</u>	<u>35 years</u>	<u>44 years</u>	<u>54 years</u>	<u>64 years</u>	<u>(<65 years)</u>	<u>(65+ years)</u>
City of Detroit	131,715	10,315	26,889	28,693	26,958	21,085	113,940	17,775
Primary Market Area	13,183	851	1,873	2,040	2,647	2,804	10,215	2,968
Wayne County	248,043	19,817	53,677	53,147	48,330	36,176	211,147	36,896
	<u>Total</u>	<u>15 to</u>	<u>25 to</u>	<u>35 to</u>	<u>45 to</u>	<u>55 to</u>	<u>Non-Senior</u>	<u>Senior</u>
	<u>Renter HH</u>	<u>24 years</u>	<u>35 years</u>	<u>44 years</u>	<u>54 years</u>	<u>64 years</u>	<u>(<65 years)</u>	<u>(65+ years)</u>
	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>	<u>Percent</u>
City of Detroit	48.9%	82.9%	71.0%	56.5%	48.3%	40.0%	54.3%	29.7%
Primary Market Area	63.1%	88.3%	80.8%	70.1%	64.2%	62.5%	69.0%	48.7%
Wayne County	35.3%	78.1%	55.8%	40.0%	31.7%	26.8%	39.0%	22.9%
Source: 2010 U.S. Census								

Table 7: Unit Size Distribution by Tenure (2010)

Renter Households							
	One Person	Two Persons	Three Persons	Four Persons	5 or More Persons	Median Persons Per Rental Unit	
						2000	2010
City of Detroit	50,179	28,648	19,510	14,280	19,098	2.68	2.57
Primary Market Area	6,892	2,899	1,456	850	1,086	2.32	2.19
Wayne County	96,817	57,751	36,680	26,258	30,537	2.46	2.46
	1 Person Percent	2 Person Percent	3 Person Percent	4 Person Percent	5+ Person Percent	Median Change	
City of Detroit	38.1%	21.7%	14.8%	10.8%	14.5%	-4.1%	
Primary Market Area	52.3%	22.0%	11.0%	6.4%	8.2%	-5.6%	
Wayne County	39.0%	23.3%	14.8%	10.6%	12.3%	0.0%	
Owner Households							
	One Person	Two Persons	Three Persons	Four Persons	5 or More Persons	Median Persons Per Owner Unit	
						2000	2010
City of Detroit	41,561	39,329	23,251	15,523	18,066	2.84	2.62
Primary Market Area	3,057	2,156	1,125	636	732	2.56	2.36
Wayne County	118,893	144,890	76,167	62,505	52,251	2.73	2.61
	1 Person Percent	2 Person Percent	3 Person Percent	4 Person Percent	5+ Person Percent	Median Change	
City of Detroit	30.2%	28.6%	16.9%	11.3%	13.1%	-7.7%	
Primary Market Area	39.7%	28.0%	14.6%	8.3%	9.5%	-7.8%	
Wayne County	26.1%	31.9%	16.8%	13.7%	11.5%	-4.4%	
Source: U.S. Census American FactFinder; ESRI Business Analyst; Shaw Research & Consulting, LLC							

Table 8: Median Household Income (1999 to 2024)

	<u>1999</u>	<u>2010</u>	<u>2019</u>	<u>2021</u>	<u>2024</u>
City of Detroit	\$29,274	\$28,357	\$30,139	\$32,068	\$34,960
Primary Market Area	\$23,413	\$23,605	\$24,106	\$25,917	\$28,632
Wayne County	\$40,570	\$42,241	\$47,398	\$50,228	\$54,473
		<u>1999-2010</u>	<u>2010-2019</u>	<u>2019-2021</u>	<u>2019-2024</u>
		<u>Change</u>	<u>Change</u>	<u>Change</u>	<u>Change</u>
City of Detroit		-3.1%	6.3%	6.4%	16.0%
Primary Market Area		0.8%	2.1%	7.5%	18.8%
Wayne County		4.1%	12.2%	6.0%	14.9%
		<u>1999-2010</u>	<u>2010-2019</u>	<u>2019-2021</u>	<u>2019-2024</u>
		<u>Ann. Change</u>	<u>Ann. Change</u>	<u>Ann. Change</u>	<u>Ann. Change</u>
City of Detroit		-0.3%	0.8%	2.1%	2.7%
Primary Market Area		0.1%	0.3%	2.5%	3.1%
Wayne County		0.4%	1.5%	2.0%	2.5%

Source: U.S. Census American FactFinder; ESRI Business Analyst; Shaw Research & Consulting, LLC

Table 9: Overall Household Income Distribution (2019)
Jefferson PMA

Income Range	Owner-Occupied		Renter-Occupied	
	<u>Number</u>	<u>Percent</u>	<u>Number</u>	<u>Percent</u>
Less than \$10,000	582	22.3%	3,230	31.6%
\$10,000 to \$14,999	209	8.0%	1,580	15.5%
\$15,000 to \$19,999	134	5.1%	915	8.9%
\$20,000 to \$24,999	235	9.0%	635	6.2%
\$25,000 to \$34,999	306	11.7%	1,092	10.7%
\$35,000 to \$49,999	129	4.9%	1,030	10.1%
\$50,000 to \$74,999	475	18.2%	882	8.6%
\$75,000 to \$99,999	134	5.1%	553	5.4%
\$100,000 to \$149,999	261	10.0%	186	1.8%
\$150,000 and Over	<u>142</u>	<u>5.5%</u>	<u>120</u>	<u>1.2%</u>
TOTAL	2,606	100.0%	10,223	100.0%
Less than \$34,999	1,466	44.5%	7,452	62.2%
\$35,000 to \$49,999	129	11.7%	1,030	10.7%
\$50,000 to \$74,999	475	4.9%	882	10.1%
\$75,000 to \$99,000	134	18.2%	553	8.6%
\$100,000 and Over	403	20.6%	306	8.4%

Source: American Community Survey; HUD User; ESRI; Shaw Research & Consulting, LLC

Table 10: Overall Household Income Distribution (2018)

Income Range	City of Detroit		Primary Market Area		Wayne County	
	<u>Number</u>	<u>Percent</u>	<u>Number</u>	<u>Percent</u>	<u>Number</u>	<u>Percent</u>
Less than \$10,000	53,155	20.6%	4,752	23.7%	81,117	12.1%
\$10,000 to \$14,999	24,391	9.4%	2,586	12.9%	43,130	6.4%
\$15,000 to \$19,999	22,359	8.7%	1,758	8.8%	42,865	6.4%
\$20,000 to \$24,999	19,110	7.4%	1,459	7.3%	39,210	5.8%
\$25,000 to \$29,999	17,143	6.6%	1,352	6.7%	36,299	5.4%
\$30,000 to \$34,999	15,382	6.0%	1,037	5.2%	37,198	5.5%
\$35,000 to \$39,999	14,077	5.4%	724	3.6%	33,000	4.9%
\$40,000 to \$44,999	12,575	4.9%	858	4.3%	31,065	4.6%
\$45,000 to \$49,999	10,179	3.9%	590	2.9%	27,164	4.0%
\$50,000 to \$59,999	16,642	6.4%	1,078	5.4%	50,419	7.5%
\$60,000 to \$74,999	18,187	7.0%	1,330	6.6%	60,193	8.9%
\$75,000 to \$99,999	16,704	6.5%	1,174	5.8%	71,052	10.6%
\$100,000 to \$124,999	8,634	3.3%	434	2.2%	45,752	6.8%
\$125,000 to \$149,999	4,051	1.6%	433	2.2%	26,087	3.9%
\$150,000 to \$199,999	3,574	1.4%	289	1.4%	25,938	3.9%
\$200,000 and Over	<u>2,308</u>	<u>0.9%</u>	<u>221</u>	<u>1.1%</u>	<u>22,654</u>	<u>3.4%</u>
TOTAL	258,471	100.0%	20,075	100.0%	673,143	100.0%
Less than \$34,999	151,540	58.6%	12,944	64.5%	279,819	41.6%
\$35,000 to \$49,999	36,831	14.2%	2,172	10.8%	91,229	13.6%
\$50,000 to \$74,999	34,829	13.5%	2,408	12.0%	110,612	16.4%
\$75,000 to \$99,999	16,704	6.5%	1,174	5.8%	71,052	10.6%
\$100,000 and Over	18,567	7.2%	1,377	6.9%	120,431	17.9%
Source: American Community Survey						

F. COMMUNITY FACTORS

Crime and School Performance

The following highlights crime and academic performance scores for the East Jefferson neighborhood and surrounding area:

- **Crime Risk** – Based on crime information by zip code, the crime rate within the immediate area is substantially above region, state, and national levels. As such, on a scale from one (indicating low crime) to 100 (high crime), the area in which the subject property is situated (zip code 48214) had a violent crime (murder, non-negligent manslaughter, rape, robbery, and aggravated assault) score of 86.3, while the property crime (burglary, larceny-theft, motor vehicle theft, and arson) score was 73.7. As can be seen, crime scores for each category were significantly above both the state and national averages.
- **Crime Assessment** – Based on first hand observations from a recent site visit, the neighborhood surrounding the subject property does not have any noticeable safety concerns. However, the elevated crime statistics for the immediate area need to be taken into consideration. As such, extra security precautions should be deemed as a necessary measure to provide a safe environment for potential residents of the subject property (such as extra lighting, surveillance cameras, security access gate, and/or secured intercom entry).
- **School Performance Scores** - Information on local academic performance was obtained from the Michigan Department of Education, which provides an accountability scorecard and proficiency scores for each school in the state. Overall, scores for the majority of nearby schools are significantly below state averages. Although the nearest public schools (within the Detroit City School District) appear to have somewhat better scores than charter schools, the overall student performance scores are still substantially below state norms.

Table 11: Crime Rates

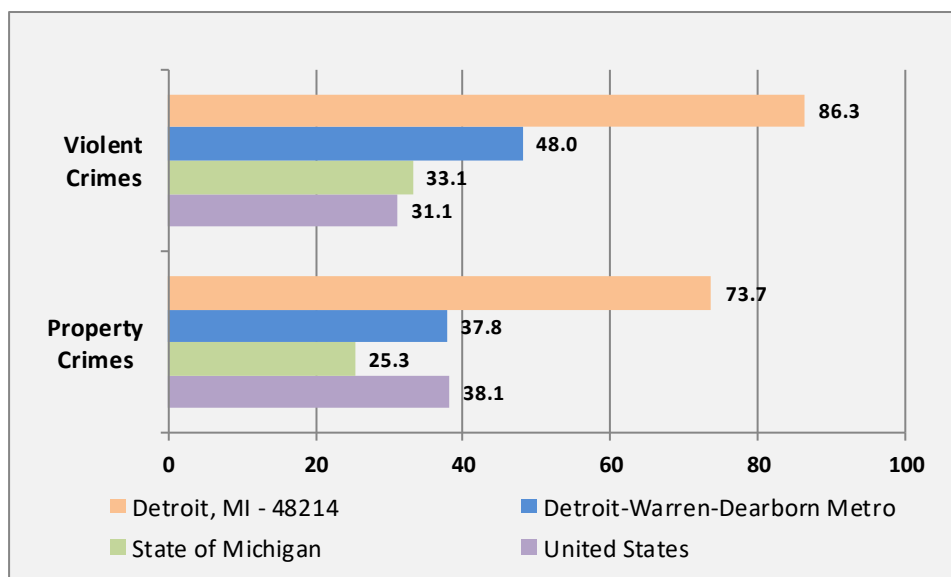


Table 12: School Performance Scores

School			2017-18 Student Performance ¹		
<u>School Name</u>	<u>Type</u>	<u>Grades</u>	<u>Subject School</u>	<u>Similar School Average²</u>	<u>State Average</u>
Bunche Preparatory Academy	Assigned	K-8	12%	15%	40%
MLK Senior High School	Assigned	9-12	14%	29%	40%
Detroit Academy of Arts/Sciences-Charter	Near	K-8	7%	24%	40%
Detroit Academy of Arts/Sciences Middle-Charter	Near	6-8	10%	15%	40%
Detroit Prep-Charter	Near	K-3	NA	NA	NA
Garvey Academy-Charter	Near	K-8	7%	11%	40%

¹Percent of students meeting state academic standards (scoring "proficient" or "advanced") on state tests (M-STEP, MI-Access, SAT) where available.

²Average of similar schools by demographic as compared to the subject school

Source: Michigan Department of Education - MiSchoolData.org

G. ECONOMIC FACTORS

Employment, Wages, Commuting

The following highlights current economic conditions for Wayne County and the market area, where available:

- **Overall Employment Trends** – Overall employment conditions within the city of Detroit have improved somewhat in recent years, with job gains in each of the last seven years. As such, approximately 21,900 jobs were added in the city between 2011 and 2018, representing an increase of 11 percent and resulting in the city's lowest annual unemployment rate since at least 2005. Additionally, the most recent figures exhibited an increase of 3,167 jobs for the city between 2017 and 2018 – resulting in an annual increase of 1.4 percent over the past year.
- **Unemployment Trends** – Based on the increasing number of jobs throughout the area, the city's annual unemployment rate for 2018 was calculated at 8.2 percent, which represented an improvement from 9.3 percent in 2017. Although remaining notably above both the state and national figures (at 4.1 and 3.9 percent, respectively), this unemployment rate reflects an improvement for the ninth consecutive year for the city.
- **Employment by Industry** - According to information from the Michigan Department of Technology, Management, & Budget (DTMB), the largest individual employment industry within the private sector for Wayne County is health care/social assistance (17 percent of all jobs), followed by manufacturing (13 percent) and retail trade (nine percent). In addition, local government positions also comprised a relatively large number of jobs, at seven percent (number six industry).
- **Employment by Industry Five Year Change** - Based on a comparison of employment from 2012, most industries within Wayne County experienced job gains over the past five years. Sectors that exhibited the largest net increase in jobs during this time frame were manufacturing (13,963 new jobs), finance/insurance (5,556 new jobs), and health care/social assistance (5,269 new jobs). In contrast, the largest employment declines occurred with local government (5,078 fewer jobs) as well as in the administrative/waste services sector (4,855 fewer jobs).
- **WARN Notices** – Despite recording employment gains, numerous local companies have reported employment reductions within the city in recent years. According to the Michigan WARN List (which provide notification of plant closures and layoff events from companies throughout Michigan), ten employers within the Detroit area reported reductions in 2018, totaling roughly 1,675 positions.
- **Commuting Characteristics** - Based on place of employment, 77 percent of PMA residents are employed within the county in which they reside, while 23 percent commute outside of the county. Furthermore, according to ACS data, approximately 64 percent of workers within the PMA drove alone to their place of employment, while a much higher than average 22 percent used public transportation, walked, or some other means.

- **Wages by Industry** – Overall, the highest wage earners within the private sector are paid to persons employed in management positions (earning an average of \$145,080 annually), followed by those in the utilities and professional/technical services industries (at \$121,680 and \$96,720, respectively). Additional industries of note include finance/insurance and federal government, both earning an average exceeding \$80,000 per year.
- **Long-Term Projections** - Overall economic projections for the Detroit Metro Prosperity Region (which includes Macomb, Oakland, and Wayne Counties) indicate modest growth over the next decade, with an overall employment gain of approximately eight percent anticipated between 2014 and 2024. Based on these projections, most industries are expected to experience increases during this time – with the greatest increases occurring within professional/business services and education/health services, both anticipated to increase by more than 30,000 jobs. In contrast, industries projected to experience the largest decreases during this time is educational services and government (both declining by more than 1,500 positions).

Table 13: Historical Employment Trends

Year	City of Detroit				Employment Annual Change			Unemployment Rate		
	Labor Force	Number Employed	Annual Change	Percent Change	City of Detroit	State of Michigan	United States	City of Detroit	State of Michigan	United States
2005	375,071	324,368	--	--	--	--	--	13.5%	6.8%	5.1%
2006	371,254	321,446	(2,922)	-0.9%	-0.9%	-0.4%	1.9%	13.4%	7.0%	4.6%
2007	363,760	314,777	(6,669)	-2.1%	-2.1%	-1.3%	1.1%	13.5%	7.0%	4.6%
2008	358,157	304,376	(10,401)	-3.3%	-3.3%	-2.8%	-0.5%	15.0%	8.0%	5.8%
2009	377,828	283,041	---	---	---	---	---	25.1%	13.7%	9.3%
2010	276,885	208,289	(74,752)	-26.4%	-26.4%	-0.9%	-0.6%	24.8%	12.6%	9.6%
2011	261,343	206,226	(2,063)	-1.0%	-1.0%	0.1%	0.6%	21.1%	10.4%	8.9%
2012	257,730	208,119	1,893	0.9%	0.9%	1.2%	1.9%	19.2%	9.1%	8.1%
2013	257,708	208,943	824	0.4%	0.4%	1.4%	1.0%	18.9%	8.8%	7.4%
2014	249,976	209,701	758	0.4%	0.4%	2.5%	1.7%	16.1%	7.2%	6.2%
2015	241,467	212,953	3,252	1.6%	1.6%	1.9%	1.7%	11.8%	5.4%	5.3%
2016	246,326	219,906	6,953	3.3%	3.3%	2.4%	1.7%	10.7%	5.0%	4.9%
2017	248,070	224,958	5,052	2.3%	2.3%	1.2%	1.3%	9.3%	4.6%	4.4%
2018	248,543	228,125	3,167	1.4%	1.4%	0.8%	1.6%	8.2%	4.1%	3.9%

City of Detroit				State of Michigan		
	Number	Percent	Ann. Avg.		Percent	Ann. Avg.
Change (2010-2015):	4,664	2.2%	0.4%	Change (2010-2015):	7.3%	1.5%
Change (2015-2018):	15,172	7.1%	2.4%	Change (2015-2018):	4.4%	1.5%
Change (2010-2018):	19,836	9.5%	1.2%	Change (2010-2018):	12.0%	1.5%

*Monthly data not seasonally adjusted

Table 14: Largest Employers – City of Detroit (2016)

Employer	Industry	Number of Employees
General Motors Company	Manufacturing	32,353
U.S. Government	Federal Government	18,701
Henry Ford Health System	Healthcare	17,332
Illitch Companies	Sports/Entertainment	16,567
Rock Ventures	Investments/Real Estate	13,445
Detroit Medical Center	Healthcare	10,558
U.S. Postal Service	Postal Service	9,856
State of Michigan	State Government	9,394
City of Detroit	City Government	8,956
Blue Cross/Blue Shield of Michigan	Insurance	6,918
DTE Energy Co.	Utilities	6,555
Detroit Public Schools	Education	5,862
Wayne State University	Education	5,589
Comerica Bank	Finance	4,797
Wayne County Government	County Government	2,852

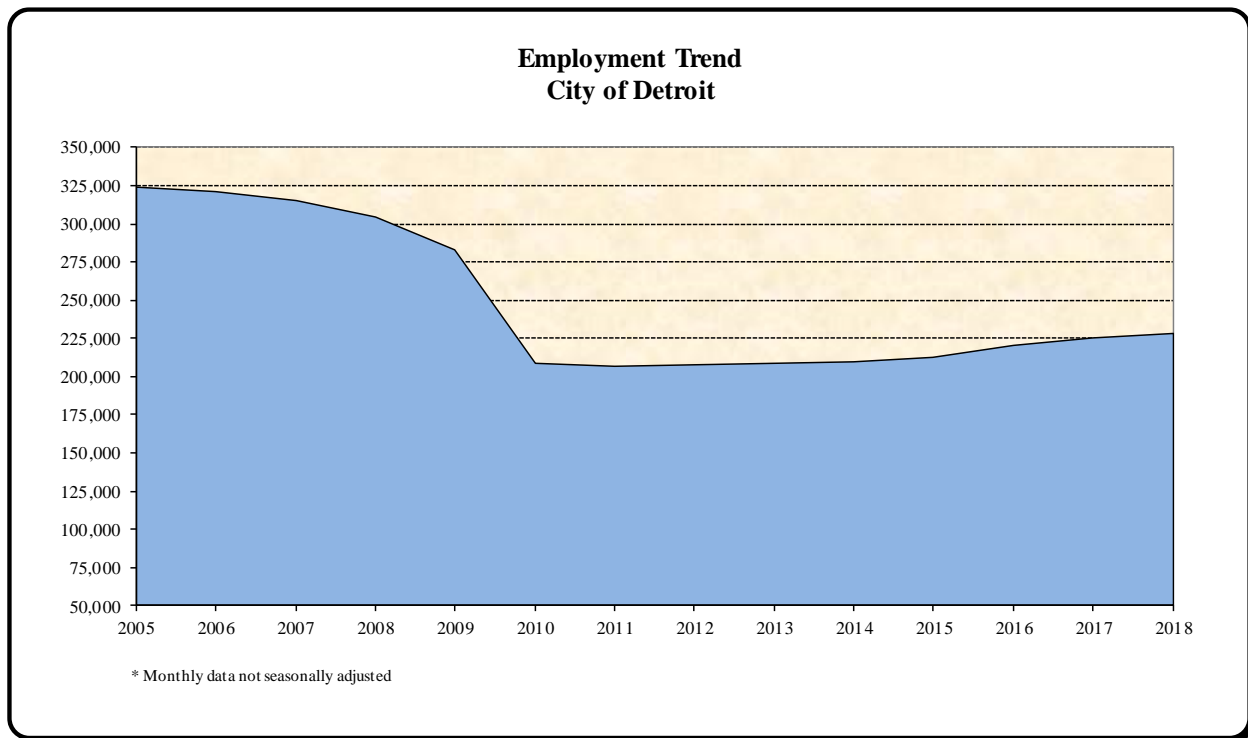
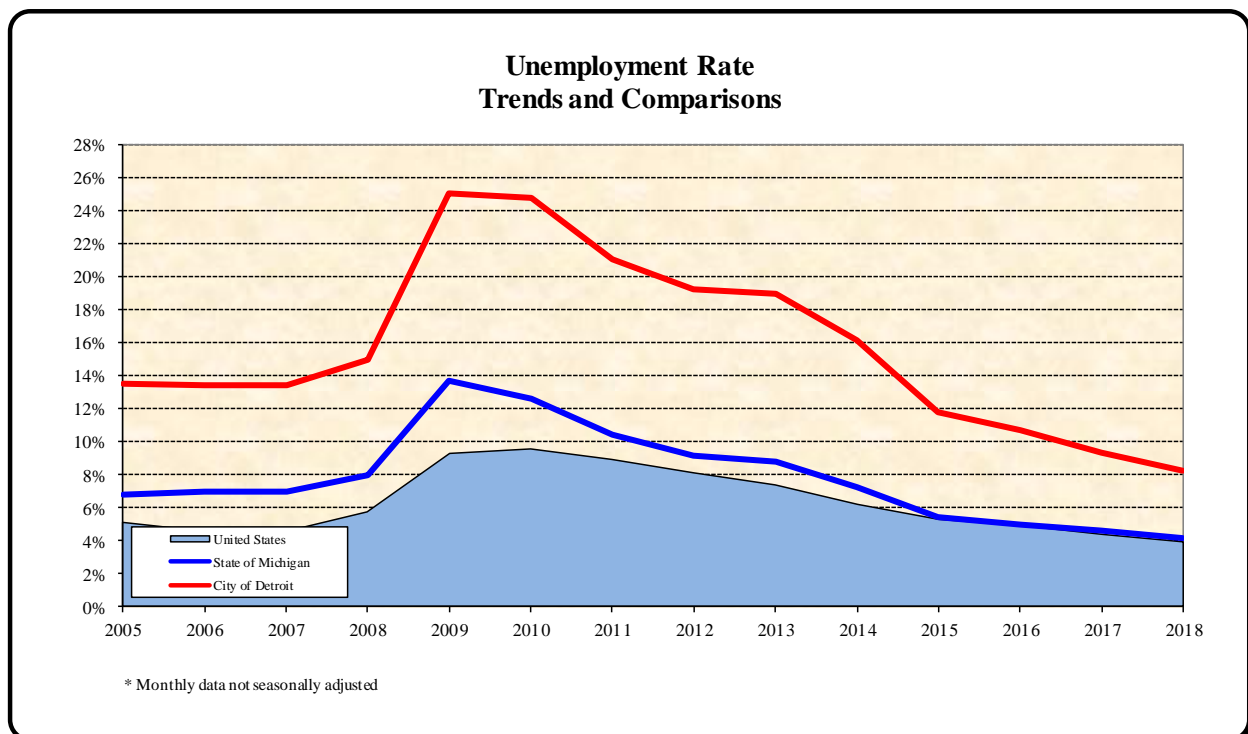
Figure 1: Employment Growth**Figure 2: Historical Unemployment Rate**

Table 15: Employment by Industry (Wayne County – 2012-2017)

Industry	Annual 2017		Annual 2012		Change (2012-2017)	
	Number Employed	Percent	Number Employed	Percent	Number Employed	Percent Change
Agriculture, forestry, fishing and hunting	341	0.0%	483	0.1%	(142)	(29%)
Mining	569	0.1%	453	0.1%	116	26%
Utilities	3,372	0.5%	3,336	0.5%	36	1%
Construction	21,008	2.9%	17,564	2.6%	3,444	20%
Manufacturing	92,289	12.8%	78,326	11.4%	13,963	18%
Wholesale trade	27,472	3.8%	26,320	3.8%	1,152	4%
Retail trade	67,734	9.4%	67,849	9.9%	(115)	(0%)
Transportation and warehousing	37,611	5.2%	33,575	4.9%	4,036	12%
Information	6,647	0.9%	6,819	1.0%	(172)	(3%)
Finance and insurance	26,582	3.7%	21,026	3.1%	5,556	26%
Real estate and rental and leasing	7,459	1.0%	8,038	1.2%	(579)	(7%)
Professional and technical services	55,377	7.7%	50,271	7.3%	5,106	10%
Management of companies and enterprises	24,964	3.5%	20,081	2.9%	4,883	24%
Administrative and waste services	38,460	5.4%	43,315	6.3%	(4,855)	(11%)
Educational services	11,105	1.5%	11,455	1.7%	(350)	(3%)
Health care and social assistance	118,325	16.5%	113,056	16.5%	5,269	5%
Arts, entertainment, and recreation	10,232	1.4%	9,090	1.3%	1,142	13%
Accommodation and food services	66,226	9.2%	64,845	9.5%	1,381	2%
Other services, exc. public administration	21,261	3.0%	22,137	3.2%	(876)	(4%)
Unclassified	780	0.1%	779	0.1%	1	0%
Federal Government	13,579	1.9%	14,361	2.1%	(782)	(5%)
State Government	14,530	2.0%	14,297	2.1%	233	2%
Local Government	52,731	7.3%	57,809	8.4%	(5,078)	(9%)
Total Private Industry	637,810	88.8%	598,818	87.4%	38,992	7%
Total All Industries	718,650	100.0%	685,285	100.0%	33,365	5%
* - Data Not Available						
Source: Industry Census of Employment & Wages (QCEW - ES202) - Wayne County						

Table 16: WARN Notices (City of Detroit)

<u>Year</u>	<u>Company Name</u>	<u>City</u>	<u>Date Announced</u>	<u>Incident Type</u>	<u>Number Affected</u>
2019	Integrated Mfg & Assembly	Detroit	2/6/2019	Layoff	<u>175</u>
	TOTAL 2019				175
2018	Envoy	Detroit	3/14/2018	Closure	114
	Live Nation - Filmore Detroit	Detroit	4/2/2018	Layoff	180
	New Center Community Services	Detroit	4/30/2018	Closure	66
	Sodexo	Detroit	5/3/2018	Closure	34
	SMART	Detroit	6/8/2018	Layoff	318
	Menzies Aviation	Detroit	9/14/2018	Layoff	189
	Bays Bakery	Detroit	10/24/2018	Closure	50
	Hard Rock Café	Detroit	11/27/2018	Closure	60
	GM Detroit-Hamtramck	Detroit	12/17/2018	Closure	620
	GM Detroit-Hamtramck LOC	Detroit	12/17/2018	Closure	<u>44</u>
	TOTAL 2018				1,675
2017	Focus:HOPE Communities, Inc.	Detroit	1/9/2017	Layoff	120
	Android	Detroit	1/25/2017	Layoff	10
	International Specialty Tube	Detroit	2/3/2017	Closure	114
	AT&T DSL Care Center	Detroit	3/15/2017	Closure	53
	Sodexo	Detroit	4/3/2017	Layoff	52
	Woodward Academy	Detroit	5/1/2017	Closure	65
	Fiat Chrysler Automotive	Detroit	7/3/2017	Closure	82
	Kindred Hospital	Detroit	7/20/2017	Closure	145
	Southwest Solutions	Detroit	10/31/2017	Layoff	0
	Yanfeng	Highland Park	11/27/2017	Layoff	<u>345</u>
	TOTAL 2017				986
NOTE: Incidents that have been rescinded are still listed, but a have a layoff figure of zero.					
NOTE: Incidents listed as "Statewide" are not included in the above figures.					
Source: Michigan WARN List - Michigan DTMB					

Table 17: Commuting Characteristics (2018)

EMPLOYMENT BY PLACE OF WORK						
	City of Detroit		Primary Market Area		Wayne County	
Total	221,025	100.0%	14,124	100.0%	705,969	100.0%
Worked in State of Residence	219,986	99.5%	14,098	99.8%	700,957	99.3%
Worked in County of Residence	157,810	71.4%	10,931	77.4%	522,296	74.0%
Worked Outside County of Residence	62,176	28.1%	3,167	22.4%	178,661	25.3%
Worked Outside State of Residence	1,039	0.5%	26	0.2%	5,012	0.7%
MEANS OF TRANSPORTATION TO WORK						
	City of Detroit		Primary Market Area		Wayne County	
Total	221,025	100.0%	14,124	100.0%	702,143	100.0%
Drove Alone - Car, Truck, or Van	153,473	69.4%	9,045	64.0%	566,350	80.7%
Carpooled - Car, Truck, or Van	28,671	13.0%	1,179	8.3%	67,405	9.6%
Public Transportation	16,714	7.6%	2,277	16.1%	20,903	3.0%
Walked	8,134	3.7%	412	2.9%	13,620	1.9%
Other Means	5,624	2.5%	472	3.3%	10,998	1.6%
Worked at Home	8,409	3.8%	739	5.2%	22,867	3.3%
Source: U.S. Census Bureau; American Community Survey						

Table 18: Wages and Employment – Wayne County (2017)

Industry	Number of Establish-ments	Average Employment	Average Weekly Wages	Average Annual Wages
Total, All Industries - Private	30,278	637,810	\$1,161	\$60,372
Agriculture, forestry, fishing and hunting	40	341	\$720	\$37,440
Mining	16	569	\$1,498	\$77,896
Utilities	61	3,372	\$2,340	\$121,680
Construction	1,777	21,008	\$1,351	\$70,252
Manufacturing	1,639	92,289	\$1,389	\$72,228
Wholesale trade	1,545	27,472	\$1,482	\$77,064
Retail trade	5,511	67,734	\$584	\$30,368
Transportation and warehousing	1,341	37,611	\$1,202	\$62,504
Information	425	6,647	\$1,451	\$75,452
Finance and insurance	1,268	26,582	\$1,625	\$84,500
Real estate and rental and leasing	880	7,459	\$950	\$49,400
Professional and technical services	2,845	55,377	\$1,860	\$96,720
Management of companies and enterprises	193	24,964	\$2,790	\$145,080
Administrative and waste services	1,663	38,460	\$795	\$41,340
Educational services	352	11,105	\$816	\$42,432
Health care and social assistance	3,225	118,325	\$1,015	\$52,780
Arts, entertainment, and recreation	366	10,232	\$1,426	\$74,152
Accommodation and food services	2,845	66,226	\$412	\$21,424
Other services, exc. public administration	3,923	21,261	\$682	\$35,464
Unclassified	365	780	\$668	\$34,736
Federal Government	132	13,579	\$1,603	\$83,356
State Government	91	14,530	\$1,144	\$59,488
Local Government	397	52,731	\$1,051	\$54,652
* - Data Not Available				
Source: Industry Census of Employment & Wages (QCEW - ES202) - Annual 2017 - Wayne County				

Table 19: Employment Projections

Long-Term Industry Employment Projections 2014 to 2024 Detroit Metro Prosperity Region				
Industry Title	Employment		Employment Change	
	2014	2024	10-Year Numeric	10-Year Percent
Total, All Industries	1,846,700	1,990,720	144,020	7.8%
Agriculture, Forestry, Fishing and Hunting	2,280	2,300	20	0.9%
Mining	790	800	10	1.3%
Construction	54,940	62,360	7,420	13.5%
Manufacturing	208,150	221,610	13,460	6.5%
Utilities	5,070	4,920	-150	-3.0%
Wholesale Trade	80,840	85,730	4,890	6.0%
Retail Trade	187,280	196,880	9,600	5.1%
Transportation and Warehousing	54,760	58,810	4,050	7.4%
Information	26,610	26,920	310	1.2%
Finance and Insurance	71,980	76,590	4,610	6.4%
Real Estate and Rental and Leasing	26,870	28,970	2,100	7.8%
Professional, Scientific, and Technical Services	187,820	220,150	32,330	17.2%
Management of Companies and Enterprises	39,490	43,390	3,900	9.9%
Administrative and Support and Waste Management	132,500	144,340	11,840	8.9%
Educational Services	109,380	106,710	-2,670	-2.4%
Health Care and Social Assistance	256,590	289,610	33,020	12.9%
Arts, Entertainment, and Recreation	21,710	23,240	1,530	7.0%
Accommodation and Food Services	147,430	159,780	12,350	8.4%
Other Services (Except Government)	72,560	75,580	3,020	4.2%
Government	84,520	83,010	-1,510	-1.8%
NOTE: Detroit Metro Prosperity Region includes Macomb, Oakland, and Wayne Counties.				
SOURCE: Michigan Department of Technology, Management and Budget, Bureau of Labor Market Information and Strategic Initiatives				

H. SUPPLY FACTORS

Building Permits

- According to building permit data, the number of permits issued within the city of Detroit has fluctuated greatly in recent years. As such, while an average of 225 permits were issued annually within the city between 2010 and 2015, this number increased to an average of 690 permits per year between 2015 and 2017.
- The number of permits peaked in 2017, with approximately 1,029 building permits issued, most of which were in larger multi-family structures (864 units).
- The majority of the residential growth has occurred in larger multi-family structures, comprising 63 percent of all residential building permits since 2005, and 82 percent of permits issued since 2014.
- According to this data, however, only 170 permits were issued in 2018, the lowest figure since 2013. Noting the amount development occurring throughout the city, it is likely that these figures are preliminary, and may not be entirely accurate.

Table 20: Building Permits – City of Detroit (2005 - 2018)

Year	Total Units	Units in 3 and 4			
		Units in SF Structures	Units in 2-unit MF Structures	unit MF Structures	Units in 5+ Unit MF Structures
2005	777	277	2	7	491
2006	406	249	2	8	147
2007	314	154	0	4	156
2008	332	85	68	67	112
2009	56	32	0	24	0
2010	383	134	32	119	98
2011	245	18	14	68	145
2012	146	4	2	4	136
2013	113	21	80	12	0
2014	238	33	0	42	163
2015	631	31	0	27	573
2016	409	25	60	0	324
2017	1,029	59	6	100	864
2018	<u>170</u>	<u>52</u>	<u>0</u>	<u>0</u>	<u>118</u>
TOTAL	5,249	1,174	266	482	3,327
		22.4%	5.1%	9.2%	63.4%

Source: State of the Cities Data Systems - Building Permits Database - HUD User

Rental Market Information

As part of the analysis for the local rental market in southeastern Detroit, a survey of existing family-oriented rental projects within the primary market area was completed by Shaw Research & Consulting in February and March 2019. Excluding senior-only rental developments, a total of 22 family-oriented apartment facilities were identified and questioned for information such as current rental rates, amenities, and vacancy levels. As such, results from the survey provide an indication of overall market conditions throughout the market area, and are discussed below and illustrated on the following pages.

- Considering the developments responding to our survey, a total of 2,765 units were reported. Of those providing unit mix information, five percent of all units were studio/efficiencies, 18 percent were one-bedroom, 69 percent had two bedrooms, and eight percent contained three bedrooms.
- The average year of construction among these facilities was 2003, averaging approximately 16 years old. Further, the average age of the 11 LIHTC properties is 12 years, with an average build date of 2007.
- Most of the facilities (13 of 22) reported to have some sort of income eligibility requirements – with 11 tax credit developments, and two subsidized projects.
- Overall conditions for the rental market appear generally positive at the current time. Among the properties included in the survey, the combined occupancy rate was calculated at 94.4 percent - with 14 developments reporting to be 97 percent occupied or better.
- Two properties reported to have occupancy levels of 80 percent or below: Jeffersonian Houze Apartments is at 80 percent due to a current renovation; and St. Paul Apartments reported an occupancy rate of 58 percent due to units being intentionally kept vacant due to lead abatement issues. Excluding these developments results in an adjusted overall occupancy rate of 97.5 percent for the local rental market.
- When subdividing the market by financing type, LIHTC developments are a combined 98.2 percent occupied, market rate units are 91.7 percent occupied, and both subsidized properties were at 100 percent occupancy. Excluding properties with intentionally vacant units, the adjusted occupancy rates are 99.7 percent for LIHTC units and 95.5 percent for market rate units – clearly demonstrating strong conditions for all types of rental housing.
- Considering the 11 projects included in the survey utilizing tax credits, all reported an occupancy rate of 96 percent or better and seven were maintaining a waiting list – many of which were quite extensive.

- Detailed results from our survey of area rental developments are illustrated in the tables on the following pages. As such, the average rent for a studio/efficiency unit was calculated at \$715 per month with an average size of 569 square feet (\$1.26 per square foot), while one-bedroom units averaged \$948 and 758 square feet (\$1.25 per square foot). Further, two-bedroom units averaged \$1,009 and 1,043 square feet (\$0.97 per square foot), and three-bedrooms averaged \$1,195 and 1,314 (\$0.91 per square foot).
- The subject proposal offers a relatively competitive amenity package in relation to other properties throughout the area, and is superior to most. As such, the property will contain the majority of the most common features, and will also include a number of amenities not typically found in area developments. The only noteworthy amenity lacking in the proposal is an on-site laundry facility.
- When reviewing units sized, the subject proposal contains among the smallest units in the market. As such, efficiency units are approximately 29 percent smaller than market average, one-bedrooms are 18 percent smaller, and two-bedroom units are 12 percent smaller than average.
- The proposed LIHTC rents for one and two-bedroom unit within the subject are reasonably competitive with tax credit averages for the PMA, and are also quite affordable relative to overall market rate averages. However, rents for efficiency units are somewhat aggressive. In comparison to tax credit averages at 60 percent AMI (and adjusting for amenities), the proposed rents for efficiency units are approximately 20 percent higher, one-bedroom units are eight percent higher, and two-bedroom units are roughly three percent higher.
- From a market standpoint, it is evident that demand is present for the development of additional affordable rental units within the market area. However, based on prevailing rental rates and income levels, the rent structure is crucial for the long-term viability of any new rental development. As such, while the proposed rents for efficiency units appear somewhat aggressive, rents for one and two-bedroom units appear appropriate and achievable for the local market area.

Table 21: Rental Housing Survey

Project Name	Year Built/ Rehab	Total Units	Studio/ Eff.	1 BR	2 BR	3 BR	4 BR	Heat Incl.	W/S Incl.	Elect. Incl.	Occup. Rate	Type	Location
550 Parkview Apts	1953	62	47	14	1	0	0	Yes	Yes	No	89%	Open	Detroit
Agnes Street Housing	2007	24	0	0	20	4	0	No	Yes	No	100%	Open	Detroit
Alden Park Towers	2014	384	NA	NA	NA	NA	0	Yes	No	No	99%	Open	Detroit
Bridgeview Apts I/II	2004	22	0	0	5	17	0	No	Yes	No	100%	Open	Detroit
Central Park Village	NA	20	0	0	10	10	0	No	Yes	No	100%	Open	Detroit
Chalmers Square Apts	2010	49	0	NA	NA	NA	0	No	Yes	No	100%	Open	Detroit
Chene Park Commons	2011	144	0	24	120	0	0	No	Yes	No	100%	Open	Detroit
Circle Drive Commons	2014	284	0	0	281	3	0	No	Yes	No	100%	Open	Detroit
Colony & Fisher Arms	2017	161	9	104	48	0	0	Yes	Yes	Yes	100%	Open	Detroit
E & B Brewery Lofts	2003	27	2	5	20	0	0	No	No	No	100%	Open	Detroit
Fenimore Court Apts	1981	144	0	24	120	0	0	No	Yes	No	96%	Open	Detroit
Helen Odean Butler Apts	1995	97	0	0	69	28	0	No	Yes	No	100%	Open	Detroit
Ida Young Gardens	2017	56	0	8	40	8	0	No	Yes	No	98%	Open	Detroit
Island View I/II	2018	72	9	46	16	0	0	Yes	Yes	No	100%	Open	Detroit
Jeffersonian Houze Apts	2019	410	0	NA	NA	NA	NA	Yes	No	No	80%	Open	Detroit
Karley Square	2006	30	0	0	10	20	0	No	Yes	No	100%	Open	Detroit
Kercheval Place	2002	24	0	0	15	9	0	No	Yes	No	96%	Open	Detroit
Noel Village	1987	128	0	NA	NA	NA	0	No	Yes	No	95%	Open	Detroit
Prince Hall Place Apartments	2010	156	0	0	156	0	0	No	Yes	No	100%	Open	Detroit
River Place Apts	1978	301	0	NA	NA	NA	0	Yes	No	No	90%	Open	Detroit
St. Paul Apts	2002	36	3	18	5	9	1	Yes	Yes	No	58%	Open	Detroit
Waters Edge Apts	2016	134	0	22	97	15	0	No	No	No	97%	Open	Detroit
Totals and Averages	2003	2,765	70	265	1,033	123	1	Overall Occupancy:			94.4%		
Unit Distribution			5%	18%	69%	8%	0%	Adjusted Occupancy:			97.5%		
SUBJECT PROJECT													
7850 E. Jefferson Apts	2021	225	69	117	39	0	0	No	Yes	No		Open	Detroit

NOTE: Shaded properties represent LIHTC

Table 22: Rental Housing Summary

Project Name	Year Built/ Rehab	Total Units	Studio/ Eff.	1 BR	2 BR	3 BR	4 BR	Heat Incl.	W/S Incl.	Elect. Incl.	Occup. Rate	Type	Location
Totals and Averages <i>Unit Distribution</i>	2003	2,765	70 5%	265 18%	1,033 69%	123 8%	1 0%	Overall Occupancy: Adjusted Occupancy:			94.4% 97.5%		
SUBJECT PROJECT													
7850 E. Jefferson Apts	2021	225	69	117	39	0	0	No	Yes	No		Open	Detroit
SUMMARY													
	Number of Dev.	Year Built/ Rehab	Total Units	Studio/ Eff.	1BR	2BR	3BR	4BR	Overall Occup.	Adjusted Occup.			
Total Developments	22	2003	2,765	70	265	1,033	123	1	94.4%	97.5%			
Market Rate Only	9	1997	1,662	58	111	254	15	0	91.7%	95.5%			
LIHTC Only	11	2007	922	3	50	721	98	1	98.2%	99.7%			
Subsidized Only	2	2017	181	9	104	58	10	0	100.0%	100.0%			

Table 23: Rent Range for Efficiency & 1 Bedrooms

Project Name	Program	PBRA Units	EFF Rent		EFF Square Feet		Rent per Square Foot Range		1BR Rent		1BR Square Feet		Rent per Square Foot Range	
			LOW	HIGH	LOW	HIGH			LOW	HIGH	LOW	HIGH		
550 Parkview Apts	Market	0	\$650	\$750	450		\$1.44	\$1.67	\$750	\$850	700		\$1.07	\$1.21
Agnes Street Housing	LIHTC	0												
Alden Park Towers	Market	0	\$615	\$800	350		\$1.76	\$2.29	\$850	\$1,100	650		\$1.31	\$1.69
Bridgeview Apts I/II	LIHTC	0												
Central Park Village	BOI-HUD	20												
Chalmers Square Apts	LIHTC/Mrkt	0							\$456	\$629	900		\$0.51	\$0.70
Chene Park Commons	LIHTC	0							\$700		850			\$0.82
Circle Drive Commons	LIHTC/Mrkt	0												
Colony & Fisher Arms	BOI-HUD	161			384	426					406	622		
E & B Brewery Lofts	Market	0	\$1,175		900	1,100	\$1.07	\$1.31	\$1,175	\$1,500	900	1,100	\$1.07	\$1.67
Fenimore Court Apts	Market	0							\$975		712			\$1.37
Helen Odean Butler Apts	LIHTC	0												
Ida Young Gardens	LIHTC	0							\$328	\$601	845		\$0.39	\$0.71
Island View I/II	Market	0	\$500		533			\$0.94	\$600		650			\$0.92
Jeffersonian Houze Apts	Market	0							\$995		800			\$1.24
Karley Square	LIHTC	0												
Kercheval Place	LIHTC	0												
Noel Village	Market	0							\$700		794			\$0.88
Prince Hall Place Apartments	LIHTC	0												
River Place Apts	Market	0							\$1,200	\$1,650	610		\$1.97	\$2.70
St. Paul Apts	LIHTC	0	\$512		410			\$1.25	\$512		515	730	\$0.70	\$0.99
Waters Edge Apts	Market	0							\$1,475	\$1,905	850	1,015	\$1.45	\$2.24
Totals and Averages		181		\$715		569		\$1.26		\$948		758		\$1.25
SUBJECT PROPERTY														
7850 E. Jefferson Apts	LIHTC	0	\$307	\$642	405	405	\$0.76	\$1.59	\$326	\$686	620	620	\$0.53	\$1.11
SUMMARY														
Overall				\$715		569		\$1.26		\$948		758		\$1.25
Market Rate Only				\$748		667		\$1.12		\$1,090		798		\$1.37
LIHTC Only				\$512		410		\$1.25		\$535		768		\$0.70
Subsidized Only				NA		405		NA		NA		514		NA

NOTE: Shaded properties represent LIHTC

Table 24: Rent Range for 2 & 3 Bedrooms

Project Name	Program	2BR Rent		2BR Square Feet		Rent per Square Foot Range		3BR Rent		3BR Square Feet		Rent per Square Foot Range	
		LOW	HIGH	LOW	HIGH			LOW	HIGH	LOW	HIGH		
550 Parkview Apts	Market	\$950		800		\$1.19							
Agnes Street Housing	LIHTC	\$765		1,050		\$0.73		\$865		1,254		\$0.69	
Alden Park Towers	Market	\$1,000	\$1,500	775	1,080	\$0.93	\$1.94	\$1,500	\$1,800	1,300		\$1.15	\$1.38
Bridgeview Apts I/II	LIHTC	\$700		1,127		\$0.62		\$800		1,256		\$0.64	
Central Park Village	BOI-HUD			1,000						1,200			
Chalmers Square Apts	LIHTC/Mrkt	\$548	\$750	1,100		\$0.50	\$0.68	\$627	\$1,000	1,200		\$0.52	\$0.83
Chene Park Commons	LIHTC	\$789		950		\$0.83							
Circle Drive Commons	LIHTC/Mrkt	\$395	\$1,129	1,250		\$0.32	\$0.90	\$406	\$1,254	1,500		\$0.27	\$0.84
Colony & Fisher Arms	BOI-HUD			587	841								
E & B Brewery Lofts	Market	\$1,600	\$2,300	1,200	3,000	\$0.53	\$1.92						
Fenimore Court Apts	Market	\$1,100		875		\$1.26							
Helen Odean Butler Apts	LIHTC	\$825		889		\$0.93		\$1,006		1,120		\$0.90	
Ida Young Gardens	LIHTC	\$418	\$745	945		\$0.44	\$0.79	\$453	\$831	1,050		\$0.43	\$0.79
Island View I/II	Market	\$725		717		\$1.01							
Jeffersonian Houze Apts	Market	\$1,095		1,150	1,220	\$0.90	\$0.95			2,100			
Karley Square	LIHTC	\$437	\$928	1,000		\$0.44	\$0.93	\$500	\$1,067	1,200		\$0.42	\$0.89
Kercheval Place	LIHTC	\$371	\$689	850		\$0.44	\$0.81	\$433	\$615	1,195		\$0.36	\$0.51
Noel Village	Market	\$775	\$925	937	1,031	\$0.75	\$0.99	\$1,005		1,181		\$0.85	
Prince Hall Place Apartments	LIHTC	\$686	\$853	860		\$0.80	\$0.99						
River Place Apts	Market	\$1,500	\$2,000					\$2,000	\$2,800	1,500		\$1.33	\$1.87
St. Paul Apts	LIHTC	\$637		800	940	\$0.68	\$0.80	\$750		940	1,220	\$0.61	\$0.80
Waters Edge Apts	Market	\$1,985	\$2,165	1,175		\$1.69	\$1.84	\$2,475	\$2,905	1,470	1,660	\$1.49	\$1.98
Totals and Averages		\$1,009		1,043		\$0.97		\$1,195		1,314		\$0.91	
SUBJECT PROPERTY													
7850 E. Jefferson Apts	LIHTC	\$390	\$822	915	915	\$0.43	\$0.90	NA		NA		NA	
SUMMARY													
Overall		\$1,009		1,043		\$0.97		\$1,195		1,314		\$0.91	
Market Rate Only		\$1,344		1,163		\$1.16		\$1,860		1,535		\$1.21	
LIHTC Only		\$660		980		\$0.67		\$708		1,194		\$0.59	
Subsidized Only		NA		809		NA		NA		1,200		NA	

NOTE: Shaded properties represent LIHTC

Table 25a: Project Amenities

Project Name	Heat Type	Central Air	Wall A/C	Garbage Disposal	Dish Washer	Microwave	Ceiling Fan	Walk-in Closet	Mini Blinds	Patio/ Balcony	Club/ Comm. Room	Computer Center	Exercise Room
550 Parkview Apts	H2O	No	No	No	No	No	No	Yes	Yes	No	No	No	No
Agnes Street Housing	Gas	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	No	No	No
Alden Park Towers	H2O	No	No	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	Yes
Bridgeview Apts I/II	Gas	Yes	No	Yes	No	No	No	Yes	Yes	Yes	No	No	No
Central Park Village	Gas	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No
Chalmers Square Apts	Gas	Yes	No	Yes	Yes	Yes	No	No	Yes	Some	No	No	No
Chene Park Commons	Gas	Yes	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No
Circle Drive Commons	ELE	Yes	No	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	No
Colony & Fisher Arms	H2O	No	No	No	No	No	No	No	No	No	No	No	No
E & B Brewery Lofts	Gas	8 units	No	Yes	Yes	Yes	Yes	Yes	No	2 units	No	No	No
Fenimore Court Apts	Gas	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	No	No	No
Helen Odean Butler Apts	Gas	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	Yes	No	No
Ida Young Gardens	Gas	Yes	No	Yes	Yes	Yes	No	No	No	Yes	No	No	No
Island View I/II	Gas	No	No	Yes	No	No	No	No	Yes	No	No	No	No
Jeffersonian Houze Apts	ELE	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No
Karley Square	Gas	Yes	No	Yes	Yes	No	No	Yes	Yes	No	No	No	No
Kercheval Place	Gas	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	No	No	No
Noel Village	Gas	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	Yes	No	No
Prince Hall Place Apartments	Gas	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No
River Place Apts	Gas	Yes	No	Yes	Yes	Some	Some	Some	Yes	Some	No	No	Yes
St. Paul Apts	Gas	No	No	Yes	No	No	No	No	Yes	No	No	No	No
Waters Edge Apts	Gas	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	Yes
Totals and Averages	--	77%	0%	91%	77%	41%	32%	77%	86%	73%	23%	0%	14%
SUBJECT PROJECT													
7850 E. Jefferson Apts	Gas	Yes	No	Yes	Yes	Yes	No	No	Yes	No	Yes	No	No
SUMMARY													
Overall	--	77%	0%	91%	77%	41%	32%	77%	86%	73%	23%	0%	14%
Market Rate Only	--	67%	0%	89%	78%	56%	44%	89%	89%	67%	22%	0%	33%
LIHTC Only	--	91%	0%	100%	82%	27%	18%	73%	91%	82%	27%	0%	0%
Subsidized Only	--	50%	0%	50%	50%	50%	50%	50%	50%	50%	0%	0%	0%

NOTE: Shaded properties represent LIHTC

Table 25b: Project Amenities

Project Name	Pool	Playground	Elevator	Exterior Storage	Sports Courts	On-Site Mgt	Security Gate	Security Intercom	Coin Op Laundry	Laundry Hookup	In-unit Laundry	Carport	Garage
550 Parkview Apts	No	No	No	Yes	No	Yes	Yes	Yes	Yes	No	No	No	No
Agnes Street Housing	No	Yes	No	Yes	No	No	No	Yes	No	Yes	No	No	No
Alden Park Towers	No	No	Yes	No	No	No	Yes	Yes	Yes	No	No	No	Yes
Bridgeview Apts I/II	No	No	No	No	No	No	No	No	No	Yes	No	No	No
Central Park Village	No	No	No	No	No	No	No	No	No	Yes	No	No	No
Chalmers Square Apts	No	No	No	No	No	Yes	No	Yes	No	No	Yes	No	No
Chene Park Commons	No	Yes	No	Yes	No	Yes	No	No	Yes	No	No	No	No
Circle Drive Commons	No	No	No	No	No	Yes	Yes	No	No	No	Yes	No	No
Colony & Fisher Arms	No	No	No	No	No	No	No	No	No	No	No	No	No
E & B Brewery Lofts	No	No	Yes	No	No	No	Yes	Yes	Yes	Yes	No	No	No
Fenimore Court Apts	No	Yes	No	Yes	No	Yes	No	No	Yes	No	No	No	No
Helen Odean Butler Apts	No	Yes	No	No	No	Yes	Yes	No	No	No	Yes	No	No
Ida Young Gardens	No	Yes	No	No	No	No	No	No	No	No	Yes	No	No
Island View I/II	No	No	No	No	No	Yes	Yes	No	Yes	No	No	No	No
Jeffersonian Houze Apts	Yes	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	No	Yes
Karley Square	No	No	Yes	No	No	Yes	No	Yes	Yes	No	No	No	No
Kercheval Place	No	Yes	No	No	No	No	No	Yes	No	Yes	No	No	Yes
Noel Village	No	Yes	No	No	No	No	No	No	Yes	Yes	No	No	No
Prince Hall Place Apartments	No	Yes	No	No	No	No	No	No	No	No	Yes	No	No
River Place Apts	No	No	Yes	No	No	Yes	Yes	Yes	Yes	Some	Y/N	No	No
St. Paul Apts	No	No	Yes	No	No	No	No	No	No	No	No	No	No
Waters Edge Apts	Yes	No	Yes	No	No	Yes	Yes	Yes	No	No	Yes	No	No
Totals and Averages	9%	36%	32%	18%	5%	50%	41%	45%	45%	32%	32%	0%	14%
SUBJECT PROJECT													
7850 E. Jefferson Apts	NA	No	Yes	Yes	No	Yes	No	Yes	No	Yes	No	No	No
SUMMARY													
Overall	9%	36%	32%	18%	5%	50%	41%	45%	45%	32%	32%	0%	14%
Market Rate Only	22%	22%	56%	22%	11%	67%	78%	67%	89%	33%	22%	0%	22%
LIHTC Only	0%	55%	18%	18%	0%	45%	18%	36%	18%	27%	45%	0%	9%
Subsidized Only	0%	0%	0%	0%	0%	0%	0%	0%	0%	50%	0%	0%	0%

NOTE: Shaded properties represent LIHTC

Table 26: Additional Information

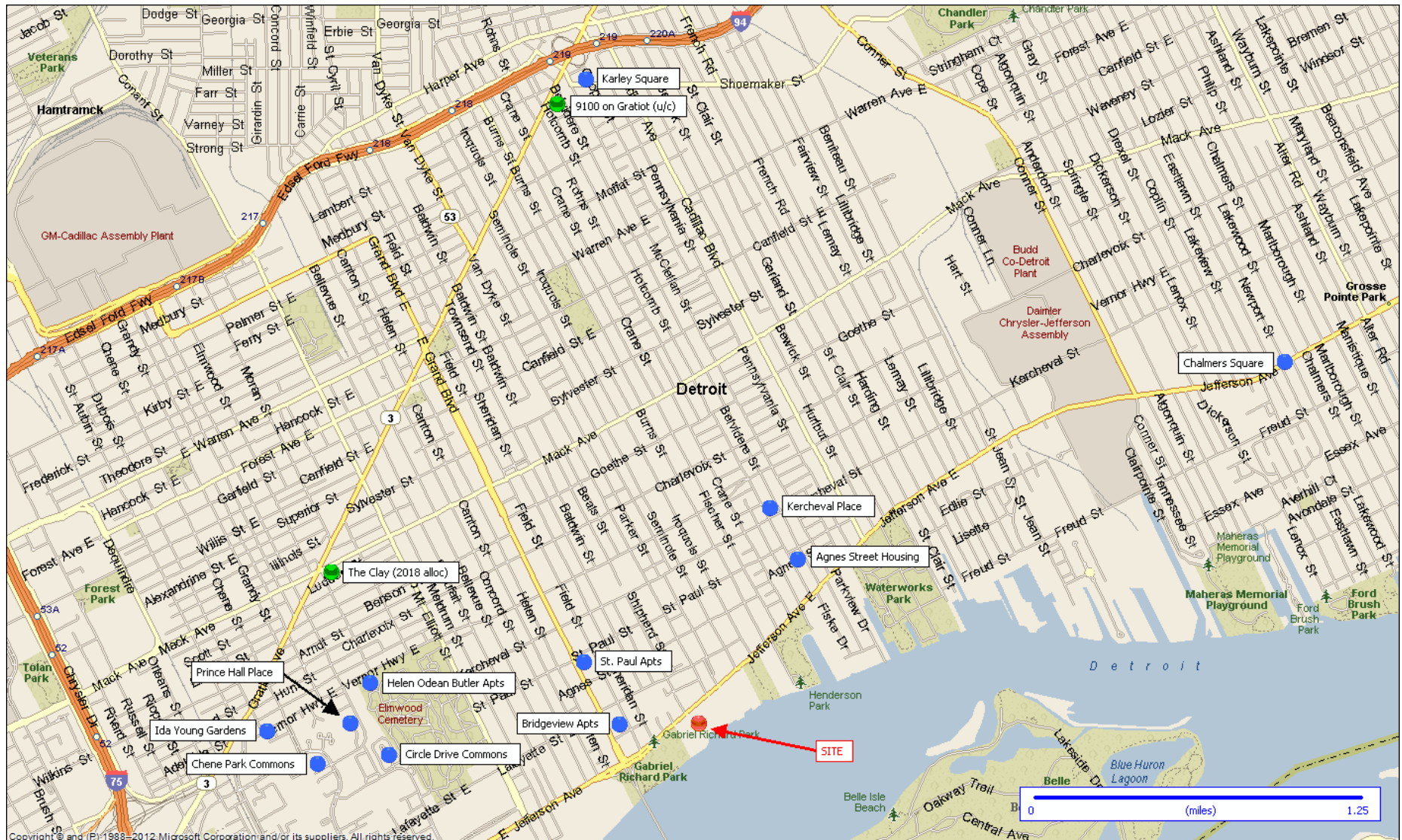
Project Name	Address	City	Telephone Number	Contact	On-Site Mgt	Waiting List	Concessions/Other	Survey Date
550 Parkview Apts	550 Parkview Dr.	Detroit	(313) 505-1585	Melvin	Yes	No	None	4-Feb-19
Agnes Street Housing	9141 Agnes Street	Detroit	(313) 823-0690	Catrina	No	5 Names	None	5-Feb-19
Alden Park Towers	8100 East Jefferson Ave	Detroit	(313) 824-1310	Stephanie	No	No	\$500 off move-in costs	5-Feb-19
Bridgeview Apts I/II	165-185 E. Grand Boulevard	Detroit	313-267-1051	Tameka	No	NA	None	5-Feb-19
Central Park Village	1440 Robert Bradby Dr.	Detroit	(313) 393-2550	Alliyah	No	No	2-3 Years	21-Jan-19
Chalmers Square Apts	1025 Newport/1010 Chalmers	Detroit	(313) 821-5855	Monique	Yes	150 Names	None	5-Feb-19
Chene Park Commons	2001 Chene St	Detroit	(313) 567-7275	Ms. Roberts	Yes	125 Names	None	5-Feb-19
Circle Drive Commons	1440 Robert Bradby Dr # A	Detroit	(313) 393-2550	Aliah	Yes	2-12 Months	None	5-Feb-19
Colony & Fisher Arms	9333 E Jefferson Avenue	Detroit	(313) 821-1756	Jase	No	1-2 Years	None	12-Feb-19
E & B Brewery Lofts	2000 Make Ave.	Detroit	313-782-4993	Sara	No	No	1st Month free	6-Feb-19
Fenimore Court Apts	1941 Chene Ct.	Detroit	(313) 259-3077	Lillian	Yes	No	\$400 off move-in costs	20-Feb-19
Helen Odean Butler Apts	3300 E Vernor Hwy	Detroit	(313) 568-0170	Shaneelia	Yes	6-12 Months	None	19-Feb-19
Ida Young Gardens	2280 E Vernor Hwy	Detroit	(313) 567-5950	Kim	No	3-6 Months	None	12-Feb-19
Island View I/II	231 East Grand Boulevard	Detroit	(313) 822-1000	Poniece	Yes	2-3 Months	None	4-Feb-19
Jeffersonian Houze Apts	9000 East Jefferson Ave	Detroit	(313) 823-3000	Katherine	Yes	No	1st Month free/Under rehab	4-Feb-19
Karley Square	9645 Shoemaker Street	Detroit	(313) 579-2612	Kelly	Yes	No	None	13-Mar-19
Kercheval Place	9131 Kercheval Place	Detroit	313-821-0469	Demetria	No	No	None	14-Sep-18
Noel Village	2158 Chene St	Detroit	(313) 567-8986	Camilla	No	3-6 Months	None	5-Mar-19
Prince Hall Place Apartments	2199 Prince Hall Dr	Detroit	(313) 259-3303	Jeffery	No	2-3 Months	None	4-Feb-19
River Place Apts	500 River Place	Detroit	(313) 259-5666	NA	Yes	No	None	5-Feb-19
St. Paul Apts	356 E. Grand Blvd	Detroit	(313) 423-6407	Lisa	No	No	Lead abatement issues	19-Feb-19
Waters Edge Apts	3500 Jefferson Ave. E	Detroit	(313) 656-0464	Ryan	Yes	No	\$1,000 off move-in	6-Feb-19

NOTE: Shaded properties represent LIHTC

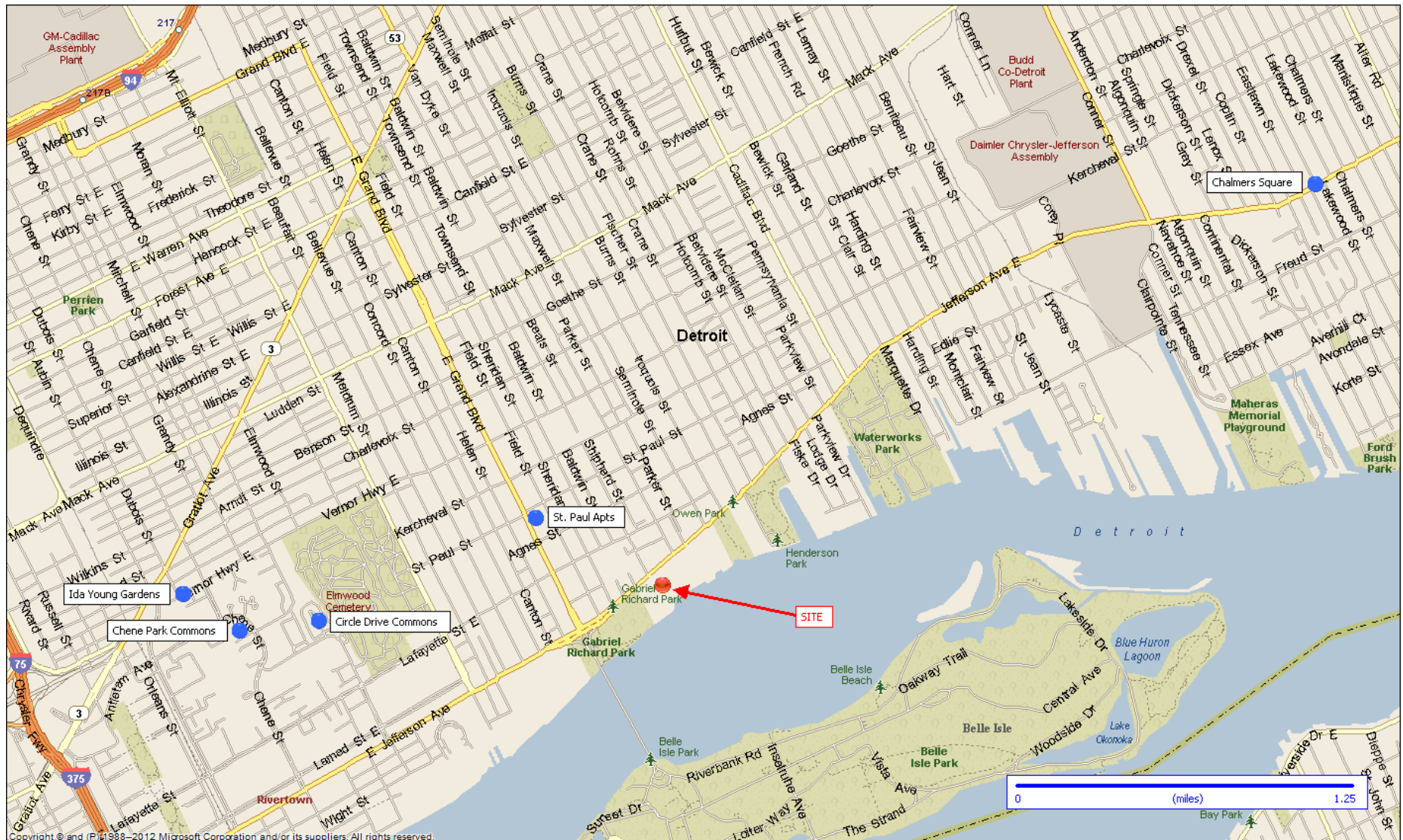
Most Comparable Properties


Of the properties included in the survey, the following developments can be considered as most comparable to the subject proposal – based on location, targeting, building type, age, and unit mix. According to the leasing managers, and not including St. Paul Apartments (which currently have a number of vacancies due to rehabbing units), the combined occupancy rate for these properties was 99.8 percent, with four of the five reporting an extensive waiting list – clearly demonstrating the strength of the local rental market and the need for affordable units. More specific details on these properties are provided on the following pages.


Map 9: Family Tax Credit Rental Developments





Map 10: Comparable Rental Developments




COMPARABLE PROJECT INFORMATION																	
Project Name: Chalmers Square Apts Address: 1025 Newport/1010 Chalmers City: Detroit State: MI Zip Code: 48214 Phone Number: (313) 821-5855 Contact Name: Monique Contact Date: 02/05/19 Current Occup: 100.0%																	
DEVELOPMENT CHARACTERISTICS																	
Total Units: 49		Year Built: 2010		Project Type: Open								Floors: 3		Program: LIHTC/Mrkt		Accept Vouchers: Yes	
PBRA Units*: 0		Voucher #: 8															
* Including Section 8, Rental Assistance, and any other Project-Based Subsidy																	
UNIT CONFIGURATION/RENTAL RATES																	
BR	Bath	Target	Type	# Units	Square Feet		Contract Rent		Vacant	Occup. Rate	Wait List						
					Low	High	Low	High									
TOTAL 1-BEDROOM UNITS					NA				0	100.0%							
1	1.0	40	Apt	NA	900		\$456		0	100.0%	Yes						
1	1.0	60	Apt	NA	900		\$610		0	100.0%	Yes						
1	1.0	Mrkt	Apt	NA	900		\$629		0	100.0%	Yes						
TOTAL 2-BEDROOM UNITS					NA				0	100.0%							
2	1.0	40	Apt	NA	1,100		\$548		0	100.0%	Yes						
2	1.0	60	Apt	NA	1,100		\$727		0	100.0%	Yes						
2	1.0	Mrkt	Apt	NA	1,100		\$750		0	100.0%	Yes						
TOTAL 3-BEDROOM UNITS					NA				0	100.0%							
3	1.5	40	Apt	NA	1,200		\$627		0	100.0%	Yes						
3	1.5	60	Apt	NA	1,200		\$787		0	100.0%	Yes						
3	1.5	Mrkt	Apt	NA	1,200		\$1,000		0	100.0%	Yes						
TOTAL DEVELOPMENT					49				0	100.0%	150 Names						
AMENITIES																	
Unit Amenities					Development Amenities				Laundry Type								
<input checked="" type="checkbox"/> - Central A/C <input type="checkbox"/> - Wall A/C Unit <input checked="" type="checkbox"/> - Garbage Disposal <input checked="" type="checkbox"/> - Dishwasher <input checked="" type="checkbox"/> - Microwave <input type="checkbox"/> - Ceiling Fan <input type="checkbox"/> - Walk-In Closet <input checked="" type="checkbox"/> - Mini-Blinds <input type="checkbox"/> - Draperies <input type="checkbox"/> - Patio/Balcony <input type="checkbox"/> - Basement <input type="checkbox"/> - Fireplace <input type="checkbox"/> - High-Speed Internet					<input type="checkbox"/> - Clubhouse <input type="checkbox"/> - Community Room <input type="checkbox"/> - Computer Center <input type="checkbox"/> - Exercise/Fitness Room <input type="checkbox"/> - Community Kitchen <input type="checkbox"/> - Swimming Pool <input type="checkbox"/> - Playground <input type="checkbox"/> - Gazebo <input type="checkbox"/> - Elevator <input type="checkbox"/> - Storage <input type="checkbox"/> - Sports Courts <input checked="" type="checkbox"/> - On-Site Management <input type="checkbox"/> - Security - Access Gate <input checked="" type="checkbox"/> - Security - Intercom				<input type="checkbox"/> - Coin-Operated Laundry <input type="checkbox"/> - In-Unit Hook-Up <input checked="" type="checkbox"/> - In-Unit Washer/Dryer								
									Parking Type								
									<input checked="" type="checkbox"/> - Surface Lot <input type="checkbox"/> - Carport <input type="checkbox"/> - Garage (att) <input type="checkbox"/> - Garage (det)								
									<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;"></td> <td style="width: 20%; text-align: center;">\$0</td> </tr> <tr> <td></td> <td style="text-align: center;">\$0</td> </tr> <tr> <td></td> <td style="text-align: center;">\$0</td> </tr> </table>				\$0		\$0		\$0
	\$0																
	\$0																
	\$0																
									Utilities Included								
									<input type="checkbox"/> - Heat <input type="checkbox"/> - Electricity <input checked="" type="checkbox"/> - Trash Removal <input checked="" type="checkbox"/> - Water/Sewer								

COMPARABLE PROJECT INFORMATION												
Project Name: Chene Park Commons Address: 2001 Chene St City: Detroit State: MI Zip Code: 48207 Phone Number: (313) 567-7275 Contact Name: Ms. Roberts Contact Date: 02/05/19 Current Occup: 100.0%												
DEVELOPMENT CHARACTERISTICS												
Total Units: 144		Year Built: 2011 Rehab		Project Type: Open								
PBRA Units*: 0		Voucher #: NA										
* Including Section 8, Rental Assistance, and any other Project-Based Subsidy												
UNIT CONFIGURATION/RENTAL RATES												
BR	Bath	Target	Type	# Units	Square Feet		Contract Rent		Vacant	Occup. Rate	Wait List	
					Low	High	Low	High				
TOTAL 1-BEDROOM UNITS				24					0	100.0%	75 Names	
1	Enter	50	Apt	NA	0				Enter	#VALUE!	Y/N	
1	1.0	60	Apt	24	850		\$700		0	100.0%	Yes	
TOTAL 2-BEDROOM UNITS				120					0	100.0%	50 Names	
2	Enter	50	Apt	NA	0				Enter	#VALUE!	Y/N	
2	1.0	60	Apt	120	950		\$789		0	100.0%	Yes	
TOTAL DEVELOPMENT				144					0	100.0%	125 Names	
AMENITIES												
Unit Amenities					Development Amenities					Laundry Type		
<input checked="" type="checkbox"/> - Central A/C <input type="checkbox"/> - Wall A/C Unit <input checked="" type="checkbox"/> - Garbage Disposal <input checked="" type="checkbox"/> - Dishwasher <input type="checkbox"/> - Microwave <input checked="" type="checkbox"/> - Ceiling Fan <input checked="" type="checkbox"/> - Walk-In Closet <input checked="" type="checkbox"/> - Mini-Blinds <input type="checkbox"/> - Draperies <input checked="" type="checkbox"/> - Patio/Balcony <input type="checkbox"/> - Basement <input type="checkbox"/> - Fireplace <input type="checkbox"/> - High-Speed Internet					<input checked="" type="checkbox"/> - Clubhouse <input type="checkbox"/> - Community Room <input type="checkbox"/> - Computer Center <input type="checkbox"/> - Exercise/Fitness Room <input type="checkbox"/> - Community Kitchen <input type="checkbox"/> - Swimming Pool <input checked="" type="checkbox"/> - Playground <input type="checkbox"/> - Gazebo <input type="checkbox"/> - Elevator <input checked="" type="checkbox"/> - Storage <input type="checkbox"/> - Sports Courts <input checked="" type="checkbox"/> - On-Site Management <input type="checkbox"/> - Security - Access Gate <input type="checkbox"/> - Security - Intercom					<input checked="" type="checkbox"/> - Coin-Operated Laundry <input type="checkbox"/> - In-Unit Hook-Up <input type="checkbox"/> - In-Unit Washer/Dryer		
										Parking Type		
					<input checked="" type="checkbox"/> - Surface Lot <input type="checkbox"/> - Carport <input type="checkbox"/> - Garage (att) <input type="checkbox"/> - Garage (det)					<input type="checkbox"/> \$0 <input type="checkbox"/> \$0 <input type="checkbox"/> \$0		
										Utilities Included		
										<input type="checkbox"/> Heat <input type="checkbox"/> Electricity <input checked="" type="checkbox"/> Trash Removal <input checked="" type="checkbox"/> Water/Sewer		

COMPARABLE PROJECT INFORMATION										
Project Name: Circle Drive Commons Address: 1440 Robert Bradby Dr # A City: Detroit State: MI Zip Code: 48207 Phone Number: (313) 393-2550 Contact Name: Aliah Contact Date: 02/05/19 Current Occup: 100.0%										
DEVELOPMENT CHARACTERISTICS										
Total Units: 284 Year Built: 2014 Rehab Project Type: Open Floors: 2 Program: LIHTC/Mrkt Accept Vouchers: Yes PBRA Units*: 0 Voucher #: Uk										
* Including Section 8, Rental Assistance, and any other Project-Based Subsidy										
UNIT CONFIGURATION/RENTAL RATES										
BR	Bath	Target	Type	# Units	Square Feet Low High	Contract Rent Low High	Vacant	Occup. Rate	Wait List	
TOTAL 2-BEDROOM UNITS				281			0	100.0%		
2	2.0	30	Apt	20	1,250	\$395	0	100.0%	6-12 Months	
2	2.0	50	Apt	20	1,250	\$714	0	100.0%	6-12 Months	
2	2.0	Mrkt	Apt	241	1,250	\$1,069 \$1,129	0	100.0%	1-2 Months	
TOTAL 3-BEDROOM UNITS				3			0	100.0%		
3	2.0	30	Apt	1	1,500	\$406	0	100.0%	Yes	
3	2.0	50	Apt	1	1,500	\$774	0	100.0%	Yes	
3	2.0	Mrkt	Apt	1	1,500	\$1,254	0	100.0%	Yes	
TOTAL DEVELOPMENT				284			0	100.0%	1-12 Months	
AMENITIES										
Unit Amenities <input checked="" type="checkbox"/> - Central A/C <input type="checkbox"/> - Wall A/C Unit <input checked="" type="checkbox"/> - Garbage Disposal <input checked="" type="checkbox"/> - Dishwasher <input type="checkbox"/> - Microwave <input checked="" type="checkbox"/> - Ceiling Fan <input checked="" type="checkbox"/> - Walk-In Closet <input checked="" type="checkbox"/> - Mini-Blinds <input type="checkbox"/> - Draperies <input checked="" type="checkbox"/> - Patio/Balcony <input type="checkbox"/> - Basement <input type="checkbox"/> - Fireplace <input type="checkbox"/> - High-Speed Internet					Development Amenities <input type="checkbox"/> - Clubhouse <input type="checkbox"/> - Community Room <input type="checkbox"/> - Computer Center <input type="checkbox"/> - Exercise/Fitness Room <input type="checkbox"/> - Community Kitchen <input type="checkbox"/> - Swimming Pool <input type="checkbox"/> - Playground <input type="checkbox"/> - Gazebo <input type="checkbox"/> - Elevator <input type="checkbox"/> - Storage <input type="checkbox"/> - Sports Courts <input checked="" type="checkbox"/> - On-Site Management <input checked="" type="checkbox"/> - Security - Access Gate <input type="checkbox"/> - Security - Intercom					Laundry Type <input type="checkbox"/> - Coin-Operated Laundry <input type="checkbox"/> - In-Unit Hook-Up <input checked="" type="checkbox"/> - In-Unit Washer/Dryer
					Parking Type <input checked="" type="checkbox"/> - Surface Lot <input type="checkbox"/> - Carport \$0 <input type="checkbox"/> - Garage (att) \$0 <input type="checkbox"/> - Garage (det) \$0					
					Utilities Included <input type="checkbox"/> - Heat ELE <input type="checkbox"/> - Electricity <input checked="" type="checkbox"/> - Trash Removal <input checked="" type="checkbox"/> - Water/Sewer					

COMPARABLE PROJECT INFORMATION											
Project Name: Ida Young Gardens Address: 2280 E Vernor Hwy City: Detroit State: MI Zip Code: 48207 Phone Number: (313) 567-5950 Contact Name: Kim Contact Date: 02/12/19 Current Occup: 98.2%											
DEVELOPMENT CHARACTERISTICS											
Total Units: 56 Project Type: Open Program: LIHTC PBRA Units*: 0		Year Built: 2017 Rehab Floors: 2 Accept Vouchers: Yes Voucher #: Enter									
* Including Section 8, Rental Assistance, and any other Project-Based Subsidy											
UNIT CONFIGURATION/RENTAL RATES											
BR	Bath	Target	Type	# Units	Square Feet		Contract Rent		Vacant	Occup. Rate	Wait List
					Low	High	Low	High			
TOTAL 1-BEDROOM UNITS				8					0	100.0%	
1	1.0	30	Apt	1	845			\$328	0	100.0%	Yes
1	1.0	45	Apt	1	845			\$533	0	100.0%	Yes
1	1.0	50	Apt	6	845			\$601	0	100.0%	Yes
TOTAL 2-BEDROOM UNITS				40					1	97.5%	
2	2.0	30	Apt	6	945			\$418	0	100.0%	Yes
2	2.0	45	Apt	6	945			\$663	0	100.0%	Yes
2	2.0	50	Apt	28	945			\$745	1	96.4%	Yes
TOTAL 3-BEDROOM UNITS				8					0	100.0%	
3	2.0	30	Apt	1	1,050			\$453	0	100.0%	Yes
3	2.0	45	Apt	2	1,050			\$736	0	100.0%	Yes
3	2.0	50	Apt	5	1,050			\$831	0	100.0%	Yes
TOTAL DEVELOPMENT				56					1	98.2%	3-6 Months
AMENITIES											
Unit Amenities				Development Amenities				Laundry Type			
<input checked="" type="checkbox"/> - Central A/C <input type="checkbox"/> - Wall A/C Unit <input checked="" type="checkbox"/> - Garbage Disposal <input checked="" type="checkbox"/> - Dishwasher <input checked="" type="checkbox"/> - Microwave <input type="checkbox"/> - Ceiling Fan <input type="checkbox"/> - Walk-In Closet <input type="checkbox"/> - Mini-Blinds <input type="checkbox"/> - Draperies <input checked="" type="checkbox"/> - Patio/Balcony <input type="checkbox"/> - Basement <input type="checkbox"/> - Fireplace <input type="checkbox"/> - High-Speed Internet				<input type="checkbox"/> - Clubhouse <input type="checkbox"/> - Community Room <input type="checkbox"/> - Computer Center <input type="checkbox"/> - Exercise/Fitness Room <input type="checkbox"/> - Community Kitchen <input type="checkbox"/> - Swimming Pool <input checked="" type="checkbox"/> - Playground <input type="checkbox"/> - Gazebo <input type="checkbox"/> - Elevator <input type="checkbox"/> - Storage <input type="checkbox"/> - Sports Courts <input type="checkbox"/> - On-Site Management <input type="checkbox"/> - Security - Access Gate <input type="checkbox"/> - Security - Intercom				<input type="checkbox"/> - Coin-Operated Laundry <input type="checkbox"/> - In-Unit Hook-Up <input checked="" type="checkbox"/> - In-Unit Washer/Dryer Parking Type <input checked="" type="checkbox"/> - Surface Lot <input type="checkbox"/> - Carport <input type="checkbox"/> - Garage (att) <input type="checkbox"/> - Garage (det)			
								Utilities Included <input type="checkbox"/> - Heat <input type="checkbox"/> - Electricity <input checked="" type="checkbox"/> - Trash Removal <input checked="" type="checkbox"/> - Water/Sewer			

COMPARABLE PROJECT INFORMATION																		
Project Name: St. Paul Apts Address: 356 E. Grand Blvd City: Detroit State: MI Zip Code: 48207 Phone Number: (313) 423-6407 Contact Name: Lisa Contact Date: 02/19/19 Current Occup: 58.3%																		
DEVELOPMENT CHARACTERISTICS																		
Total Units: 36		Year Built: 2002 Rehab		Project Type: Open									Floors: 4		Program: LIHTC		Accept Vouchers: Yes	
PBRA Units*: 0		Voucher #: uk																
* Including Section 8, Rental Assistance, and any other Project-Based Subsidy																		
UNIT CONFIGURATION/RENTAL RATES																		
BR	Bath	Target	Type	# Units	Square Feet		Contract Rent		Vacant	Occup. Rate	Wait List							
					Low	High	Low	High										
TOTAL 1-BEDROOM UNITS				18					NA	NA								
1	1.0	50	Apt	4	515	730		\$512			No							
1	1.0	60	Apt	10	515	730		\$512			No							
TOTAL 2-BEDROOM UNITS				5					NA	NA								
2	1.0	50	Apt	1	800	940		\$637			No							
2	1.0	60	Apt	2	800	940		\$637			No							
TOTAL 3-BEDROOM UNITS				9					NA	NA								
3	1 or 2	50	Apt	3	940	1,220		\$750			No							
3	1 or 2	60	Apt	4	940	1,220		\$750			No							
TOTAL 4-BEDROOM UNITS				1					NA	NA								
4	2.0	60	Apt	1		1,030		\$907			No							
TOTAL EFFICIENCY UNITS				3					NA	NA								
Eff	1.0	60	Apt	3		410		\$512			No							
TOTAL DEVELOPMENT				36					15	58.3%	No							
AMENITIES																		
<u>Unit Amenities</u> _____ - Central A/C _____ - Wall A/C Unit X _____ - Garbage Disposal _____ - Dishwasher _____ - Microwave _____ - Ceiling Fan _____ - Walk-In Closet X _____ - Mini-Blinds _____ - Draperies _____ - Patio/Balcony _____ - Basement _____ - Fireplace _____ - High-Speed Internet					<u>Development Amenities</u> _____ - Clubhouse _____ - Community Room _____ - Computer Center _____ - Exercise/Fitness Room _____ - Community Kitchen _____ - Swimming Pool _____ - Playground _____ - Gazebo X _____ - Elevator _____ - Storage _____ - Sports Courts _____ - On-Site Management _____ - Security - Access Gate _____ - Security - Intercom					<u>Laundry Type</u> _____ - Coin-Operated Laundry _____ - In-Unit Hook-Up _____ - In-Unit Washer/Dryer <u>Parking Type</u> X _____ - Surface Lot _____ - Carport _____ - Garage (att) _____ - Garage (det)								
										<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td></td> <td style="text-align: center;">\$0</td> </tr> <tr> <td></td> <td style="text-align: center;">\$0</td> </tr> <tr> <td></td> <td style="text-align: center;">\$0</td> </tr> </table>				\$0		\$0		\$0
	\$0																	
	\$0																	
	\$0																	
										<u>Utilities Included</u> X _____ - Heat _____ - Electricity X _____ - Trash Removal X _____ - Water/Sewer								

Recent Tax Credit Development

According to MSHDA information, the following LIHTC allocations have been recorded within the PMA since 2010. Gratiot Central Commons (aka 9100 on Gratiot Apts) and The Clay (aka The Sanctuary) are the most recent allocations, and are currently under construction.

Tax Credit Awards (2010-2019) (Jefferson PMA - Detroit, Michigan)					
City	Project Name	Target	Total Units	LIHTC Units	Type
2018					
Detroit	The Sanctuary/The Clay	Family	42	42	New
2016					
Detroit	Gratiot Central Commons	Family	45	36	New
2014					
Detroit	Colony/Fisher Arms	Family	161	161	Acq/Reh
2011					
Detroit	Parkview Tower & Square	Fam/Sen	350	350	Reh

Pipeline Tax Credit Development

Based on prior LIHTC allocations from MSHDA and discussions with local government officials, there are two comparable properties currently in process within the PMA:

1. **9100 on Gratiot Apts (aka Gratiot Central Commons)** is a 2016 allocation located at the corner of Gratiot Avenue and Holcomb Avenue near I-94. The property consists of 45 total units, with 36 LIHTC units, with construction nearing completion and anticipated to enter the market by summer 2019.
2. **The Clay (aka The Sanctuary)** is a 2018 allocation situated at the southeast corner of Gratiot Avenue and Mack Avenue. The development will contain a total of 42 units (all LIHTC), and is anticipated to enter the market sometime in 2020.

Because both of these properties will likely be constructed and fully absorbed before any newly allocated LIHTC units will enter the market, neither are anticipated to have an adverse impact on any new developments.

Estimated Achievable Market Rent

Estimated market rental rates for each unit type have been calculated based on existing rental developments within the primary market area. Modifications to the base rent of these properties were made based on variances to the subject proposal in age, unit sizes, unit and development amenities, location, and utilities included in the rent. Further, comparable rents were adjusted based on whether or not concessions are currently being offered, if necessary. As such, the following summary table reflects the estimated market rents using the aforementioned modifications.

	Proposed Net Rent	Estimated Market Rent	Market Advantage
Efficiency/Studio Units			
30% AMI	\$307	\$692	56%
40% AMI	\$431	\$692	38%
50% AMI	\$555	\$692	20%
60% AMI	\$642	\$692	7%
One-Bedroom Units			
30% AMI	\$326	\$961	66%
40% AMI	\$460	\$961	52%
50% AMI	\$593	\$961	38%
60% AMI	\$686	\$961	29%
Two-Bedroom Units			
30% AMI	\$390	\$1,170	67%
40% AMI	\$550	\$1,170	53%
60% AMI	\$822	\$1,170	30%

Rent Comparability Grid

Subject Property		Comp #1		Comp #2		Comp #3		Comp #4	
Project Name		550 Parkview Apts		Alden Park Towers		Jeffersonian Houze Apts		River Place Apts	
Project City	Subject Data	Detroit		Detroit		Detroit		Detroit	
Date Surveyed		2/4/19		2/5/19		2/4/19		2/5/19	
A. Design, Location, Condition		Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
Structure Type									
Yr. Built/Yr. Renovated	2021	1953	\$30	2014	\$5	2019	\$2	1978	\$30
Neighborhood									
B. Unit Amenities		Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
Central A/C	Yes	No	\$15	No	\$15	Yes		Yes	
Garbage Disposal	Yes	No	\$5	Yes		Yes		Yes	
Dishwasher	Yes	No	\$5	Yes		Yes		Yes	
Microwave	Yes	No	\$5	Yes		Yes		Yes	
Walk-In Closet	No	Yes	(\$3)	Yes	(\$3)	Yes	(\$3)	Yes	(\$3)
Mini-Blinds	Yes	Yes		Yes		Yes		Yes	
Patio/Balcony	No	No		No		Yes	(\$5)	Yes	(\$5)
Basement	No	No		No		No		No	
Fireplace	No	No		Yes	(\$10)	No		No	
C. Site Amenities		Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
Clubhouse	No	No		No		No		No	
Community Room	Yes	No	\$5	No	\$5	No	\$5	No	\$5
Computer Center	No	No		No		No		No	
Exercise Room	No	No		Yes	(\$5)	No		Yes	(\$5)
Swimming Pool	No	No		No		Yes	(\$5)	No	
Playground	No	No		No		No		No	
Sports Courts	No	No		No		Yes	(\$3)	No	
On-Site Management	Yes	Yes		No	\$5	Yes		Yes	
Security - Access Gate	No	Yes	(\$5)	Yes	(\$5)	Yes	(\$5)	Yes	(\$5)
Security - Intercom	Yes	Yes		Yes		Yes		Yes	
D. Other Amenities		Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
Coin-Operated Laundry	Yes	Yes		Yes		Yes		Yes	
In-Unit Hook-Up	Yes	No	\$10	No	\$10	No	\$10	Yes	
In-Unit Washer/Dryer	No	No		No		No		No	
Carport	No	No		No		No		No	
Garage	No	No		Yes	(\$15)	Yes	(\$15)	No	
Fit/Finish/Other	No	No	(\$50)	Yes	(\$75)	Yes	(\$75)	No	(\$75)
E. Utilities Included		Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
Heat	No	Yes	XX	Yes	XX	Yes	XX	Yes	XX
Electric	No	No		No		No		No	
Trash Removal	Yes	Yes		No	XX	No	XX	No	XX
Water/Sewer	Yes	Yes		No	XX	No	XX	No	XX
Heat Type	Gas	H2O		H2O		ELE		Gas	
Utility Adjustments									
Efficiency Units			(\$16)		\$46		\$46		\$46
One-Bedroom Units			(\$19)		\$48		\$48		\$48
Two-Bedroom Units			(\$22)		\$77		\$77		\$77

<i>Subject Property</i>		<i>Comp #1</i>		<i>Comp #2</i>		<i>Comp #3</i>		<i>Comp #4</i>	
Project Name		550 Parkview Apts		Alden Park Towers		Jeffersonian Houze Apts		River Place Apts	
Project City	Subject Data	Detroit		Detroit		Detroit		Detroit	
Date Surveyed		2/4/2019		2/5/2019		2/4/2019		2/5/2019	
F. Average Unit Sizes		Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
Efficiency Units	405	450	(\$7)	350	\$8				
One-Bedroom Units	620	700	(\$12)	650	(\$5)	800	(\$27)	610	\$2
Two-Bedroom Units	915	800	\$17	928	(\$2)	1,185	(\$41)		\$0
G. Number of Bathrooms		Data	\$ Adj	Data	\$ Adj	Data	\$ Adj	Data	\$ Adj
Efficiency Units	1.0	1.0	\$0	1.0	\$0				
One-Bedroom Units	1.0	1.0	\$0	1.0	\$0	1.0	\$0	1.0	\$0
Two-Bedroom Units	1.0	1.0	\$0	2.0	(\$30)	2.0	(\$30)	2.0	(\$30)
G. Total Adjustments Recap									
Efficiency Units			(\$6)		(\$19)				
One-Bedroom Units			(\$14)		(\$29)		(\$74)		(\$9)
Two-Bedroom Units			\$12		(\$28)		(\$88)		(\$11)

		Comp #1		Comp #2		Comp #3		Comp #4	
Project Name		550 Parkview Apts		Alden Park Towers		Jeffersonian Houze Apts		River Place Apts	
Project City	Subject Data	Detroit		Detroit		Detroit		Detroit	
Date Surveyed		2/4/2019		2/5/2019		2/4/2019		2/5/2019	
H. Rent/Adjustment Summary		Unadjust ed Rent	Adjusted Rent	Unadjust ed Rent	Adjusted Rent	Unadjust ed Rent	Adjusted Rent	Unadjust ed Rent	Adjusted Rent
Market Rate Units									
Efficiency Units	\$692	\$700	\$694	\$708	\$689				
One-Bedroom Units	\$961	\$800	\$786	\$975	\$946	\$995	\$922	\$1,200	\$1,192
Two-Bedroom Units	\$1,170	\$950	\$962	\$1,250	\$1,222	\$1,095	\$1,007	\$1,500	\$1,489

I. DEMAND ANALYSIS

Demand for Family Rental Units

Demand calculations for each targeted income level of the subject proposal are illustrated in the following tables. As such, demand forecasts are presented for current year and market entry year for units at the 30 percent, 40 percent, 50 percent, and 60 percent AMI income-qualification ranges, based on the proposed beginning LIHTC rental rates and an income ceiling of \$38,340 - the 3-person income limit at 60 percent AMI for Wayne County. Utilizing a 40 percent rent-to-income ratio for LIHTC units and unduplicated income ranges (to avoid counting households more than once), the resulting overall income-eligibility range (expressed in current-year dollars) for each targeted income level is as follows:

	<u>Minimum</u>	<u>Maximum</u>
30 percent of AMI	\$11,190	\$15,000
40 percent of AMI	\$15,000	\$19,500
50 percent of AMI	\$19,500	\$22,500
60 percent of AMI	\$22,500	\$38,340
Total Project	\$11,190	\$38,340

By applying the appropriate income range and 2019 household forecasts to the current-year household income distribution by tenure (adjusted from Census data utilizing the U.S. Bureau of Labor Statistic's CPI index), demand can be derived from three key sources: existing renter households, existing owner households, and new income-qualified renters. Utilizing MSHDA's demand worksheet, the PMA has a tax credit demand of 815 units from existing renter households, and 33 units from existing owner households. Taking into consideration the declining number of renter households expected within the market area between 2019 and 2021, a negative demand of 66 units needs to be factored in the calculation. As such, combining these factors result in an overall demand of 782 LIHTC units for 2021.

Comparable activity within the PMA since 2015 also needs to be accounted for in the demand calculation. As such, a total of 78 LIHTC units within two projects currently under construction (9100 on Gratiot Apartments and The Clay) need to be deducted from demand figures.

Utilizing information from the demand forecast calculations, and taking into consideration necessary tax credit activity, ratios that measure the impact of the subject proposal upon the existing rental market can be determined. These ratios are calculated for each targeted income level and include the following:

Penetration Rate – the percentage of income-qualified households required to occupy the proposed number of units. A threshold of three percent is associated with normal lease-up rates.

Saturation Rate – the percentage of income-qualified households required to occupy the proposed number of units plus pipeline and comparable units constructed since 2000. This ratio adds other known proposals and comparable developments to the penetration rate calculation to provide a broader measure of the market’s ability to absorb the subject proposal. A threshold rate of 20 percent can be considered as acceptable for normal rental market activity.

Capture Rate – the percentage of annual demand required to occupy the proposed number of units as well as similar units proposed and/or in the pipeline. Capture rates of 30 percent or below can be considered as acceptable for family-oriented rental developments.

The following table presents demand for the subject property utilizing “Straight MSHDA Requirements”. That is, this scenario does not include any subsidies and assumes that the development will follow tax credit guidelines for occupancy of all units. According to this calculation, the subject proposal has a penetration rate of 4.7 percent, a saturation rate of 6.3 percent, and a capture rate of 38.8 percent. As can be seen, the overall penetration and capture rates are somewhat elevated (and above MSHDA thresholds), and demonstrate that adequate market depth is not present for the subject proposal in its current configuration.

Table 27: Demand Calculations

Family Demand Scenario One: "Straight MSHDA Requirements"					
Area Median Income Targeting	30% AMI	40% AMI	50% AMI	60% AMI	Total LIHTC
Minimum Income (based on lowest rent income band)	\$11,190	\$15,000	\$19,500	\$22,500	\$11,190
Maximum Income (based on information from MSHDA)	\$15,000	\$19,500	\$22,500	\$38,340	\$38,340
A. Demand From Existing Renter Households					
1 Number of existing households for current year	12,829	12,829	12,829	12,829	12,829
2 Renter percentage based upon most current Census data	79.7%	79.7%	79.7%	79.7%	79.7%
3 Number of renters for current year	10,223	10,223	10,223	10,223	10,223
4 Income-Qualification percentage	11.8%	8.1%	4.0%	16.0%	39.9%
5 Number of income-qualified renter households	1,204	823	409	1,639	4,075
6 Movership rate, the estimated percentage of renter HHs that move into different rental units in a given year	20.0%	20.0%	20.0%	20.0%	20.0%
7 Estimated annual demand from existing rental HHs	241	165	82	328	815
B. Demand from Existing Owner Households					
8 Number of existing households for current year	12,829	12,829	12,829	12,829	12,829
9 Owner percentage based upon most current Census data	20.3%	20.3%	20.3%	20.3%	20.3%
10 Number of owners for current year	2,606	2,606	2,606	2,606	2,606
11 Income-qualification percentage	6.1%	4.6%	5.0%	17.3%	33.1%
12 Number of income-qualified owner households	159	120	131	452	862
13 Movership rate, the estimated percentage of owner HHs that move into rental units in a given year	3.8%	3.8%	3.8%	3.8%	3.8%
14 Estimated annual demand from existing owner HHs	6	5	5	17	33
C. Demand from New Households:					
15 Number of households projected to exist at market entry	12,420	12,420	12,420	12,420	12,420
16 Number of existing households in current year	12,829	12,829	12,829	12,829	12,829
17 Number of new households	-410	-410	-410	-410	-410
18 Years between current year and market entry	2	2	2	2	2
19 Annual growth in households	-205	-205	-205	-205	-205
20 Renter percentage estimate for market entry year	80.9%	80.9%	80.9%	80.9%	80.9%
21 Annual growth increment in renter households	-166	-166	-166	-166	-166
22 Income qualification percentage	11.8%	8.1%	4.0%	16.0%	39.9%
23 Number of income-qualified new renters per year	-20	-13	-7	-27	-66
D. Total Demand Estimate					
	227	156	80	318	782
E. Demand Analysis					
24 Number of Units Proposed	30	54	27	114	225
25 Penetration Rate (units proposed/income qualified HH)	2.3%	5.9%	5.1%	5.6%	4.7%
26 Number of comparable pipeline units	0	0	0	0	78
27 Capture Rate (# units proposed+ # comparable pipeline units)/demand estimate	13.2%	34.6%	33.7%	35.8%	38.8%
28 Number of existing comparable units constructed since 2010	0	0	0	0	0
29 Saturation Rate (# units+ # comparable pipeline units+ # existing comparable units constructed since 2010)/# income qualified HH)	2.3%	5.9%	5.1%	5.6%	6.3%

Absorption Rate

Despite strong occupancy levels throughout the PMA (with an adjusted occupancy rate of 97.5 percent) as well as an extremely positive affordable rental market (at 99.7 percent occupancy), the penetration and capture rates are somewhat elevated and provide an indication that adequate market depth is not present for 225 total units within all three phases of the subject proposal. Although rental rates are relatively competitive, demand forecasts indicate a relatively lengthy absorption period should be expected. As such, considering the number of units as well as other characteristics of the subject proposal, the overall absorption period to reach 93 percent occupancy is estimated at roughly 12 to 13 months. Considering these factors, and while evidence presented within the market study suggests no market-related concerns are present within the PMA, the construction of all three phases of the subject property simultaneously will likely result in a prolonged absorption period.

J. OTHER REQUIREMENTS

Conclusions and Recommendations

Based on the information collected and reported within this study, sufficient evidence cannot be presented for the successful development and introduction of the subject proposal in its present configuration. Although a number of positive factors supporting the development of additional affordable units can be demonstrated within the PMA, demand estimates indicate that adequate market depth is not present for a total of 225 units, as currently proposed. As such, positive factors of the local rental market include the following: relatively strong rental conditions throughout the area (with an adjusted occupancy rate of 97.5 percent), an extremely positive affordable rental market (a combined LIHTC occupancy rate of 99.7 percent), frontage along the Detroit River, and a positive site location along Jefferson Avenue (providing convenient access to most necessary services required by residents).

Assuming the subject proposal is developed as described within this analysis, Shaw Research & Consulting cannot provide a positive recommendation for the development of the subject proposal. As such, it is recommended to decrease the total development size to achieve a more reasonable absorption period and viable product overall.

Certificate of Accuracy/Consultant Certification

I hereby attest that this market study has been completed by an independent third-party market consultant with no fees received contingent upon the funding of this proposal. Additionally, there is no identity of interest between Shaw Research and Consulting and the entity for whom this report is prepared. Information contained within the following report obtained through other sources is considered to be trustworthy and reliable. As such, Shaw Research & Consulting, LLC does not guarantee the data nor assume any liability for any errors in fact, analysis, or judgment resulting from the use of this data. Furthermore, all recommendations and conclusions in this report are based solely on professional opinion and best efforts.

Date of Original Report: March 15, 2019

Date of Site Visit: March 3, 2019



Steven R. Shaw
SHAW RESEARCH & CONSULTING, LLC
(989) 415-3554

Date: March 15, 2019

Qualifications and Resume

STEVEN R. SHAW SHAW RESEARCH & CONSULTING, LLC

Mr. Shaw is a principal at Shaw Research and Consulting. With over twenty-eight years of experience in market research, he has assisted a broad range of clients with the development of various types of housing alternatives throughout the United States, including multi-family rental properties, single-family rental developments, for-sale condominiums, and senior housing options. Clients include developers, federal and state government agencies, non-profit organizations, and financial institutions. Areas of expertise include market study preparation, pre-feasibility analysis, strategic targeting and market identification, customized survey and focus group research, and demographic and economic analysis. Since 2000, Mr. Shaw has reviewed and analyzed housing conditions in more than 425 markets across 24 states.

Previous to forming Shaw Research in January 2007, he most recently served as partner and Director of Market Research at Community Research Services (2004-2006). In addition, Mr. Shaw also was a partner for Community Research Group (1999-2004), and worked as a market consultant at Community Targeting Associates (1997-1999). Each of these firms provided the same types of services as Shaw Research and Consulting.

Additional market research experience includes serving as manager of automotive analysis for J.D. Power and Associates (1992-1997), a global automotive market research firm based in Troy, Michigan. While serving in this capacity, Mr. Shaw was responsible for identifying market trends and analyzing the automotive sector through proprietary and syndicated analytic reports. During his five-year tenure at J.D. Power, Mr. Shaw developed a strong background in quantitative and qualitative research measurement techniques through the use of mail and phone surveys, focus group interviews, and demographic and psychographic analysis. Previous to J.D. Power, Mr. Shaw was employed as a Senior Market Research Analyst with Target Market Systems (the market research branch of First Centrum Corporation) in East Lansing, Michigan (1990-1992). At TMS, his activities consisted largely of market study preparation for housing projects financed through RHS and MSHDA programs. Other key duties included the strategic targeting and identification of new areas for multi-family and single-family housing development throughout the Midwest.

A 1990 graduate of Michigan State University, Mr. Shaw earned a Bachelor of Arts degree in Marketing with an emphasis in Market Research, while also earning an additional major in Psychology.

*Resume for Steven R. Shaw***EDUCATION**

Michigan State University (Graduated 6/1990)
Bachelor of Arts – Marketing; Emphasis in Market Research
Additional Major – Psychology

EMPLOYMENT HISTORY

SHAW RESEARCH AND CONSULTING, Real estate and market feasibility services. Bad Axe, MI

Owner/Principal (1/2007 – Present)

Primary duties are to assist a broad range of clients with the development of various types of housing alternatives throughout the U.S., including multi-family rental properties, single-family rental development, for-sale single-family homes and condominiums, and senior housing options. Areas of expertise include market study preparation, pre-feasibility analysis, strategic targeting and market identification, and customized survey and focus group research.

COMMUNITY RESEARCH SERVICES, LLC, a real estate market research company. Okemos, MI

Partner and Director of Market Research (6/2004 – 12/2006)

Directed the market research division of CRS developing and instituting numerous procedures benefiting the efficiency of the overall research process. Managed a group of 14 analysts, research assistants, and support personnel preparing market studies and analyses throughout much of the U.S.

COMMUNITY RESEARCH GROUP, LLC, a real estate market research company. Okemos, MI

Partner (5/1999 – 6/2004)

Responsibilities involved working with developers, government agencies, non-profit organizations, and financial institutions with the development of numerous types of housing alternatives throughout the United States. Duties included the following:

- | | | |
|----------------------------|----------------------------|---------------------|
| ➤ Community Identification | ➤ Demographic Analysis | ➤ Economic Analysis |
| ➤ Market Study Preparation | ➤ Pre-Feasibility Analysis | ➤ Survey Research |
| ➤ Focus Group Facilitation | ➤ Geographic Mapping | ➤ Needs Assessments |

COMMUNITY TARGETING ASSOCIATES, real estate market research. Ovid, MI

Market Analyst/Consultant (3/1997 – 5/1999)

Worked as a consultant in the preparation of market feasibility studies and other housing-related services for developers and other organizations throughout the United States. Other responsibilities included marketing and new client and product development, including focus group moderation on housing-related topics.

J.D. POWER AND ASSOCIATES, an automotive marketing information firm. Troy, MI

Manager, Automotive Analysis (1/1997 – 1/1998)

Was one of four employees selected to establish a division focusing on the analysis of internal automotive data. Produced several syndicated studies involving topics such as Sport Utility Vehicles, Luxury Vehicles, Sports Cars, Electric Vehicles, and the Used Vehicle Market. In addition to the production of these reports, responsibilities included mail and phone questionnaire development, focus group organization, and management of a team of seven employees. Through this experience, I gained a strong knowledge of both qualitative and quantitative research techniques.

J.D. POWER AND ASSOCIATES, an automotive marketing information firm. Troy, MI

Project Director, Volkswagen Account (1/1995 – 1/1997)

Assistant Project Director, Volkswagen Account (4/1994 – 1/1995)

Research Assistant (10/1993 – 4/1994)

Was responsible for day-to-day activities and communications between J.D. Power and Volkswagen of America. Primary responsibilities included daily management of six automotive-related proprietary tracking studies, as well as the preparation and presentation of proprietary and syndicated study results to executives and senior Volkswagen personnel in the United States, Mexico, and Germany. Additional duties included mail and phone questionnaire development, focus group organization, and the development and implementation of a major syndicated automotive study.

TARGET MARKET SYSTEMS, INC., a subsidiary of First Centrum Corporation. East Lansing, MI

Market Analyst (1/1991 – 2/1992)

Senior Market Analyst (2/1992 – 11/1992)

Worked with two in-house development companies identifying potential areas for affordable housing alternatives throughout the Great Lakes region. Responsibilities included demographic and economic data collection, preparation of recommendations for targeted areas, comparable rental project analysis, market study preparation, and supervision of part-time staff.

Sources

Apartment Listings – LIHTC – low-income-housing.credio.com

Apartment Listings – Michigan Housing Locator - www.michiganhousinglocator.com

Apartment Listings – Yellowbook – www.yellowbook.com

Building Permits – State of the Cities Data Systems (SOCDS) – HUD User

Census Data – American Community Survey – 5-Year Estimates – U.S. Census Bureau

Census Data – Demographic Forecasts, ESRI Business Analyst Online

Census Data – U.S. Census of Population and Housing - U.S. Census Bureau

CPI Inflation Calculator – Bureau of Labor Statistics – U.S. Department of Labor

Crime Data – Sperling’s Best Places – bestplaces.net

Interviews with community planning officials

Interviews with managers and leasing specialists at local rental developments

Michigan Industry Census of Employment and Wages (QCEW - ES-202) – Michigan Dept. of Technology, Management, and Budget

Michigan Industry Forecasts – Michigan Dept. of Technology, Management, and Budget

Michigan Labor Market Information – Michigan Dept. of Technology, Management, and Budget

Michigan LIHTC Allocations – Michigan State Housing Development Authority

Michigan School District Maps – Michigan Dept. of Technology, Management, and Budget

Michigan WARN List – Michigan Dept. of Technology, Management, and Budget

Microsoft Streets and Trips 2013

School Data – Michigan Department of Education – www.MISchoolData.org



7850 East Jefferson, Detroit MI

Detroit, MI

10,000 5,000 0 10,000
Feet

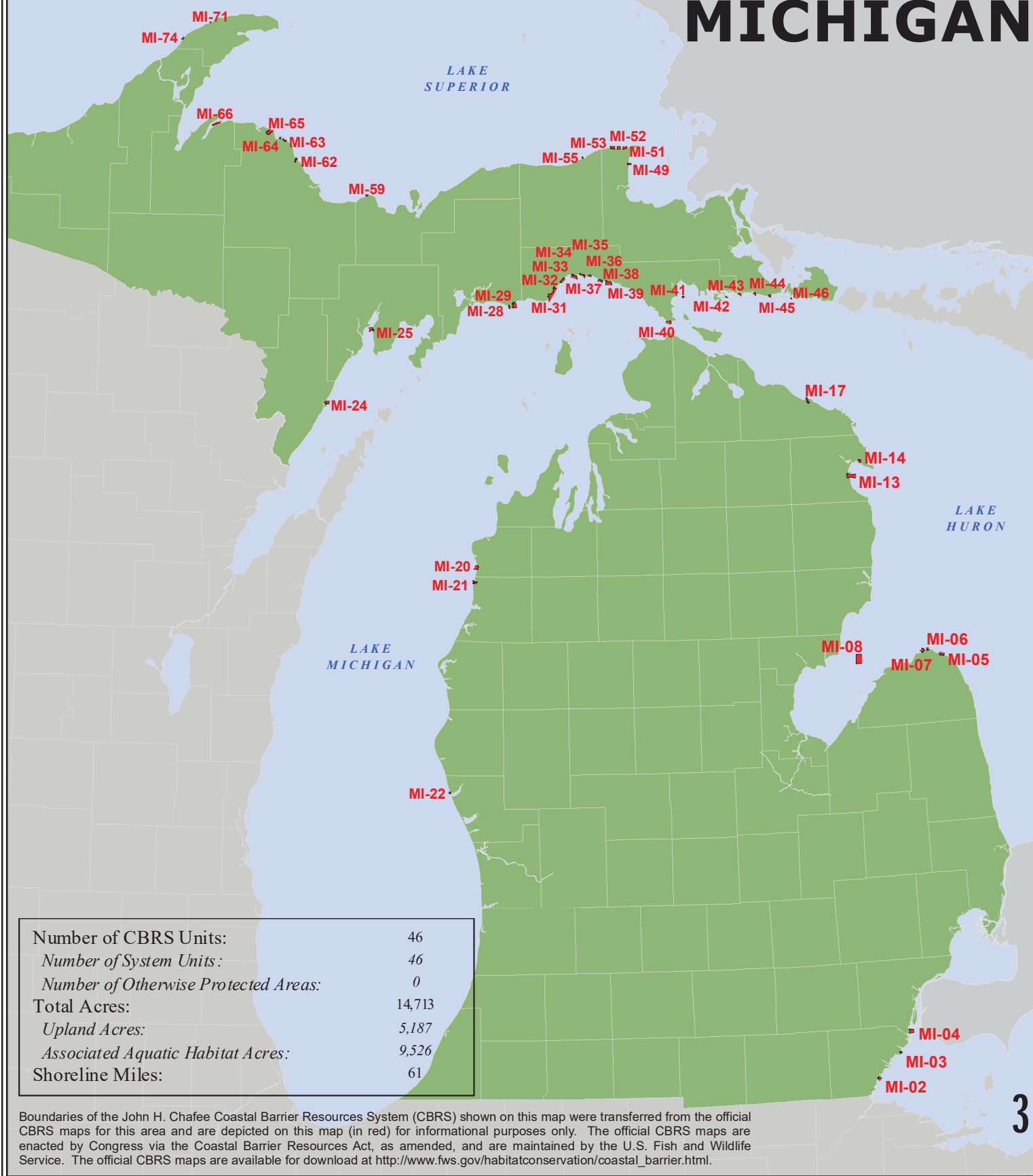


Created for: GDC East Jefferson, LLC
Created by: RMH, September 26, 2019, ASTI Project 5-10105

Airport Location Map

JOHN H. CHAFEE COASTAL BARRIER RESOURCES SYSTEM

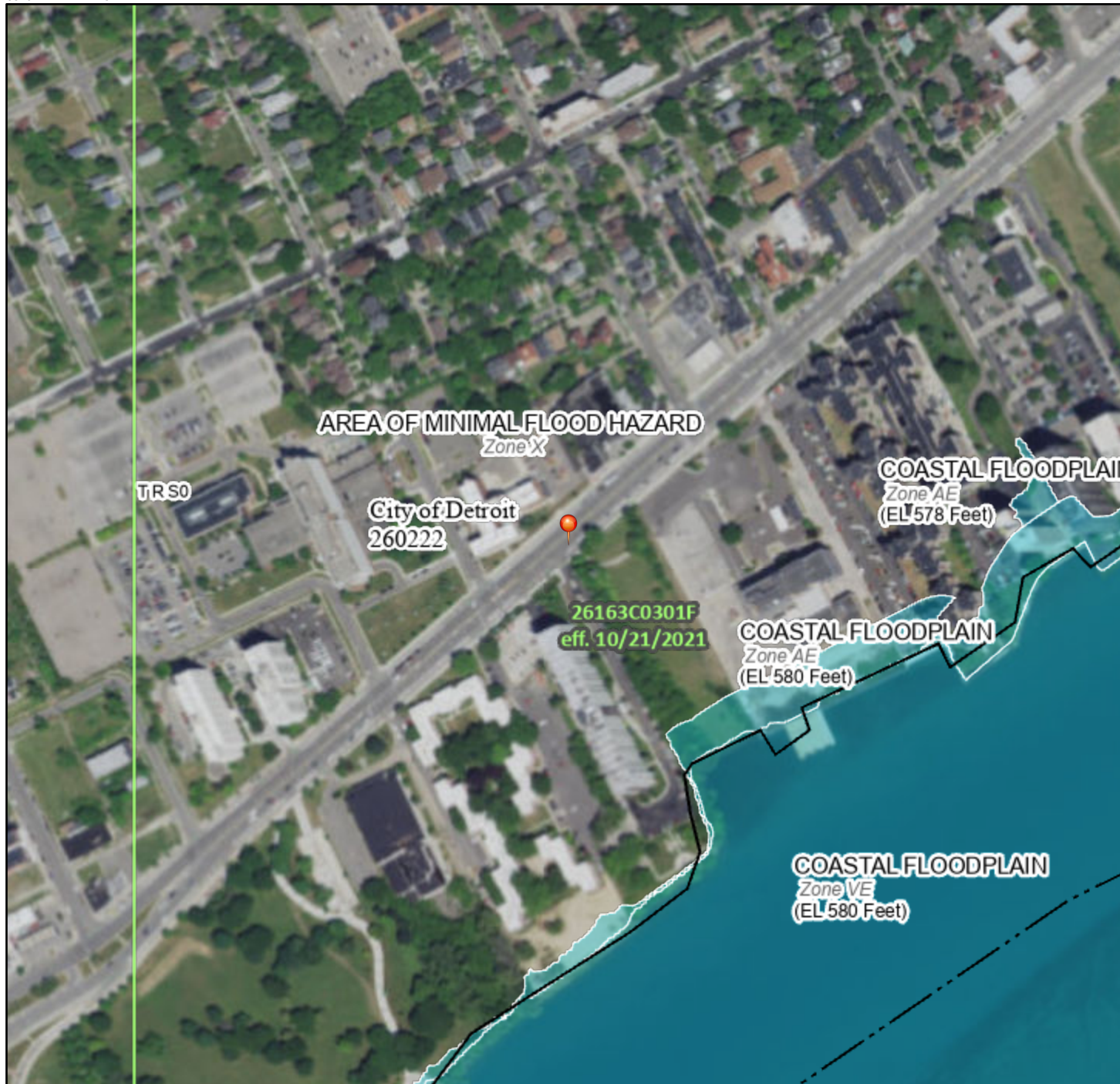
MICHIGAN



National Flood Hazard Layer FIRMette



83°0'4"W 42°21'15"N



0 250 500 1,000 1,500 2,000 Feet 1:6,000

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

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
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
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
OTHER FEATURES		Levee, Dike, or Floodwall
		Cross Sections with 1% Annual Chance Water Surface Elevation
MAP PANELS		Coastal Transect
		Base Flood Elevation Line (BFE)
OTHER FEATURES		Limit of Study
		Jurisdiction Boundary
OTHER FEATURES		Coastal Transect Baseline
		Profile Baseline
OTHER FEATURES		Hydrographic Feature
		Digital Data Available
MAP PANELS		No Digital Data Available
		Unmapped



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 6/9/2022 at 3:13 PM 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.



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



LIESL EICHLER CLARK
DIRECTOR

October 8, 2019

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

Dear Ms. Czapek:

Subject: City of Detroit, United States Department of Housing and Urban Development
Grant Award Air Quality Analysis – 7850 East Jefferson

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), has reviewed the federal regulations related to general conformity of projects with state implementation plans (SIPs) 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. The AQD is currently working to complete the required SIP submittals for this area; therefore, an alternative evaluation was completed to assess conformity. Specifically, we 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."

The AQD has reviewed emission estimation analyses for the projects that Wayne County proposes to complete with federal grant monies; including the construction of a 225-unit rental apartment community to be constructed on vacant land along the Detroit River at 7850 East Jefferson Avenue. The project will be built in three concurrent, identical 75-unit phases encompassing 3.8 acres, and is expected to take approximately 12 months to complete.

In reviewing the *"Air Quality and Greenhouse Gas Study: Uptown Orange Apartments in Orange, California,"* dated December 2012, prepared for KTG Y 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.

Ms. Ashleigh Czapek
October 8, 2019
Page 2

The size, scope, and duration of the 7850 East Jefferson Avenue 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 517-284-6737; bukowskib@michigan.gov; or EGLE AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

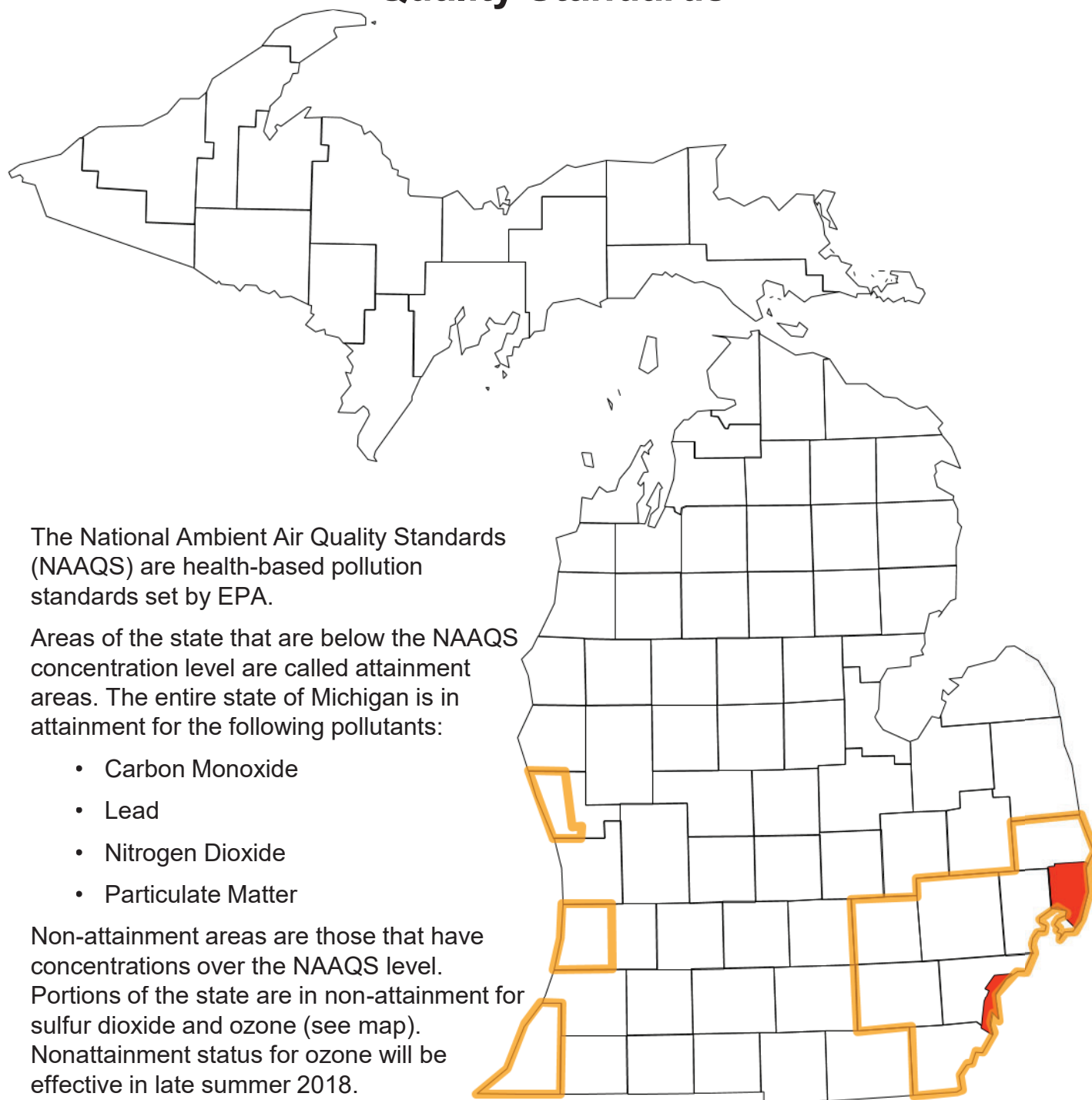
Sincerely,

A handwritten signature in black ink, appearing to read "Breanna Bukowski". The signature is fluid and cursive, with the first name "Breanna" and last name "Bukowski" clearly distinguishable.

Breanna Bukowski
Environmental Quality Analyst

cc: Mr. Michael Leslie, USEPA Region 5
Ms. Carmen E. Reverón-Rondón, U.S. Dept. of Housing and Urban Development

Attainment Status for the National Ambient Air Quality Standards



LEGEND



Sulfur Dioxide
Nonattainment Area



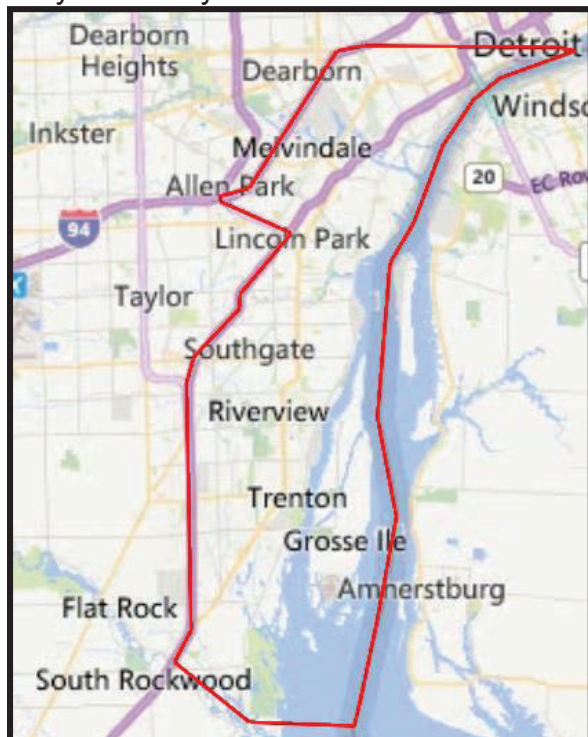
Ozone
Nonattainment Area

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

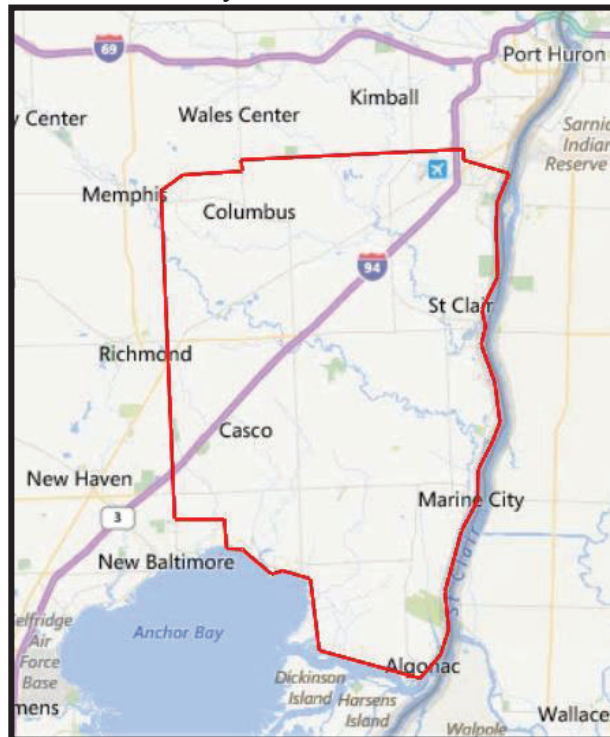
Close-Up Maps of Partial County Nonattainment Areas

Sulfur Dioxide Nonattainment Areas

Wayne County Area

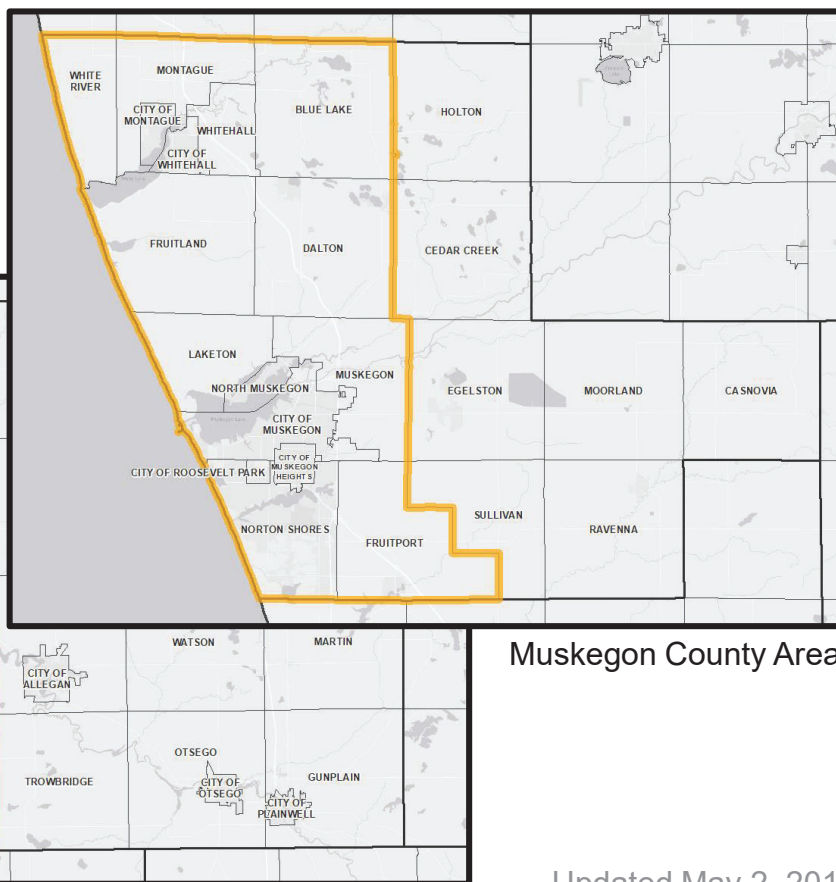
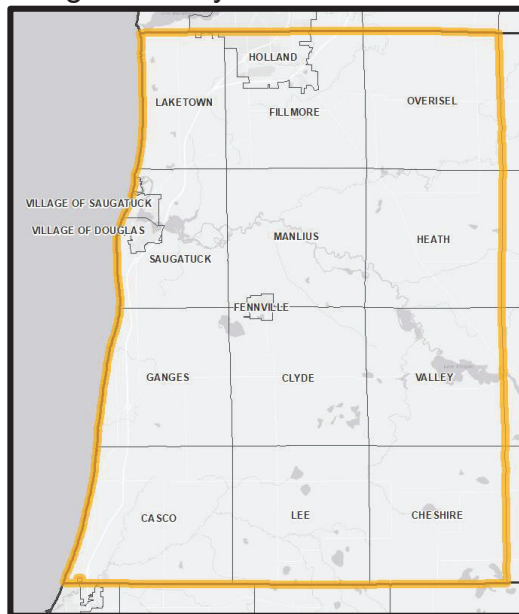


St. Clair County Area



Ozone Nonattainment Areas

Allegan County Area



Muskegon County Area

Updated May 2, 2018

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



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 22, 2019

Ashleigh Czapek
10448 Citation drive, Suite 100
Brighton, MI 48116

Dear Ms. Czapek:

Subject: Federal Consistency Determination, Proposed Construction at 7850 East
Jefferson Avenue, Detroit, Michigan

Staff of the Water Resources Division has reviewed this phase of the project for consistency with Michigan's Coastal Management Program (MCMP), as required by Section 307 of the Coastal Zone Management Act, PL 92-583, as amended (CZMA). Thank you for providing the opportunity to review this proposed activity.

Our review indicates that portions of this project are located within Michigan's coastal management boundary and are subject to consistency requirements.

A determination of consistency with MCMP requires evaluation of a project to determine if it will have an adverse impact on coastal land or water uses or coastal resources. Projects are evaluated using the permitting criteria contained in the regulatory statutes administered by the Department of Environment, Great Lakes, and Energy. These statutes constitute the enforceable policies of the Coastal Management Program.

Provided all required permits are issued and complied with, no adverse impacts to coastal resources are anticipated from this project as described in the information you forwarded to our office. Issuance of all required permits will certify the activity for which the permits were issued as consistent with MCMP. If no permits are required, this project shall be considered consistent as of the date of this letter.

This consistency determination does not waive the need for permits that may be required under other federal, state or local statutes. Please call me if you have any questions regarding this review.

Sincerely,

Chris Antieau
Field Operations Support Section
Water Resources Division
517-290-5732

Wayne County
Grosse Pointe Township, Grosse Pointe Woods, Grosse Pointe Farms
Grosse Pointe, Grosse Pointe Park, and Detroit, T1S R14E
Detroit, T1S R14E, T2S R13E, and T2S 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 (<i>Lynx canadensis</i>)	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 <i>Canis lupus</i>	Endangered	Alger, Baraga, Chippewa, Delta, Dickinson, Gogebic, Houghton, Iron, Keweenaw, Luce, Mackinac, Marquette, Menominee, Ontonagon, Schoolcraft	Northern forested areas
Indiana bat (<i>Myotis sodalis</i>)	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 <i>Myotis septentrionalis</i>	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 <i>Setophaga kirtlandii</i>	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 (<i>Chradrius melodus</i>)	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 (<i>Chradrius melodus</i>)	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 (<i>Calidris canutus rufa</i>)	Threatened	<p>Only actions that occur along coastal areas during the Red Knot migratory window of MAY 1 - SEPTEMBER 30 for the following counties:</p> <p>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</p> <p>Only actions that occur in large wetland complexes during the Red knot migratory window of MAY 1 - SEPTEMBER 30 for the following counties:</p> <p>Midland, Saginaw, Shiawassee</p>	Coastal areas and large wetland complexes
Whooping crane ** (<i>Grus americanus</i>)	Non-essential experimental population	Allegan, Barry, Berrien, Jackson, Kent, Lenawee, Macomb, Oceana, Ottawa	Open wetlands and lakeshores
REPTILES			
Copperbelly water snake (<i>Nerodia erythrogaster neglecta</i>)	Threatened	Branch, Calhoun, Cass, Eaton, Hillsdale, St. Joseph	Wooded and permanently wet areas such as oxbows, sloughs, brushy ditches and floodplain woods
Eastern massasauga (<i>Sistrurus catenatus</i>)	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 (<i>Somatochlora hineana</i>)	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 (<i>Brychius hungerfordi</i>)	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 (<i>Lycaeides melissa samuelis</i>)	Endangered	Allegan, Ionia, Kent, Lake, Mason, Mecosta, Monroe, Montcalm, Muskegon, Newaygo, Oceana	Pine barrens and oak savannas on sandy soils and containing wild lupines (<i>Lupinus perennis</i>), the only known food plant of larvae.
Mitchell's satyr (<i>Neonympha mitchellii mitchellii</i>)	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 (<i>Oarisma poweshiek</i>)	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 (<i>Pleurobema clava</i>)	Endangered	Hillsdale	Found in coarse sand and gravel areas of runs and riffles within streams and small rivers
Northern riffleshell (<i>Epioblasma torulosa rangiana</i>)	Endangered	Monroe, Sanilac, Wayne	Large streams and small rivers in firm sand of riffle areas; also occurs in Lake Erie
Rayed Bean (<i>Villosa fabalis</i>)	Endangered	Oakland, St. Clair	Belle, Black, Clinton and Pine Rivers
Snuffbox (<i>Epioblasma triquetra</i>)	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 (<i>Asplenium scolopendrium</i> var. <i>americanum</i> = <i>Phyllitis japonica</i> ssp. <i>a.</i>)	Threatened	Chippewa, Mackinac	Cool limestone sinkholes in mature hardwood forest
Dwarf lake iris (<i>Iris lacustris</i>)	Threatened	Alpena, Charlevoix, Cheboygan, Chippewa, Delta, Emmet, Mackinac, Menominee, Presque Isle, Schoolcraft	Partially shaded sandy-gravelly soils on lakeshores
Eastern prairie fringed orchid (<i>Plantathera leucophaea</i>)	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 (<i>Solidago houghtonii</i>)	Threatened	Charlevoix, Cheboygan, Chippewa, Crawford, Emmet, Kalkaska, Mackinac, Presque Isle, Schoolcraft	Sandy flats along Great Lakes shores
Lakeside daisy (<i>Hymenoxys acaulis</i> var. <i>glabra</i>)	Threatened	Mackinac	Dry, rocky prairie grassland underlain by limestone
Michigan monkey-flower (<i>Mimulus michiganensis</i>)	Endangered	Benzie, Charlevoix, Cheboygan, Emmet, Leelanau, Mackinac	Soils saturated with cold flowing spring water; found along seepages, streams and lakeshores
Pitcher's thistle (<i>Cirsium pitcheri</i>)	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 <i>(Isotria medeoloides)</i>	Threatened	Berrien	Dry woodland; upland sites in mixed forests (second or third growth stage)

[Home \(/\)](#) > [Programs \(/programs/\)](#) > [Environmental Review \(/programs/environmental-review/\)](#) > ASD Calculator

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/ft² - hr - people and 10,000 BTU/ft² - 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, Siting 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: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="1320"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="310.48"/>

ASD for Thermal Radiation for Buildings (ASDBN)	37.17
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 \(/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/\)](/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 \(/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/\)](/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/)
- [ASD Flow Chart \(/resource/3840/acceptable-separation-distance-asd-flowchart/\)](/resource/3840/acceptable-separation-distance-asd-flowchart/)

[Home \(/\)](#) > [Programs \(/programs/\)](#) > [Environmental Review \(/programs/environmental-review/\)](#) > ASD Calculator

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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: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="10000"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<input type="button" value="Calculate Acceptable Separation Distance"/>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="721.77"/>
ASD for Thermal Radiation for Buildings (ASDBPII)	<input type="text" value="145.79"/>

ASD for Thermal Radiation for Buildings (ASDBN)	143.70
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 \(/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/\)](/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/)

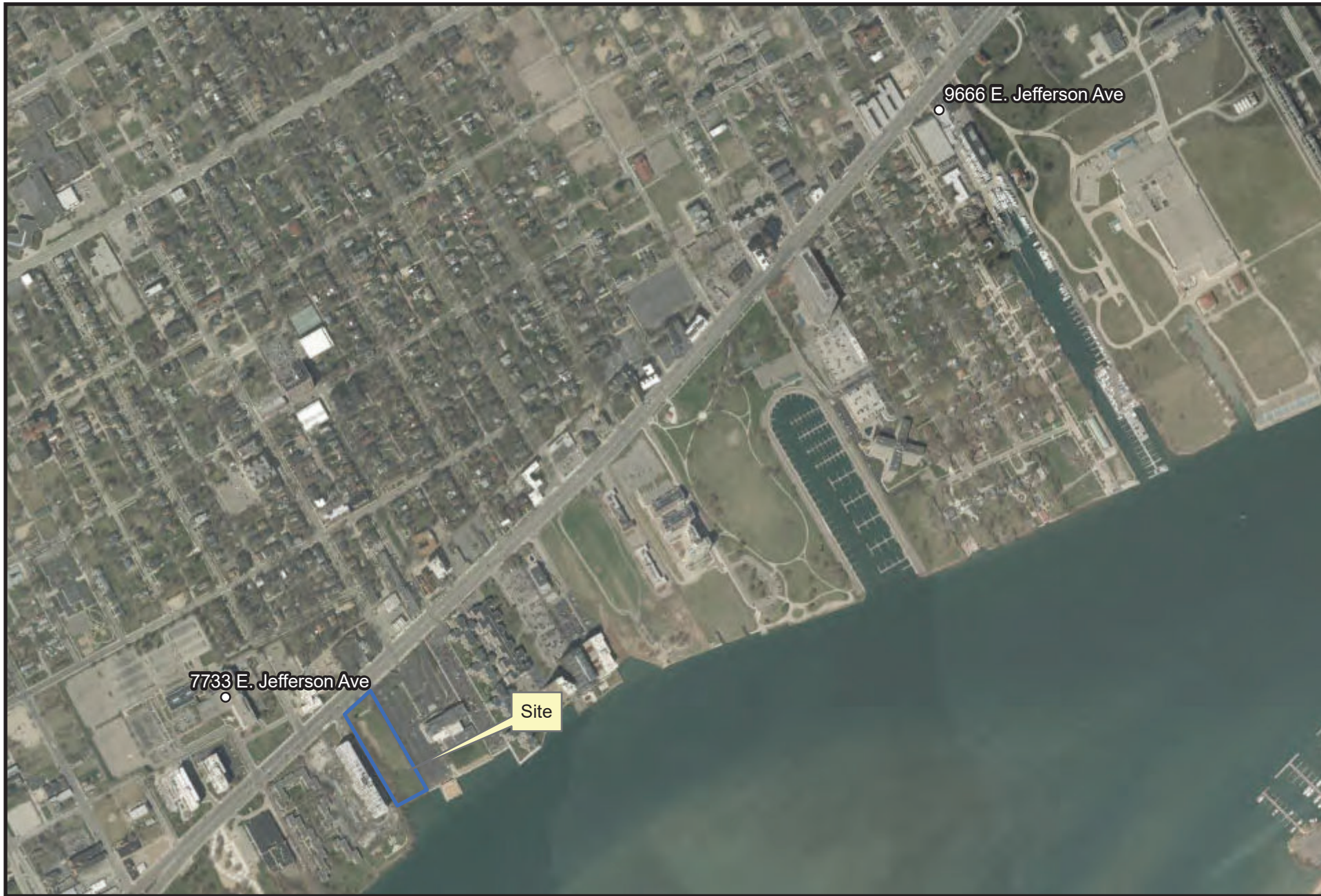
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Related Information

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7850 E. Jefferson

Detroit, MI

1,000 500 0 1,000 Feet



Soil Map—Wayne County, Michigan



**Natural Resources
Conservation Service**

Web Soil Survey
National Cooperative Soil Survey

9/26/2019
Page 1 of 3

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

Water Features

Streams and Canals

Transportation

Rails

Interstate Highways

US Routes

Major Roads

Local Roads

Background

Aerial Photography

Spoil Area

Stony Spot

Very Stony Spot

Wet Spot

Other

Special Line Features

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 4, Sep 11, 2018

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 15, 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	2.5	93.5%
UrbarB	Urban land-Riverfront complex, dense substratum, 0 to 4 percent slopes	0.1	3.4%
W	Water	0.1	3.0%
Totals for Area of Interest		2.7	100.0%

7850 E Jefferson – 8 Step Floodplain Process

Step One: Determine whether the action is located in a 100-year floodplain or a 500-year floodplain for critical actions) or wetland.

This action is located in a 100-year floodplain. The planned pathway and sea wall is located within AE Zone (special flood hazard area with water surface elevations determined) as indicated on the FEMA Preliminary Flood Insurance Rate Map (FIRM) Panel 301 of 575 no. 26163CO301F revised December 21, 2018. Additionally, a potential third building comprised of market-rate units may be developed in the future. The FIRM is attached to this document.

This project is (a) acquisition of property and (b) new construction of affordable multifamily housing of greater than four units and, for these reasons, E.O. 11988- Floodplain Management applies. This project does not meet any of the exceptions at 24 CFR 55.12 and therefore requires an 8-step analysis of the direct and indirect impacts associated with the construction, occupancy, and modification of the floodplain.

The initial proposed project is located at 7850 E. Jefferson in Detroit, Wayne County, Michigan and includes the new construction of 225-unit rental apartment community to be built in three concurrent identical 75-unit phases on approximately 3.8 acres of vacant land. The purpose is to construct much needed affordable housing for families in the greater downtown Detroit area, especially with access to the Detroit Riverfront. The southern portion of the property near the Detroit River, including a future walk path, playground, curb and small portion of Building Three; Therefore, this analysis will consider impacts to the floodplain along with concerns for loss of property.

Step Two: Notify the public for early review of the proposal and involve the affected and interested public in the decision-making process.

A public notice describing the project was published in the Detroit News, the local and regional paper, on April 28, 2021. The ad targeted local residents, including those in the floodplain. The notice was also sent to interested Federal, State, local agencies, and non-profit groups such as the groups of individuals known by the City of Detroit to be interested in such notices. A list of specific agencies and individuals and a copy of the published notification is kept in the project's environmental review record and attached to this document. A copy was also posted on the City of Detroit's website. The required 15 calendar days were allowed for public comment. As required by regulation, the notice also included the name, proposed location and description of the activity, total number of floodplain acres involved, and the responsible entity contact for information as well as a website and the location and hours of the office at which a full description of the proposed action can be viewed.

The project scope included in the Early Public Notice included construction of three buildings – two on the northern portion of the property outside of the floodplain and one on the southern portion of the property in the floodplain. All three buildings would have included low-income housing units. Additionally, the Early Public Notice utilized data from the 2012 FEMA Firm MAP to evaluate the project for floodplain impacts. According to this map, the proposed sidewalk, sea wall and third building are located in Zone X of the 100-year floodplain.

Comments regarding this project were received from the HUD Detroit Field Environmental Officer (FEO). The HUD Detroit FEO indicated that an updated FEMA Preliminary FIRM map from 2018 was available. This meant a portion of the originally proposed third building was located in the Special Flood Hazard Area (SFHA) –Zone AE. Additionally, the HUD Detroit FEO indicated that the elevation of the originally

proposed third building put the main floor below the Preliminary Map 100-year flood elevation. The City of Detroit Environmental Review Officer (ERO) held two meetings with the HUD Detroit FEO to discuss her comments. The City of Detroit ERO also submitted a written response to the HUD Detroit FEO. The changes to the initial project scope are described in Steps 3-6 of this document.

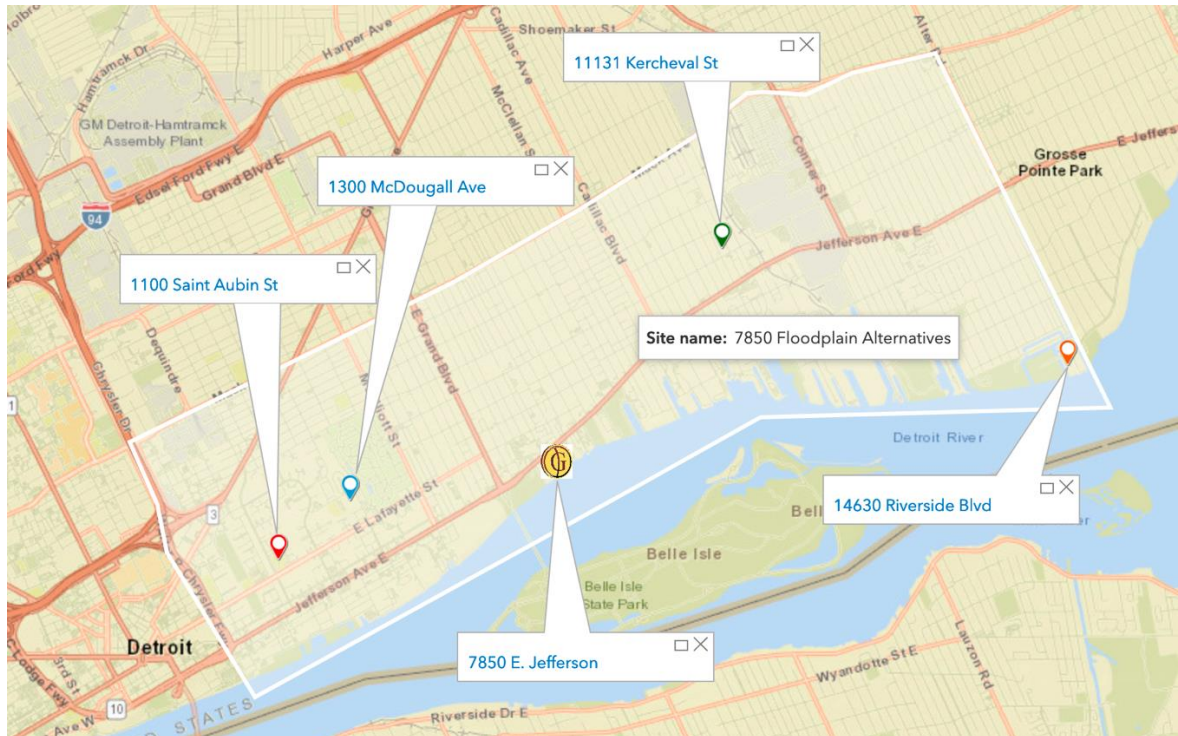
Step Three: Identify and evaluate practicable alternatives:

The project site selection criteria are:

- A. For Sale/For Lease
- B. Scale of property (greater than 2.8 +/- acreage),
- C. Zoning requirements (i.e., requires no re-zoning to accommodate Multi-Family Apartments),
- D. Within approximately 0.25 miles of East Jefferson Avenue, east of the Central Business District within the city limits of Detroit, and
- E. Proximity to similar natural amenities such as the Detroit River.

The City of Detroit considered several alternative sites believed to satisfy these requirements:

1. Moving the project to a different location mostly outside the floodplain
 - There are only four comparable properties within the criterion identified above. The locations are depicted in Figure 1. The properties include:
 - **11131 Kercheval Avenue**
 - NOT FOR SALE
 - Not on the riverfront
 - No direct access to greenways or walking paths to the riverfront
 - Zoned in General Business District
 - Not in the floodplain
 - **1300 McDougall**
 - Zoning is Planned Development, requiring additional public approvals for entitlement of the proposed project
 - Not on the riverfront
 - No direct access to greenways or walking paths to the riverfront
 - Comparable adjacent uses
 - Not in the floodplain
 - **14630 Riverside Drive**
 - NOT FOR SALE
 - On the river, but much further away from downtown Detroit
 - Does not have the potential for riverwalk access
 - Location is partially within a floodplain
 - **1100 St. Aubin**
 - NOT FOR SALE
 - Not on the riverfront
 - Access to riverfront via Dequindre Cut
 - Does not provide the same amenities as 7850 (no Riverwalk access, worse views, etc.)
 - Not in the floodplain



COMPARABLE ALTERNATIVE				Property	Proposed Use		Land Area	
Property Address	City	State	Zip	Type	Compliant?	For Sale Price	(AC)	Zoning
1) 11131 Kercheval St	Detroit	MI	48214	Land	Yes	Not for sale	4.08	GBD
2) 1300 McDougall Ave	Detroit	MI	48207	Land	Yes	\$ 2,750,000	4.74	PD
3) 14630 Riverside Blvd	Detroit	MI	48215	Land	Yes	Not for sale	7.06	R-6
4) 1100 Saint Aubin St	Detroit	MI	48207	Land	Yes	Not for sale	4.01	R-6
7850 E. Jefferson	Detroit	MI	48214	Land	Yes	SUBJECT PROPERTY	3.5 (2.80 Usable)	R-6

Figure 1- Properties Evaluated as Potential Alternatives

- Only one property (1300 McDougall) is actively for sale; therefore, there is only one practicable alternative location. The location is not adjacent to the riverfront, does not have direct access to greenways or riverwalk access and the property is zoned for Planning Development, which requires additional approvals to construct the project. Therefore, there is not an equivalent practicable alternative location for this project.
2. The City of Detroit considered several actions on the property believed to satisfy these requirements:
- **Alternative Method #1: Adjust layout of structures such that all 225 units are accommodated in one smaller building footprint.**
 - This modification to the project would have required modification to unit sizes and orientation to accommodate additional corners in the building, created additional unit types, and expanded common areas to occupy otherwise unusable spaces created by the revised layout.

- **Alternative Method #2: Construct new seawall and modify the Flood Plain through a conditional Letter of Map Revision (LOMR) such that all three buildings are out of the floodplain – Moving Forward.**

The developer evaluated the construction of a new seawall at higher elevation and modification of the Flood Plain such that the proposed third building will not be located in a flood plain. This requires a conditional Letter of Map Revision (LOMR) to modify the FIRM to reflect the as-constructed site improvements after the project is completed. This modification results in the maximum amount of low-income housing available on the site while protecting the safety and security of the low-income residents and their property. Additionally, this eliminates the risk for damage to a HUD-funded property from flooding. Therefore, the scope of the project will be changed to include a new seawall, flood plain modification and conditional Letter of Map Revision.

- **Alternative Method #3: Re-orient buildings on the site to avoid or reduce impact to the floodplain.**
 - The design team evaluated placement of the third building along the east property line to allow more parking to be placed along the west property line, reducing the overall number of parking spaces residing in the floodplain. However, the geotechnical report identified poor soils on southeastern quadrant of the site preventing the location of the third building outside the floodplain. In order to accommodate placement of the third building in this location the structural design would require deep foundations extending more than 100' to bedrock thereby increasing the construction costs of that building by nearly \$4,000 per unit. The additional cost per unit would decrease the affordability and decrease the projects' goal of addressing the City of Detroit's affordable housing crisis.
- **Alternative Method #4: Eliminate parking or achieve zoning variance for reductions to parking.**
 - This modification would have required special approvals from the City of Detroit's Board of Zoning Appeals as well as the Michigan State Housing Development Authority to allow for the reduction of parking spaces below the lender and zoning ordinance minimum standards. An additional 10-15% reduction of parking spaces would be required to eliminate the complete impact to the floodplain. Further, as a largely car-dependent community the reality of reducing parking spaces made available on the premises would have reduced the marketability of the property to potential low-income renters.
- **Alternative Method #5: Re-orient parking on site to avoid or reduce impact of parking on the floodplain.**
 - The design team evaluated alternative layouts for the parking provided. The parking areas were split along the western property line to avoid placement of buildings in the floodplain. As a result of this modification the parking became inefficient and prevented the achievement of parking, counts per zoning ordinance (see also Alternative Method #4).

3. No Action or Alternative Actions:

- A no action alternative was considered and rejected because the City of Detroit suffers from a critical shortage of quality affordable housing for low and very low-income families. Over 10,000 families in Detroit suffer from rent overburden (where families

pay rent greater than 30% of their income) due to the lack of affordable housing (Source: *Michigan Statewide Housing Needs Assessment by the Michigan State Housing Development Authority, April 2019*).

- These families have both limited income and limited housing options. These families are often forced to either live in substandard housing or choose to pay a greater proportion of their household income on rent, reducing income available to purchase other essentials such as groceries or medicine.
- Within the Primary Market Area (PMA) for the proposed project (approximately two miles surrounding the site), there is a need for more than 780 affordable housing units (Source: *Market Study by Shaw Research and Consulting, 2019*).
 - Therefore, the proposed project helps to address rent overburden for a small fraction of families (less than 20%) within the PMA. Up to 150 Low and Very Low-income families would continue suffer the negative effects of rent overburden if this project does not move forward.

Step Four: Identify Potential Direct and Indirect Impacts of Associated with Floodplain Development.

1. Impacts on people and property:

- **Leaving the floodplain as-is creates less attractive connection to the Detroit River**
 - Current access to the Detroit River is essentially non-existent at the site, further blocked by invasive overgrowth and vegetation.
 - Proposed access to the Detroit River provides engineered grade changes (steps) leading to stone walking paths to connect residents to waterfront, surrounded by native plantings.
 - Proposed new seawall with landscaped areas immediately adjacent to the river and associated Resident Park in the floodplain allows enhanced views of the riverfront and beyond.
- **Modifying the floodplain eliminates the potential concern of impacting people and property**
 - Under this modified proposed project scope, low-income residents will reside outside of the modified floodplain
 - This protects the low-income residents and their property from potential flood damage if a catastrophic flooding event occurred.
 - The buildings moving forward to construction are located on the northern portion of the property outside of the current floodplain. The third building will be constructed after site modifications are complete. Therefore, the construction of these buildings will not require FEMA Flood Insurance.
- **The proposed modification of the floodplain is minimal**
 - The overall current regulated floodplain is approximately 2,244 CY yards. The project proposes to reduce the floodplain volume by 2,035 cubic yards. This amount represents 90.69 % of the existing floodplain, as illustrated in Figure 2.

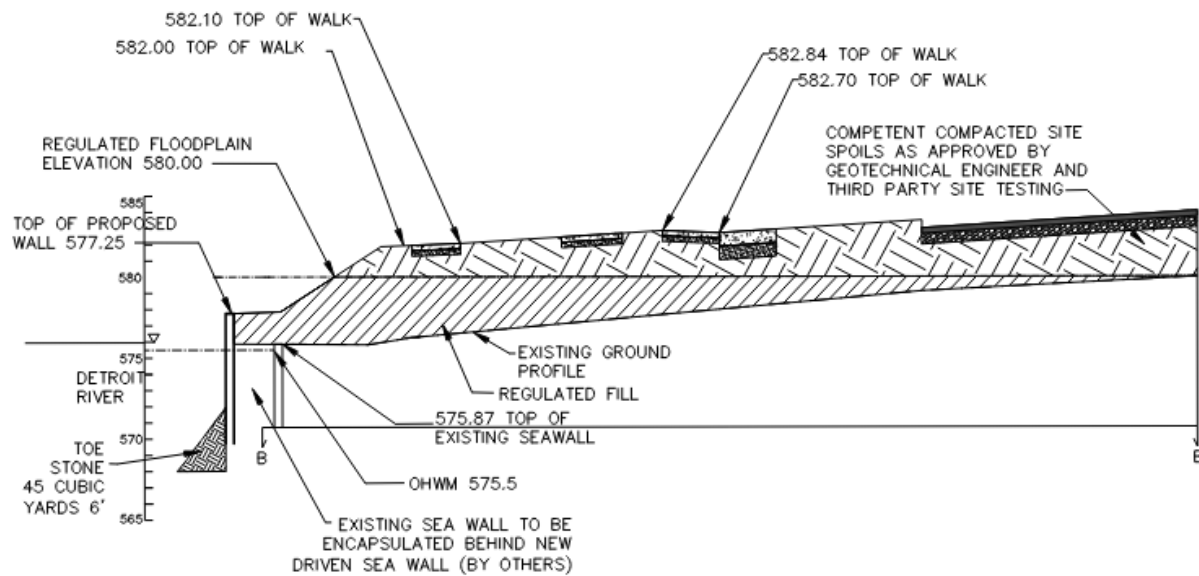


Figure 2- Floodplain Impact Cross Section

- Adjustments in the floodplain to help match neighboring properties. Current elevation differential between the adjacent property on the west is changing by approximately 5' to partially address the existing 8' grade differential between the properties. On the east property, the grade is changing to accommodate overland drainage swales for flood areas while matching the existing grade of the adjacent property.
- Added a new seawall to limit the area of impact to the least number of parking spaces and still accommodate the riverfront park area. If the riverfront park area were eliminated, the volume of impact to the floodplain would be reduced.
- Modification to floodplain allows the resident playground/park to enhance the residential experience. There are no multi-family affordable properties located on the Detroit River. This means low-income families only enjoy riverfront access through public parks. The only affordable properties located on the Detroit River are restricted to senior renters (see Figure 3). The project at 7850 E. Jefferson creates an unprecedented access for families to enjoy the riverfront from within an affordable housing property.
- Converted floodplain areas to park features that can be accessed when flooding does not occur.

- **The amount of fill has been limited to the least amount necessary to accommodate the project.**
 - **Elevation of protection (flood-proofing) provided through the new seawall proposed to be built on the property.**
 - This further protects potential future development and site improvements by raising the grade above the base flood elevation that floodwaters would need to overcome before damaging property.
2. Preserving Natural Values and Minimizing Impacts to the Environment:
- **Current vegetation along the river is a negative, invasive water-based species (Phragmites) which has been promulgated by lack of riverfront maintenance.**
 - Our project will eliminate this invasive species and return the riverfront to its natural state with plants that are native to MI including Panther Ninebarks, Karl Forrester Grasses and Blackgums.
 - **Utilizing native soils with proper drainage to avoid unnecessary import or export of fill materials.**

Step 6 – Reevaluate Alternatives

1. As documented above, construction at 11131 Kercheval Avenue, 1300 McDougall, 14630 Riverside Drive and 1100 St. Aubin is not viable because the sites do not meet one or more of the selection criteria:
 - A. For Sale/For Lease
 - B. Scale of property (greater than 2.8 +/- acreage),
 - C. Zoning requirements (i.e. requires no re-zoning to accommodate Multi-Family Apartments),
 - D. Within approximately 0.25 miles of East Jefferson Avenue, east of the Central Business District within the city limits of Detroit, and
 - E. Proximity to similar natural amenities such as the Detroit River.

1300 McDougall is the only property actively for sale; therefore. However, the property is not adjacent to the riverfront, does not have direct access to greenways or riverwalk access and the property is zoned for Planning Development. Therefore, the 7850 E. Jefferson property is the only location that satisfies these needs and concerns without displacing residents.

2. Although a portion of the 7850 E. Jefferson is in the floodplain, the project plan has been modified in order to minimize effects on people, property and the environment. Additionally, steps were taken to minimize the impact to the floodplain by removing the smallest amount of fill necessary and constructing a new retaining wall. Finally, a new FEMA Floodplain Map has been created since the original eight step process was completed. The final proposal is:

The proposed project is located at 7850 E. Jefferson in Detroit, Wayne County, Michigan and includes the new construction of a 225-unit rental apartment community to be built in two concurrent identical 75-unit phases and one future 75-unit phase on approximately 3.8 acres of vacant land. The purpose is to construct much needed affordable housing in the greater downtown Detroit area, especially with access to the Detroit Riverfront. The southern portion of the property near the Detroit River, including a new seawall and walkway, are located within the Special Flood Hazard Area (the 100-year floodplain) as indicated on the FEMA Preliminary Flood Insurance Rate Map (FIRM) 26163CO301F dated October 21, 2021. HOME funds and Detroit Housing Commission PBV's will be used in the financing of this project. The project proposes to place 2,035 cubic yards of fill within 0.57 acres of the 100-year floodplain

3. The No Action alternative is also impracticable because it does not satisfy the need to assist the low-income families in the City of Detroit.

Step 7: *Determination of Practicable Alternative*

It is the City of Detroit's determination that eliminating a building in the floodplain to house low-income people is the best practicable alternative. Although the building will not be constructed in the revised floodplain, the floodplain will be impacted by the seawall upgrades, fill.

A final noticed was published and posted that included changes in the scope of the project to reduce impacts to the floodplain. The notices explains reasons why the project was modified and the remaining work must be located in the floodplain, offers a list of alternatives considered at Steps 3 and 6 and describes all mitigation measures at Step 5 taken to minimize adverse impacts and preserve natural and beneficial floodplain values. The Notice is attached to this document.

Step 8: *Implement the Proposed Action*

The City of Detroit will assure that the plan is executed as modified and described above and in the EGLE Part 31 Permit approved in review. Necessary language will be included in all agreements with participating parties. The City will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken.

This Eight-Step Process only covers review for the two buildings outside of the floodplain. Once the project is complete, any future construction projects that occur in the floodplain should strongly consider acquiring flood insurance to protect the safety of future occupants and their property.

Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain

To: All interested Federal, State and Local Agencies, Groups and Individuals

This is to give notice that the City of Detroit has conducted an evaluation as required by Executive Order 11988 in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management. The activity is funded under the Home Funding Program under Title II of the National Affordable Housing Act of 1990 and Project Based Vouchers (PBV's) from the Detroit Housing Commission. The proposed project is located at 7850 E. Jefferson in Detroit, Michigan.

The proposed project is located at 7850 E. Jefferson in Detroit, Wayne County, Michigan and includes the re-evaluation of the new construction of a 225-unit rental apartment community to be built in two concurrent identical 75-unit phases and one future 75-unit phase on approximately 3.8 acres of vacant land. The purpose is to construct much needed affordable housing in the greater downtown Detroit area, especially with access to the Detroit Riverfront. The southern portion of the property near the Detroit River, including a new seawall and walkway, are located within the Special Flood Hazard Area (the 100-year floodplain) as indicated on the FEMA Preliminary Flood Insurance Rate Map (FIRM) 26163CO301F dated December 21, 2018. HOME funds and Detroit Housing Commission PBV's will be used in the financing of this project. The project proposes to place 2,035 cubic yards of fill within 0.57 acres of the 100-year floodplain

The City of Detroit has considered the following revised alternatives and mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial values: The first alternative considered was to move the project to a different location. This alternative would not be feasible, since this alternative would not provide low-income families direct access to the riverfront. The second alternative considered was to construct a new seawall and modify the floodplain through a conditional Letter of Map Revision (LOMR). This would remove the buildings from the floodplain. This option is the optimal alternative, as it will significantly reduce the project's impact to human life, property, and the floodplain. The third alternative considered was to re-orient buildings to reduce impact. This alternative would not be feasible, since there are poor soils on the southeastern quadrant of the site. The fourth alternative considered was eliminate parking or a zoning variation to reduce parking. This alternative is not feasible as it requires special approvals to below minimum standards. The fifth alternative considered was to reorient parking on the site. This alternative would not be feasible as the parking would be inefficient and prevent meeting the minimum parking standards.

The City of Detroit has reevaluated the alternatives to building in the floodplain and has determined that it the second alternative was the most feasible. Environmental files that document compliance with steps 3 through 6 of Executive Order 11988, are available for public inspection, review and copying upon request at the times and location delineated in the last paragraph of this notice for receipt of comments.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special

areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplains, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Detroit's Housing and Revitalization Department at the following address on or before June 30, 2022.

City of Detroit Housing & Revitalization Department
2 Woodward Avenue, Suite 908
Detroit, MI 48226
dwoinenp@detroitmi.gov
Attention: Penny Dwoinen, Environmental Review Officer

A full description of the project may also be reviewed on the City of Detroit's Housing & Revitalization Public Notice page <https://detroitmi.gov/departments/housing-and-revitalization-department/public-notices>. Comments may also be submitted via email at dwoinenp@detroitmi.gov.

Date: June 22, 2022.

Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain

To: All interested Federal, State and Local Agencies, Groups and Individuals

This is to give notice that the City of Detroit has conducted an evaluation as required by Executive Order 11988 in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management. The activity is funded under the Home Funding Program under Title II of the National Affordable Housing Act of 1990 and Project Based Vouchers (PBV's) from the Detroit Housing Commission. The proposed project is located at 7850 E. Jefferson in Detroit, Michigan.

The proposed project is located at 7850 E. Jefferson in Detroit, Wayne County, Michigan and includes the new construction of 150-unit rental apartment community to be built in two concurrent identical 75-unit phases on approximately 3.8 acres of vacant land. The purpose is to construct much needed affordable housing in the greater downtown Detroit area, especially with access to the Detroit Riverfront. The southern portion of the property near the Detroit River, including a future seawall and walkway, are located within the Special Flood Hazard Area (the 100-year floodplain) as indicated on the FEMA Preliminary Flood Insurance Rate Map (FIRM) 26163CO301F dated December 21, 2018. HOME funds and Detroit Housing Commission PBV's will be used in the financing of this project. The project proposes to place 208 cubic yards of fill within 0.16 acres of the 100-year floodplain.

The City of Detroit has considered the following alternatives and mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial values: The first alternative considered was to move the project to a different location. This alternative would not be feasible, since this alternative would not provide low-income families direct access to the riverfront. The second alternative considered was to change the scope of the project. Five different scope changes were considered. One of the proposed scope changes included not constructing the third building that is located in the floodplain. This option is the optimal alternative, as it will significantly reduce the projects impact to human life, property and the floodplain. The third alternative considered was to do no-action. This alternative would not be feasible, since this alternative would not create additional housing for low-income families in the City of Detroit.

The City of Detroit has reevaluated the alternatives to building in the floodplain and has determined that it the second alternative was the most feasible. Environmental files that document compliance with steps 3 through 6 of Executive Order 11988, are available for public inspection, review and copying upon request at the times and location delineated in the last paragraph of this notice for receipt of comments.

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Written comments must be received by the City of Detroit's Housing and Revitalization Department at the following address on or before August 5, 2021.

City of Detroit Housing & Revitalization Department
2 Woodward Avenue, Suite 908
Detroit, MI 48226
Phone: (313) 224-1508
Attention: Penny Dwoinen, Environmental Review Officer

A full description of the project may also be reviewed on the City of Detroit's Housing & Revitalization Public Notice page <https://detroitmi.gov/departments/housing-and-revitalization-department/public-notices>. Comments may also be submitted via email at dwoinenp@detroitmi.gov.

Date: July 28, 2021

Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain

To: All interested Federal, State and Local Agencies, Groups and Individuals

This is to give notice that the City of Detroit has conducted an evaluation as required by Executive Order 11988 in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management. The activity is funded under the Home Funding Program under Title II of the National Affordable Housing Act of 1990 and Project Based Vouchers (PBV's) from the Detroit Housing Commission. The proposed project is located at 7850 E. Jefferson in Detroit, Michigan.

The proposed project is located at 7850 E. Jefferson in Detroit, Wayne County, Michigan and includes the new construction of 150-unit rental apartment community to be built in two concurrent identical 75-unit phases on approximately 3.8 acres of vacant land. The purpose is to construct much needed affordable housing in the greater downtown Detroit area, especially with access to the Detroit Riverfront. The southern portion of the property near the Detroit River, including a future seawall and walkway, are located within the Special Flood Hazard Area (the 100-year floodplain) as indicated on the FEMA Preliminary Flood Insurance Rate Map (FIRM) 26163CO301F dated December 21, 2018. HOME funds and Detroit Housing Commission PBV's will be used in the financing of this project. The project proposes to place 208 cubic yards of fill within 0.16 acres of the 100-year floodplain.

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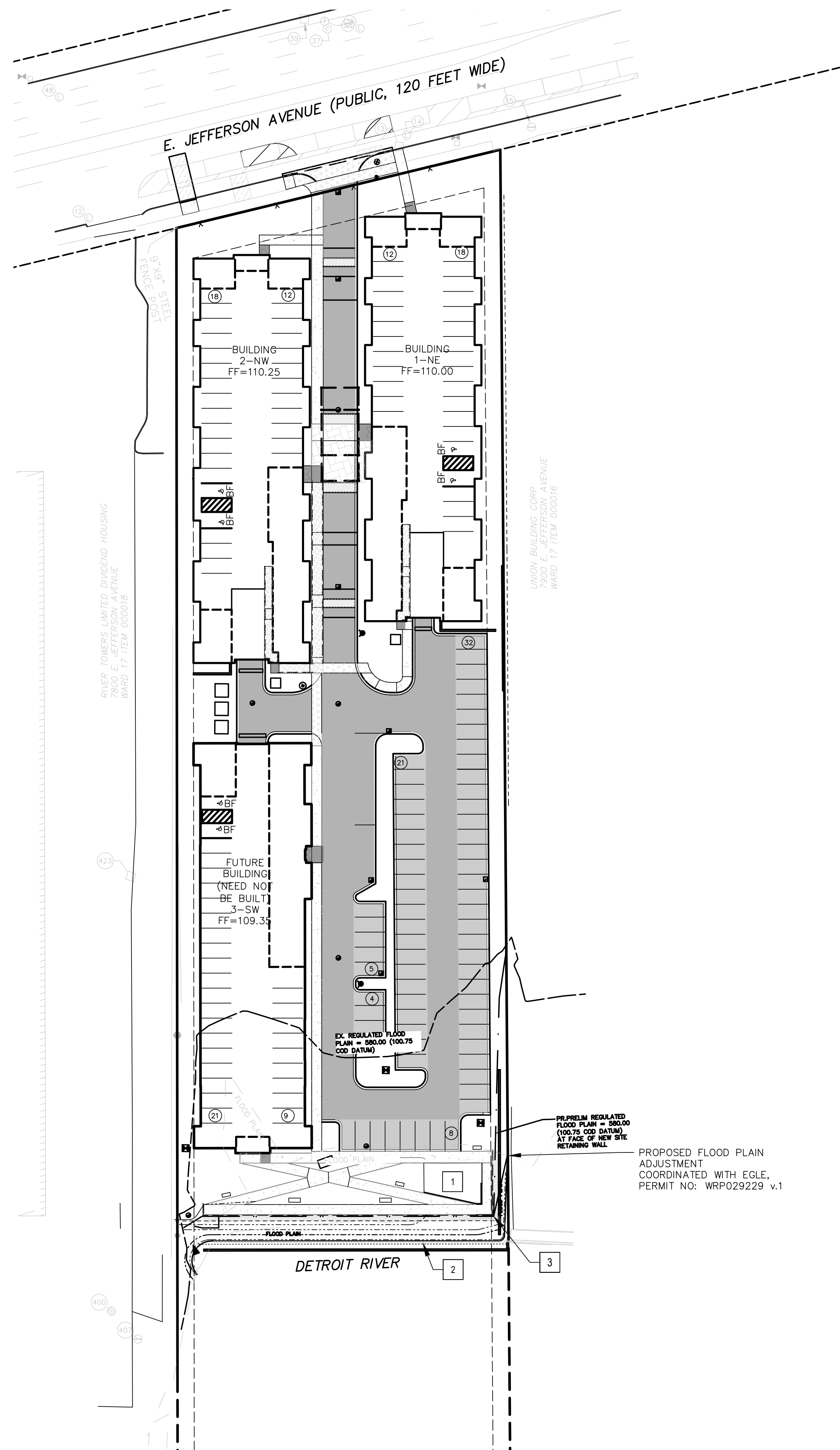
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Date: June 22, 2022.



INTERIOR LANDSCAPE REQUIREMENT

REQUIRED = 22SF*PARKING SPACES PROVIDED
 REQUIRED = 22SF*70=1,540 SF
 PROVIDED = 4,526 SF

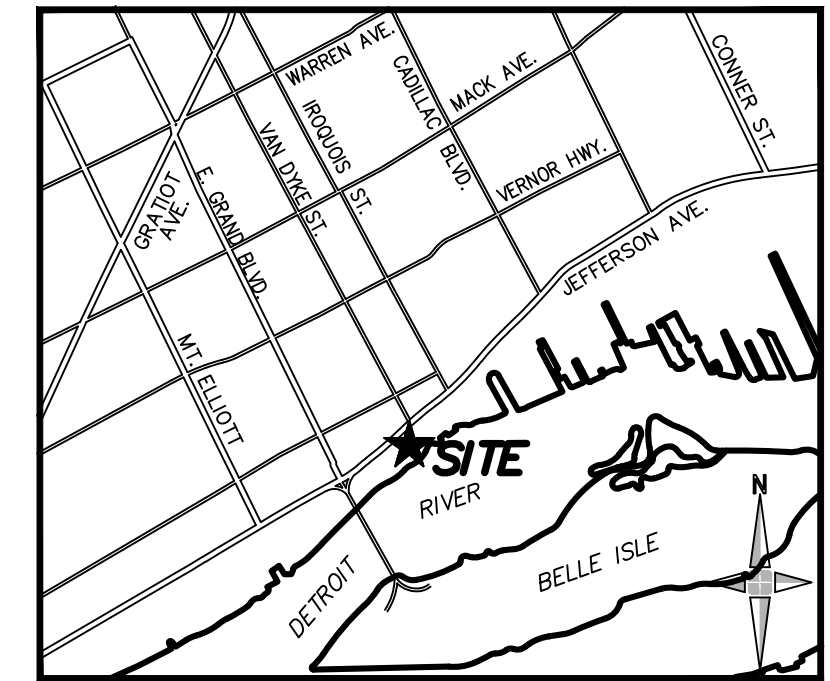
PARKING REQUIREMENTS

	REQUIRED	PROVIDED
Parking Spaces*	169	160
Barrier-Free Spaces (Van Accessible)**	6(1)	6(3)
Off-Street Loading Zone***	2	2

*Detroit Zoning Ordinance 61-14-24 (0.75 Spaces Per Dwelling Unit, Multifamily housing where located within 0.5 mi of high-frequency transit corridor)

**Detroit Zoning Ordinance 61-14-122 (151-200 Total Spaces Provided)

***Detroit Zoning Ordinance 61-14-81 (100,000-500,000 Sq.Ft.; (1) 12x35 Space and (1) 12x55 Space Required)



LOCATION MAP
(NOT TO SCALE)

SITE PLAN KEY NOTES

- 1 PLAYScape
- 2 EXISTING SEAWALL
- 3 NEW SITE RETAINING WALL

giffels
webster

Engineers
Surveyors
Planners
Landscape Architects

8 West Adams Road
Suite 1200
Detroit, MI 48226
p (313) 962-4442
f (313) 962-5068
www.giffelswebster.com

Executive:	M. Marks
Manager:	D. Root
Designer:	S. Forest
Quality Control:	M. Darga
Section:	PC - Van Dyke Farm

Professional Seal:



Know what's **below**.
Call before you dig.

DATE:	ISSUE:
01/19/07-24	Design Development Owner Review
01/19-08/07	Site Plan Re-Submission
01/19-09/12	Site Plan Re-Submission
01/19-11/13	Site Plan Re-Submission
02/00-03/27	Revised Site Plan Approval
02/00-04/08	Revised Site Plan Approval
02/00-07/02	Revised Site Plan Approval
02/01-01/06	EGLE Submittal
02/01-06/21	HUD Coordination
02/02-03/01	EGLE Permit Revision
02/01-07/02	Permits

Developed For:

Ginosko Development Co.

1800 W. 11 Mile Rd
Ste. 209
Novi, MI 48375
T: (248) 513-4900
F: (248) 513-4904

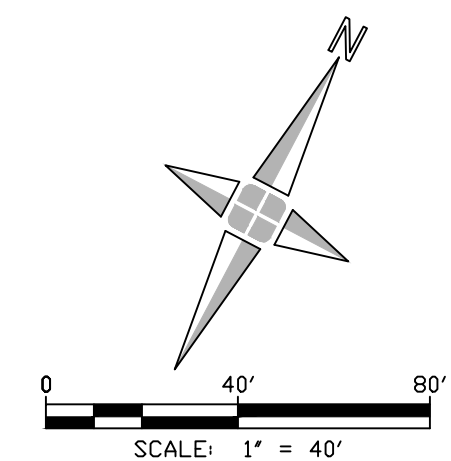
OVERALL SITE PLAN

7850 E. Jefferson Ave.

City of Detroit
Wayne County
MICHIGAN

Date:	2021-07-02
Scale:	1"=40'
Sheet:	C-500
Project:	19604-01

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Housing and Revitalization
Department

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

Phone: 313.224.6380
Fax: 313.224.1629
www.detroitmi.gov

November 21, 2019

Penny Dwoinen, Environmental Review Officer
Housing & Revitalization Department
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 908
Detroit, Michigan, 48226

RE: **Section 106 Review of a City of Detroit HOME & Detroit Housing
Commission PBV-Funded 7850 E. Jefferson Project Located 7850 East
Jefferson Avenue in the City of Detroit, Wayne County, Michigan (Sec. 106 ID
#42106)**

Dear Mrs. Dwoinen

The 7850 E. Jefferson Project, located at 7850 East Jefferson Avenue, involves the new construction of a three identical apartment building on a presently vacant lot along the Detroit River. The HOME funding allocation for this project is \$3,120,000, and will include 36 Detroit Housing Commission (DHC) Project Based Vouchers (PBV). 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...,” 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).

Based on the information submitted to this office on October 30, 2019, we have determined that within in the Area of Potential Effects (APE), the **West Village Historic Local District and Alden Park Towers** are listed on the National Register of Historic Places (NRHP).

Additionally, per Stipulation VI.C and VII of Programmatic Agreement (PA), the proposed undertaking qualified for review by the State Historic Preservation Office (SHPO) Archaeologist since the site is larger than 1/2-acre and will include ground disturbing activities. A report was submitted to the SHPO for review electronically on July 9, 2019. In an email (attached) dated August 12, 2019, the SHPO Archaeologist determined the following:

“Based on the information in our files and that which you’ve submitted for review, we would not recommend archaeological survey. However, we recommend a strong unanticipated discoveries plan including having an archaeologist accessible in the event construction reveals concentrations of potentially historic artifacts or features (e.g. foundations or other structural remains).”



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Based on those comments, the developer has since contracted with a consultant, The Mannik & Smith Group, Inc., to develop an unanticipated discoveries plan for the project (attached). This plan was submitted to the SHPO archaeologist and approved on October 14, 2019.

Since National Register-listed historic properties are located within the APE of the new construction project, the Preservation Specialist is required to review construction drawings, specifications and photos of the proposed work. Therefore, this project has been given a **Conditional No Adverse Effect** determination (Federal Regulations 36 CFR Part 800.5(b)) on properties that are listed or eligible for listing in the National Register of Historic Places, as long as the following conditions are met:

- Prior to the start of any work, building plans, specifications and photos must be submitted to the Preservation Specialist for review and Conditional Approval;
- Once construction has started the unanticipated discoveries plan shall be executed for the duration of the project, and;
- If there is a change in the scope of work, those changes will be required to undergo additional Section 106 Review prior to the execution of any work.

Please note that the Section 106 Review process will not be complete until the above mentioned conditions are met and the completed work is approved by the Preservation Specialist. Additionally, once the work is complete, "After" photos of all work items will need to be submitted to the Preservation Specialist so that the project can comply with the requirements of the Section 106 review. An *Approval of Completed Work* may be issued for the project once photos of the completed work are received and reviewed.

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 contact the Lead Preservation Specialist by phone at (313) 224-1508 or email at rschumak@detroitmi.gov. Please reference the project name and the Section 106 identification number in all communications with this office.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. M. Schumaker", with a long horizontal flourish extending to the right.

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



**Housing and Revitalization
Department**

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

Phone: 313.224.6380
Fax: 313.224.1629
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Cc: Kimberly Siegal, HRD
Ashleigh Czapek, ASTI Environmental
Anna Shires, HRD

Ryan Schumaker

From: Tchorzynski, Stacy (MSHDA) <TchorzynskiS@michigan.gov>
Sent: Monday, August 12, 2019 10:10 AM
To: Ryan Schumaker
Cc: Grennell, Brian (MSHDA)
Subject: RE: PA Archaeology Review Request - 7850 E. Jefferson Project

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Ryan,

Thank you for your patience. As you know, two previously reported archaeological sites appear within the APE on our maps.

20WN804 is reportedly the charred hull of the Yantic, a 1864 wooden hull gunboat. The Yantic had an incredible Naval career and ultimately reportedly was stripped and set ablaze at the foot of Townsend Street Nov 22, 1929. Per some historical accounts, its remains are allegedly buried in a filled-in boat slip in Gabriel Richard Park to the southwest of the APE. Our maps show the location at the southern tip of your APE, which I'm suspecting is our mapping error (I can find no evidence otherwise). The Yantic's anchor was/is supposedly displayed in front of the Naval Armory at E Jefferson and Baldwin. Based on the information in hand, it seems reasonable to predict that the Yantic remains are outside of the APE to the southwest.

20WN765 is in our files as the historical map-documented location of the 18th c. Boyer-Meloche farm and its associated structures. This site has not been field verified/currently there is no evidence for its remains to exist. Due to the land use history of the northern portion of the APE as shown in your research, it seems unlikely that archaeological materials related to the farm remain, though one cannot be certain.

Based on the information in our files and that which you've submitted for review, we would not recommend archaeological survey. However, we recommend a strong unanticipated discoveries plan including having an archaeologist accessible in the event construction reveals concentrations of potentially historic artifacts or features (e.g. foundations or other structural remains).

Best,

Stacy Tchorzynski
Archaeologist
State Historic Preservation Office
Michigan Economic Development Corporation
Office: 517.335.9840 | Desk: 517.335.9914

From: Ryan Schumaker <rschumak@detroitmi.gov>
Sent: Tuesday, July 9, 2019 3:20 PM
To: Tchorzynski, Stacy (MSHDA) <TchorzynskiS@michigan.gov>
Cc: Tiffany Rakotz <rakotzt@detroitmi.gov>; Grennell, Brian (MSHDA) <GrennellB@michigan.gov>; Penny Dwoinen <Dwoinenp@detroitmi.gov>; Michelle Gilliland <gillilandm@detroitmi.gov>; Anna Shires <shiresa@detroitmi.gov>
Subject: PA Archaeology Review Request - 7850 E. Jefferson Project

Hi Stacy,

Please see the attached report for the 7850 E. Jefferson Project. Per our Programmatic Agreement, this project meets the threshold for review by your office. Let me know if you have any questions.

Thank you,

Ryan M. Schumaker
Lead Preservation Specialist
City of Detroit
Housing & Revitalization Department
2 Woodward Ave, Suite 908
Detroit, MI 48226
313.224.1508 Office
rschumak@detroitmi.gov

UNANTICIPATED DISCOVERIES PLAN

7850 E. JEFFERSON, DETROIT, MI

OCTOBER 2019

PREPARED FOR:
GDC-EAST JEFFERSON, LLC
41800 WEST 11 MILE RD., SUITE 209
NOVI, MICHIGAN



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1.0 INTRODUCTION

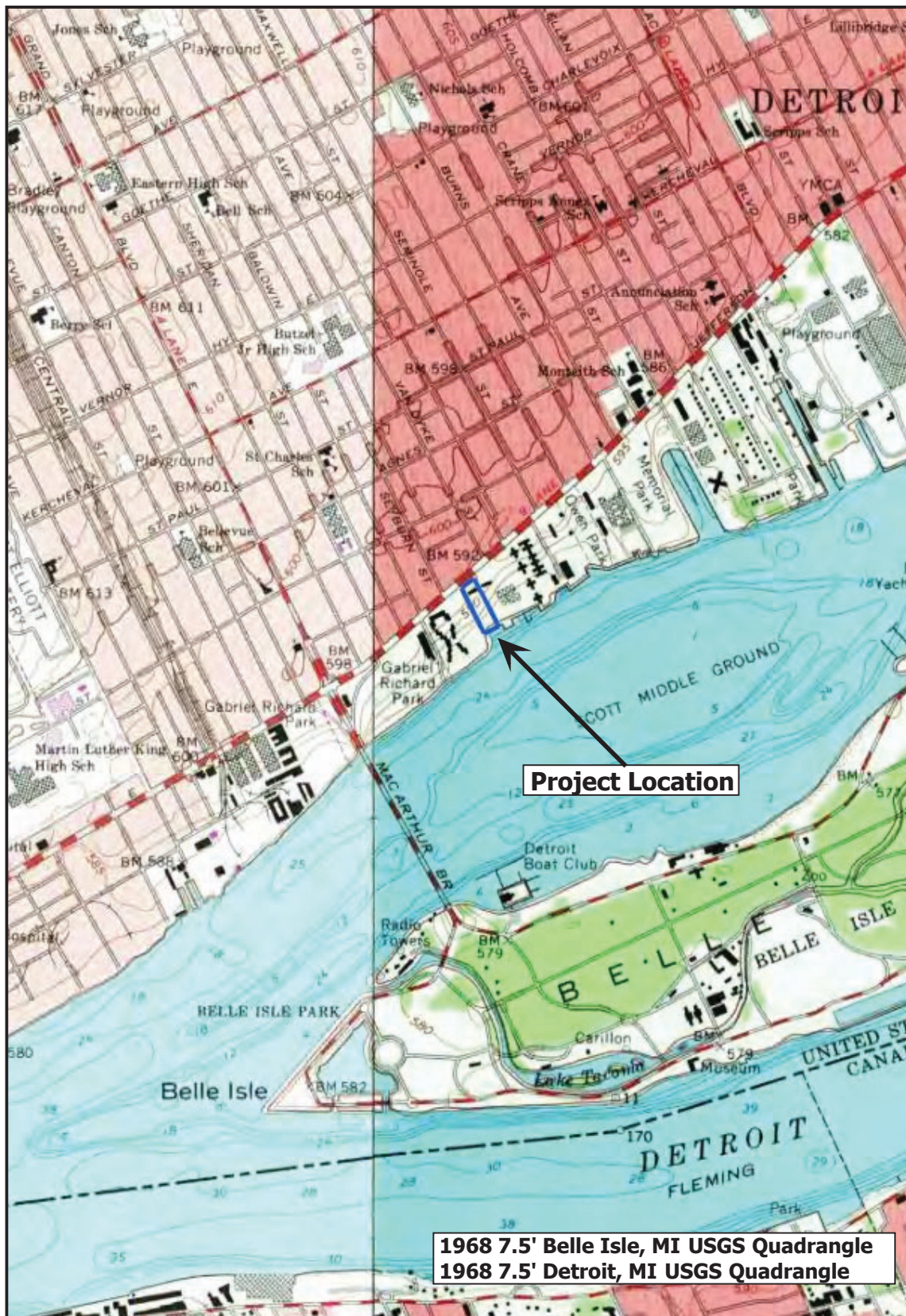
Under contract with GDC-East Jefferson, LLC and its affiliates (i) 7850-9%-1 Limited Dividend Housing Association, LLC, (ii) 7850-9%-2 Limited Dividend Housing Association, LLC, (iii) 7850-9%-3 Limited Dividend Housing Association, LLC, (iv) 7850-4%-1 Limited Dividend Housing Association, LLC, (v) 7850-4%-2 Limited Dividend Housing Association, LLC, and (vi) 7850-4%-3 Limited Dividend Housing Association, LLC (hereafter collectively referred to as GDC), The Mannik & Smith Group, Inc. (MSG) has prepared this Unanticipated Discoveries Plan for the proposed development at 7850 E. Jefferson in the City of Detroit (City), Michigan (Figure 1.1). The proposed development is being funded in part through the Department of Housing and Urban Development's HOME program, and therefore is considered to be a federal undertaking subject to compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Under the terms of a Programmatic Agreement between the City and the Michigan State Historic Preservation Office (MISHPO), the City's Housing and Revitalization Department (HRD) submitted an archaeology review report for the undertaking to the MISHPO in July 2019. In August 2019, the MISHPO responded and noted that two archaeological site records in their files are mapped within the development parcel. However, neither site has been field-verified by a professional archaeologist. Therefore the MISHPO requested the preparation of an Unanticipated Discoveries Plan (UDP) to guide the actions of GDC and its construction contractor in the event that archaeological resources are encountered during construction.

1.1 Organization of the Unanticipated Discoveries Plan

The UDP has two main components. Section 2 contains background information on the project parcel, including a brief summary of the parcel's history and a discussion of archaeological sites 20WN765 and 20WN804. Section 3 presents detailed processes to be followed in the event that archaeological remains associated with sites 20WN765 and 20WN804, or human remains, are discovered during construction.

1.2 Preparer Qualifications

This UDP was prepared by Robert Chidester, Ph.D. Dr. Chidester meets the Secretary of the Interior's professional qualification standards (36 CFR 61) in the fields of archaeology and history, and is a Registered Professional Archaeologist (RPA 1066050). He was assisted by Project Archaeologist Jordan Shaffer, B.S.



2.0 BRIEF HISTORY OF 7850 E. JEFFERSON

2.1 Land-Use History

During the 18th century, French settlers along the Detroit River established “ribbon farms” – long, narrow parcels fronting on the river and extending northward – so that farm houses could be clustered along the riverfront for mutual self-protection from potentially hostile Native American residents of the region. The modern plan of the City of Detroit still reflects the layout of these ribbon farms, with many of the north-south streets named after the original owners of the Private Land Claims from which the farms were formed. The parcel at 7850 E. Jefferson was located on one such farm plot (see below).

By the late 19th century Detroit had expanded considerably beyond its 18th-century boundaries, but this section of E. Jefferson had yet to be extensively developed. Sanborn Fire Insurance Maps show that by 1897 shows a residential duplex located near the northern end of the parcel, with a small outbuilding located to the south in the approximate center of the parcel – what was then along the original shoreline of the Detroit River. By 1910 additional residential units had been added to the duplex; the outbuilding had been replaced by what appears to have been a much larger commercial greenhouse operation; and the parcel had been extended southward through the use of landfill. By 1915 two boathouses, a long dock and a short slip had been added at the southern end of the parcel. By 1941 the connected residential units had been converted to the Colony Town Club, and by 1951 to the Detroit Medical Hospital. By this year the boathouses, dock and slip had been removed. Between 1953 and 1957 the hospital was renamed the St. Clair Hospital & Clinic. Between 1972 and 1977 both the hospital and the commercial greenhouse had been removed from the property. It has been vacant ever since. Copies of Sanborn Fire Insurance maps depicting the property are contained in Appendix A.

2.2 Archaeological Site 20WN765

During the 1980s, researchers from Wayne State University conducted detailed examinations of several 18th and 19th-century maps depicting the locations of the farms, including the locations of specific farm houses. These locations were then recorded as archaeological sites, despite the fact that no attempt to field-verify the existence of associated archaeological remains was made.

Site 20WN765 is one such site – the location of the Boyer-Meloche Farm. Little is recorded about this site, except that it was located on Lot 22 and contained five structures. The mapped boundary of the archaeological site encompasses 2.25 acres, including nearly the entire northern three-quarters of the parcel at 7850 E. Jefferson.

While archaeologists doing work in Detroit have been searching for archaeological remains of 18th-century ribbon farms since the 1960s, only one site with intact 18th-century archaeological remains has been identified to date. If another such site were found to exist, it would be extremely significant as a rare source of information on the earliest period of European settlement in Detroit.

2.3 Archaeological Site 20WN804

Site 20WN804 is the reported location of the burned remains of the *USS Yantic*, a wooden-hulled gunboat built in 1864. According to some accounts this ship was retired, stripped and set ablaze at the foot of Townsend Street in November 1929, while according to others it unexpectedly sank due to age-induced structural infirmity. Whatever the cause of its demise, its remains were subsequently incorporated into landfill to create a boat slip in Gabriel Richard Park. It appears that

the mapped location of 20WN804 at the southern end of the parcel at 7850 E. Jefferson is an error, but this cannot be confirmed without subsurface investigation.

2.4 Identification of Sensitive Locations at 7850 E. Jefferson

The location of the project parcel, the recorded boundaries of sites 20WN765 and 20WN804, and the approximate locations of the 20th-century hospital and greenhouse are shown on Figure 2.1. Given the imprecise nature of what is known about sites 20WN765 and 20WN804, any portion of the project parcel outside of the locations of the hospital and greenhouse should be considered archaeologically sensitive.



Figure 2.1
Archaeologically Sensitive Areas
7850 E. Jefferson Ave.
Detroit, Michigan



3.0 PROCESS FOR IDENTIFYING, ASSESSING AND REPORTING UNANTICIPATED DISCOVERIES

3.1 Archaeological Resources

3.1.1 Definition of Terms

- **Archaeological Site:** Location recorded in the files of the MISHPO where actual or potential archaeological resources are located, based on prior field investigations or archival research.
- **Archaeological Remains:** Physical remains of past human activity over 50 years old, usually surviving below the existing ground surface. Archaeological remains can be divided into two broad classes: artifacts and features.
- **Artifact:** Any object made or used by people in the past. Examples include metal tools and hardware, glass bottles, ceramic dishes, items of clothing (buttons, shoes, etc.), toys, butchered animal bones, and many others.
- **Feature:** Any remains of past human activity whose removal from the ground would require destruction or disaggregation of the remains. Examples include building foundations, old cistern or outhouse (privy) shafts, concentrated trash deposits called middens (often associated with dark soil staining), and non-structural elements of the human-modified landscape (e.g., landfill along the Detroit River for the purpose of creating or extending the amount of usable land).
- **Historical / Modern:** For the purposes of this UDP, archaeological remains will be described as historical if they pre-date the 20th century. In contrast, archaeological remains dating to the 20th century will be described as modern.

3.1.2 Types of Archaeological Remains that Might Be Encountered

Based on the documented site history of 7850 E. Jefferson, the archaeological remains that are most likely to be present on the parcel are structural features associated with the hospital that was located at the northern end of the property and with the commercial greenhouse that was located near the center of the property. However, extensive artifact deposits are unlikely to be associated with these features at either site, and the information potential of 20th-century structural features associated with commercial and institutional sites is relatively low. Furthermore, the MISHPO did not express any concern over the potential for archaeological remains associated with any 20th-century activity on the parcel. Therefore, the remainder of this section will be concerned only with the potential for remains associated with sites 20WN765 and 20WN804.

As discussed in Section 2.2, site 20WN765 is recorded as the location of the 18th-century Boyer-Meloche Farm. While the locations of numerous 18th-century ribbon farms have been recorded in MISHPO's archaeological site files, extensive archaeological research in Detroit since the 1960s has thus far resulted in the discovery of a single intact archaeological deposit associated with a ribbon farm. However, some assumptions about the types of features and artifacts that would be associated with an 18th-century farm site can be made. Building foundations were likely made of locally-quarried stone or hand-made bricks, while building superstructures would have been of timber-framed construction. Metal hardware such as nails would have been hand-forged rather than machine-cut. Trash disposal would have been informal, likely forming sheet middens in yard areas or as fill within abandoned shaft features such as cisterns or privies. These shaft features would likely have been anywhere from 6-20 feet in depth and 4-6 feet in diameter, and would today be marked by much darker soil than surrounding areas. Hand-

blown glass bottles would likely be present in any artifact deposits, as would 18th-century ceramic types such as French faience and English refined earthenwares such as creamware and pearlware. Photographs illustrating some diagnostic characteristics of both historic and modern artifacts are contained in Appendix B.

As discussed in Section 2.3, site 20WN804 is recorded as the location of the remains of the wooden-hulled gunboat *Yantic*. If the *Yantic* was purposefully burned, then it is likely that all useful metal elements of the ship were removed for recycling, and that primarily wooden elements of the boat's hull remain. On the other hand, if the ship sank, some metal elements might remain, including its various guns. Wooden timbers may be either straight or curved, and likely sealed with pitch. Given the boat's construction date of 1864, the nails used to hold wooden elements together were likely machine-cut. A photograph of the *Yantic* from the early 20th century is reproduced in Figure 3.1.

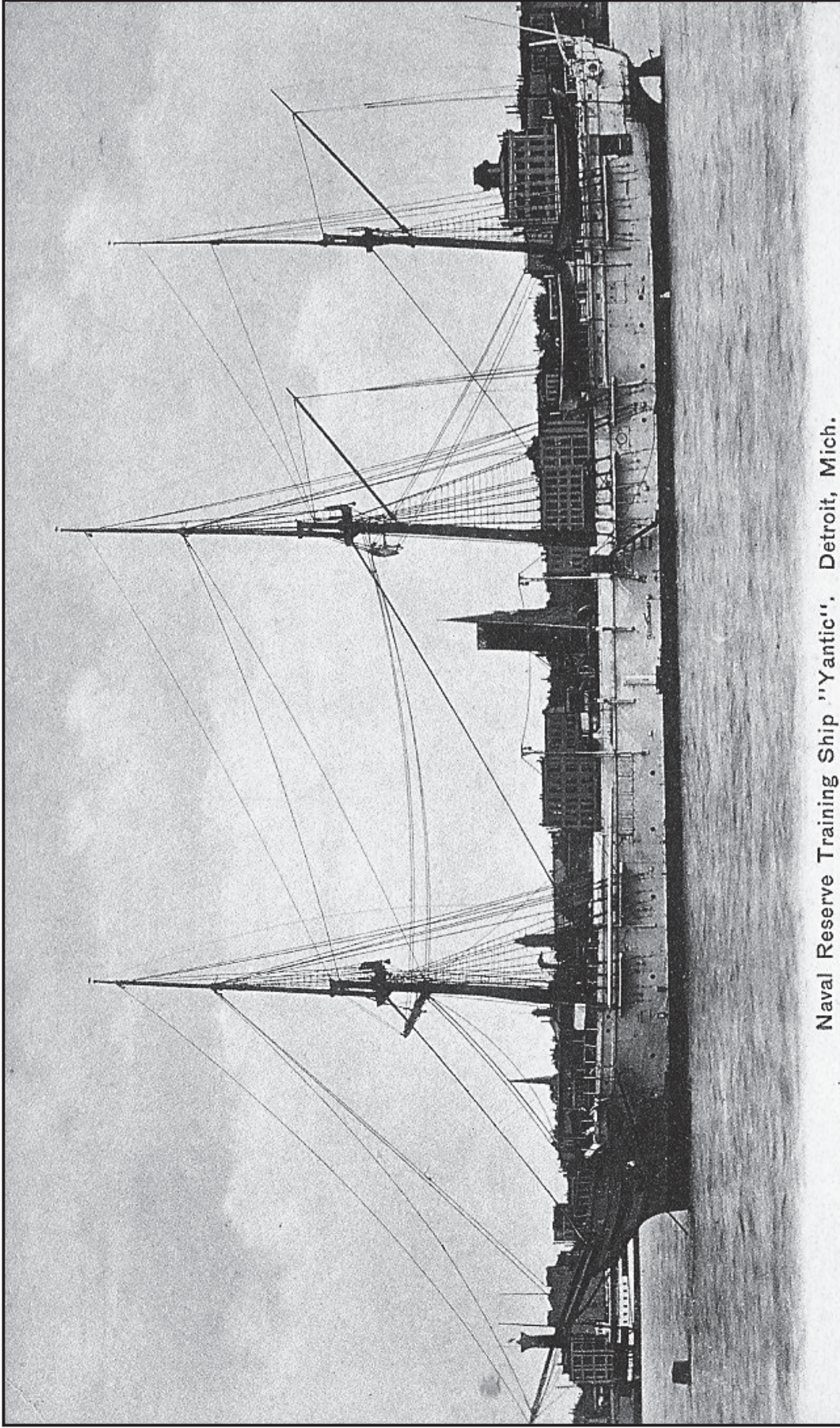
3.1.3 Anticipated Depth of Archaeological Remains

In the northern half of the parcel, where archaeological remains associated with site 20WN765 may be present, such remains are not likely to be located near the present-day ground-surface. Rather, they are most likely to be buried under one or more layers of fill that have been placed or that have built up naturally since the 18th century. Furthermore, 18th-century archaeological remains are not likely to have survived intact within or directly adjacent to any foundations associated with the 20th-century hospital. Away from these modern foundations, archaeological remains of site 20WN765 are most likely to be present at depths of 2-8 feet.

It is more difficult to predict the depth of archaeological remains associated with site 20WN804 in the southern third of the parcel. Because the burned remains of the *Yantic*'s hull were used as landfill, they could be present at any depth from just below the present-day ground surface to the water table.

3.1.4 Process for Assessing and Reporting Unanticipated Discoveries

If any member of the construction crew encounters artifacts or features that he or she suspects may constitute archaeological remains associated with sites 20WN765 or 20WN804, they shall immediately cease work in the vicinity of the remains and notify the site foreman. If, after inspecting the remains and consulting this UDP, the site foreman determines that the remains are not associated with either site, then construction activity may proceed. If, however, the site foreman concurs that the remains are potentially associated with sites 20WN765 or 20WN804, then the construction crew shall protect the remains from the elements as necessary (e.g., by covering them with a plastic tarp) and the site foreman shall immediately notify GDC. It will then be GDC's responsibility to immediately notify by phone the City of Detroit's HRD of the unanticipated discovery, as well as to retain the services of a professional archaeologist meeting the Secretary of the Interior's professional qualifications (36 CFR 61) to visit the site and assess the remains. The professional archaeologist should visit the site to conduct the assessment within 24 hours of notification. Concurrent with this assessment, the HRD will notify the MISHPO of the unanticipated discovery.



Naval Reserve Training Ship "Yantic", Detroit, Mich.

Figure .1
he USS Yantic



The archaeological assessment should be limited to visual assessment of the exposed archaeological remains, as well as photographic documentation, location recordation using a hand-held GPS unit capable of sub-meter accuracy, and, if appropriate, the preparation of scaled drawings. The professional archaeologist shall also define a protection buffer around the unanticipated discovery; no construction activity shall occur within this buffer zone until the completion of the following process.

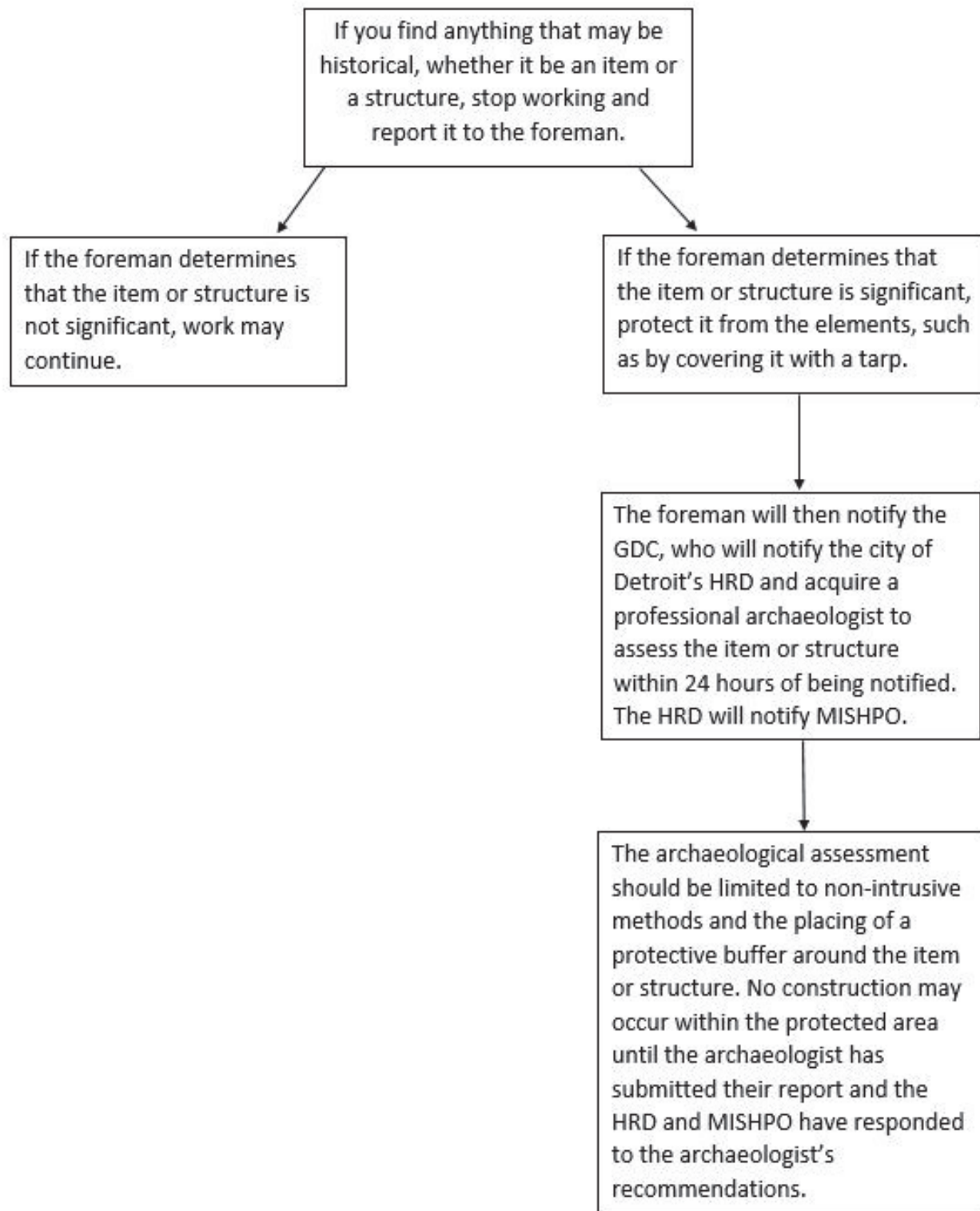
Within three business days of the completion of the on-site assessment, the professional archaeologist shall compile the collected data into a letter report and provide a preliminary assessment of the remains, including the following:

- The likelihood that the remains are associated with either site 20WN765 or 20WN804, or with a previously undocumented archaeological site;
- The physical integrity of the remains;
- The potential eligibility of the remains for listing on the National Register of Historic Places (NRHP) (with specific reference to the NRHP eligibility criteria); and
- If they appear to be eligible for the NRHP, recommendations for avoidance, additional investigation or mitigation of the remains.

The professional archaeologist shall submit the assessment report directly to the HRD in electronic format. Within two business days of receipt of the assessment report, the HRD shall transmit the report to the MISHPO. The MISHPO shall respond to the recommendations contained in the assessment report within 10 business days of its receipt of the report.

The process for assessing and reporting unanticipated discoveries is presented in flow-chart format in Figure 3.2.

Process for Assessing and Reporting Unanticipated Discoveries



3.2 Human Remains

3.2.1 Legal Requirements

The Michigan Administrative Code (MAC), R325.8051 Rule 1 states, "A person who inadvertently discovers a burial or parts of a human skeleton shall immediately notify the police authority of the jurisdiction where the remains are found." The Michigan Attorney General's Opinion No. 6585 (Attorney General Frank J. Kelley, 1989) asserts the state's opinion that such remains should not be disturbed unless necessary. Finally, Section 2853 of the Public Health Code (MCL 333.2853; MSA 14.15(2853)) mandates that a permit from the local health department or a court disinterment decree must be obtained prior to the excavation and removal of a burial, even if said burial is determined to be historic in nature. Copies of these documents are contained in Appendix B.

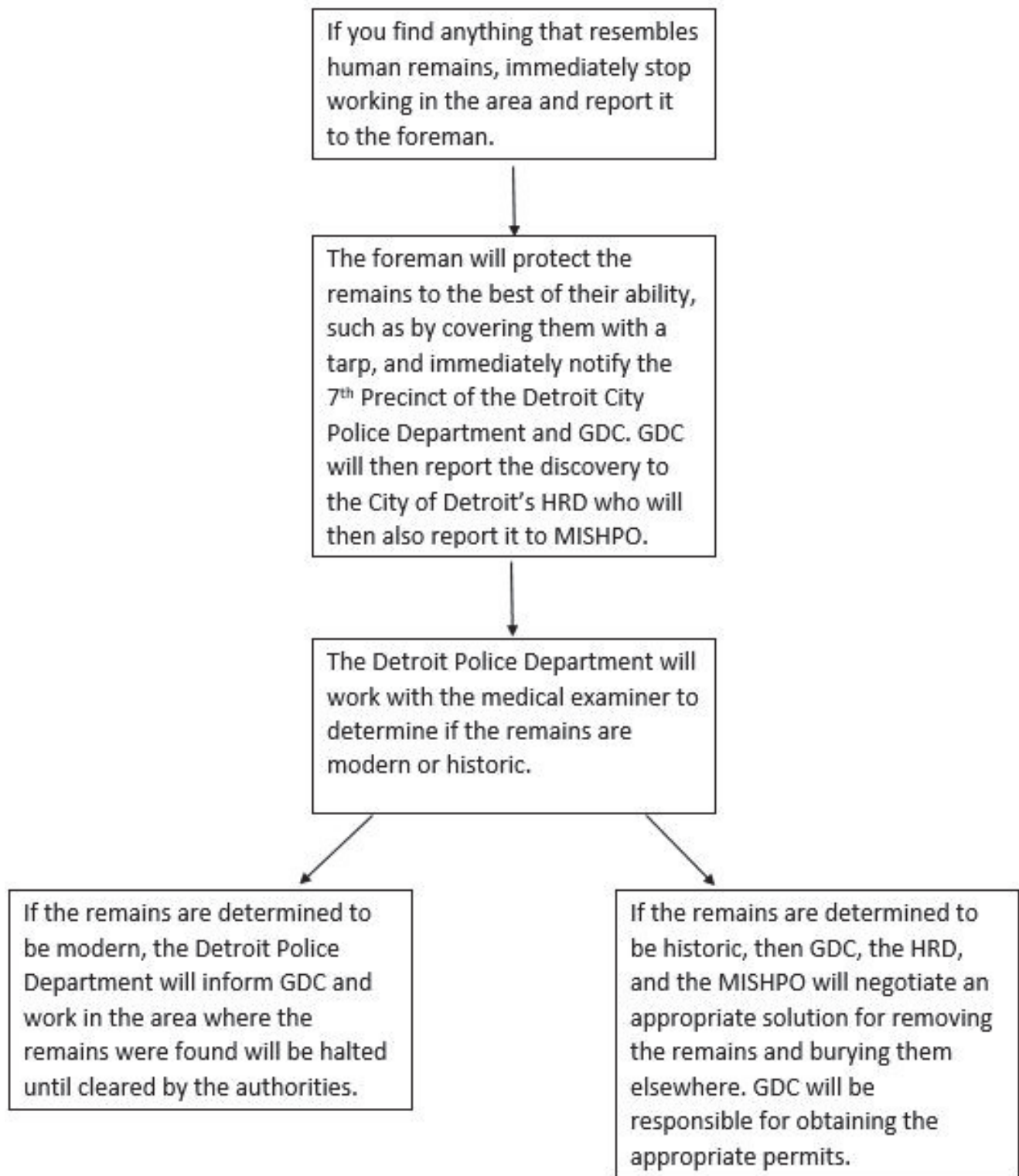
3.2.2 Process for Reporting Discovery of Human Remains

If any member of the construction crew encounters human remains, they shall immediately cease work in the vicinity of the remains and notify the site foreman. The site foreman shall protect the remains from the elements as necessary (e.g., by covering them with a plastic tarp) and immediately notify the Detroit City Police Department, 7th Precinct, as well as GDC. It will then be GDC's responsibility to immediately notify by phone the City of Detroit's HRD of the human remains discovery. The HRD will notify the MISHPO of the human remains discovery.

The Detroit Police Department, in consultation with the City of Detroit Medical Examiner, will be responsible for determining whether the human remains are modern (i.e., less than 50 years old) or historic (i.e., more than 50 years old). If the remains are determined to be modern, the Detroit Police Department will inform GDC and the construction contractor of their responsibilities while a criminal investigation is conducted. If the remains are determined to be historic, then GDC, the HRD and the MISHPO shall negotiate an appropriate solution for disinterring the remains and reintering them elsewhere. GDC will be responsible for obtaining a permit for disinterment/reinterment from the City of Detroit Health Department before the disinterment can commence.

The process for assessing and reporting unanticipated human remains discoveries is presented in flow-chart format in Figure 3.3.

Process for Reporting Human Remains



3.3 Contact List

Current contact information for all agencies and other entities listed in Sections 3.1 and 3.2 is listed here.

GDC-East Jefferson, LLC and Its Affiliates

(248) 513-4900

- Mr. Nathan Keup, Nkeup@ginosko.com
- Mr. Michael Stefanko, Mstefanko@ginosko.com

City of Detroit Housing and Revitalization Department

(313) 224-1508

- Mr. Ryan Schumaker, Lead Preservation Specialist, rschumak@detroitmi.gov

Michigan State Historic Preservation Office

(517) 335-9840

- Ms. Stacy Tchorzynski, Archaeologist, tchorzynskis@michigan.gov

Detroit Police, 7th Precinct

3501 Chene St.

Detroit, MI 48207

(313) 596-5700

City of Detroit Medical Examiner

(313) 833-2504

City of Detroit Health Department

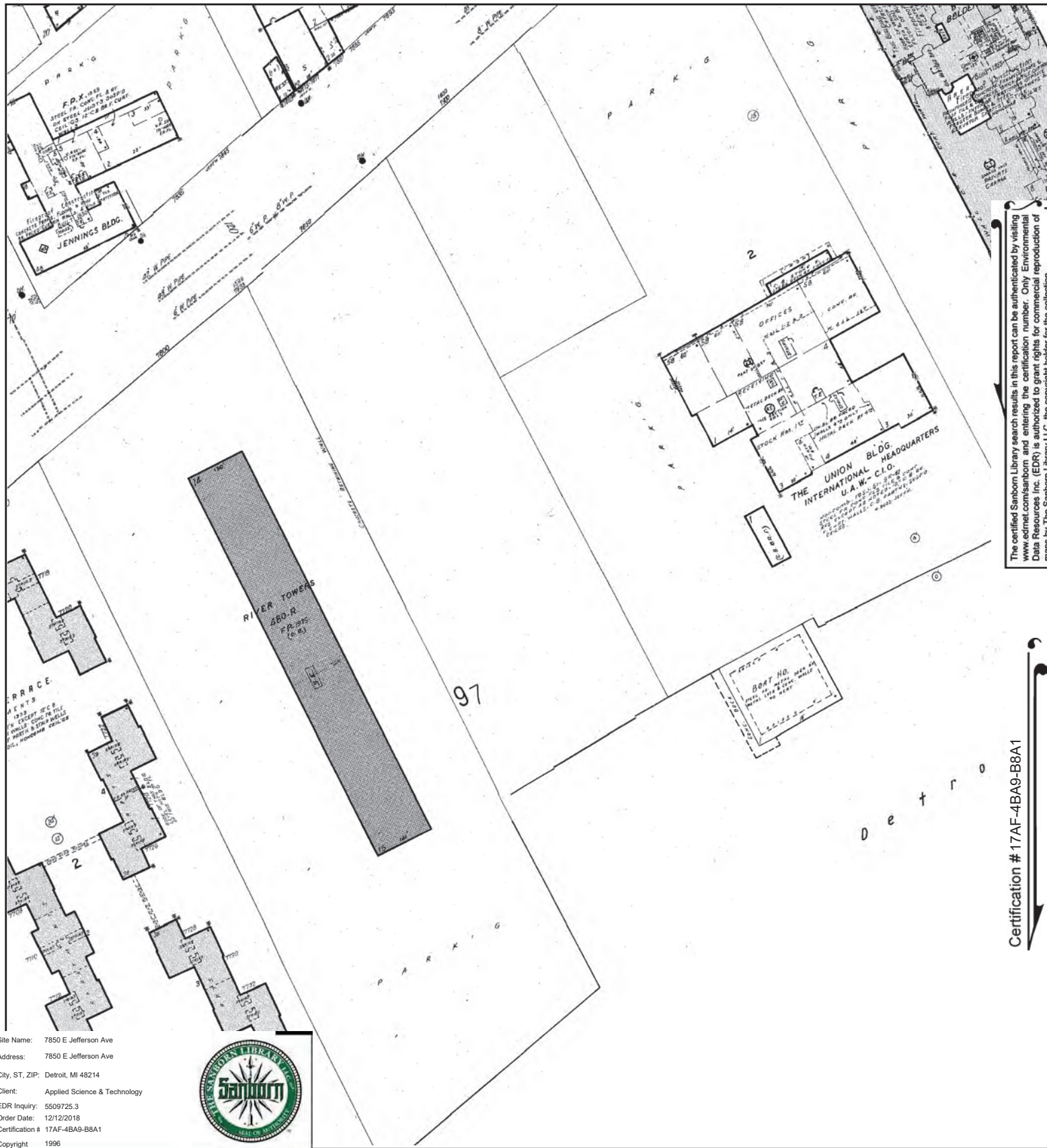
3245 E Jefferson Ave., Suite 100

Detroit, MI 48207

(313) 876-4000

APPENDIX A HISTORIC SANBORN MAPS





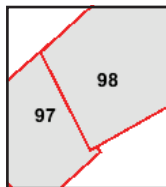
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Address: 7850 E Jefferson Ave
City, ST, ZIP: Detroit, MI 48214
Client: Applied Science & Technology
EDR Inquiry: 5509725.3
Order Date: 12/12/2018
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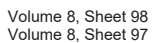
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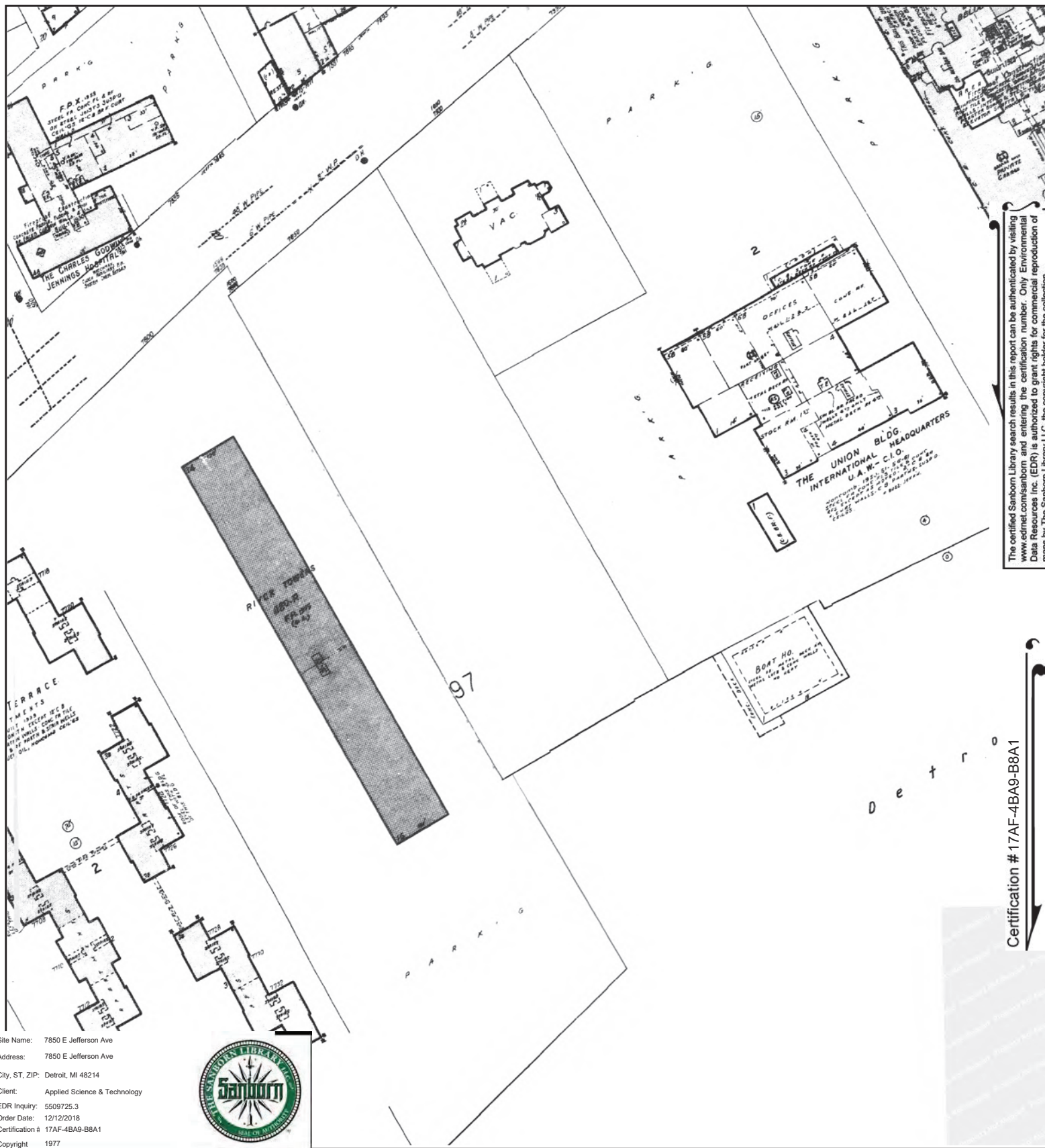


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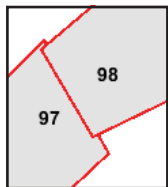
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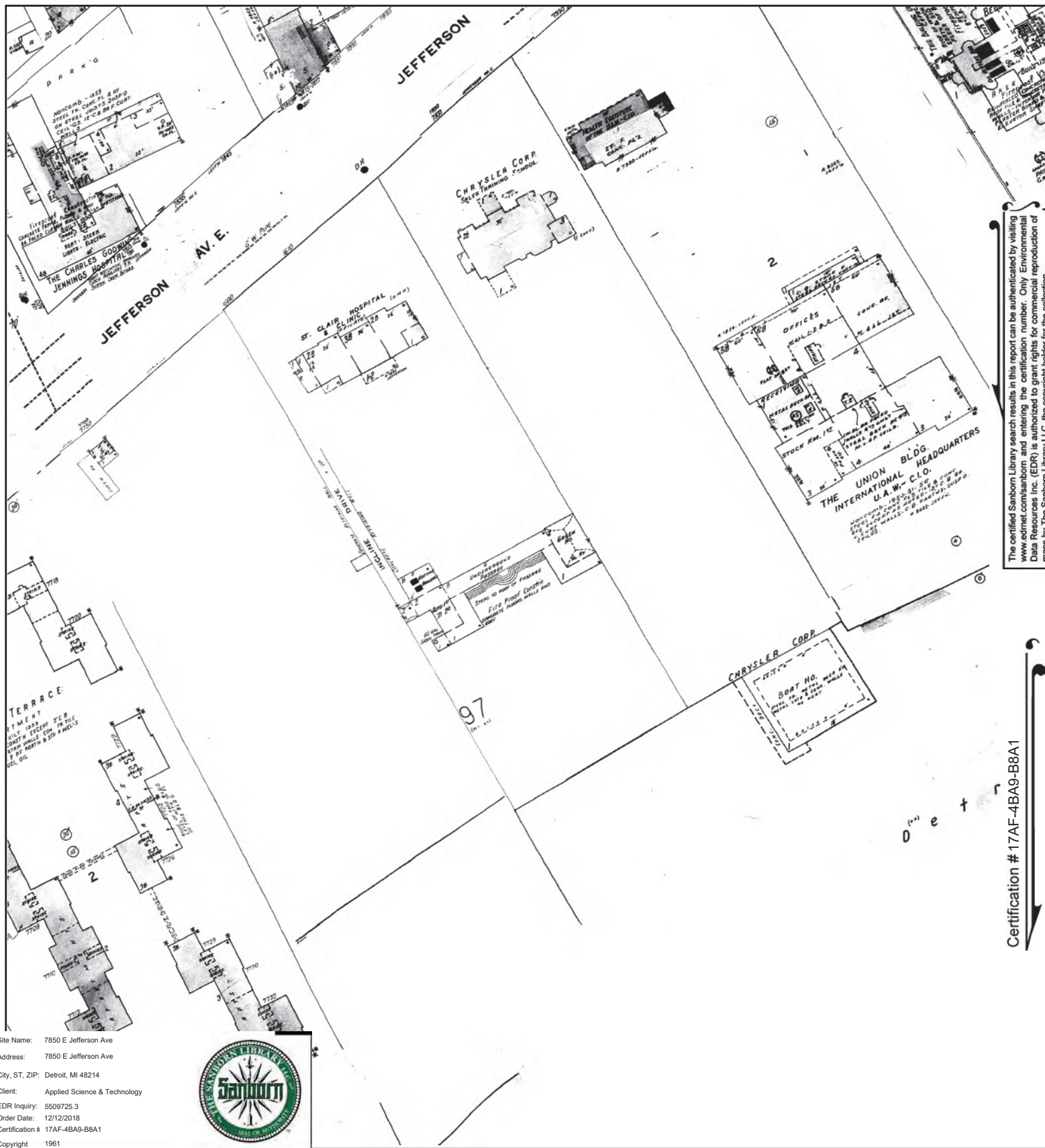




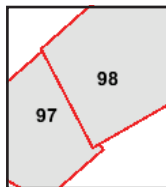


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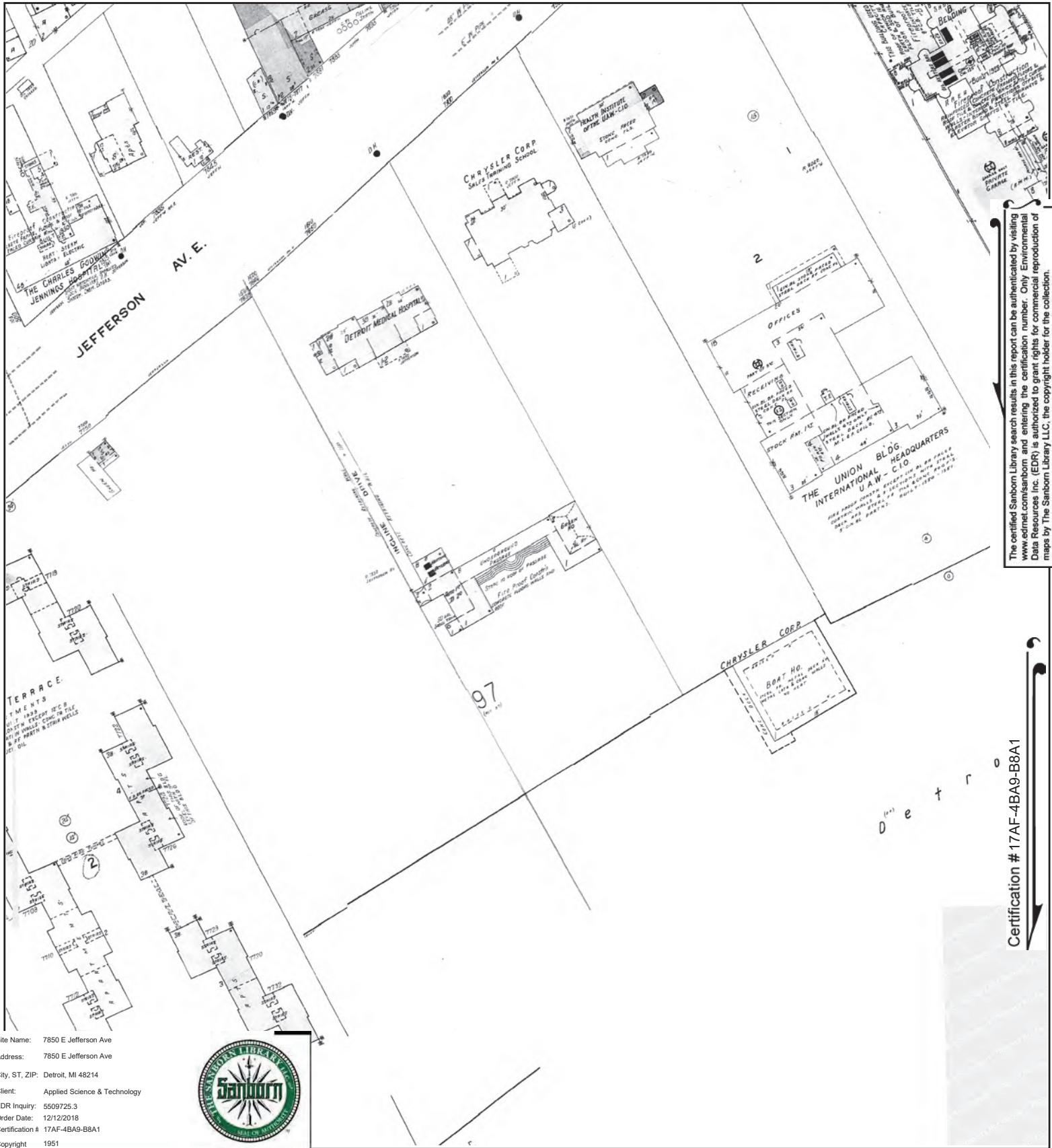
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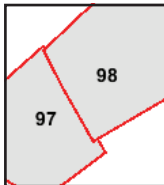


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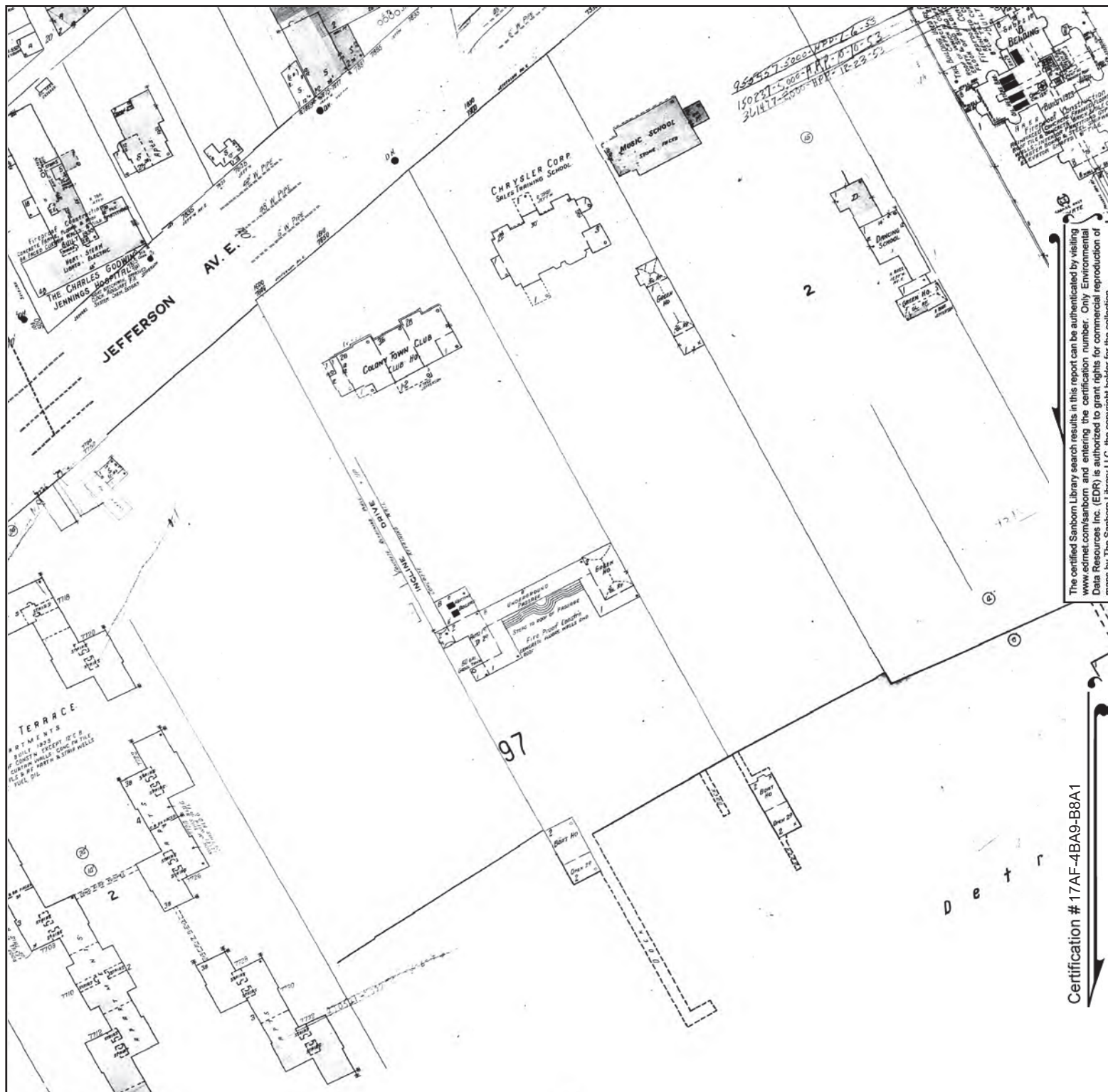


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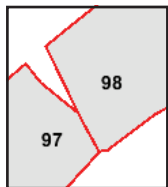
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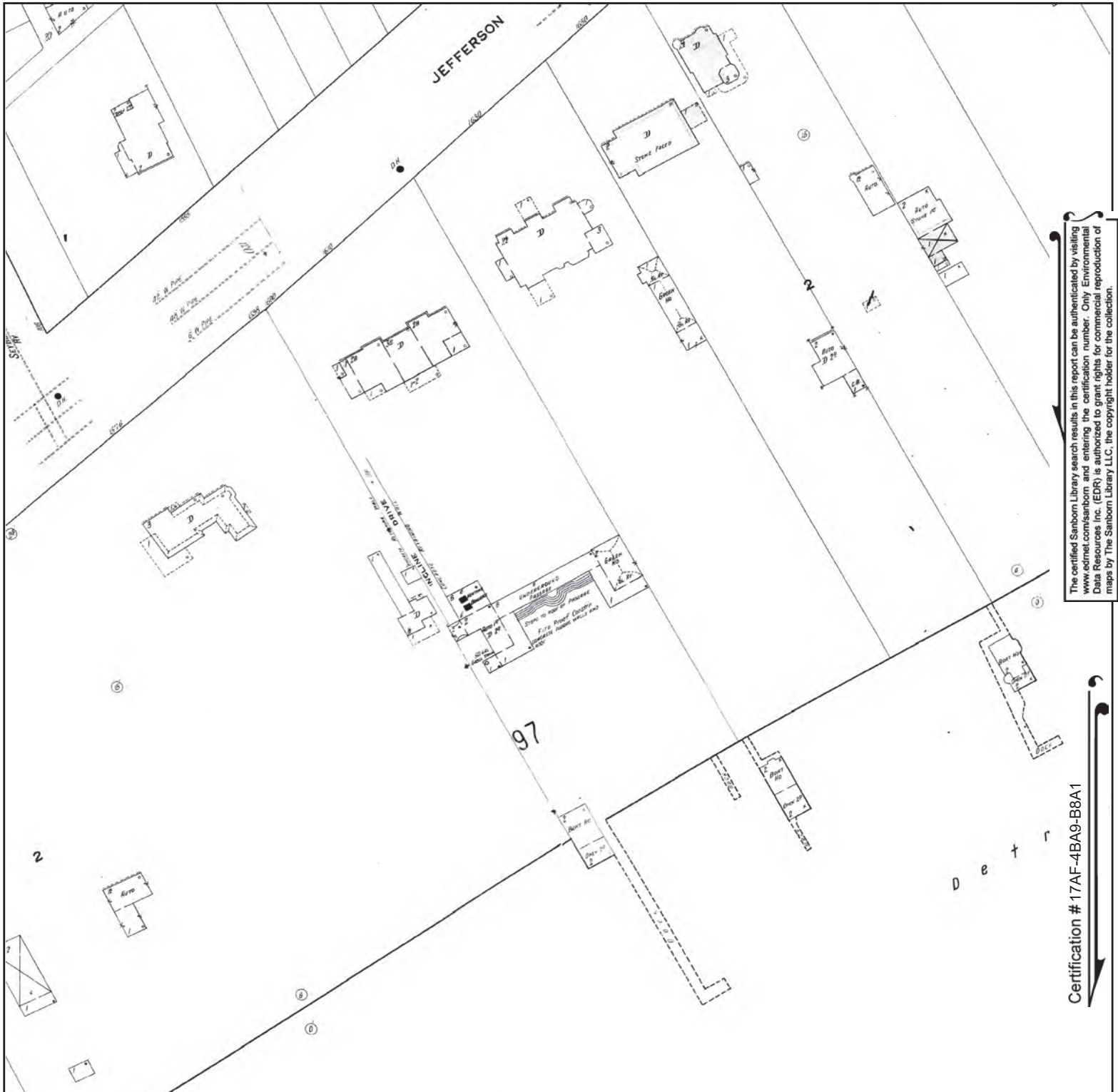


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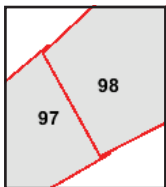
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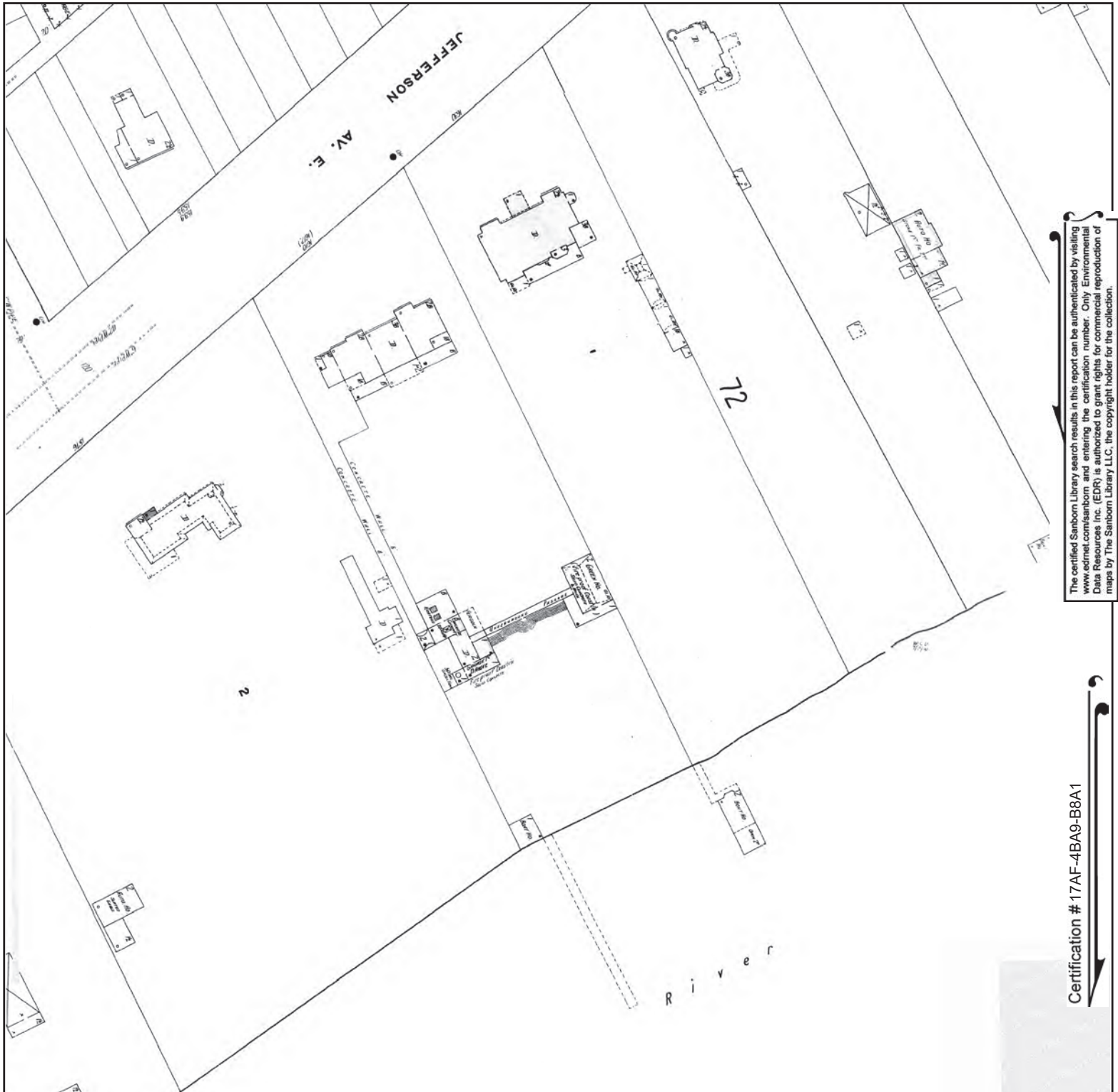


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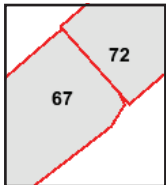
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 EDR Inquiry: 5509725.3
 Order Date: 12/12/2018
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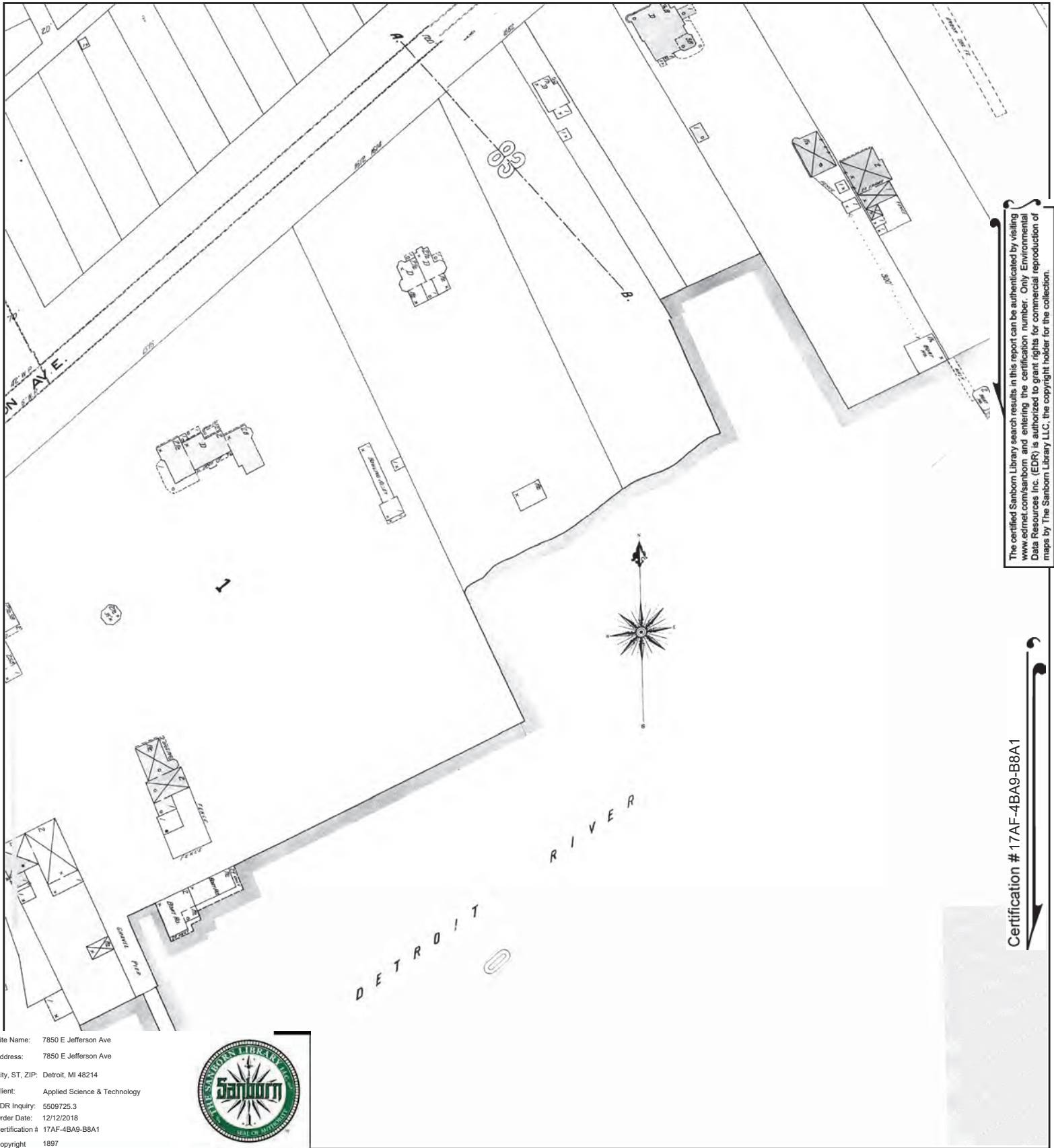


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 Volume 8, Sheet 67





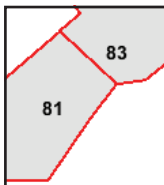
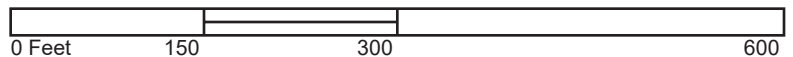
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APPENDIX B

HISTORIC VS. MODERN ARTIFACTS





Hand-forged Nails (prior to 1820)



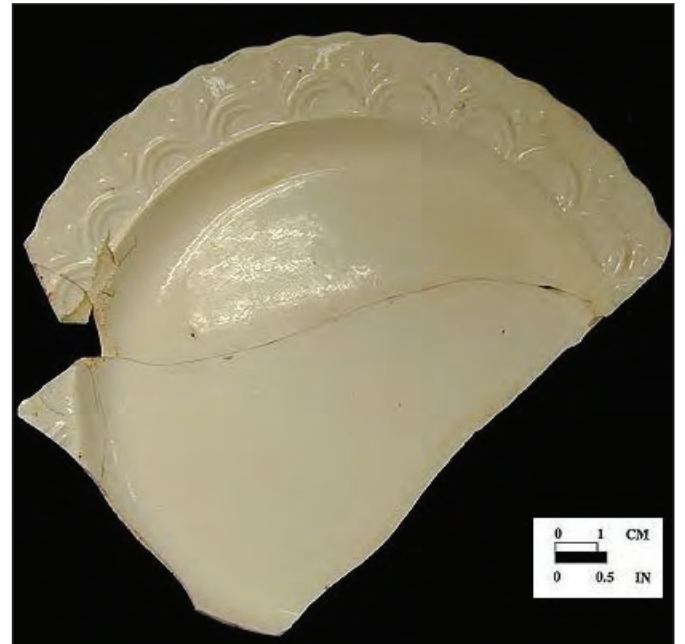
Machine-cut Square Nails (ca. 1805-1890)



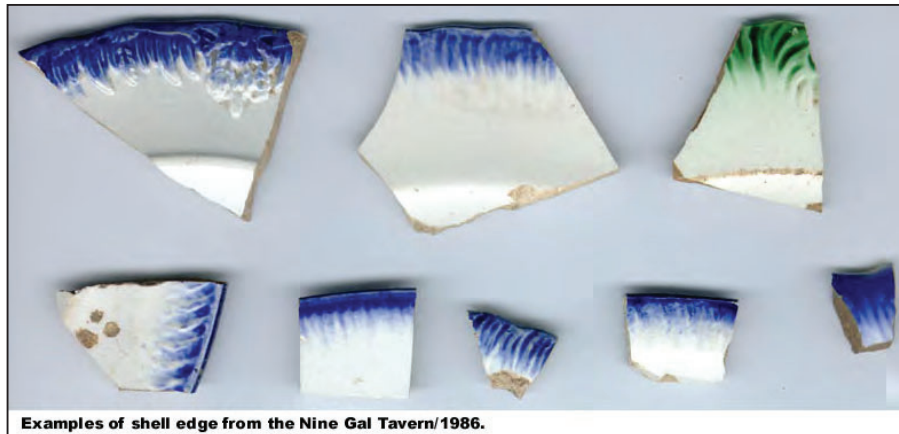
Machine-made Wire Nails (after 1885)



18th-century French Faience Pottery



Creamware Plate (ca. 1760-1820)



Pearlware Plate Fragments (ca. 1780-1830)



Pontil-scarred Bottle Base (prior to 1870)



Bottle Base made in a Two-Piece Mold (prior to 1875)



Mold Seam on and over Bottle Lip



Valve Ejection Mark on Dairy Bottle Base



Mold Seams on Machine-made Bottle



Suction Scar on Bottle Base from an Owens Automatic Bottle Machine

Figure B4
Modern Glass Bottle Features



APPENDIX C

LEGAL GUIDANCE FOR DISCOVERY OF HUMAN REMAINS



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The following opinion is presented on-line for informational use only and does not replace the official version. (Mich Dept of Attorney General Web Site - www.ag.state.mi.us)

STATE OF MICHIGAN

FRANK J. KELLEY, ATTORNEY GENERAL

Opinion No. 6585

June 7, 1989

CEMETERIES AND DEAD BODIES:

Disinterment of human remains

Reinterment of human remains

COURTS:

Order to disinter and reinter human remains

PUBLIC HEALTH:

Permit to disinter and reinter human remains

WORDS AND PHRASES:

"Established scientific institution or society"

A local health department permit or court disinterment decree is required before a landowner, excavator or scientific institution or society may disinter human remains.

A local health department permit or court disinterment decree is required before a landowner, excavator or scientific institution or society may disinter partial human remains, where the remains are in a condition from which it may reasonably be concluded that death has occurred.

An "established scientific institution or society" as used in MCL 750.160; MSA 28.357, and 1982 AACRS R 325.8051 means an institution for the advancement or promotion of knowledge or an association organized for the purpose of scientific investigation and pursuits, which has displayed some degree of permanence and longevity.

When an historic period cemetery is disinterred and moved, the disinterred remains must be reinterred in a cemetery located in the same governmental unit or in adjoining governmental units or within a reasonable distance from the municipality where the historic period cemetery is discovered.

The cost of removing bodies from unanticipated burials and reintering them should be at public expense, unless next of kin can be located and are willing to undertake those expenses.

Honorable Richard H. Austin

Secretary of State

Treasury Building

Lansing, Michigan 48918

You have requested my opinion on five questions regarding the disinterment of human remains. You have informed me that because the Michigan Department of State is charged with the responsibility for preserving and protecting Michigan's historic and archaeological resources, it has occasion to participate in the disinterment of historic and prehistoric human remains, and is consulted with respect to the subsequent storage or reinterment of those remains. Your questions will be answered seriatim.

Your first question asks:

Is a local health department permit or court disinterment decree required pursuant to MCL 35.841 et seq; MSA 4.1341 et seq, MCL 333.2801 et seq; MSA 14.15(2801) et seq, MCL 750.160; MSA 28.357, or 1982 AACRS, R 325.8051 before a landowner or excavator may disinter human remains? Is the answer different if the disinterer is a scientific institution or society?

The settled policy of this state is to preserve and maintain the burial places of the dead. *Avery v Forest Lawn Cemetery Co*, 127 Mich 125; 86 NW 538 (1901). Consistent with this policy, the Legislature has enacted a number of statutes regulating disinterment or reinterment of human remains.

Section 2853 of the Public Health Code, MCL 333.2853; MSA 14.15(2853), provides in pertinent part:

"(1) A permit for disinterment and reinterment is required before disinterment of a dead body. The local health department in whose jurisdiction the body is interred shall issue the permit upon proper application by a licensed funeral director or person acting as a funeral director in accordance with rules promulgated by the department.

"(2) A person shall not disinter or permit the disinterment of a dead body in a cemetery and the body's reinterment in a cemetery or removal from the cemetery unless a disinterment and reinterment permit is issued by the local health department in the jurisdiction in which the cemetery is located."

It is a basic rule of statutory construction that where the Legislature uses certain and unambiguous language, the plain meaning of the statute must be followed. *Browder v. Int'l Fidelity Ins Co*, 413 Mich 603, 611; 321 NW2d 668 (1982). Although the provisions of MCL 333.2853(2); MSA 14.15(2853)(2), are applicable only to the disinterment of a body located in a cemetery, the provisions of MCL 333.2853(1); MSA 14.15(2853)(1), are not so limited, and clearly and unambiguously require a permit for disinterment and reinterment before disinterment of a dead body.

The other statutes and the administrative rule to which you have referred in no way conflict with the requirements of MCL 333.2853; MSA 14.15(2853).

1982 AACRS, R 325.8051, states:

"A person who inadvertently discovers a burial or parts of a human skeleton shall immediately notify the police authority of the jurisdiction where the remains are found. If preliminary inspection by the police authority indicates that the remains are those of a prehistoric or historic native American, the state archaeologist of the Michigan history division, department of state, shall be immediately notified of the finding. This rule does not apply to archaeological excavations conducted by representatives of established scientific institutions or societies."

This rule requires that the police be notified following the discovery of human remains. Such notification is required even if the remains are not eventually disinterred. Representatives of established scientific institutions or societies conducting archaeological excavations are exempted from the provisions of this rule, but are still required to obtain a local health department permit for disinterment and reinterment prior to disinterment of a dead body, pursuant to MCL 333.2853; MSA 14.15(2853).

MCL 35.841 et seq; MSA 4.1341 et seq, addresses the disinterment and removal of remains of war veterans for the purpose of reintering such remains in an area set aside exclusively for the graves of United States soldiers, sailors or marines. The Act authorizes the circuit court for the county in which the veteran is buried to enter a decree directing disinterment and removal. MCL 35.841; MSA 4.1341. The Act's applicability is limited to situations where the decree is sought on behalf of the Grand Army of the Republic, the United Spanish War Veterans, the American Legion or the Veterans of Foreign Wars. MCL 35.842; MSA 4.1342. Such a court decree is not necessary before a landowner or excavator disinters remains unless the purpose of disinterment is removal to a special veterans burial area. MCL 35.844; MSA 4.1344, requires that court decrees authorizing disinterment and removal provide that the same be done

under the supervision of proper health officials. Where remains are disinterred under local health department supervision pursuant to a court decree, a separate health department permit is not necessary.

Section 160 of the Michigan Penal Code, MCL 750.160; MSA 28.357, states:

"A person, not being lawfully authorized so to do, who shall wilfully dig up, disinter, remove, or convey away a human body, or the remains thereof, from the place where the body may be interred or deposited, or who shall knowingly aid in such disinterment, removal, or conveying away, or who shall mutilate, deface, remove, or carry away a portion of the dead body of a person, whether in his charge for burial or otherwise, when the mutilation, defacement, removal, or carrying away is not necessary in any proper operation in embalming the body or for the purpose of a postmortem examination, and every person accessory thereto, either before or after the fact, shall be guilty of a felony, punishable by imprisonment for not more than 10 years, or by fine of not more than \$5,000.00. This section shall not be construed to prohibit the digging up, disinterment, removal or carrying away for scientific purposes of the remains of prehistoric persons by representatives of established scientific institutions or societies, having the consent in writing of the owner of the land from which the remains may be disinterred, removed or carried away."

This section simply makes criminal the disinterment of a dead body by a person who acts wilfully and without lawful authority. It would, therefore, not apply to a person who had obtained a proper permit as required by MCL 333.2853; MSA 14.15(2853), or a court decree as provided by MCL 35.841; MSA 4.1341. Nor would it apply to an accidental or unintentional disinterment, although once a person became aware of the presence of a dead body, the person would then be obligated to report the discovery to the police and obtain the necessary permit.

Finally, although not raised in your question, it is appropriate to examine the aboriginal records and antiquities act, as last amended by 1988 PA 452, MCL 299.51 et seq; MSA 13.21 et seq. This Act provides that it is unlawful for a person to remove any human bones without the consent of the landowner, MCL 299.54; MSA 13.24, and further provides that a person shall not explore or excavate an aboriginal remain covered by the Act upon state-owned lands unless the person has obtained a permit from the Director of the Department of Natural Resources with written approval by the Secretary of State. MCL 299.53; MSA 13.23. Violation of any of the provisions of this Act is a misdemeanor. MCL 299.55; MSA 13.25.

It is my opinion, in response to your first question, that a local health department or court disinterment decree is required before a landowner or excavator may disinter human remains, regardless of whether the disinterer is a scientific institution or society.

Your second question asks:

Is a local health department permit or court disinterment decree required before a landowner, excavator, or scientific institution or society may disinter partial human remains, e.g., a femur or a few finger bones?

"Dead body" is defined by Sec. 2803(1) of the Public Health Code, MCL 333.2803(1); MSA 14.15(2803)(1), to mean "a human body, or parts thereof, in a condition from which it may reasonably be concluded that death has occurred."

MCL 333.2853; MSA 14.15(2853), requires that a permit for disinterment and reinterment be obtained before disinterment of a dead body. This provision thus applies to the disinterment of partial human remains where those remains are "in a condition from which it may reasonably be concluded that death has occurred." In general, the discovery of partial human remains would lead to the conclusion that death has occurred, unless the circumstances under which they were found indicated that the remains were the result of a loss of limb which did not result in death, e.g., an accident or amputation.

Additionally, both MCL 750.160; MSA 28.357, and 1982 AACRS R 325.8051 expressly apply to bodies and portions thereof. Therefore, partial human remains may be disinterred only in compliance with this statute and this rule.

It is my opinion, in response to your second question, that a local health department or court disinterment decree is required before a landowner, excavator, or scientific institution or society may disinter partial human remains, where those remains are in a condition from which it may reasonably be concluded that death has occurred.

Your third question asks:

With regard to human disinterment, what is the proper definition of the term "scientific institution or society" as found in MCL 750.160; MSA 28.357, and 1982 AACRS R 325.8051?

In *Detroit Home & Day School v Detroit*, 76 Mich 521, 523; 43 NW 593 (1889), the court stated:

"[I]t is matter of common knowledge that all general educational establishments have universally been known as 'scientific institutions,' and fall naturally and directly within it. A 'scientific institution,' under the language of all civilized countries, means an institution for the advancement or promotion of knowledge, which is the English rendering of 'science.' "

In a similar vein, a "scientific society" has been defined as any association of individuals organized for the purpose of mutual cooperation in scientific investigation and pursuits. *People v. Cothran*, 27 Hun 344, 345 (NY Sup Ct, 1882).

Additionally, the word "established" connotes some degree of permanency. *Cornell v. Dalpiaz*, 128 NE2d 132, 134 (Ohio App, 1952).

It is my opinion, in response to your third question, that an "established scientific institution or society," as that phrase is used in MCL 750.160; MSA 28.357, and 1982 AACRS, R 325.8051, means an institution for the advancement or promotion of knowledge or an association organized for the purpose of scientific investigation and pursuits, which has displayed some degree of permanence or longevity.

Your fourth question asks:

When an historic period cemetery is disinterred and moved, what are the standards under MCL 128.1 et seq; MSA 5.3165 et seq, concerning where the new cemetery or burial must be located?

1895 PA 49, MCL 128.31 et seq; MSA 5.3071 et seq, authorizes townships to seek and obtain a court order to vacate and remove private cemeteries located within a township for certain specified reasons. MCL 128.31; MSA 5.3071. The Act requires reinterment, at township expense, in the township cemetery or if the township does not have a suitable cemetery, then in a suitable cemetery in an adjoining township. MCL 128.34; MSA 5.3074. If the vacated cemetery belongs to a church or religious society, removal may be made to another suitable cemetery belonging to the same church or society within the township or an adjoining township, instead of to the township cemetery. *Id.*

1871 PA 164, MCL 128.41 et seq; MSA 5.3081 et seq, authorizes cities and villages to seek and obtain a court order to vacate and remove private and public cemeteries located within their boundaries for certain specified reasons. MCL 128.41; MSA 5.3081. Reinterment, at city or village expense, must be within a city or village cemetery if one exists, and if not, must be in a suitable cemetery within six miles of the corporate limits of the city or village. MCL 128.44; MSA 5.3084.

1929 PA 297, MCL 128.51 et seq; MSA 5.3091 et seq, authorizes the voluntary sale of public and private cemeteries to cities or villages upon order of the circuit court authorizing the vacating of the cemetery and approval of a 3/4 vote of scrip holders or stockholders in the cemetery association. MCL 128.52; MSA 5.3092. In such cases, the Act provides that the cemetery association shall be responsible for interment "within a reasonable distance from such city or village,...." *Id.* Objecting lot owners shall be separately compensated for removing and reintering dead bodies if removed to a different location. MCL 128.54; MSA 5.3094.

There are no statutes addressing directly the reinterment of human remains, except where removed pursuant to a formal cemetery vacation.

It is my opinion, in answer to your fourth question, that when an historic period cemetery is disinterred and moved, the disinterred remains must be reinterred in a municipal cemetery within the same township, village or city as the remains are discovered and, if no such cemetery exists, in a cemetery in an adjacent township if unearthed in a township or in a cemetery within six miles of the city or village corporate boundary if unearthed in a city or village. It is my further opinion that if the historic period cemetery is known to belong to a church or religious society, reinterment may be in another suitable cemetery belonging to the same church or society located within, or within a reasonable distance from, the township or municipality where the cemetery is discovered. Finally, it must be noted that while the statutes discussed in answer to your fourth question establish certain locations within which a municipality must reinter bodies removed from a vacated cemetery, they do not so limit an individual who may desire to reinter in a different location a body over which he or she may exercise control.

Your fifth question asks:

If a construction project, such as Detroit's people mover, encounters unanticipated burials, who pays for the disinterment and/or reinterment? What if many years earlier, someone had been paid to move the burials?

Relocation of established public or private cemeteries must be pursuant to the vacation procedures set forth in the statutes discussed in response to question 4. In each case, the vacating governmental entity is responsible for costs of disinterment and reinterment.

The Legislature has not addressed the issue of allocation of costs for disinterment and reinterment of burials which are not part of established public or private cemeteries. However, in the event a contractor inadvertently discovers a burial or parts of a human skeleton, the contractor is obligated to immediately notify local police authorities. 1982 AACCS, R 325.8051. The contractor is also required to obtain a permit from the local health department for disinterment and reinterment before removing the body. MCL 333.2853; MSA 14.15(2853). Under these circumstances, it is most reasonable that local authorities make appropriate efforts to determine and notify any next of kin, who could then claim the body, and if unable to do so, undertake to bury the body at public expense. MCL 52.205(5); MSA 5.953(5) (5). See also MCL 333.2653; MSA 14.15(2653).

It is my opinion, in response to your fifth question, that the cost of removing bodies from unanticipated burials and reintering them elsewhere shall be at public expense, unless next of kin can be located and are willing to undertake those expenses.

Frank J. Kelley

Attorney General

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State of Michigan, Department of Attorney General

Last Updated 11/10/2008 16:49:34

DEPARTMENT OF COMMUNITY HEALTH

OFFICE OF THE STATE REGISTRAR

DISINTERMENT--REINTERMENT

(By authority conferred on the department of public health by section 2853 of Act No. 368 of the Public Acts of 1978, as amended, being S333.2853 of the Michigan Compiled Laws)

R 325.8051 Discovery of remains; notification of police required; exception.

Rule 1. A person who inadvertently discovers a burial or parts of a human skeleton shall immediately notify the police authority of the jurisdiction where the remains are found. If preliminary inspection by the police authority indicates that the remains are those of a prehistoric or historic native American, the state archaeologist of the Michigan history division, department of state, shall be immediately notified of the finding. This rule does not apply to archaeological excavations conducted by representatives of established scientific institutions or societies.

History: 1982 AACCS.

R 325.8052 Disinterment permit; application; fee.

Rule 2. (1) A request for a disinterment permit shall be made to the local health officer in whose district the cemetery is located, and the request shall be made on an affidavit which is signed by a licensed funeral director and by a person or persons as follows:

- (a) The surviving spouse.
- (b) If no surviving spouse, then by all surviving children.
- (c) If no surviving children, then by the surviving parents.
- (d) If no surviving parents, then by all surviving brothers and sisters.

(2) The request shall be accompanied by a fee established by the local health department pursuant to section 2444 of Act No. 368 of the Public Acts of 1978, as amended, being S333.2444 of the Michigan Compiled Laws.

History: 1982 AACCS.

R 325.8053 Affidavit content.

Rule 3. An affidavit shall contain all of the following information:

- (a) The name and address of the licensed funeral director to whom the permit is to be issued.
- (b) The name and address of the person petitioning for the permit.
- (c) The name of the lot or the burial right owner.
- (d) The name of the deceased.

(e) The present location of the grave, including the lot number, the section number, or other location, such as a location in a mausoleum.

(f) Reinterment location.

(g) Relationship of petitioner to deceased.

(h) Reason for disinterment.

(i) Approval of all persons who may have a claim for the deceased as specified in R 325.8052.

(j) Written consent of the lot or burial space owner or owners, if other than petitioner.

History: 1982 AACCS.

R 325.8054 Local health officer; duties.

Rule 4. The local health officer or his or her designated representative shall do all of the following:

(a) Review the affidavit for disinterment-reinterment.

(b) Issue the disinterment-reinterment permit if the consent required by R 325.8052(1) has been obtained, or deny the disinterment-reinterment permit if the consent required by R 325.8052(1) has not been obtained.

(c) Provide instructions or guidance to the funeral director on the handling of the disinterred body which is necessary to protect the health of the public and those handling the disinterred body.

(d) Retain the affidavit for a period of not less than 5 years.

History: 1982 AACCS.

R 325.8055 Disinterment of cremated remains; opening casket; permit not required.

Rule 5. (1) A permit is not required to disinter cremated remains. A request to disinter cremated remains may be made to the cemetery by the next surviving kin, as designated in R 325.8052, on an affidavit described in R 325.8053. The affidavit shall be maintained as part of the permanent records of the cemetery from which the cremated remains are removed.

(2) A permit is not required to open a casket to remove an article or to place an article in a casket.

History: 1982 AACCS.

R 325.8056 Cemetery retention of permit.

Rule 6. A duplicate copy of the permit shall be maintained as part of the permanent records of the cemetery from which the deceased was removed.

History: 1982 AACCS.

R 325.8057 Transportation of disinterred body.

Rule 7. A disinterred body shall not be accepted for transportation by common or contract carrier unless it has been enclosed in a container which insures against leakage, offensive odors, and other menaces to the public health and safety. A disinterred body may be transported by private vehicle, under the supervision of a licensed funeral director, if enclosed in any suitable container which insures against leakage, offensive odors, and other menaces to the public health and safety. The licensed funeral director in charge of disinterment shall be responsible for the proper conduct of the disinterment and removal.

History: 1982 AACCS.

PUBLIC HEALTH CODE (EXCERPT)
Act 368 of 1978

333.2853 Permit for disinterment and reinterment required; issuance; forms for permits and applications; retention of application; copy of permit as permanent record; petition for disinterment order.

Sec. 2853. (1) A permit for disinterment and reinterment is required before disinterment of a dead body. The local health department in whose jurisdiction the body is interred shall issue the permit upon proper application by a licensed funeral director or person acting as a funeral director in accordance with rules promulgated by the department.

(2) A person shall not disinter or permit the disinterment of a dead body in a cemetery and the body's reinterment in a cemetery or removal from the cemetery unless a disinterment and reinterment permit is issued by the local health department in the jurisdiction in which the cemetery is located.

(3) The department shall prepare and furnish to local health departments the forms for permits and applications therefor, which shall be used in the procedures prescribed by this section and section 2852.

(4) The local health department shall retain an application for a disinterment and reinterment permit for not less than 5 years. A duplicate copy of the permit shall be maintained in permanent records of the cemetery from which the body was disinterred.

(5) If a required consent cannot be obtained, a person may petition the circuit court of the county in which the cemetery is located for a disinterment order.

History: 1978, Act 368, Eff. Sept. 30, 1978.

Popular name: Act 368

Administrative rules: R 325.8051 et seq. of the Michigan Administrative Code.

Noise Assessment
2.8 Acres of Vacant Land
7850 East Jefferson Ave.
Detroit, Michigan

GDC-East Jefferson, LLC

January 9, 2019

ASTI ENVIRONMENTAL



Noise Assessment
2.8 Acres of Vacant Land
7850 East Jefferson Ave.
Detroit, Michigan

January 9, 2019

Report Prepared For:

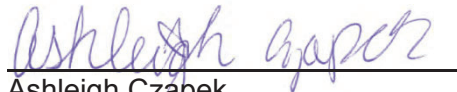
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ATTACHMENTS

- A** NAL Location Map
- B** Airport Noise Contour Map
- C** AADT Information
- D** Day-Night Level Electronic Assessment

1.0 INTRODUCTION

GDC-East Jefferson, LLC proposes a new construction project utilizing funding provided from the Michigan State Housing Development Authority (MSHDA). The project is located on 2.8 acres of vacant land at 7850 E. Jefferson Ave., 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 follow.

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

One NAL (NAL #1) was selected on the Subject Property for this analysis based on proximity to noise sources. A map with the Subject Property boundaries and NAL location is included as Attachment A.

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

NAL #1

Noise Source with Applicable Distance	Name	Distance to NAL
Airport(s)	Coleman A Young International Airport	3.74 miles
	Windsor International Airport	5.22 miles
Busy Road(s)	E. Jefferson Ave.	65 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 3.74 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 5.22 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 roadway is:

- E. Jefferson Ave.

E. Jefferson Ave. is an 8-lane road with a center turn lane. E. Jefferson Ave. is a main transportation route into the city of Detroit. The roadway is an approximate effective distance of 65 feet from the Subject Property (NAL #1). Traffic counts for Woodward Ave. were obtained through the Southeast Michigan Council of Government (SEMCOG). Projections were done through 2029. A compounded growth rate of 1% per year was judged appropriate as traffic levels are expected to remain relatively stable. Traffic projections are included in Attachment C. Noise levels from the applicable roadways at NAL #1, as predicted in 2029, were within the Normally Unacceptable range per HUD/MSHDA standards.

2.3 Railroads

Not applicable.

2.4 Non-Transportation Sources

Not applicable.

3.0 CALCULATIONS

A Noise DNL calculator worksheet for the NAL is provided in Appendix D.

Using the HUD DNL calculator, the noise level at NAL #1, as predicted in 2028, is calculated to be 74.4 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	74.4	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://maps.semcog.org/TrafficVolume/>
- <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

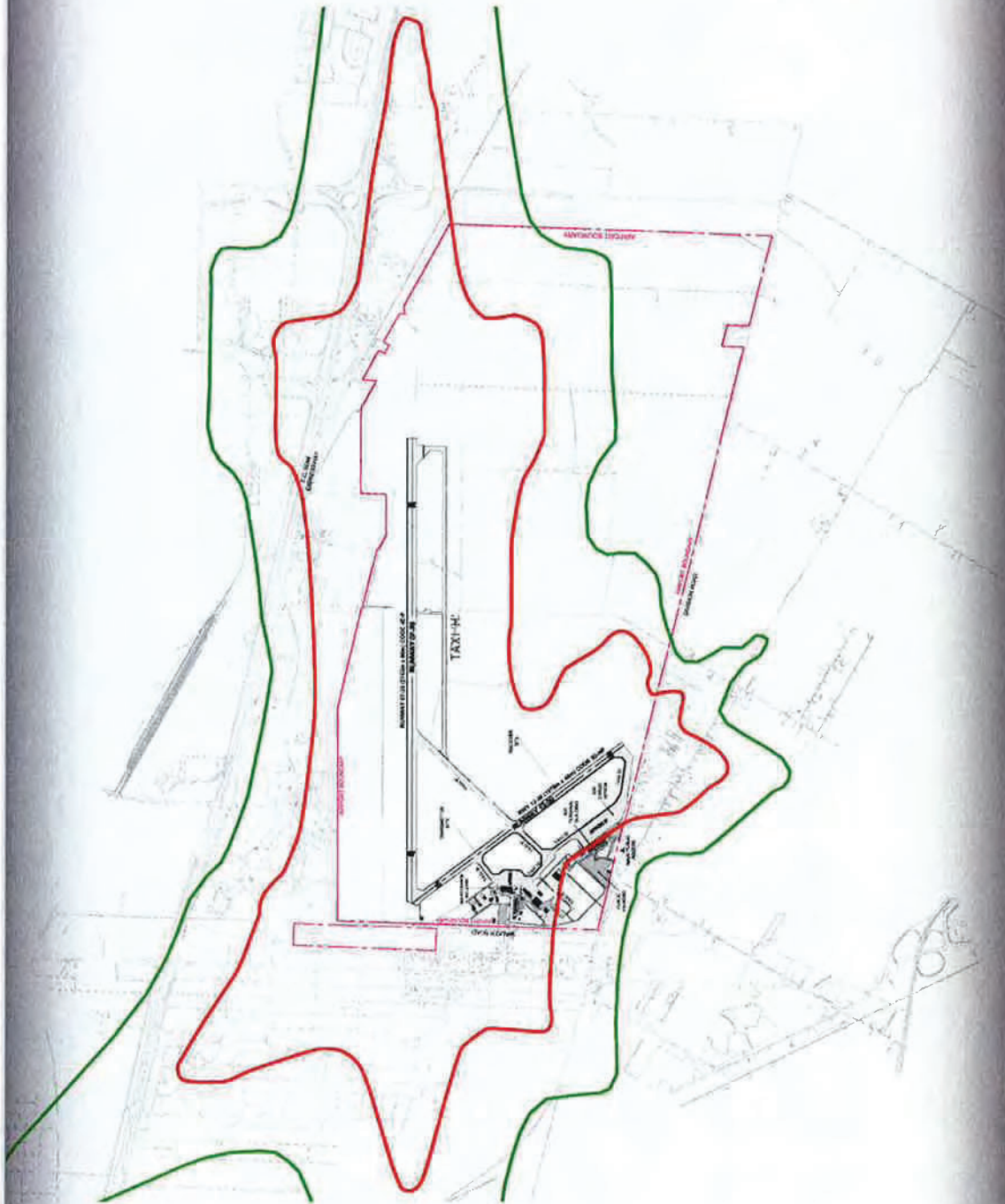
NAL Location Map



Attachment B

Airport Noise Contour Maps





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

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\PROJECTS\09\092665 Windsor Airport Master Plan



Map Projection: n/a TAXI 'H'
Project #: 09-2665
Status: No
Date: December 2010



Attachment C

AADT Information

Auto and Heavy Truck 10-year ADT Projections

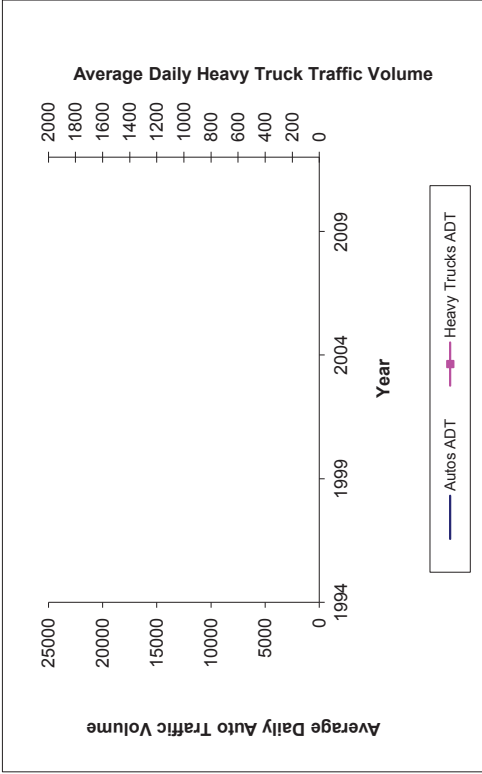
East Jefferson

	Cars	% Change	Trucks	% Change
2016	21528		1872	
	Avg % change:	#DIV/0!	Avg % change:	#DIV/0!
	Avg % change (Last 5-yr Trend):	#DIV/0!	Avg % change (Last 5-yr Trend):	#DIV/0!
	% Change/Year Assumption	1	%/Year Change Assumption	1

2028 Projections

	Cars	Trucks
2016	21528	1872
2017	21743	1891
2018	21961	1910
2019	22180	1929
2020	22402	1948
2021	22626	1967
2022	22852	1987
2023	23081	2007
2024	23312	2027
2025	23545	2047
2026	23780	2068
2027	24018	2089
2028	24258	2109
2029	24501	2131

Predicted 2028 Auto ADT	Predicted 2028 Truck ADT
24501	2131



Attachment D

Day-Night Level Electronic Assessments

Notice (/site-wide-banners/notice/)

Due to the lapse in Congressional Appropriations for Fiscal Year 2019, the U.S. Department of Housing and Urban Development (HUD) is closed. This website is supported by a cooperative agreement funded under a prior appropriation. Current functions will remain operational but no new functions will be added during the lapse in appropriations. For more information, see **HUD Contingency Plan for Possible Lapse in Appropriations** (<https://www.hud.gov/sites/documents/HUDCONTINGENCYPLANFINAL.PDF>).

[Home \(/\)](#) > [Programs \(/programs/\)](#) > [Environmental Review \(/programs/environmental-review/\)](#) > DNL Calculator

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	<input type="text" value="1-10105"/>
Record Date	<input type="text" value="01/09/2019"/>
User's Name	<input type="text" value="ASTLE..."/>

Road # 1 Name:

E Jefferson

Road #1

Vehicle Type	Cars <input checked="" type="checkbox"/>	Medium Trucks <input checked="" type="checkbox"/>	Heavy Trucks <input checked="" type="checkbox"/>
Effective Distance	65	65	65
Distance to Stop Sign			
Average Speed	35	35	35
Average Daily Trips (ADT)	24501	1066	1065
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	66.4902	62.8759	73.3047
Calculate Road #1 DNL	74.4649	Reset	

Add Road Source

Add Rail Source

Airport Noise Level

Loud Impulse Sounds?

☐ Yes ☒ NoCombined DNL for all
Road and Rail sources

74.4649

Combined DNL including Airport

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/>)

Sound Transmission Classification Assessment Tool (STraCAT)

Part I - Description

Project

7850 E Jefferson

Sponsor/Developer

Ginosko Development

Location

7850 E Jefferson, Detroit, MI

Prepared by

David Steinhauer, AIA

Noise Level

74.4

Date

2019-08-06

Primary Source(s)

vehicular traffic

Part II - Wall Components

Wall Construction Detail	Area	STC
4" face brick one course; 1/2" air space; 3/4" insulation board;	4305	56
5/8" x 10" redwood siding; 1/2" insulation board; 2x4" wood studs	1131	47
<div>Add new wall</div>		

Wall Construction Detail			Area 15,619 Sq. Feet	STC 48.2
Window Construction Detail	Quantity	Sq Ft/Unit	STC	
Single hung Vinyl	165	15	27	
<div>Add new window</div>				
Door Construction Detail			Quantity	Sq Ft/Unit STC
3'x7' steel-faced rigid polyurethane core door 1 3/4" tl		2	21	26
<div>Add new door</div>				

Part III - Results			
Wall Statistics			
Stat		Value	
Area:		15619 ft²	
Wall STC:		48.2	
Aperture Statistics			
Aperture	Count	Area	% of wall
Windows:	165	ft²	15.85%
Doors:	2	42 ft²	0.27%
Evaluation Criteria			
Criteria		Value	

Evaluation Criteria

Criteria	Value
Noise source sound level(dB):	74.4
Combined attenuation for wall component:	34.74 dB
Required attenuation:	32.400000000000006
Do Wall components meet requirements?	Yes

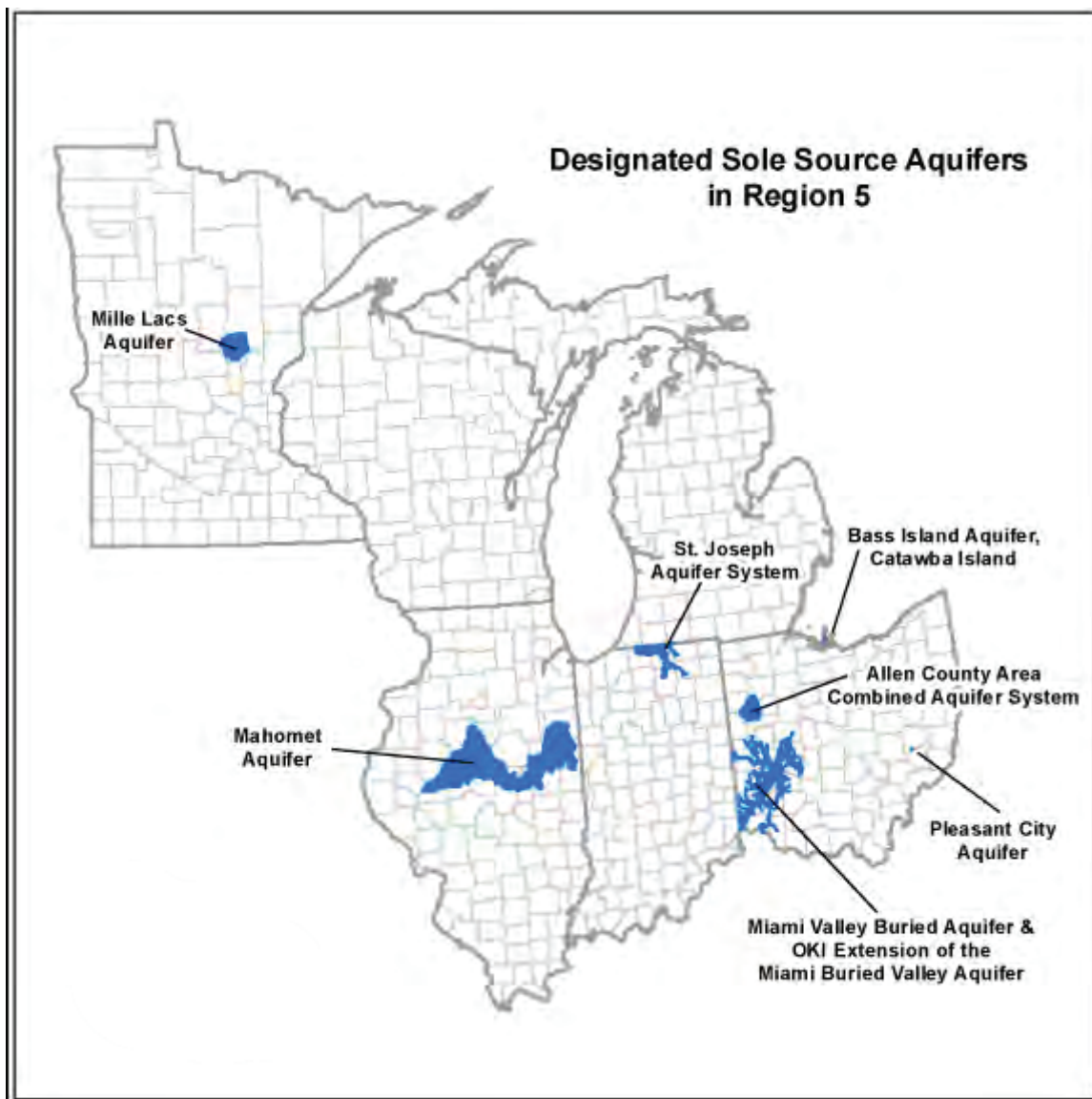
Print

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.





U.S. Fish and Wildlife Service

National Wetlands Inventory

Wetlands



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

Detroit River

January 11, 2019

Wetlands

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

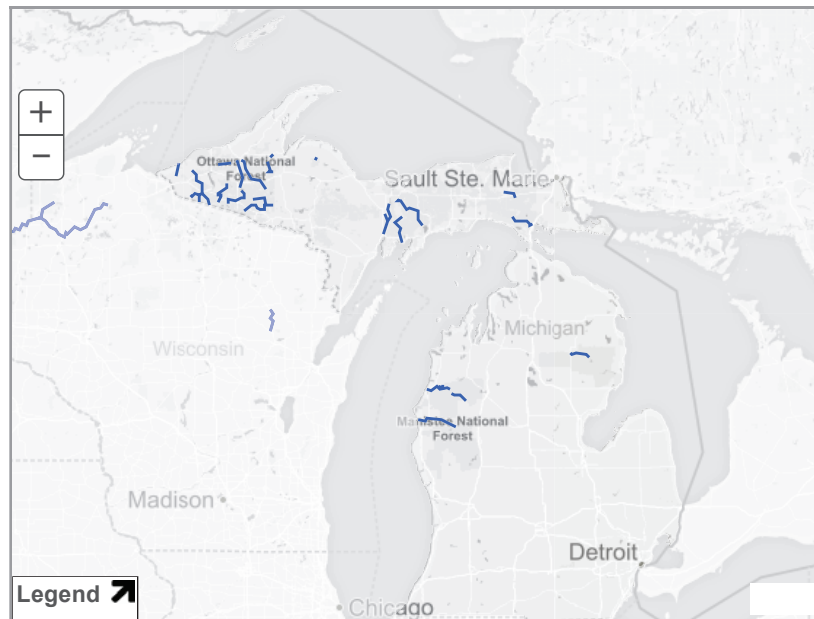
This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



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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.



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.

[+ View larger map](#)

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

[NATIONWIDE RIVERS INVENTORY](#) | [CONTACT US](#) | [PRIVACY NOTICE](#) | [Q & A SEARCH ENGINE](#) | [SITE MAP](#)



Designated Rivers

[About WSR Act](#)
[State Listings](#)
[Profile Pages](#)

National System

[WSR Table](#)
[Study Rivers](#)
[Stewardship](#)
[WSR Legislation](#)

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[Management Plans](#)
[River Mgt. Society](#)
[GIS Mapping](#)

Resources

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[Logo & Sign Standards](#)

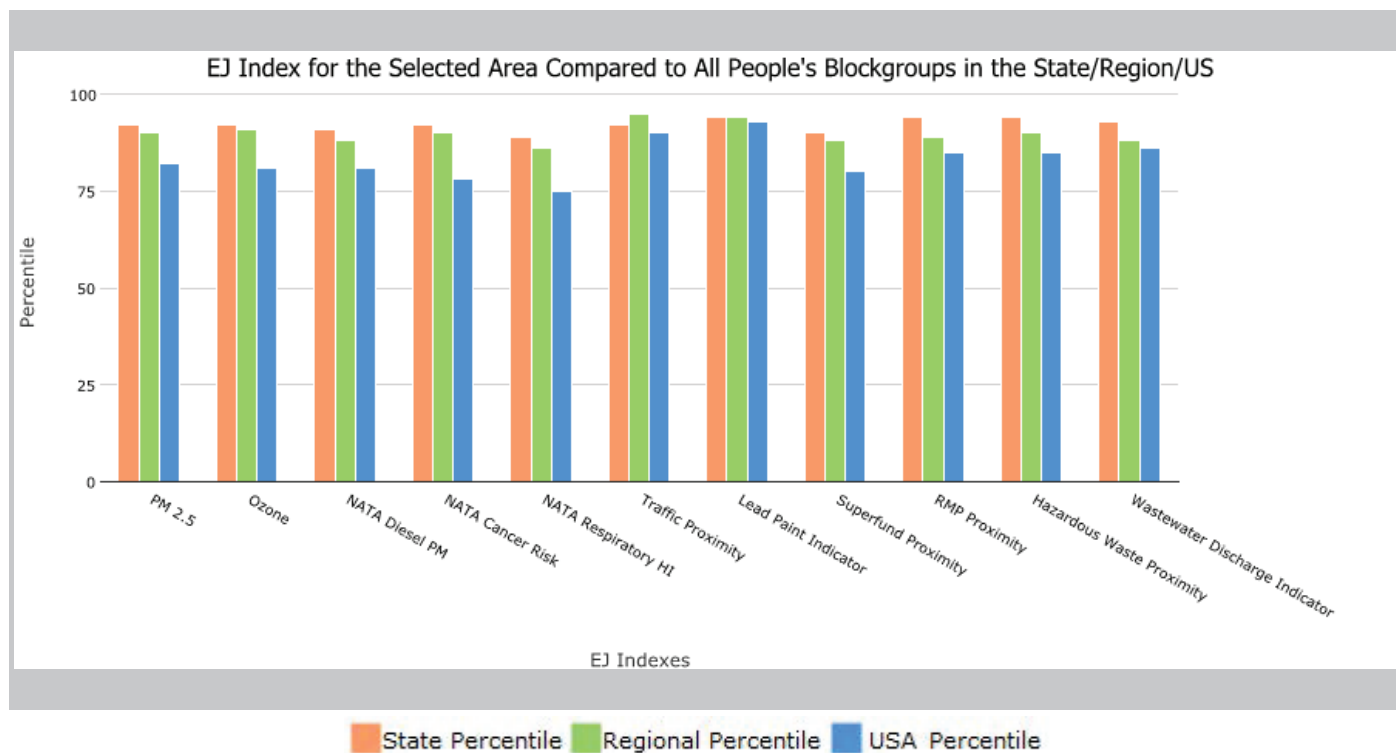
1 mile Ring around the Corridor, MICHIGAN, EPA Region 5

Approximate Population: 12,120

Input Area (sq. miles): 3.49

7850 E. Jefferson (The study area contains 1 blockgroup(s) with zero population.)

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	92	90	82
EJ Index for Ozone	92	91	81
EJ Index for NATA* Diesel PM	91	88	81
EJ Index for NATA* Air Toxics Cancer Risk	92	90	78
EJ Index for NATA* Respiratory Hazard Index	89	86	75
EJ Index for Traffic Proximity and Volume	92	95	90
EJ Index for Lead Paint Indicator	94	94	93
EJ Index for Superfund Proximity	90	88	80
EJ Index for RMP Proximity	94	89	85
EJ Index for Hazardous Waste Proximity	94	90	85
EJ Index for Wastewater Discharge Indicator	93	88	86



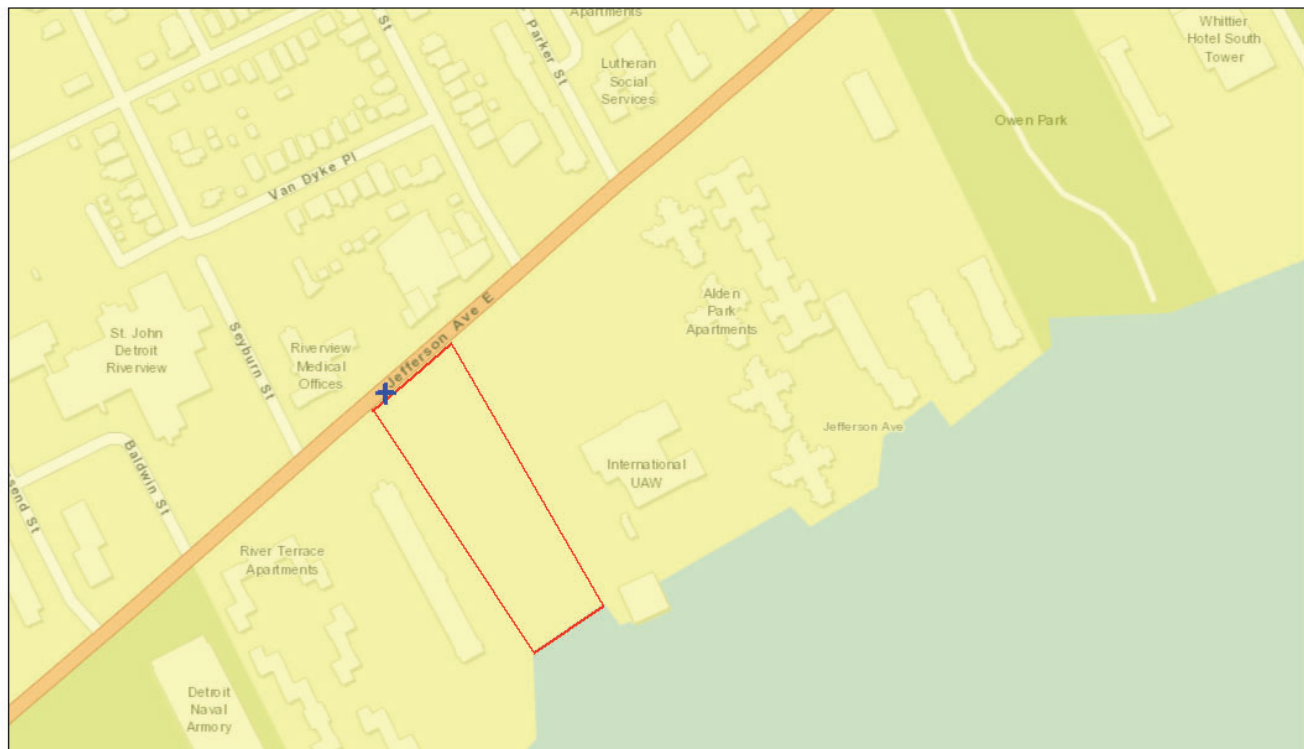
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective 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.

1 mile Ring around the Corridor, MICHIGAN, EPA Region 5

Approximate Population: 12,120

Input Area (sq. miles): 3.49

7850 E. Jefferson (The study area contains 1 blockgroup(s) with zero population.)



Sites reporting to EPA

Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJSCREEN Report (Version 2018)

1 mile Ring around the Corridor, MICHIGAN, EPA Region 5

Approximate Population: 12,120

Input Area (sq. miles): 3.49

7850 E. Jefferson (The study area contains 1 blockgroup(s) with zero population.)

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 $\mu\text{g}/\text{m}^3$)	11.1	10.2	90	10.8	49	9.53	80
Ozone (ppb)	43.7	42.9	58	42.6	66	42.5	63
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.988	0.726	73	0.932	50-60th	0.938	60-70th
NATA* Cancer Risk (lifetime risk per million)	38	31	81	34	70-80th	40	<50th
NATA* Respiratory Hazard Index	1.4	1.3	49	1.7	<50th	1.8	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	870	570	80	370	89	600	85
Lead Paint Indicator (% Pre-1960 Housing)	0.71	0.38	80	0.38	81	0.29	88
Superfund Proximity (site count/km distance)	0.055	0.13	53	0.12	55	0.12	53
RMP Proximity (facility count/km distance)	0.95	0.52	82	0.81	71	0.72	75
Hazardous Waste Proximity (facility count/km distance)	2.1	0.8	88	1.5	77	4.3	77
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.00066	0.16	69	4.2	55	30	65
Demographic Indicators							
Demographic Index	66%	29%	90	28%	91	36%	86
Minority Population	81%	24%	91	25%	91	38%	84
Low Income Population	52%	34%	79	32%	82	34%	79
Linguistically Isolated Population	1%	2%	66	2%	61	4%	47
Population With Less Than High School Education	20%	10%	88	10%	86	13%	77
Population Under 5 years of age	4%	6%	29	6%	26	6%	26
Population over 64 years of age	21%	15%	79	15%	81	14%	81

* 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

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. 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. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.