



**U.S. Department of Housing and Urban  
Development**  
451 Seventh Street, SW  
Washington, DC 20410  
[www.hud.gov](http://www.hud.gov)  
[espanol.hud.gov](http://espanol.hud.gov)

**Environmental Review for Activity/Project that is  
Categorically Excluded Subject to Section 58.5  
Pursuant to 24 CFR 58.35(a)**

**Project Information**

**Project Name:** 440-E.-Grand-Blvd.-Acquisition

**HEROS Number:** 900000010239049

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

**State / Local Identifier:** Detroit, Michigan

**RE Preparer:** Kim Siegel

**Certifying Officer:** Julie Schneider

**Grant Recipient (if different than Responsible Entity):**

**Point of Contact:**

**Consultant (if applicable):**

**Point of Contact:**

**Project Location:** 440 E. Grand Blvd, Detroit, MI 48207

**Additional Location Information:**

N/A

**Direct Comments to:**

**Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:**

The site is currently developed with a two story nursing home. The City of Detroit is providing funding to a local non-profit to purchase the property to provide a non-congregate emergency shelter for households experiencing homelessness.

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

**Level of Environmental Review Determination:**

**Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at 58.5:**

58.34(a)(12)

58.35(a)(5)

**Determination:**

✓	This categorically excluded activity/project converts to <b>EXEMPT</b> per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; <b>Funds may be committed and drawn down after certification of this part</b> for this (now) EXEMPT project; OR
	This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, <b>publish NOI/RROF and obtain "Authority to Use Grant Funds"</b> (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
	This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

**Approval Documents:**

[Signature Page 440 E Grand Acquisition.pdf](#)

**7015.15 certified by Certifying Officer on:**

**7015.16 certified by Authorizing Officer on:**

**Funding Information**

Grant / Project Identification Number	HUD Program	Program Name
E20MW260006	Community Planning and Development (CPD)	Emergency Solutions Grants CARES Act (ESG-CV)

**Estimated Total HUD Funded, Assisted**    \$612,000.00

**or Insured Amount:**

**Estimated Total Project Cost:**

\$612,000.00

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

<b>Compliance Factors:</b> 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)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The property is not located in a FAA designated Airport Runway Clear Zone. The Coleman A. Young International Airport (DET) is approximately 3.70 miles from the property (Attachment A).
<b>Coastal Barrier Resources Act</b> 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	This project does not involve any property or parcel within the Coastal Barrier Resource System. This project will not affect the resource in question and, therefore, does not require formal consultation with the U.S. Fish and Wildlife Service (Attachment B).
<b>Flood Insurance</b> 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	According to FEMA Firmette Map 26163C0282F, effective October 21, 2021, the property is located in Zone X, which represents minimal risk outside the 1-percent and 2-percent-annual-chance floodplains. The structure or insurable property is not located in a FEMA designated Special Flood Hazard Area. The project is in compliance with flood insurance requirements (Attachment C).
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b>		
<b>Air Quality</b> 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 project located in Wayne County, which is in nonattainment for Ozone. However, the project does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units. Therefore, the project is in compliance

		with the Clean Air Act and demonstration of conformance with the State Implementation Plan (SIP) is not required (Attachment D).
<b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not involve any property or parcel located within the Coastal Zone Management Area for Wayne County. This project does not require formal consultation with the State of Michigan Coastal Zone Management Program (Attachment E).
<b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A Phase I Environmental Site Assessment (ESA) was completed for the site. The Phase I ESA did not identify any Recognized Environmental Conditions. Based on the age of the building, asbestos-containing material (ACM) and lead-based paint (LBP) may be present. If additional federal funding is used for rehabilitation subsequent to the acquisition of the site, an ACM survey and LBP survey and abatement (if present) will be required. The property is located in Wayne County, which is within Zone 3 of the EPA Radon Map for risk of indoor radon levels; Zone 3 is low potential risk for indoor radon levels (Attachment F).
<b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project involves acquisition, which does not disturb natural vegetation of critical habitat. Additionally, the project area is in an urban residential and commercial area. Therefore, the project will not impact threatened or endangered species (Attachment G).
<b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The City of Detroit is providing funding to a local non-profit to purchase this site. The project scope does not include development, construction, rehabilitation that will increase residential densities, or conversion. No further evaluation is required. (Attachment H).
<b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Review of the USDA Web Soil Survey indicates the site does not contain prime or unique farmland. The site is

<p>and 1541; 7 CFR Part 658</p>		<p>located in the heavily developed and urbanized area. Additionally, this project does not include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use (Attachment I).</p>
<p><b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project is located in FEMA Flood Map Panel 26163C0282F, effective October 21, 2021. The project is located in zone X, which represents minimal risk outside the 1-percent and 2-percent annual- chance floodplains. Floodplain management is not required (Attachment C).</p>
<p><b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project was submitted to the City of Detroit for review, per the programmatic agreement between the City of Detroit and the State Historic Preservation Office (SHPO).The building at 440 E Grand Blvd is listed on the National Register of Historic Places as part of the East Grand Boulevard Historic District. Therefore, per Stipulation V.B of the Programmatic Agreement (PA), the project shall be carried out in accordance with the Secretary of the Interior's Standards for Rehabilitation. This building is considered "non-contributing" to the district. A building not contributing to the historic significance of a district is one which does not add to the district's sense of time and place and historical development. This project is intended to provide funding for purchase of the building through competitive NOFA process to convert a nursing home into a supportive housing shelter. If additional federal funding is used for exterior building rehabilitation, the scope of work required for this adaptive use will be subject to additional approval. This project has been given a No Adverse Effect determination (Federal Regulations 36 CFR Part</p>

		800.5(b)) on properties that are listed or eligible for listing in the National Register of Historic Places (Attachment J).
<b>Noise Abatement and Control</b> 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	The project does not include new construction, rehabilitation of an existing residential property, a research project which does not result in new construction or reconstruction, an interstate land sales registration or timely emergency assistance under disaster assistance provisions or appropriations. Therefore, no further evaluation is required (Attachment K).
<b>Sole Source Aquifers</b> 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 in the state of Michigan. Therefore, the project will not impact a sole source aquifer (Attachment L).
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project does not include new construction, expansion of a buildings footprint or ground disturbance. Therefore, the project is in compliance with Executive Order 11990 (Attachment M).
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to the attached Michigan Department of Natural Resources map of wild and scenic rivers, no federal or state wild and scenic rivers are located in the City of Detroit. Therefore, no wild or scenic rivers will be impacted by this project (Attachment N).
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project scope will not have an adverse affect on human health or the environment of minority and/or low income populations. The purchase of the site to provide a non-congregate emergency shelter for households experiencing homelessness will benefit the health and environment of this population in the City of Detroit (Attachment O).

**Mitigation Measures and Conditions [40 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.

<b>Law, Authority, or Factor</b>	<b>Mitigation Measure or Condition</b>	<b>Comments on Completed Measures</b>	<b>Mitigation Plan</b>	<b>Complete</b>
------------------------------------------	----------------------------------------	-----------------------------------------------	----------------------------	-----------------

**Project Mitigation Plan**

**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 property is not located in a FAA designated Airport Runway Clear Zone. The Coleman A. Young International Airport (DET) is approximately 3.70 miles from the property (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

### **Screen Summary**

#### **Compliance Determination**

This project does not involve any property or parcel within the Coastal Barrier Resource System. This project will not affect the resource in question and, therefore, does not require formal consultation with the U.S. Fish and Wildlife Service (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 - FIRMette.pdf](#)

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

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

No

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

Yes

**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**

According to FEMA Firmette Map 26163C0282F, effective October 21, 2021, the property is located in Zone X, which represents minimal risk outside the 1-percent and 2-percent-annual-chance floodplains. The structure or insurable property is not located in a FEMA designated Special Flood Hazard Area. The project is in compliance with flood insurance requirements (Attachment C).

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Air Quality

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

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

Yes

✓ No

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

### **Screen Summary**

#### **Compliance Determination**

The project located in Wayne County, which is in nonattainment for Ozone. However, the project does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units. Therefore, the project is in compliance with the Clean Air Act and demonstration of conformance with the State Implementation Plan (SIP) is not required (Attachment D).

#### **Supporting documentation**

[Attachment D - Air Quality.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Coastal Zone Management Act

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

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

Yes

No

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

### **Screen Summary**

#### **Compliance Determination**

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

#### **Supporting documentation**

[Attachment E - Coastal Zone Management.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

**Explain:**

No Recognized Environmental Conditions (REC's) were found during the Phase I Environmental Site Assessment (ESA).

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

Yes

### Screen Summary

#### **Compliance Determination**

A Phase I Environmental Site Assessment (ESA) was completed for the site. The Phase I ESA did not identify any Recognized Environmental Conditions. Based on the age of the building, asbestos-containing material (ACM) and lead-based paint (LBP) may be present. If additional

federal funding is used for rehabilitation subsequent to the acquisition of the site, an ACM survey and LBP survey and abatement (if present) will be required. The property is located in Wayne County, which is within Zone 3 of the EPA Radon Map for risk of indoor radon levels; Zone 3 is low potential risk for indoor radon levels (Attachment F).

**Supporting documentation**

[Attachment F - Radon Maps.pdf](#)

[Attachment F - Phase I Environmental Site Assessment.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.

This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

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

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.

### Screen Summary

#### Compliance Determination

This project involves acquisition, which does not disturb natural vegetation of critical habitat. Additionally, the project area is in an urban residential and commercial area. Therefore, the project will not impact threatened or endangered species (Attachment G).

#### Supporting documentation

[Attachment G - Endangered Species List.pdf](#)

Are formal compliance steps or mitigation required?



440-E.-Grand-Blvd.-  
Acquisition

Detroit, MI

900000010239049

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

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

Yes

### Screen Summary

#### **Compliance Determination**

The City of Detroit is providing funding to a local non-profit to purchase this site. The project scope does not include development, construction, rehabilitation that will increase residential densities, or conversion. No further evaluation is required. (Attachment H).

#### **Supporting documentation**

[Attachment H - Explosive and Flammable Hazards.pdf](#)

**Are formal compliance steps or mitigation required?**

- Yes  
 No



## Farmlands Protection

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

**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:

The project does not include any activities that could convert agricultural land to a non-agricultural use.

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**

Review of the USDA Web Soil Survey indicates the site does not contain prime or unique farmland. The site is located in the heavily developed and urbanized area. Additionally, this project does not include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use (Attachment I).

#### **Supporting documentation**

[Attachment I - Farmland Classification.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 - FIRMette.pdf](#)

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

**Does your project occur in a floodplain?**

- No

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

Yes

**Screen Summary**

**Compliance Determination**

The project is located in FEMA Flood Map Panel 26163C0282F, effective October 21, 2021. The project is located in zone X, which represents minimal risk outside the 1-percent and 2-percent annual- chance floodplains. Floodplain management is not required (Attachment C).

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" <a href="https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf">https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf</a>

### **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):**

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

- ✓ Other Consulting Parties

✓ City of Detroit Preservation Specialist

Completed

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

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

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

**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:**

See attached Area of Interest (AOI) (Appendix J).

**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:

A survey of historic buildings was completed. The project is less than 1/2 acre in size; therefore, an archeology review is not required.

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:**

This project is intended to provide funding for purchase of the building through competitive NOFA process to convert a nursing home into a supportive housing shelter. If additional federal funding is used for exterior building rehabilitation, the scope of work required for this adaptive use will be subject to additional approval.

**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**

The project was submitted to the City of Detroit for review, per the programmatic agreement between the City of Detroit and the State Historic Preservation Office (SHPO). The building at 440 E Grand Blvd is listed on the National Register of Historic Places as part of the East Grand Boulevard Historic District. Therefore, per Stipulation V.B of the Programmatic Agreement (PA), the project shall be carried out in accordance with the Secretary of the Interior's Standards for Rehabilitation. This building is considered "non-contributing" to the district. A building not contributing to the historic significance of a district is one which does not add to the district's sense of time and place and historical development. This project is intended to provide funding for purchase of the building through competitive NOFA process to convert a nursing home into a supportive housing shelter. If additional federal funding is used for exterior building rehabilitation, the scope of work required for this adaptive use will be subject to additional approval. This project has been given a 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 (Attachment J).

**Supporting documentation**

[Attachment J - 440 E Grand APE.pdf](#)

[Attachment J - Section 106 Review.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

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

### Screen Summary

#### Compliance Determination

The project does not include new construction, rehabilitation of an existing residential property, a research project which does not result in new construction or reconstruction, an interstate land sales registration or timely emergency assistance under disaster assistance provisions or appropriations. Therefore, no further evaluation is required (Attachment K).

#### Supporting documentation

[Attachment K - Noise Abatement.pdf](#)

**Are formal compliance steps or mitigation required?**

440-E.-Grand-Blvd.-  
Acquisition

Detroit, MI

900000010239049

Yes

✓ No

## Sole Source Aquifers

General requirements	Legislation	Regulation
<b>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.</b>	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

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

No

### Screen Summary

#### **Compliance Determination**

There are no sole source aquifers in the state of Michigan. Therefore, the project will not impact a sole source aquifer (Attachment L).

#### **Supporting documentation**

[Attachment L - Sole Source Aquifer Map.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

## Wetlands Protection

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

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

No

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

Yes

### **Screen Summary**

#### **Compliance Determination**

The project does not include new construction, expansion of a buildings footprint or ground disturbance. Therefore, the project is in compliance with Executive Order 11990 (Attachment M).

#### **Supporting documentation**

[Attachment M - Wetland Map.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

## Wild and Scenic Rivers Act

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

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

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

### Screen Summary

#### **Compliance Determination**

According to the attached Michigan Department of Natural Resources map of wild and scenic rivers, no federal or state wild and scenic rivers are located in the City of Detroit. Therefore, no wild or scenic rivers will be impacted by this project (Attachment N).

#### **Supporting documentation**

[Attachment N - Wild and Scenic Rivers.pdf](#)

#### **Are formal compliance steps or mitigation required?**

Yes

No

## Environmental Justice

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

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

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

Yes

No

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

### Screen Summary

#### **Compliance Determination**

The project scope will not have an adverse affect on human health or the environment of minority and/or low income populations. The purchase of the site to provide a non-congregate emergency shelter for households experiencing homelessness will benefit the health and environment of this population in the City of Detroit (Attachment O).

#### **Supporting documentation**

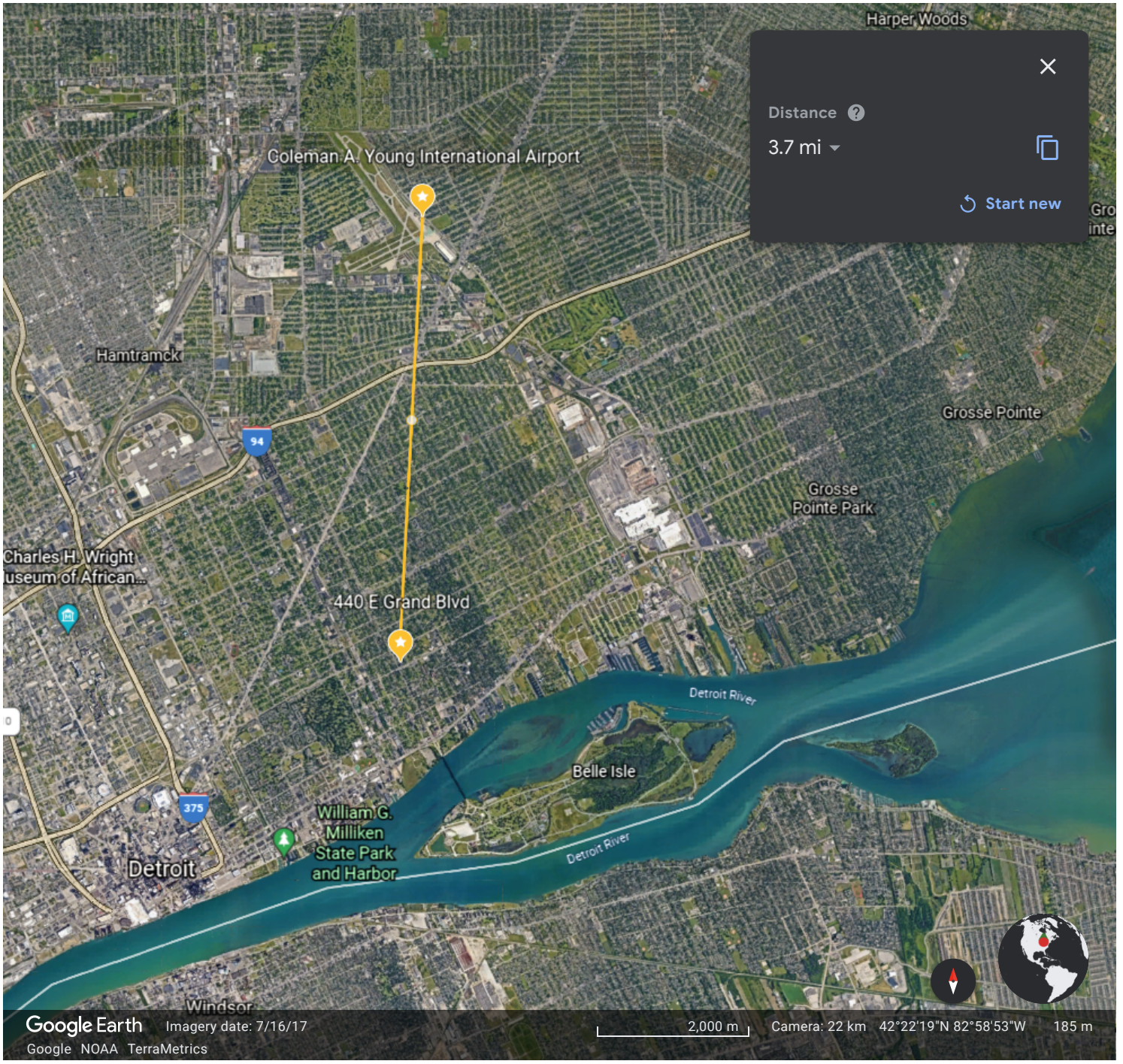
[Attachment O - EJ Screen.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No





Distance ?

3.7 mi ▾

Start new

Google Earth

Imagery date: 7/16/17

Google NOAA TerraMetrics

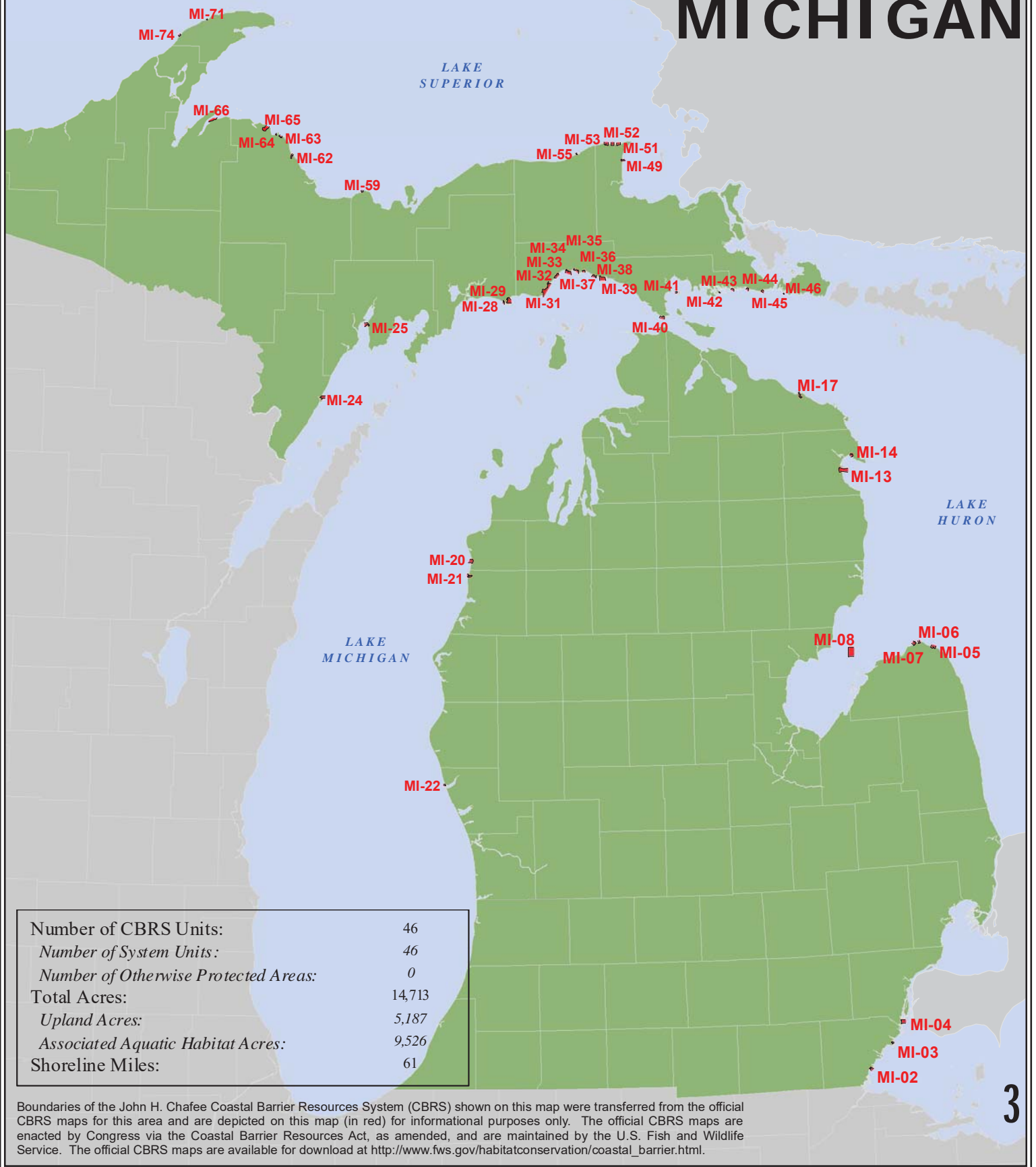
2,000 m

Camera: 22 km

42°22'19"N 82°58'53"W

185 m

# JOHN H. CHAFEE COASTAL BARRIER RESOURCES SYSTEM MICHIGAN

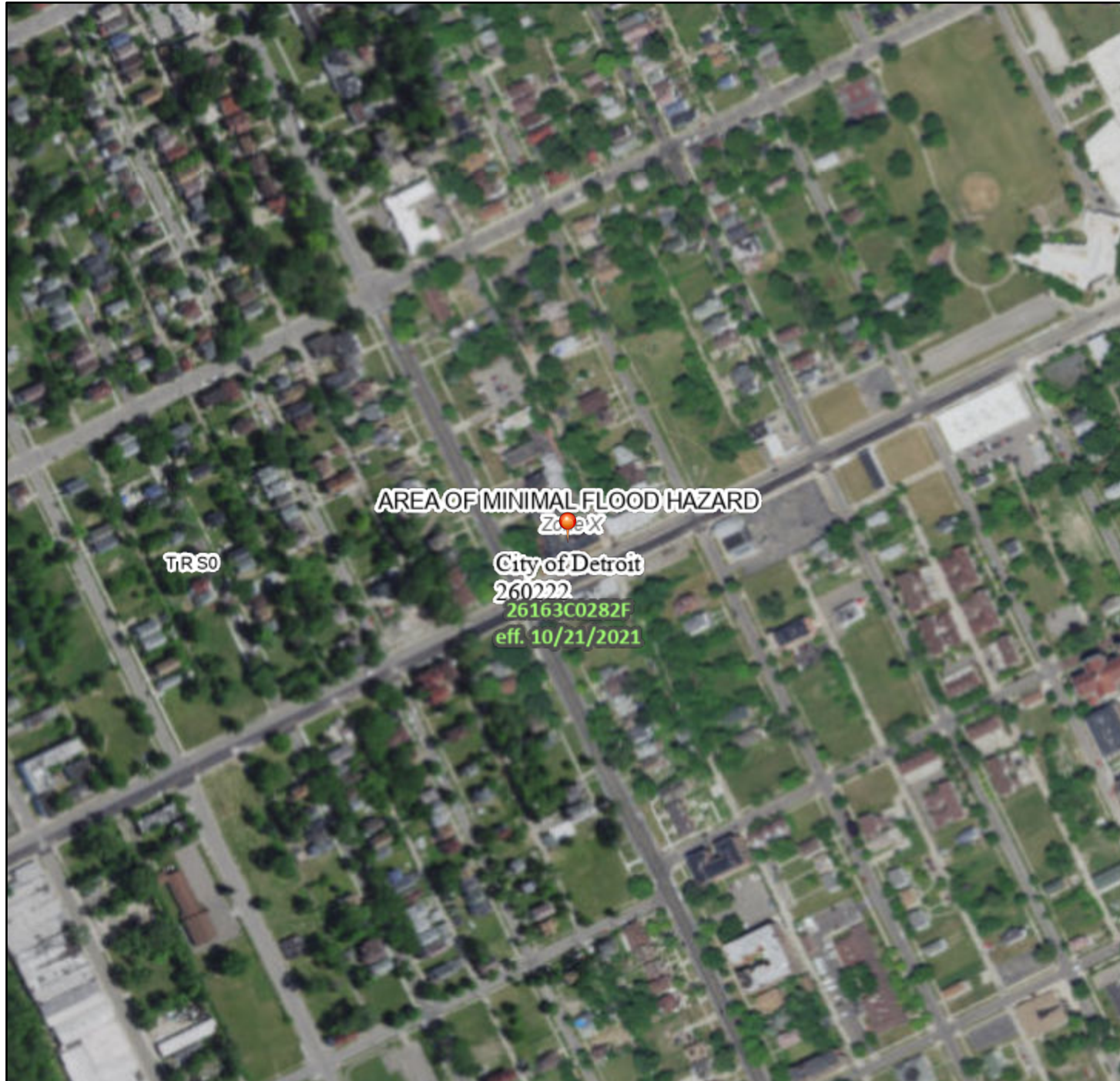


Boundaries of the John H. Chafee Coastal Barrier Resources System (CBRS) shown on this map were transferred from the official CBRS maps for this area and are depicted on this map (in red) for informational purposes only. The official CBRS maps are enacted by Congress via the Coastal Barrier Resources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

# National Flood Hazard Layer FIRMMette



83°0'44"W 42°21'35"N



83°0'7"W 42°21'8"N

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

## Legend

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

<b>SPECIAL FLOOD HAZARD AREAS</b>		Without Base Flood Elevation (BFE) <i>Zone A, V, A99</i>
		With BFE or Depth <i>Zone AE, AO, AH, VE, AR</i>
		Regulatory Floodway
<b>OTHER AREAS OF FLOOD HAZARD</b>		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 <i>Zone X</i>
		Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i>
		Area with Reduced Flood Risk due to Levee. See Notes. <i>Zone X</i>
		Area with Flood Risk due to Levee <i>Zone D</i>
<b>OTHER AREAS</b>		NO SCREEN Area of Minimal Flood Hazard <i>Zone X</i>
		Effective LOMRs
<b>GENERAL STRUCTURES</b>		Area of Undetermined Flood Hazard <i>Zone D</i>
		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
<b>OTHER FEATURES</b>		20.2 Cross Sections with 1% Annual Chance
		17.5 Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
<b>MAP PANELS</b>		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
		Digital Data Available
		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 **2/3/2022 at 9:06 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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

# Attainment Status for the National Ambient Air Quality Standards

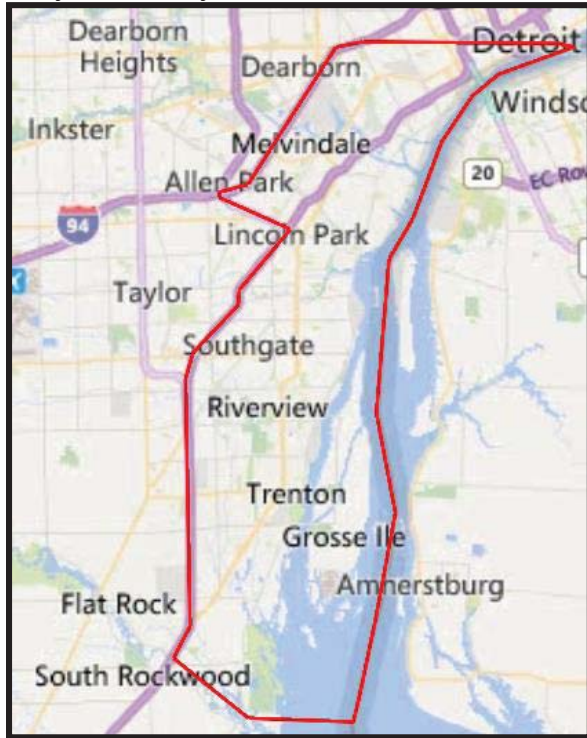


<b>LEGEND</b>		See Page 2 for close-up maps of partial county nonattainment areas	
	Sulfur Dioxide Nonattainment Area		

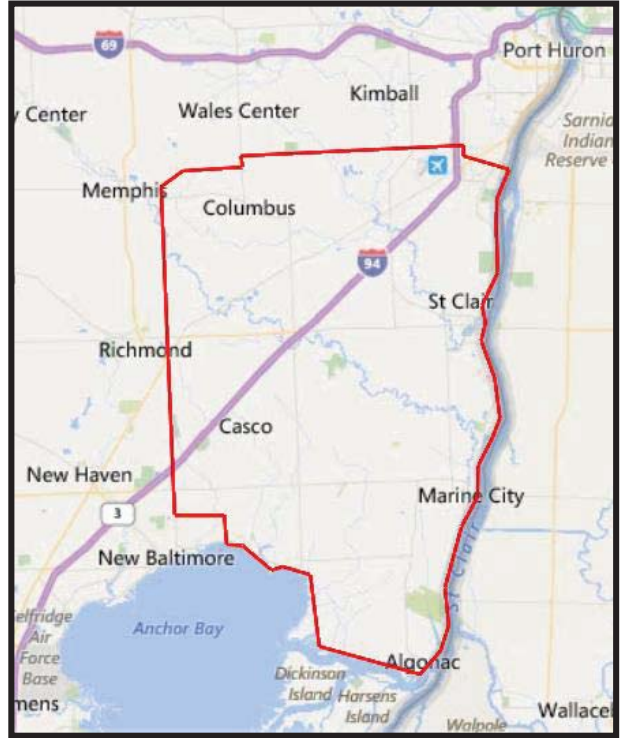
# Close-Up Maps of Partial County Nonattainment Areas

## 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

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*.





# AEI Consultants

Environmental & Engineering Services

June 17, 2014

## PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

**Property Identification:**

Alpha Manor Nursing and Rehabilitation  
440 East Grand Boulevard  
Detroit, Wayne County, MI 48207

AEI Project No. 330676  
Client Reference No. 330676

**Prepared for:**

Omega Healthcare Investors, Inc.  
200 International Circle, Suite 3500  
Hunt Valley, MD 21030

**Prepared by:**

AEI Consultants  
20 Gibson Place  
Freehold, NJ 07728  
732-414-2720

Environmental &  
Engineering Due  
Diligence

Site Investigation &  
Remediation

Energy Performance  
& Benchmarking

Industrial Hygiene

Construction  
Consulting

Construction,  
Site Stabilization &  
Stormwater Services

Zoning Analysis  
Reports & ALTA  
Surveys

National Presence

Regional Focus

Local Solutions



# AEI

## Consultants

Environmental & Engineering Services

June 17, 2014

Vikus Gupta  
Omega Healthcare Investors, Inc.  
200 International Circle, Suite 3500  
Hunt Valley, MD 21030

RE: Environmental Site Assessment  
Alpha Manor Nursing and Rehabilitation  
440 East Grand Boulevard  
Detroit, MI 48207  
Project No. 330676

AEI Consultants, Inc. (AEI) is pleased to provide the results of our environmental site assessment of the above-referenced Property. This assessment was authorized and performed in accordance with the scope of services outlined in AEI's Proposal and ASTM E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

We appreciate the opportunity to provide this service. If you have any questions concerning this report, or if we can assist you in any other matter, please contact Gene Belli at 732.414.2720.

Sincerely,

**AEI Consultants, Inc.**

Eugene Belli, REPA, CHMM  
Senior Vice President



## EXECUTIVE SUMMARY

AEI Consultants (AEI) was retained by Omega Healthcare Investors, Inc. to conduct a Phase I Environmental Site Assessment (ESA), in conformance with the scope and limitations of ASTM Standard Practice E1527-13 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) for the Alpha Manor Nursing Home located at 440 East Grand Boulevard, Detroit, Michigan (the "Property"). Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report.

## PROPERTY DESCRIPTION

The subject Property is located on the northeast corner of East Grand Boulevard and Kercheval Avenue in a mixed commercial and residential area of Detroit. The Property totals approximately 0.4 acres and is improved with a two-story building with full basement totaling approximately 22,956 square feet per the pre-inspection questionnaire. The building is currently occupied by Alpha Manor Nursing Home. On-site operations include general assisted living and food preparation activities. Each of the floors are equipped with six communal bathrooms and two showers. At the time of the site reconnaissance, 73 of the 80 beds were occupied. The basement includes the boiler room, break room, storage, kitchen, elevator equipment and laundry facilities. In addition to the subject Property building, the Property is improved with asphalt-paved parking areas, diesel generator and associated landscaping.

The Property was developed with the current improvements in 1963. Based on a review of historical sources, the Property was formerly unimproved land according to review of the 1897 Sanborn map. In the 1910 Sanborn map, the subject property is depicted with two dwellings and a storage shed.

AEI reviewed regulatory databases and files from federal, state and local environmental regulatory agencies to identify use, generation, storage, treatment or disposal of hazardous materials or release incidents of such materials that may impact the site. The records reviewed included, but were not limited to, the following: Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS); National Priorities List (NPL); Resource Conservation Recovery Information System (RCRIS); Treatment, Storage and Disposal Facilities (TSD); Large and Small Quantity Generators; Emergency Response Incidence Logs; state-registered underground storage tanks (UST); state leaking underground storage tank (LUST) incident reports; state solid waste facilities/landfill sites (SWF/LS); state hazardous waste sites (SHWS); and other local records.

The subject Property was not identified in the regulatory database.

The adjacent properties were not listed in the regulatory database search.

Based upon topographic map interpretation, the direction of groundwater flow beneath the subject property is inferred to be to the south, and present at a depth of 10 to 30 feet below ground surface (bgs).

## CONCLUSIONS

AEI has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard Practice E 1527-13 of 440 East Grand Boulevard, Detroit, Michigan, the Property. Any exceptions to or deletions from this practice are described in Section 1.5 of this report. This assessment has revealed no evidence of Recognized Environmental Conditions in connection with the Property.

AEI's assessment included additional services to evaluate asbestos-containing materials, radon, lead-based paint, lead in drinking water, wetlands and mold. This assessment has revealed no evidence of related conditions of concern in connection with the Property, except for the following:

- Asbestos - Based on the age of the building, asbestos may be present in the building materials. Building materials were in good condition and can be effectively managed as part of an asbestos Operations and Maintenance (O&M) Program until such time as renovation or demolition activities necessitate their removal. An O&M Plan was not in place at the Property.
- Lead-based Paint (LBP) - Based on the age of the building, painted surfaces may contain lead. Painted surfaces were in good condition and can be effectively managed as part of a LBP O&M Program until such time as renovation or demolition activities necessitate their removal. An O&M Plan was not in place at the property.

## RECOMMENDATIONS

As a result of this assessment, AEI recommends the following:

- **Asbestos** - Given the good condition of the identified and suspect ACM, these materials can be effectively managed as part of an asbestos O&M Program until such time as renovation or demolition activities necessitate their removal. The objective of an O&M Program is to implement a practical management approach to controlling identified ACM within the subject property. The O&M Program is designed to cleanup existing contamination, minimize future fiber release by controlling disturbance of ACM, and monitor the condition of the ACM until it is removed.
- **Lead-Based Paint** - AEI recommends implementing a lead-based paint O&M plan. The property falls under the definition of Target Housing, and is regulated under Title X. Regardless of the findings of this limited screening, the seller or renter of the property is required to make available a federally approved lead hazard information pamphlet and must disclose known lead-based paint and/or lead-based paint hazards to purchasers and renters of the property pursuant to the requirements of 24 CFR 35.92 and 40 CFR 745.113. If a definitive investigation is desired, a quantitative lead-based paint inspection in conformance with Title X Guidelines will yield a comprehensive analysis of conditions.

Report Section		No Further Action	REC	CREC	HREC	Issue/Further Investigation	Comments/Costs
4.1	Standard Environmental Record Sources	X					
6.1	Historical Summary	X					
8.1	Subject Property Reconnaissance Findings	X					
	Hazardous Substances and/or Petroleum Products in Connection with Property Use	X					
	Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs / USTs)	X					
	Unidentified Substance Containers	X					
	Electrical or Mechanical Equipment Likely to Contain Fluids	X					
	Stained Soil or Pavement	X					
8.2	Adjacent Property Reconnaissance Findings	X					
9.1	Asbestos-Containing Materials	X					Asbestos O&M Program (\$400)
9.2	Lead-Based Paint	X					LBP O&M Program (\$400)
9.3	Radon	X					
9.4	Microbial Contamination (Mold)	X					

## Table of Contents

1.0 Introduction.....	1
1.1 Purpose.....	1
1.2 Scope of Work.....	1
1.3 Significant Assumptions.....	1
1.4 Limitations.....	1
1.5 Limiting Conditions/Deviations.....	2
1.6 Data Gaps and Data Failure.....	2
1.7 Reliance.....	3
2.0 Site and Vicinity Description.....	4
2.1 Site Location and Description.....	4
2.2 Site and Vicinity Characteristics.....	4
2.3 Description of Structures and Other Improvements.....	4
3.0 User Provided Information.....	5
3.1 User Responsibilities.....	5
3.1.1 Environmental Liens.....	5
3.1.2 Activity and Land Use Limitations.....	5
3.1.3 Specialized Knowledge.....	5
3.1.4 Valuation Reduction for Environmental Issues.....	5
3.1.5 Commonly Known or Reasonably Ascertainable Information.....	5
3.1.6 Knowledge of Presence or Likely Presence of Contamination.....	5
3.1.7 Reason For Performing Phase I.....	5
3.2 Additional Owner, Property Manager, and Occupant Information.....	5
4.0 Records Review.....	7
4.1 Standard Environmental Record Sources.....	7
4.1.1 Federal Databases.....	7
4.1.2 State Databases.....	9
4.2 Additional Environmental Record Sources.....	10
4.2.1 Federal ASTM Supplemental.....	10
4.2.2 State or Local ASTM Supplemental.....	10
4.2.3 EDR Proprietary Historical Databases.....	11
4.2.4 Brownfield Databases.....	11
4.2.5 State Environmental Superliens and Property Transfer Laws.....	11
4.3 Vapor Encroachment.....	11
4.4 Physical Setting Source(s).....	11
4.4.1 Topography.....	11
4.4.2 Surface Water Bodies.....	11
4.4.3 Soils/Geology.....	11
4.4.4 Hydrology.....	11
4.4.5 Wetlands.....	12
4.4.6 Flood Zone Information.....	12
5.0 Regulatory Agencies Records Review.....	13
5.1 Health Department.....	13
5.2 Fire Department.....	13
5.3 Building Department.....	13
5.4 Planning Department.....	13
5.5 Department of Oil and Gas.....	13
5.6 Other Agencies Searched.....	14

## Table of Contents

6.0	Historical Review of Site and Vicinity.....	15
6.1	Historical Summary.....	15
6.2	Aerial Photograph Review.....	15
6.3	Sanborn Fire Insurance Maps.....	15
6.4	City Directories.....	16
6.5	Historical Topographic Maps.....	16
6.6	Title Records.....	16
6.7	Data Failure.....	16
7.0	Interviews.....	17
7.1	Interviews.....	17
7.2	Interview with Owner.....	17
7.3	Interview with Key Site Manager.....	17
7.4	Past Owners, Operators and Occupants.....	17
7.5	Interview with Others.....	17
8.0	Site Inspection and Reconnaissance.....	18
8.1	Subject Property Reconnaissance Findings.....	18
	Hazardous Substances and/or Petroleum Products in Connection with Property Use.....	18
	Electrical or Mechanical Equipment Likely to Contain Fluids.....	18
	Interior Stains or Corrosion.....	19
	Drains and Sumps.....	19
8.2	Adjacent Property Reconnaissance Findings.....	19
9.0	Other Environmental Considerations.....	20
9.1	Asbestos-Containing Materials.....	20
9.2	Lead-Based Paint.....	21
9.3	Radon.....	21
9.4	Microbial Contamination (Mold).....	21
9.5	Lead in Drinking Water.....	22
10.0	Conclusions and Recommendations.....	23
10.1	Findings and Opinions.....	23
10.1.1	On-Site Recognized Environmental Conditions.....	23
10.1.2	Off-Site Recognized Environmental Conditions.....	23
10.1.3	Controlled Recognized Environmental Conditions.....	23
10.1.4	Historic Recognized Environmental Conditions.....	23
10.1.5	De Minimis Environmental Conditions.....	23
10.1.6	Other Environmental Considerations (Non-ASTM Scope Considerations).....	23
10.2	Conclusions.....	24
10.3	Recommendations.....	24
11.0	References.....	25
12.0	Signatures of Environmental Professionals.....	26
13.0	Qualifications.....	27
13.1	Definition of an Environmental Professional.....	27
13.2	Relevant Experience.....	27
Figures		
	Site Location Map.....	29
	Site Plan.....	30
Appendices		
	Appendix A Site Photographs.....	31

## Table of Contents

---

Appendix B Historical Research Documentation.....	36
Appendix C Regulatory Records Documentation.....	117
Appendix D Interview Records.....	193
Appendix E Client-Provided Documentation.....	195
Appendix F Other Supporting Documentation.....	367
Appendix G Qualifications of Environmental Professionals.....	385

## **1.0 INTRODUCTION**

AEI Consultants (AEI) was retained by Omega Healthcare Investors, Inc. to perform a Phase I Environmental Site Assessment (ESA) of the Alpha Manor Nursing Home located at 440 East Grand Boulevard in Detroit, Michigan (the "Property"). This ESA was performed in accordance with AEI's Proposal authorized by Omega Healthcare Investors, Inc. on May 27, 2014.

### **1.1 PURPOSE**

The purpose of the ESA was to conduct all appropriate inquiry (AAI) into the previous ownership and uses of the Property consistent with good commercial or customary practice as defined at 42 U.S.C. Section 9601(35)(B). As such, this assessment is intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on Comprehensive Environmental Response, Compensation, and Liability Act liability.

### **1.2 SCOPE OF WORK**

This ESA was performed in accordance with ASTM E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process". The scope of work for this ESA included: 1) a review of federal, state, tribal and local databases that identify and describe underground fuel tank sites, leaking underground fuel tank sites, hazardous waste generation sites, and hazardous waste storage and disposal facility sites within the ASTM approximate minimum search distance; 2) a Property and surrounding site reconnaissance, and interviews with the past and present owners and current occupants and operators to identify potential environmental contamination; and 3) a review of historical sources to help ascertain previous land use at the site and in the surrounding area.

The goal of AEI Consultants in conducting the environmental site assessment was to identify the presence or likely presence of any hazardous substances or petroleum products on the Property that may indicate an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum product into the soil, groundwater, or surface water of the Property.

### **1.3 SIGNIFICANT ASSUMPTIONS**

The following assumptions are made by AEI in this report. AEI relied on information derived from secondary sources including governmental agencies, the client, designated representatives of the client, Property contact, Property owner, Property owner representatives, computer databases, and personal interviews. AEI has reviewed and evaluated the thoroughness and reliability of the information derived from secondary sources including government agencies, the client, designated representatives of the client, Property contact, Property owner, Property owner representatives, computer databases, or personal interviews. It appears that all information obtained from outside sources and reviewed for this investigation is thorough and reliable. However, AEI cannot guarantee the thoroughness or reliability of this information.

Groundwater flow and depth to groundwater, unless otherwise specified by on-site well data, or well data from adjacent sites are assumed based on contours depicted on the United States Geological Survey topographic maps. AEI assumes the Property has been correctly and accurately identified by the client, designated representative of the client, Property contact, Property owner, and Property owner's representatives.

### **1.4 LIMITATIONS**

Property conditions, as well as local, state, tribal and federal regulations can change significantly over time. Therefore, the recommendations and conclusions presented as a result of this study apply strictly to the environmental regulations and Property conditions existing at the time the study was performed. Available information has been analyzed using currently accepted assessment techniques and it is believed that the inferences made are reasonably representative of the Property. AEI Consultants makes no warranty, expressed or implied, except that the services have been performed in accordance with generally accepted environmental property assessment practices applicable at the time and location of the study.

Considerations identified by ASTM as beyond the scope of a Phase I ESA that may affect business environmental risk at a given property include the following: asbestos-containing materials, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, mold, vapor intrusion, and high voltage lines. These environmental issues or conditions may warrant assessment based on the type of the property transaction; however, they are considered non-scope issues under ASTM Standard Practice E1527-13.

If requested by the client, these non-scope issues are discussed in Section 9.0. Otherwise, the purpose of this investigation is solely to satisfy one of the requirements for qualification of the innocent landowner defense, contiguous property owner or bona fide prospective purchaser under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). ASTM Standard Practice E1527-13 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) constitute the "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined in:

- 42 U.S.C § 9601(35)(B), referenced in the ASTM Standard Practice E1527-13.
- Sections 101(35)(B) (ii) and (iii) of CERCLA and referenced in the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312).
- 42 U.S.C. 9601(40) and 42 U.S.C. 9607(q).

The Phase I Environmental Site Assessment is not, and should not be construed as, a warranty or guarantee about the presence or absence of environmental contaminants that may affect the Property. Neither is the assessment intended to assure clear title to the Property in question. The sole purpose of investigation into Property title records is to ascertain a historical basis of prior land use. All findings, conclusions, and recommendations stated in this report are based upon facts, circumstances, and industry-accepted procedures for such services as they existed at the time this report was prepared (i.e., federal, state, and local laws, rules, regulations, market conditions, economic conditions, political climate, and other applicable matters). All findings, conclusions, and recommendations stated in this report are based on the data and information provided, and observations and conditions that existed on the date and time of the Property visit.

Responses received from local, state, or federal agencies or other secondary sources of information after the issuance of this report may change certain facts, findings, conclusions, or circumstances to the report. A change in any fact, circumstance, or industry-accepted procedure upon which this report was based may adversely affect the findings, conclusions, and recommendations expressed in this report.

### **1.5 LIMITING CONDITIONS/DEVIATIONS**

The performance of this Phase I Environmental Site Assessment was limited by the following condition(s):

- Due to the timeframe of this investigation, records at the Detroit Buildings, Safety Engineering & Environmental Department (DBSEED) were not available for review. If this review reveals any items of concern for the subject property, this report will be updated and re-issued. Based on the quality of information obtained from other sources and known property uses, the DBSEED review is not expected to indicate additional environmental concerns.

No deviations from the recommended scope of ASTM Standard E 1527-13 were performed as part of this ESA with the exception of any additional services noted in Section 1.4.

### **1.6 DATA GAPS AND DATA FAILURE**

According to ASTM E1527-13, data gaps occur when the Environmental Professional is unable to obtain information required, despite good faith efforts to gather such information.

Data failure is one type of data gap. According to ASTM E1527-13 "data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met". Pursuant to ASTM Standards, historical sources are required to document property use back to the property's first developed use or back to 1940, whichever is earlier.

No data gaps were identified during the course of this ESA.

### **1.7 RELIANCE**

All reports, both verbal and written, are for the benefit of Omega Healthcare Investors, Inc. This report has no other purpose and may not be relied upon by any other person or entity without the written consent of AEI. Either verbally or in writing, third parties may come into possession of this report or all or part of the information generated as a result of this work. In the absence of a written agreement with AEI granting such rights, no third parties shall have rights of recourse or recovery whatsoever under any course of action against AEI, its officers, employees, vendors, successors or assigns. Reliance is provided in accordance with AEI's Proposal and Terms and Conditions executed by Omega Healthcare Investors, Inc. on May 27, 2014. The limitation of liability defined in the Terms and Conditions is the aggregate limit of AEI's liability to the client and all relying parties.



## 2.0 SITE AND VICINITY DESCRIPTION

### 2.1 SITE LOCATION AND DESCRIPTION

The subject Property is located on the northeast corner of East Grand Boulevard and Kercheval Avenue in a mixed commercial and residential area of Detroit. The Property totals approximately 0.4 acres and is improved with a two-story building with full basement totaling approximately 22,956 square feet per the pre-inspection questionnaire. The building is currently occupied by Alpha Manor Nursing Home. On-site operations include general assisted living and food preparation activities. Each of the floors are equipped with six communal bathrooms and two showers. At the time of the site reconnaissance, 73 of the 80 beds were occupied. The basement included the boiler room, break room, storage, kitchen, elevator equipment and laundry facilities. In addition to the subject Property building, the Property is improved with asphalt-paved parking areas, diesel generator and associated landscaping.

The Property can be accessed from the alley on the east side of the Property.

The building is currently occupied by the residences of the Alpha Manor Nursing Home.

Information obtained from the Wayne County Mapping Department indicated that the tax assessment parcel number for the Property is 15007567.

### 2.2 SITE AND VICINITY CHARACTERISTICS

The subject property is located in a mixed commercial and residential area of Detroit, Michigan. The immediately surrounding properties consist of the following:

Direction From Site	Occupant	Use	Comments
North	Boulevard Manor Nursing & Rehabilitation	Multi-Family	464 East Grand Boulevard
South	Payless Market & Liquor	Commercial	Kercheval Avenue followed by 428 East Grand Boulevard
East	Vacant Structure	Multi-Family	Alley followed by structure
West	Two single-family residential structures	Residential	East Grand Boulevard followed by dwellings

### 2.3 DESCRIPTION OF STRUCTURES AND OTHER IMPROVEMENTS

The Property totals approximately 0.4 acres and is improved with a two-story building with full basement totaling approximately 22,956 square feet per the pre-inspection questionnaire. The building is currently occupied by Alpha Manor Nursing Home. Each of the floors are equipped with six communal bathrooms and two showers. The basement included the boiler room, break room, storage, kitchen, elevator equipment and laundry facilities. The building is heated by a natural gas fired boiler. In addition to the subject Property building, the Property is improved with asphalt-paved parking areas, diesel generator and associated landscaping.

The flooring and paint on the 1st and 2nd floors were replaced circa 2011.

The City of Detroit supplies drinking water to the Property from the municipal distribution system. Sanitary discharges on the Property are discharged into the municipal sanitary sewer system. The Property area is serviced by the City of Detroit. The Property has been connected to the municipal sewer system from the time the site was developed.

Electricity and natural gas is provided to the Property by DTE Energy Company.

## **3.0 USER PROVIDED INFORMATION**

---

### **3.1 USER RESPONSIBILITIES**

According to ASTM E1527-13 and EPA's AAI Rule, the following items should be researched by the prospective landowner or grantee, and the results of such inquiries may be provided to the environmental professional. The responsibility for qualifying for Landowner Liability Protections (LLPs) by conducting the following inquiries ultimately rests with the User, and providing the following information to the environmental professional would be prudent if such information is available.

#### **3.1.1 Environmental Liens**

AEI was not informed by the User, Omega Healthcare Investors, Inc., of any environmental cleanup liens encumbering the subject property that are filed or recorded under federal, tribal, state or local law.

#### **3.1.2 Activity and Land Use Limitations**

AEI was not informed by the User of any AULs, such as engineering controls, land use restrictions or institutional controls that are in place at the subject property and/or have been filed or recorded in a registry under federal, tribal, state or local law.

#### **3.1.3 Specialized Knowledge**

AEI was not informed by the User of any specialized knowledge or experience related to the subject property or nearby properties.

#### **3.1.4 Valuation Reduction for Environmental Issues**

The User did not indicate to AEI any information to suggest that the valuation of the subject property is significantly less than the valuation for comparable properties due to environmental factors.

#### **3.1.5 Commonly Known or Reasonably Ascertainable Information**

The User did not inform AEI of any commonly known or reasonably ascertainable information about the subject property which aided AEI in identifying conditions indicative of a release or threatened release.

#### **3.1.6 Knowledge of Presence or Likely Presence of Contamination**

The User did not inform AEI of any obvious indicators that pointed to the presence or likely presence of contamination at the subject property.

#### **3.1.7 Reason For Performing Phase I**

We understand that the purpose of this assessment is to complete an evaluation that will help to provide the factual support of the innocent landowner defense to CERCLA liability and to understand potential environmental conditions that could materially impact the operation of the business associated with the Property (business environmental risk).

### **3.2 ADDITIONAL OWNER, PROPERTY MANAGER, AND OCCUPANT INFORMATION**

Documentation was provided to AEI by the client during this investigation. A summary of this information follows:

#### **Phase I Environmental Site Assessment - 440 East Grand Boulevard, Detroit, Michigan, LM Architectural and Engineering Consultants (April 27, 2010):**

LM prepared a Phase I ESA for the subject property in April 2010 in conformance with the scope and limitations of ASTM Standard Practice E1527-05. The subject property at the time of the April 2010 report was developed to the same extent as AEI's June 10, 2014 site reconnaissance. LM's historical review indicated the site was residential from 1910 to the current improvements in 1963. LM states in their Conclusions and Recommendations section, "Due to the age of the building, asbestos-containing materials are suspected in the building. Prior to any renovation or demolition activities, an asbestos

survey should be completed as required by US EPA NESHAPS regulations. In addition, an Asbestos O&M Plan should be developed for the subject property." LM's assessment revealed no recognized environmental conditions.

Copies can be found in Appendix D.

## 4.0 RECORDS REVIEW

### 4.1 STANDARD ENVIRONMENTAL RECORD SOURCES

The following information was obtained through a search of electronically compiled federal, state, county, and city databases provided by Environmental Data Resources, Inc. (EDR). The database search includes regulatory agency lists of known or potential hazardous waste sites, landfills, hazardous waste generators, and disposal facilities in addition to sites under investigation. The information provided in this report was obtained from publicly available sources. The locations of the sites listed in this report are plotted with a geographic information system utilizing geocoding of site addresses. The accuracy of these locations is generally +/- 300 feet. AEI's field representative has attempted to confirm the locations of listings on or adjacent to the subject property. Refer to the radius map (Appendix C: Regulatory Database Review Report) for the locations of the sites in relation to the subject property.

Migration of petroleum hydrocarbon or volatile organic compound (VOC) contamination is generally via groundwater. Therefore, only those contaminant release sites located hydrologically upgradient relative to the subject property are expected to represent a potential environmental concern to the subject property. Contaminated sites located hydrologically downgradient of the subject property are not expected to represent a potential threat to the groundwater quality beneath the subject property. Sites that are situated hydrologically cross-gradient relative to the subject property are not expected to represent a concern unless close proximity allows for the potential of lateral migration. Groundwater in the vicinity of the subject property is inferred to flow to the south.

#### Map Findings Summary

Database	Target Property	Adjacent Property	Search Distance (Miles)	0.125	0.25	0.5	1-mile	Total
NPL			1	0	0	0	0	0
DELISTED NPL			1	0	0	0	0	0
CERCLIS			0.5	0	0	2	NR	2
CERCLIS-NFRAP			0.5	0	0	0	NR	0
CORRACTS			1	0	0	0	0	0
RCRA-TSDF			0.5	0	0	0	NR	0
RCRA-LQG			0.25	0	0	NR	NR	0
RCRA-SQG			0.25	0	0	NR	NR	0
US ENG CONTROLS			0.5	0	0	0	NR	0
US INST CONTROL			0.5	0	0	0	NR	0
ERNS			TP	NR	NR	NR	NR	0
US BROWNFIELDS			0.5	0	0	0	NR	0
SHWS			1	0	0	1	2	3
SWF/LF			0.5	0	0	0	NR	0
LUST			0.5	1	0	5	NR	6
UST			0.25	1	0	NR	NR	1
AST			0.25	0	0	NR	NR	0
BROWNFIELDS			0.5	0	0	2	NR	2
BROWNFIELDS 2			0.5	0	0	0	NR	0
INDIAN LUST			0.5	0	0	0	NR	0
INDIAN UST			0.25	0	0	NR	NR	0
INDIAN VCP			0.5	0	0	0	NR	0
INDIAN ODI			0.5	0	0	0	NR	0
INDIAN RESERV			1	0	0	0	0	0

#### 4.1.1 Federal Databases

##### 4.1.1.1 Federal NPL

The NPL is the U.S. EPA's list of uncontrolled or abandoned hazardous waste sites that have been identified for priority remedial actions under the Comprehensive Environmental Response, Compensation and Liability Act (Superfund). EDR reviewed the NPL for sites within one mile of the site. A review of the EDR database search did not show the Project as an NPL listed facility.

As indicated in the summary table, the subject Property was not identified as an NPL site and no NPL sites were identified within a one-mile radius of the Property.

#### **4.1.1.2 Federal Delisted NPL**

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate. EDR reviewed the Delisted NPL for sites within a one-mile of the site.

A review of the EDR database search did not show the Property as a Delisted NPL facility and no properties were listed within a one-mile radius of the Property.

#### **4.1.1.3 Federal CERCLIS List**

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). CERCLIS contains sites that are either proposed to be or are on the NPL and sites which are in the screening and assessment phase for possible inclusion on the NPL.

A review of the EDR database search did not show the Property as a CERCLIS-listed facility but two CERCLIS-listed facilities were identified within one-half mile of the Property. The two sites are located at a distance over 1/4th of a mile to the south of the Property. Based on the closed regulatory status, distance from the Property and hydrological gradient, these sites are not expected to represent a significant environmental concern.

#### **4.1.1.4 Federal CERCLIS NFRAP Sites List**

The CERCLIS No Further Remedial Action Planned (NFRAP) List is a compilation of sites that the EPA has investigated, and has determined that the facility does not pose a threat to human health or the environment, under the CERCLA framework.

The Property was not listed as a CERCLIS-NFRAP facility and no CERCLIS-NFRAP sites are listed within a half mile radius of the Property.

#### **4.1.1.5 Federal Resource Conservation and Recovery Act (RCRA) CORRACTS Facilities List**

The EPA Resource Conservation and Recovery Act (RCRA) Program identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA Treatment, Storage and Disposal (TSD) database is a compilation by the EPA of reporting facilities that treat, store or dispose of hazardous waste. The CORRACTS database is the EPA's list of treatment storage or disposal facilities subject to corrective action under RCRA.

The Property is not listed as a RCRA CORRACTS TSD facility and no RCRA CORRACTS TSD facilities are listed within one mile of the Property.

#### **4.1.1.6 Federal Resource Conservation and Recovery Act (RCRA) Non-CORRACTS TSD Facilities List**

The RCRA TSD database is a compilation by the EPA of reporting facilities that treat, store or dispose of hazardous waste.

The Property is not listed as an RCRA-TSD facility and no RCRA TSD sites are listed within a half mile of the Property.

#### **4.1.1.7 Federal RCRA Generator List**

The RCRA program identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA Generators database is a compilation by the EPA of reporting facilities that generate hazardous waste.

The Property is not listed as an RCRA Generator and no RCRA Generator sites are listed on the adjoining Properties.

#### **4.1.1.8 Federal Institutional Control/Engineering Control Registries**

The EPA maintains a listing of sites with institutional controls currently in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

The Property is not listed as a US IC/EC Controlled property.

#### **4.1.1.9 Federal Emergency Response Notification System (ERNS)**

The Emergency Response Notification System (ERNS) records information on reported releases of oil and hazardous substances. The database contains preliminary information on specific releases, including the spill location, substance released and the responsible party. The ERNS database was searched by EDR and reviewed by AEI to identify reported incidents that may have occurred at the Property.

The Property is not listed on the ERNS database.

#### **4.1.2 State Databases**

##### **4.1.2.1 State Priority List (SPL)**

The MDEQ maintains a State Priority List (SPL) of sites considered to be actually or potentially contaminated and presenting a possible threat to human health and the environment.

A review of the EDR database search did not show the Property as an SPL listed facility. Three SPL sites were noted within one-mile radius but based on the closed regulatory status, distance from the Property and hydrological gradient, are not expected to represent a significant environmental.

##### **4.1.2.2 State Priority CERCLIS-Equivalent List**

The State Hazardous Waste Sites (SHWS) records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Site identified on the SHWS include both priority sites planned for clean up using state funds (state equivalent of Superfund) and sites where clean up will be paid for by potentially responsible parties.

The Property is not listed as a SHWS facility. Three SHWS sites were noted within one-mile radius but based on the closed regulatory status, distance from the Property and hydrological gradient, are not expected to represent a significant environmental.

##### **4.1.2.3 Solid Waste Landfill Facilities (SWLF)**

SWLF records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites. The SWLF database was searched by EDR and reviewed by AEI for evidence of landfills and solid waste treatment facilities within a one-half mile radius of the site.

No SWLF facilities were identified within the search radius.

##### **4.1.2.4 State Registered Underground Storage Tank List (UST)**

The MDEQ compiles a list of registered UST locations.

The Property is not listed as an UST facility. No additional adjoining properties were identified as UST facilities.

##### **4.1.2.5 State Leaking Underground Storage Tank List (LUST)**

The MDEQ compiles lists of all reported leaks of hazardous substances from underground storage tanks (USTs).

The Property is not listed as a LUST facility. Six LUST facilities were identified within one-half mile of the Property.

- The JM & H Mini Mart located 569 feet to the east (crossgradient) of the Property at 7353 Kercheval Street was identified three times as a LUST site. Release C-0333-06 regarding diesel,

gasoline and kerosene is currently open. However, based on the hydrological gradient, this site is not expected to represent a significant environmental concern.  
The remaining sites are not expected to represent a significant environmental concern.

#### **4.1.2.6 State Institutional Controls**

The MDEQ compiles lists of No Further Action (NFA) Sites with Land Use Restrictions and Monitoring, A land use restricted site is a property where there are limits or requirements on future use of the property due to varying levels of cleanup possible, practical, or necessary at the site.

The Property is not listed as having Land Use Restrictions or Institutional Controls.

#### **4.1.2.7 State Voluntary Cleanup Sites**

The MDEQ compiles a listing of sites that are being voluntarily cleaned up by the Responsible Party(s) under supervision of State officials. The VCP database was searched by EDR and reviewed by AEI for evidence of properties in this program within a one-half mile radius of the site.  
No VCP properties were identified within the search radius.

#### **4.1.2.8 State Brownfield Sites**

The MDEQ compiles an inventory of Brownfields Projects. A Brownfield site is an abandoned, idled, or underused property where the threat of environmental contamination has hindered its redevelopment. All of the sites in the inventory are working toward a Brownfield agreement for cleanup and liability control. The state's Brownfield's database was searched by EDR and reviewed by AEI for evidence of properties in this program within a one-half mile radius of the site.  
Two Brownfield properties were identified within the search radius. However, based on the distance from the Property, they are not expected to represent a significant environmental concern.

### **4.2 ADDITIONAL ENVIRONMENTAL RECORD SOURCES**

#### **4.2.1 Federal ASTM Supplemental**

- Superfund (CERCLA) Consent Decrees (CONSENT)
- Records of Decision (ROD)
- National Priority List Deletions (Delisted NPL)
- Facility Index System/Facility Identification Initiative Program Summary Report (FINDS)
- Hazardous Materials Information Reporting System (HMIRS)
- Material Licensing Tracking System (MLTS)
- Mines Master Index File (MINES)
- Federal Superfund Liens (NPL Liens)
- PCB Activity Database System (PADS)
- Department of Defense Sites (DOD)
- Indian Reservations (INDIAN RESERV)
- Open Dump Inventory (ODI)
- Uranium Mill Tailings Sites (UMTRA)
- Formerly Used Defense Sites (FUDS)
- RCRA Administrative Action Tracking System (RAATS)
- Toxic Chemical Release Inventory System (TRIS)
- Toxic Substances Control Act (TSCA)
- Section 7 Tracking Systems (SSTS)
- FIFRA/TSCA Tracking System (FTTS INSP)

No issues of concern were identified during the review of the additional environmental record sources.

#### **4.2.2 State or Local ASTM Supplemental**

- Spills Incidents
- Registered Bulk Fertilizer and Pesticide Storage Facilities (BULK)
- Drycleaner Facility Listing (DRYCLEANERS)

No issues of concern were identified during the review of the additional environmental record sources.

#### **4.2.3 EDR Proprietary Historical Databases**

- Former Manufactured Gas (Coal Gas) Sites (Coal Gas)
- Historical Auto Stations
- Historical Dry Cleaners

No issues of concern were identified during the review of the additional environmental record sources.

#### **4.2.4 Brownfield Databases**

- Listing of Brownfields Sites (US Brownfields)
- Brownfields Site List (Brownfields)
- Sites with Restrictions (AUL)
- Voluntary Remediation Program Site List (VCP)

No issues of concern were identified during the review of the additional environmental record sources.

#### **4.2.5 State Environmental Superliens and Property Transfer Laws**

Michigan adopted the Uniform Federal Lien Registration Act MCLA 600.4035. Environmental Liens are filed with the Register of Deeds in the county where the property resides.

Michigan has a first priority Super Lien Statute for clean up of hazardous waste. Mich. Comp. Laws §324.20138(2), 4 [Enacted in 1990, recodified in 1994, amended in 1995].

### **4.3 VAPOR ENCROACHMENT**

While not intended to meet the requirements of a Tier I Vapor Encroachment Screen as specified in ASTM Standard E2600-10, AEI reviewed reasonably ascertainable information during this ESA for the subject and nearby properties to determine whether a potential vapor encroachment condition (VEC) exists at the subject property. During the course of this Phase I ESA, a reasonable probability was not identified to indicate that a VEC exists at the subject property.

### **4.4 PHYSICAL SETTING SOURCE(S)**

#### **4.4.1 Topography**

The Property lies between 605 and 615 feet in elevation above mean sea level. Land in the general vicinity is slightly sloped to the south. The Property did not appear to receive significant surface water runoff from adjoining properties.

#### **4.4.2 Surface Water Bodies**

The nearest surface water in the vicinity of the Property is the Detroit River located approximately 3/4 of a mile to the south of the Property. No settling ponds, lagoons, surface impoundments, wetlands or natural catch-basins were observed at the Property during this investigation.

#### **4.4.3 Soils/Geology**

Based on a review of the United States Department of Agriculture (USDA) Soil Survey for the area of the subject Property, the soils in the vicinity of the subject property are classified as Urban Land. The Urban Land designation indicates that more than 85 percent of the original soils have been disturbed or covered by paved surfaces, buildings or other structures. Because of the variability of the soil material, on-site investigation would be required to determine the specific soil composition at the subject Property.

#### **4.4.4 Hydrology**

Shallow groundwater flow generally follows the local topography, but may be affected by localized conditions. Based on the local topography of the area, shallow groundwater in the vicinity of the Property is expected to flow to the south.

The Geologic Atlas of Wayne County indicates that groundwater may be encountered at approximately 10 to 30 feet below the ground surface, and the groundwater flow direction in this aquifer is to the south.



#### **4.4.5 Wetlands**

According to the US Fish and Wildlife Service Geospatial Wetlands Information online map interface (<http://www.fws.gov/wetlands/data/Digital/index.html>), there are no jurisdictional wetlands on the Property.

#### **4.4.6 Flood Zone Information**

A review of the Flood Insurance Rate Maps, published by the Federal Emergency Management Agency, was performed. According to Panel Number 285 of 575, dated February 2, 2012, the Property is located in Flood Zone X. Flood Zone X regions consist of areas that are not within the 500-year flood zone. The distance to the nearest 100-year flood plain is approximately 3/4-mile to the south.

## **5.0 REGULATORY AGENCIES RECORDS REVIEW**

Local and state agencies, such as environmental health departments, fire prevention bureaus, and building and planning departments are contacted to identify any current or previous reports of hazardous materials use, storage, and/or unauthorized releases that may have impacted the subject property. In addition, information pertaining to Activity and Use Limitations (AULs), defined as legal or physical restrictions, or limitations on the use of, or access to, a site or facility, is requested. Specifically AULs are comprised of engineering controls (EC) and institutional controls (IC).

Engineering Controls are defined as physical modifications to a site or facility to reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or ground water on the property. Institutional Controls are defined as a legal or administrative restriction on the use of, or access to, a site or facility to 1) reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or ground water on the property, or 2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment.

### **5.1 HEALTH DEPARTMENT**

On May 29, 2014, the Wayne County Health Department (WCHD) was contacted to review files on the subject property and nearby sites of concern. Files at the WCHD may contain information regarding hazardous materials storage, as well as information regarding unauthorized releases of petroleum hydrocarbons or other contaminants that may affect the soil or groundwater in the area.

No information indicating current or prior use or storage of hazardous materials, or the existence of AULs was on file for the subject property with the WCHD.

### **5.2 FIRE DEPARTMENT**

On June 10, 2014, the Detroit Fire Department (DFD) was visited to review information on the subject property to identify any evidence of previous or current hazardous material usage.

No information indicating current or prior use or storage of hazardous materials, or the existence of AULs was on file for the subject property with the DFD.

### **5.3 BUILDING DEPARTMENT**

Due to the time frame of this investigation, records at the Detroit Buildings, Safety Engineering & Environmental Department (DBSEED) were not available for review. If this review reveals any items of concern for the subject property, this report will be updated and re-issued. Based on the quality of information obtained from other sources and known property uses, the DBSEED review is not expected to indicate additional environmental concerns.

### **5.4 PLANNING DEPARTMENT**

Due to the time frame of this investigation, records at the Detroit Buildings, Safety Engineering & Environmental Department (DBSEED) were not available for review. If this review reveals any items of concern for the subject property, this report will be updated and re-issued. Based on the quality of information obtained from other sources and known property uses, the DBSEED review is not expected to indicate additional environmental concerns.

### **5.5 DEPARTMENT OF OIL AND GAS**

Michigan Department of Environmental Quality (MDEQ) Oil and Gas database concerning the subject property and nearby properties were reviewed. MDEQ maps contain information regarding oil and gas development.

According to the MDEQ map, there are no oil or gas wells within 500 feet of the subject property. No environmental concerns were noted during the MDEQ map review.

## **5.6 OTHER AGENCIES SEARCHED**

On May 29, 2014, AEI contacted the Michigan Department of Environmental Quality (MDEQ) for information regarding hazardous materials storage, as well as information regarding unauthorized releases of petroleum hydrocarbons or other contaminants that may affect the soil or groundwater in the area.

No information indicating current or prior use or storage of hazardous materials, or the existence of AULs was on file for the subject property with the MDEQ.

## 6.0 HISTORICAL REVIEW OF SITE AND VICINITY

### 6.1 HISTORICAL SUMMARY

Reasonably ascertainable standard historical sources as outlined in ASTM Standard E1527-13 were used to determine previous uses and occupancies of the subject Property that are likely to have led to recognized environmental conditions in connection with the subject Property. A chronological summary of historical data found, including but not limited to aerial photographs, historic city directories and Sanborn fire insurance maps and building department records is as follows:

Date Range	Source(s)	Subject Property Description/Use
At least 1897 to approximately 1910	Sanborn maps	Unimproved land
Circa 1910 to 1962	Sanborn maps and city directories	Two, single-family structures and shed
1963 to the present time	Sanborn maps and city directories	Two-story nursing home structure with basement

According to historical sources, the current subject Property building was constructed in 1963 for use as a nursing home. Prior to the construction of the building, the property was residential in nature circa 1910 to 1962. No potential environmental concerns were identified in association with the current or historical use of the subject property. If available, copies of historical sources are provided in the report appendices.

### 6.2 AERIAL PHOTOGRAPH REVIEW

Available aerial photographs dated 1937, 1949, 1952, 1956, 1961, 1967, 1972, 1981, 1985, 1993, 1997, 1999, 2005, 2009, 2010 and 2012 from EDR were reviewed for this Environmental Site Assessment. Copies of selected photographs are included in Appendix B of this report. A summary of aerial photographs is provided below.

Date(s)	Scale	Subject Property Comments	Surrounding Area Comments
1937	500	Due to the poor resolution and dense urban location, the subject property and surrounding sites are not clearly visible.	
1949, 1952, 1956, 1961	500	The subject property appears developed with residential structures.	The surrounding sites appear residential in nature.
1967	500	The subject property appears developed as it does today.	The surrounding sites are developed as they are today with the exception of the north adjoining site, it remains residential.
1972	600	No significant changes were noted.	The surrounding sites appear as they do today.
1981 - 2012	500	No significant changes were noted.	No significant changes were noted.

No concerns were noted in the aerials observed that would be considered an REC.

### 6.3 SANBORN FIRE INSURANCE MAPS

AEI requested historical Sanborn Fire Insurance maps for the Property from Environmental Data Resources (EDR), and was subsequently informed that maps for the Property and immediate vicinity are maintained in EDR's collection. EDR provided AEI with copies of the Sanborn Fire Insurance maps.

A copy of the maps is included in Appendix B of this report.

Date(s)	Subject Property Comments	Surrounding Area Comments
1897	Unimproved Land	No structures depicted
1910	The subject property is depicted with a single-story, two-bedroom dwelling addressed 440 East Grand Boulevard, a single-story, three-bed dwelling addressed 267, 269 and 271 Kercheval Avenue and a storage shed.	The north, east and west surrounding sites are residential. The south adjacent site is unimproved land.
1915	No significant changes were noted.	The east adjacent residential structure was expanded to Kercheval Avenue.

Date(s)	Subject Property Comments	Surrounding Area Comments
1941	No significant changes were noted.	The south adjacent sites addressed 7212 Kercheval Avenue is developed with a greenhouse and storefront.
1951	No significant changes were noted.	The west adjacent sites are occupied by a clinic and undertaker.
1953	No significant changes were noted.	No significant changes were noted.
1957	No significant changes were noted.	No significant changes were noted.
1961	No significant changes were noted.	No significant changes were noted.
1977	The subject property building is depicted as a two-story rest home constructed in 1963.	The south adjacent site is now developed as is today with a commercial structure.
1989, 1991, 1996 and 2002	No significant changes were noted.	No significant changes were noted.

No concerns were noted in the Sanborn Fire Insurance Maps that would be considered an REC.

## 6.4 CITY DIRECTORIES

AEI reviewed city directories for the Property and adjoining properties by EDR that covered the years 1915 through 2013. The Property address was first listed in 1915 as VanderVelpen J B H - Arthur VanderVelpen. In the 1954 city directory, the subject property was identified as the Hart Rest Home. Alpha Manor Nursing Home was first identified in the 1968 city directory.

Year(s)	Occupant Listed
1915 - 1941	Aurthur VanderVelpen
1954	Hart Rest Home
1964	No Return
1968 - 2013	Alpha Manor Nursing Home

No concerns were noted in the historical city directories that would be considered an REC.

## 6.5 HISTORICAL TOPOGRAPHIC MAPS

Available topographic maps dated 1905, 1918, 1936, 1940, 1947, 1952, 1968, 1973, 1980 from EDR were reviewed for this Environmental Site Assessment. Copies of selected maps are included in Appendix B of this report.

No concerns were noted in the historical topographic map that would be considered an REC.

## 6.6 TITLE RECORDS

Review of a 50-year chain of title was not included in the scope of the assessment.

## 6.7 DATA FAILURE

Based on the definition presented in ASTM E1527-13, data failure occurs when all of the standard historical sources that are reasonably-ascertainable and likely to be useful have been reviewed and the historical use of the Property has not been documented back to the Property's first developed use, or 1940 whichever is earlier. When data failure occurs, ASTM E 1527-13 requires the Environmental Professional to document the data failure and assess the potential impact on the ability of the Environmental Professional to identify recognized environmental conditions.

AEI was able to document the historical use of the Property in accordance with the Standard and therefore no related data failure was identified.

## 7.0 INTERVIEWS

---

### 7.1 INTERVIEWS

Pursuant to ASTM E1527-13, the following interviews were performed during this investigation in order to obtain information indicating RECs in connection with the subject property.

### 7.2 INTERVIEW WITH OWNER

The subject property owner, H & A Investments LLC, was not aware of any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the subject property; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or any notices from a governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

### 7.3 INTERVIEW WITH KEY SITE MANAGER

The key site manager, Mr. Donsell Crawley, was not aware of any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the subject property; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or any notices from a governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

Question	Response
Any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the property.	No
Any pending, threatened or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the property.	No
Any notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.	No
Any incidents of flooding, leaks, or other water intrusion, and/or complaints related to indoor air quality.	No

### 7.4 PAST OWNERS, OPERATORS AND OCCUPANTS

Interviews with past owners and occupants regarding historical on-site operations were not reasonably ascertainable. However, based on information obtained from other sources, it is likely that the information provided by past owners and operators would have been duplicative.

### 7.5 INTERVIEW WITH OTHERS

Information obtained during interviews with local government officials is incorporated into the appropriate sections of this assessment.

## 8.0 SITE INSPECTION AND RECONNAISSANCE

On June 10, 2014, a site reconnaissance of the subject property and adjacent properties was conducted by Mr. Mark Kelker of AEI in order to obtain information indicating the likelihood of recognized environmental conditions at the subject property and adjacent properties as specified in ASTM Standard Practice E1527-13 §8.4.2, 8.4.3 and 8.4.4.

### 8.1 SUBJECT PROPERTY RECONNAISSANCE FINDINGS

Yes	No	Observation
X		Hazardous Substances and/or Petroleum Products in Connection with Property Use
	X	Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs / USTs)
	X	Hazardous Substance and Petroleum Product Containers and Unidentified Containers not in Connection with Property Use
	X	Unidentified Substance Containers
X		Electrical or Mechanical Equipment Likely to Contain Fluids
X		Interior Stains or Corrosion
	X	Strong, Pungent or Noxious Odors
	X	Pools of Liquid
X		Drains, Sumps and Clarifiers
	X	Pits, Ponds and Lagoons
	X	Stained Soil or Pavement
	X	Stressed Vegetation
	X	Solid Waste Disposal or Evidence of Fill Materials
	X	Waste Water Discharges
	X	Wells
	X	Septic Systems
	X	Other

The above identified observed items are further discussed below

#### Hazardous Substances and/or Petroleum Products in Connection with Property Use

AEI found evidence of the storage of hazardous substances during the inspection of the Property. Refer to table below for details.

Hazardous Material	Location	Secondary Containment	Staining / Spills
360-gallon belly tank	Within diesel generator	No	No

No evidence of leaks or spills was observed at the base of the generator. Based on the good condition of the equipment and regular maintenance, the presence of the emergency generator and associated diesel fuel is not expected to represent a significant environmental concern.

#### Electrical or Mechanical Equipment Likely to Contain Fluids

Electrical transformers and certain equipment that contains hydraulic fluids are a potential source of environmental concern due to the potential presence of polychlorinated biphenyl (PCB) containing cooling oils used in some units.

##### Summary

Material	Quantity	Use	Comments
Hydraulic Fluid in Elevator	1	Vertical transportation	

The subject property is equipped with a hydraulic elevator that services all three floors of the subject building. According to the Maintenance Director of the subject property, Mr. Donsell Crawley, the elevator is serviced by Lardner Elevator. The equipment room for this elevator is located in the basement of the subject building. A small amount of staining to the concrete and absorbent was observed at the base of the hydraulic tank. The staining is likely surficial and does not appear to affect the subsurface of the subject property. Based on the small quantity and surficial nature of

staining observed, this equipment is not expected to represent a significant environmental concern. However, it is recommended that the elevator equipment be checked for a hydraulic fluid leak and any necessary maintenance be performed.

### Interior Stains or Corrosion

As discussed above, a small amount of staining to the concrete and absorbent was observed at the base of the hydraulic tank. The staining is likely surficial and does not appear to affect the subsurface of the subject property. Based on the small quantity and surficial nature of staining observed, this equipment is not expected to represent a significant environmental concern. However, it is recommended that the elevator equipment be checked for a hydraulic fluid leak and any necessary maintenance be performed.

### Drains and Sumps

One sump was noted in the basement which is used for groundwater intrusion. Based on the lack of hazardous materials within the vicinity of the sump, it is not expected to represent a significant environmental concern.

## 8.2 ADJACENT PROPERTY RECONNAISSANCE FINDINGS

Yes	No	Observation
	X	Hazardous Substances and/or Petroleum Products in Connection with Property Use
	X	Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs / USTs)
	X	Hazardous Substance and Petroleum Product Containers and Unidentified Containers not in Connection with Property Use
	X	Unidentified Substance Containers
	X	Electrical or Mechanical Equipment Likely to Contain Fluids
	X	Strong, Pungent or Noxious Odors
	X	Pools of Liquid
	X	Drains, Sumps and Clarifiers
	X	Pits, Ponds and Lagoons
	X	Stained Soil or Pavement
	X	Stressed Vegetation
	X	Solid Waste Disposal or Evidence of Fill Materials
	X	Waste Water Discharges
	X	Wells
	X	Septic Systems
	X	Other

None of the above listed items were observed during the site inspection.



## 9.0 OTHER ENVIRONMENTAL CONSIDERATIONS

### 9.1 ASBESTOS-CONTAINING MATERIALS

Asbestos is the name for a group of naturally occurring silicate minerals that can be separated into fibers. The fibers are strong, durable, and resistant to heat and fire. They are also long, thin and flexible, so they can even be woven into cloth. Because of these qualities, asbestos has been used in thousands of consumer, industrial, maritime, automotive, scientific and building products. During the 20th century, some 30 million tons of asbestos have been used in industrial sites, homes, schools, shipyards and commercial buildings in the United States. Commercial use of ACM began in the early 1900's and peaked in the period between 1940 and into the 1970's. Common ACMs include pipe-covering, insulating cement, insulating block, refractory and boiler insulation materials, transite board, fireproofing spray, joint compound, vinyl floor tile, ceiling tile, mastics, roofing products, and duct insulation for HVAC applications. Inhalation of asbestos fibers can result in deleterious health effects.

The potential for asbestos containing material (ACM) was evaluated based the USEPA Guidance Document: Managing Asbestos in Place - A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials (the Green Book). In 1973 the National Emissions Standards for Hazardous Air Pollutants (NESHAPS) banned the use of most spray-applied surfacing ACM, specifically asbestos containing spray-on fireproofing and insulation. Subsequent revisions to this regulation in 1975 and 1978 effectively eliminated the use of friable pre-molded pipe, boiler, turbine, and duct insulation; and the spray application of friable asbestos-containing materials for all uses in buildings. In 1989 the EPA issued regulations to ban some asbestos-containing products and phase out most others over a multi-year period. The "Ban and Phase-Down" rule was challenged in court and the regulation remanded to the agency. As a result, any asbestos-containing products then "in commerce" would not be banned. Those not in commerce would be banned. Those materials "banned" could not be sold. It did not affect such materials already installed, or in use. Most US firms voluntarily ceased production of asbestos containing building materials not covered by the aforementioned Federal bans by the mid-1980's. In 1994, the Occupational Safety and Health Administration (OSHA) determined that employers and building owners are required to treat installed thermal system installation and sprayed on and troweled-on surfacing materials, as well as vinyl or asphalt flooring material, as ACM in buildings constructed no later than 1980 until tested by laboratory analysis to prove otherwise.

The information below is for general informational purposes only and does not constitute an asbestos survey. In addition, the information is not intended to comply with federal, state or local regulations in regards to ACM.

#### Summary

Material	Location	Estimated Quantity	Friable (Yes/No)	Physical Condition	Action
Pipe Insulation	Basement boiler room	50 linear feet	Yes	Fair	O&M Plan
Ceiling Tiles	Throughout	Unknown	Yes	Fair	O&M Plan
Mastic	Flooring throughout	Unknown	No	Fair	O&M Plan
Wall System Materials	Wall systems throughout	Unknown	No	Fair	O&M Plan

Due to the age of the subject property building, there is a potential that ACMs are present. Based on the potential presence of ACMs, AEI recommends the property owner develop and implement an O&M Plan for the subject property which stipulates the identification, assessment, repair and maintenance of building materials to protect the health and safety of the building occupants, visitors to the site, and the environment. All observed suspect ACMs were in good condition and are not expected to pose a health and safety concern to the occupants of the subject property at this time. In the event that building renovation or demolition activities are planned, a thorough asbestos survey is required in accordance with the EPA NESHAP 40 CFR Part 61 prior to demolition or renovation activities that may disturb ACMs.

## 9.2 LEAD-BASED PAINT

Lead-based paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has greater than or equal to 1 mg/cm<sup>2</sup> (5,000 ug/g or 5,000 ppm) or more of lead by federal guidelines; state and local definitions may differ from the federal definitions in amounts ranging from 0.5 mg/cm<sup>2</sup> to 2.0 mg/cm<sup>2</sup>.

It is important to note that LBP may create a lead hazard when being removed. The condition of these materials must be monitored when they are being disturbed. In the event LBP is subject to abrading, sanding, torching and/or cutting during demolition or renovation activities, there may be regulatory issues that must be addressed.

The information below is for general informational purposes only and does not constitute a lead hazard evaluation. In addition, the information is not intended to comply with federal, state or local regulations in regards to lead-containing paints.

In buildings constructed after 1978, it is unlikely that LBP is present. Structures built prior to 1978 and especially prior to the 1960's should be expected to contain LBP.

Due to the age of the subject property building, there is a potential that LBP is present. All observed painted surfaces were in good condition and are not expected to pose a health and safety concern to the occupants of the subject property at this time. Local regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. Actual material samples would need to be collected or an XRF survey performed in order to determine if LBP is present. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.

## 9.3 RADON

Radon is a naturally-occurring, odorless, invisible gas. Natural radon levels vary and are closely related to geologic formations. Radon may enter buildings through basement sumps or other openings.

The US EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones, Zone 1 being those areas with the average predicted indoor radon concentration in residential dwellings exceeding the EPA Action limit of 4.0 picoCuries per Liter (pCi/L). It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the EPA recommends site specific testing in order to determine radon levels at a specific location. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Radon sampling was not requested as part of this assessment. According to the US EPA, the radon zone level for the area is Zone 3, which has a predicted average indoor screening level less than 2 pCi/L, below the action level of 4.0 pCi/L set forth by the EPA. Based on the construction of the site and the radon zone, radon is not considered to be a concern.

## 9.4 MICROBIAL CONTAMINATION (MOLD)

Molds are simple, microscopic organisms, which can often be seen in the form of discoloration, frequently green, gray, white, brown or black. When excessive moisture or water accumulates indoors, mold growth will often occur, particularly if the moisture problem remains undiscovered or is not addressed. As such, interior areas of buildings characterized by poor ventilation and high humidity are the most common locations of mold growth. Building materials including drywall, wallpaper, baseboards, wood framing, insulation, and carpeting often play host to such growth. Mold spores primarily cause health problems through the inhalation of mold spores or the toxins they emit when they are present in large numbers. This can occur primarily when there is active mold growth within places where people live or work.

Mold, if present, may or may not visually manifest itself. Neither the individual completing this inspection, nor AEI has any liability for the identification of mold-related concerns except as defined in applicable industry standards. In short, this Phase I ESA should not be construed as a mold survey or inspection.

No evidence of mold growth, or suspect moisture intrusion, was identified.

### **9.5 LEAD IN DRINKING WATER**

AEI requested information pertaining to the regulatory compliance of the drinking water supplied to the Property. The Property receives its drinking water from the Detroit Water and Sewage Department. According to the 2012 (annual water quality report), the city tests its water before it enters the distribution system. The water supplied to the Property meets federal and state drinking water standards, including those for lead and copper. Water sampling was not conducted to verify water quality.

Copies of the compliance documents are included in Appendix E.

## **10.0 CONCLUSIONS AND RECOMMENDATIONS**

---

### **10.1 FINDINGS AND OPINIONS**

#### **10.1.1 On-Site Recognized Environmental Conditions**

No on-site Recognized Environmental Conditions were identified during the course of this assessment.

#### **10.1.2 Off-Site Recognized Environmental Conditions**

No off-site Recognized Environmental Conditions were identified that were considered likely to impact the Property.

#### **10.1.3 Controlled Recognized Environmental Conditions**

Controlled Recognized Environmental Conditions (CRECs) are defined by the ASTM Standard Practice E1527-13 as a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

No Controlled Recognized Environmental Conditions (CRECs) were identified during the course of this assessment.

#### **10.1.4 Historic Recognized Environmental Conditions**

No Historic Recognized Environmental Conditions (HRECs) were identified during the course of this assessment.

#### **10.1.5 De Minimis Environmental Conditions**

De minimis conditions are those that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions.

The following de minimis conditions were identified during completion of this assessment:

- The subject property is equipped with a hydraulic elevator that services all three floors of the subject building. According to the Maintenance Director of the subject property, Mr. Donsell Crawley, the elevator is serviced by Lardner Elevator. The equipment room for this elevator is located in the basement of the subject building. A small amount of staining to the concrete and absorbent was observed at the base of the hydraulic tank. The staining is likely surficial and does not appear to affect the subsurface of the subject property. Based on the small quantity and surficial nature of staining observed, this equipment is not expected to represent a significant environmental concern. However, it is recommended that the elevator equipment be checked for a hydraulic fluid leak and any necessary maintenance be performed.

#### **10.1.6 Other Environmental Considerations (Non-ASTM Scope Considerations)**

This assessment also included other environmental considerations identified at Section 9.0. The following related Issues of Concern were identified:

- Asbestos - Based on the age of the building, asbestos may be present in the building material. Building materials were in good condition and can be effectively managed as part of an asbestos Operations and Maintenance (O&M) Program until such time as renovation or demolition activities necessitate their removal.
- Lead-based Paint - Based on the age of the building, painted surfaces may contain lead. Painted surfaces were in good condition and can be effectively managed as part of a lead based paint O&M Program until such time as renovation or demolition activities necessitate their removal.

## 10.2 CONCLUSIONS

AEI has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of 440 East Grand Blvd., Detroit, MI, the Property. Any exceptions to or deletions from this practice are described in Section 1.5 of this report. This assessment has revealed no evidence of Recognized Environmental Conditions in connection with the Property.

AEI's assessment included additional services to evaluate asbestos-containing materials, radon, lead-based paint, lead in drinking water, wetlands and mold. This assessment has revealed no evidence of related conditions of concern in connection with the Property, except for the following:

- Asbestos - Based on the age of the building, asbestos may be present in the building materials. Building materials were in good condition and can be effectively managed as part of an asbestos O&M Program until such time as renovation or demolition activities necessitate their removal. An O&M Plan was not in place at the Property.
- Lead-based Paint (LBP) - Based on the age of the building, painted surfaces may contain lead. Painted surfaces were in good condition and can be effectively managed as part of a LBP O&M Program until such time as renovation or demolition activities necessitate their removal. An O&M Plan was not in place at the property.

## 10.3 RECOMMENDATIONS

As a result of this assessment, AEI recommends the following:

- Asbestos - Given the good condition of the identified and suspect ACM, these materials can be effectively managed as part of an asbestos O&M Program until such time as renovation or demolition activities necessitate their removal. The objective of an O&M Program is to implement a practical management approach to controlling identified ACM within the subject property. The O&M Program is designed to cleanup existing contamination, minimize future fiber release by controlling disturbance of ACM, and monitor the condition of the ACM until it is removed.
- Lead-Based Paint - AEI recommends implementing a lead-based paint O&M plan. The property falls under the definition of Target Housing, and is regulated under Title X. Regardless of the findings of this limited screening, the seller or renter of the property is required to make available a federally approved lead hazard information pamphlet and must disclose known lead-based paint and/or lead-based paint hazards to purchasers and renters of the property pursuant to the requirements of 24 CFR 35.92 and 40 CFR 745.113. If a definitive investigation is desired, a quantitative lead-based paint inspection in conformance with Title X Guidelines will yield a comprehensive analysis of conditions.

## 11.0 REFERENCES

---

### Interviews:

Site Contact - Mr. Donsell Crawley - June 10, 2014

### Research:

7.5-Minutes Series Topographic Map, Detroit, Michigan Quadrangle, U.S. Department of the Interior Geological Survey, courtesy of Globexplorer ([www.globexplorer.com](http://www.globexplorer.com)).

Environmental Data Resources, Inc. (EDR) Radius Map with GeoCheck Report, May 30, 2014.

Environmental Data Resources, Inc. (EDR) Sanborn Map Report, May 30, 2014.

Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package, the following years: 1937, 1949, 1952, 1956, 1961, 1967, 1972, 1981, 1985, 1993, 1997, 1999, 2005, 2009, 2010 and 2012.

Environmental Data Resources, Inc. (EDR) City Directories, the following years: 1915, 1919, 1925, 1930, 1936, 1941, 1954, 1964, 1968, 1973, 1979, 1984, 1989, 1994, 1999, 2003, 2008 and 2013

United States Department of Agriculture, Soil Survey of Wayne County, June 2014.

Flood Map - Accessed June 13, 2014 - Federal Emergency Management Agency

Wetland Map - Accessed June 13, 2014 - United States Fish and Wildlife

Fire Records Reviewed - June 10, 2014 - Detroit Fire Department and Safety Administration Building

Oil and Gas Database - Michigan Department of Environmental Quality

Water Quality Report - City of Detroit

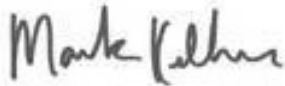
Phase I Environmental Site Assessment - 440 East Grand Boulevard, Detroit, Michigan, LM Architectural and Engineering Consultants - April 27, 2010

## 12.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

---

By signing this report, the senior author declares that, to the best of his or her professional knowledge and belief, he or she meets the definition of Environmental Professional as defined in §312.10 of 40 CFR Part 312.

The senior author has the specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the subject property. The senior author has developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40CFR Part 312.



---

Mark Kelker  
Project Manager



---

Carla A. Wesley  
Senior Author

## **13.0 QUALIFICATIONS**

---

### **13.1 DEFINITION OF AN ENVIRONMENTAL PROFESSIONAL**

An Environmental Professional means: (1) a person who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases (see §312.1(c)) on, at, in, or to a property, sufficient to meet the objectives and performance factors in §312.20(e) and (f). (2) Such a person must: (i) hold a current Professional Engineer's or Professional Geologist's license or registration from a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) and have the equivalent of three (3) years of full-time relevant experience; or (ii) be licensed or certified by the federal government, a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) to perform environmental inquiries as defined in §312.21 and have the equivalent of three (3) years of full-time relevant experience; or (iii) have a Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five (5) years of full-time relevant experience; or (iv) have the equivalent of ten (10) years of full-time relevant experience. (3) An environmental professional should remain current in his or her field through Participation in continuing education or other activities. (4) The definition of environmental professional provided above does not preempt state professional licensing or registration requirements such as those for a professional geologist, engineer, or site remediation professional. Before commencing work, a person should determine the applicability of state professional licensing or registration laws to the activities to be undertaken as Part of the inquiry identified in §312.21(b). (5) A person who does not qualify as an environmental professional under the foregoing definition may assist in the conduct of all appropriate inquiries in accordance with this Part if such person is under the supervision or responsible charge of a person meeting the definition of an environmental professional provided above when conducting such activities.

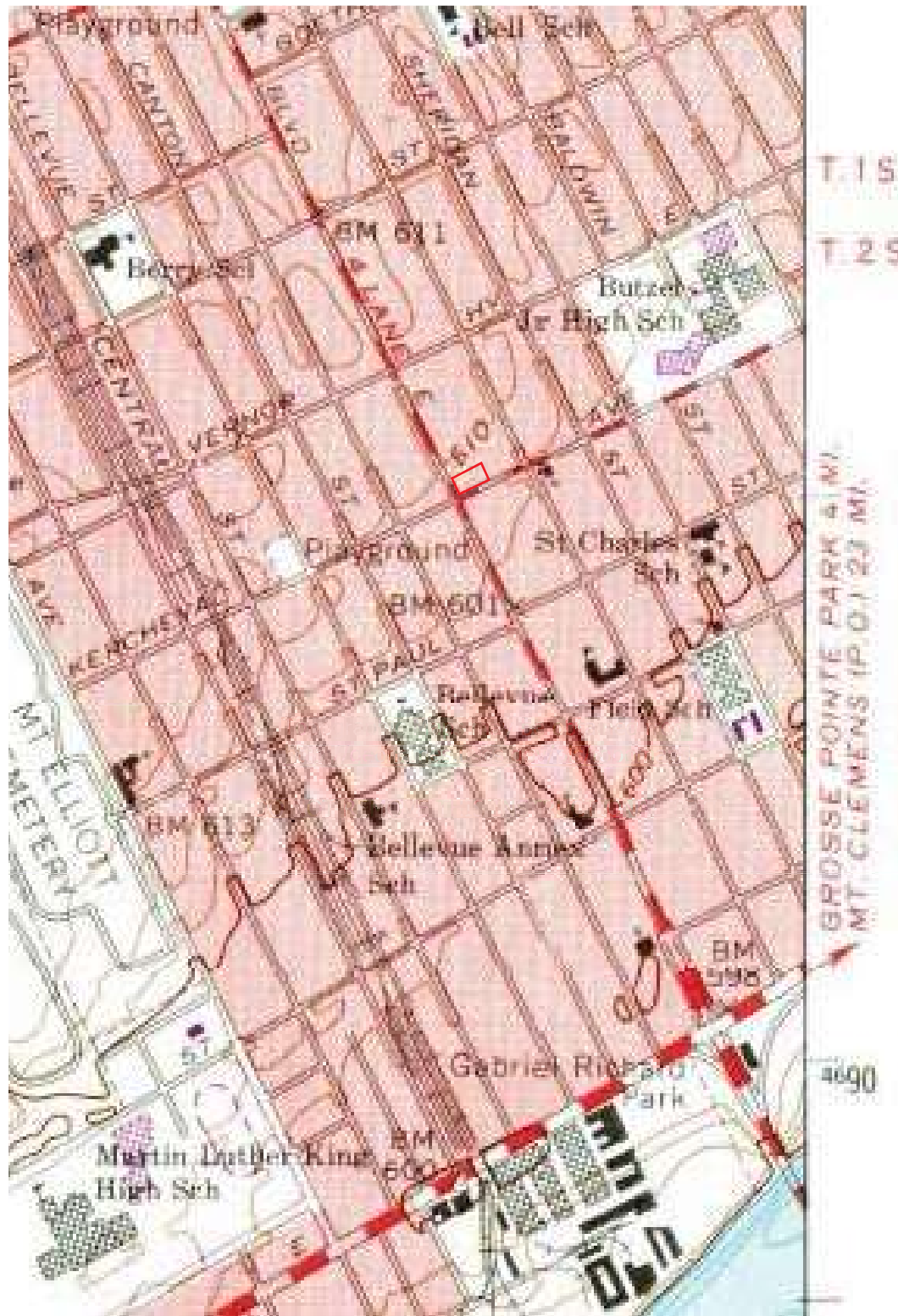
### **13.2 RELEVANT EXPERIENCE**

Relevant experience, as used in the definition of environmental professional in this Section, means: Participation in the performance of all appropriate inquiries investigations, environmental site assessments, or other site investigations that may include environmental analyses, investigations, and remediation which involve the understanding of surface and subsurface environmental conditions and the processes used to evaluate these conditions and for which professional judgment was used to develop opinions regarding conditions indicative of releases or threatened releases (see §312.1(c)) to the Property.

Resumes for the Environmental Professionals involved in this project are included in Appendix F.



# Figures



Legend  
 Approximate Property Boundary ———




### Figure 1: SITE LOCATION MAP


440 East Grand Boulevard, Detroit, Michigan 48207  
 Project Number: 330676





Legend

Groundwater Flow Direction 

Approximate Property Boundary 



**Figure 2: SITE MAP**

440 East Grand Boulevard, Detroit, Michigan 48207  
Project Number: 330676







# Michigan

## Federally-listed Endangered and Threatened Species

Updated October 2018

SPECIES	STATUS	COUNTIES	HABITAT
<b>MAMMALS</b>			
Canada lynx ( <i>Lynx canadensis</i> )	Threatened	<b>Current distribution:</b> 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.
<b>BIRDS</b>			
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><b>Only actions that occur along coastal areas during the Red Knot migratory window of MAY 1 - SEPTEMBER 30 for the following counties:</b></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><b>Only actions that occur in large wetland complexes during the Red knot migratory window of MAY 1 - SEPTEMBER 30 for the following counties:</b></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
<b>REPTILES</b>			
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
<b>INSECTS</b>			
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 <a href="http://www.fws.gov/midwest/angered/insects/posk/fcHmaps/poskchMI.pdf">www.fws.gov/midwest/angered/insects/posk/fcHmaps/poskchMI.pdf</a>	Wet prairie and fens
<b>MUSSELS</b>			
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
<b>PLANTS</b>			
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)



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

**Explosive and Flammable Hazards (CEST and EA) – PARTNER**

<https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities>

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

→ Continue to Question 2.

Yes

**Explain:**

[Click here to enter text.](#)

→ Go directly to Question 5.

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

No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes → Continue to Question 3.

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

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide all documents used to make your determination.

Yes

→ Continue to Question 4.

4. Visit HUD's website to identify the appropriate tank or tanks to assess and to calculate the required separation distance using the [electronic assessment tool](#). To document this step in the analysis, please attach the following supporting documents to this screen:

- Map identifying the tank selected for assessment, and showing the distance from the tank to the proposed HUD-assisted project site; and
- Electronic assessment tool calculation of the required separation distance.

**Based on the analysis, is the proposed HUD-assisted project site 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. Continue to the Worksheet Summary below.

No

→ Go directly to Question 6.

5. **Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?**

Please visit HUD's website for information on calculating Acceptable Separation Distance.

Yes

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

*Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.*

No

→ Continue to Question 6.

*Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.*

6. **For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Mitigation measures may include both natural and manmade barriers, modification of the project design, burial or removal of the hazard, or other engineered solutions. Describe selected mitigation measures, including the timeline for implementation, and attach an implementation plan. If negative effects cannot be mitigated, cancel the project at this location.**

Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.

[Click here to enter text.](#)

### **Worksheet Summary**

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

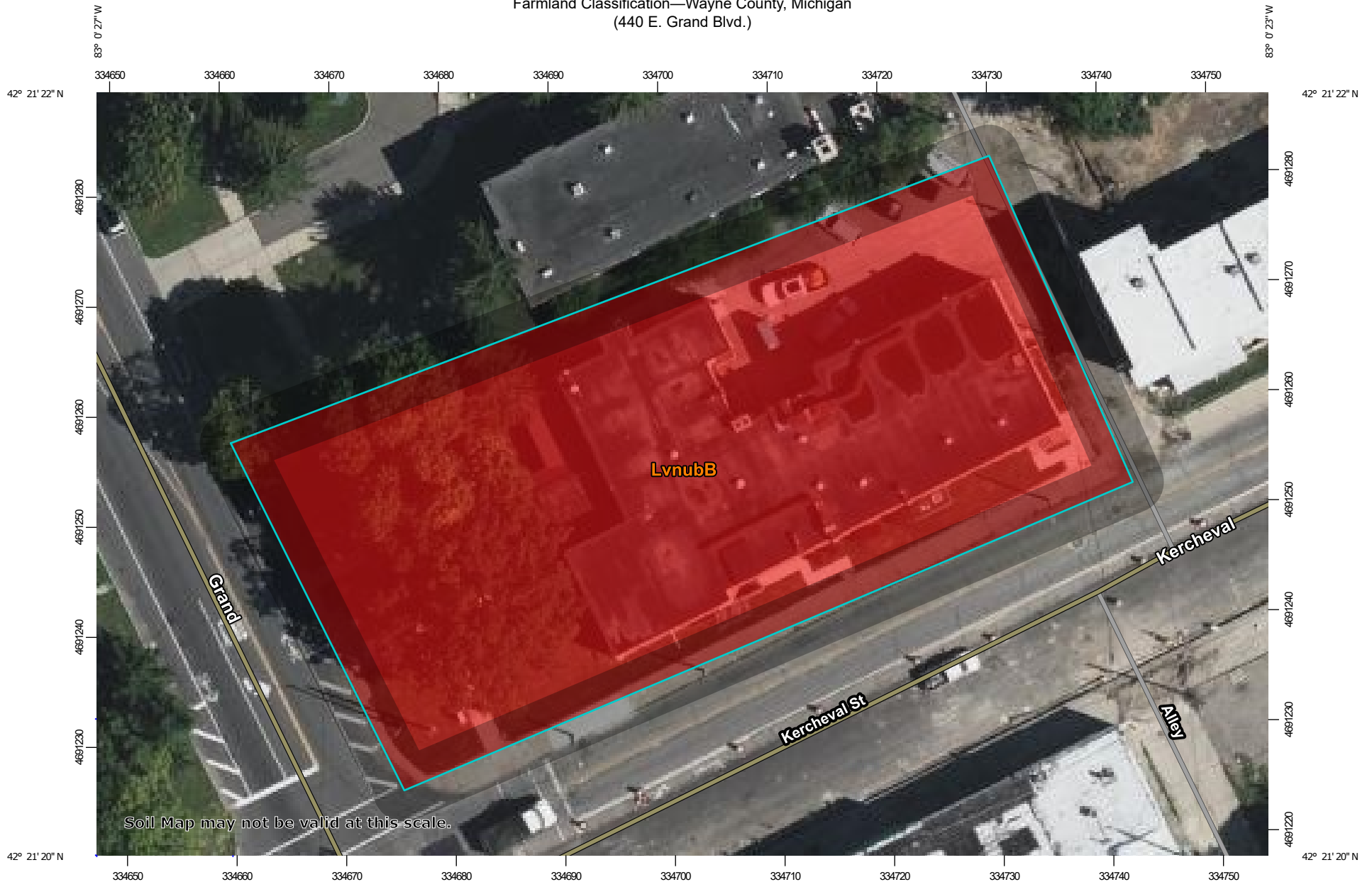
- Map panel numbers and dates

- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

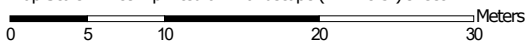
**Include all documentation supporting your findings in your submission to HUD.**

The City of Detroit is providing funding to a local non-profit to purchase this site. The project scope does not include development, construction, rehabilitation that will increase residential densities, or conversion. No further evaluation is required.

Farmland Classification—Wayne County, Michigan  
(440 E. Grand Blvd.)



Map Scale: 1:489 if printed on A landscape (11" x 8.5") sheet.




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



Farmland Classification—Wayne County, Michigan  
(440 E. Grand Blvd.)









**MAP LEGEND**








**Area of Interest (AOI)**






 Area of Interest (AOI)








**Soils**



**Soil Rating Polygons**

-  Not prime farmland
-  All areas are prime farmland
-  Prime farmland if drained
-  Prime farmland if protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated
-  Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated and drained
-  Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season









-  Prime farmland if subsoiled, completely removing the root inhibiting soil layer
-  Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
-  Prime farmland if irrigated and reclaimed of excess salts and sodium
-  Farmland of statewide importance
-  Farmland of statewide importance, if drained
-  Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if irrigated

-  Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if irrigated and drained
-  Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer
-  Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60



































-  Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium
-  Farmland of statewide importance, if drained or either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if warm enough
-  Farmland of statewide importance, if thawed
-  Farmland of local importance
-  Farmland of local importance, if irrigated

-  Farmland of unique importance
-  Not rated or not available

**Soil Rating Lines**

-  Not prime farmland
-  All areas are prime farmland
-  Prime farmland if drained
-  Prime farmland if protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated
-  Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated and drained
-  Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season

Farmland Classification—Wayne County, Michigan  
(440 E. Grand Blvd.)

	Prime farmland if subsoiled, completely removing the root inhibiting soil layer		Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium		Farmland of unique importance		Prime farmland if subsoiled, completely removing the root inhibiting soil layer
	Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60		Farmland of statewide importance, if irrigated and drained		Farmland of statewide importance, if drained or either protected from flooding or not frequently flooded during the growing season	<b>Soil Rating Points</b>			Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
	Prime farmland if irrigated and reclaimed of excess salts and sodium		Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season		Not prime farmland		Prime farmland if irrigated and reclaimed of excess salts and sodium
	Farmland of statewide importance						Prime farmland if drained		Farmland of statewide importance
	Farmland of statewide importance, if drained		Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer				Prime farmland if protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if drained
	Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60		Farmland of statewide importance, if warm enough		Prime farmland if irrigated		Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season
	Farmland of statewide importance, if irrigated				Farmland of statewide importance, if thawed		Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if irrigated
					Farmland of local importance		Prime farmland if irrigated and drained		
					Farmland of local importance, if irrigated		Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season		

Farmland Classification—Wayne County, Michigan  
(440 E. Grand Blvd.)

<p> Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season</p>	<p> Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium</p> <p> Farmland of statewide importance, if drained or either protected from flooding or not frequently flooded during the growing season</p>	<p> Farmland of unique importance</p> <p> Not rated or not available</p>	<p>The soil surveys that comprise your AOI were mapped at 1:12,000.</p>
<p> Farmland of statewide importance, if irrigated and drained</p>	<p> Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season</p>	<p><b>Water Features</b></p> <p> Streams and Canals</p>	<p>Warning: Soil Map may not be valid at this scale.</p> <p>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.</p>
<p> Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season</p>	<p> Farmland of statewide importance, if warm enough</p>	<p><b>Transportation</b></p> <p> Rails</p> <p> Interstate Highways</p> <p> US Routes</p> <p> Major Roads</p> <p> Local Roads</p>	
<p> Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer</p>	<p> Farmland of statewide importance, if thawed</p>	<p><b>Background</b></p> <p> Aerial Photography</p>	<p>Please rely on the bar scale on each map sheet for map measurements.</p>
<p> Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60</p>	<p> Farmland of local importance</p>		<p>Source of Map: Natural Resources Conservation Service Web Soil Survey URL: Coordinate System: Web Mercator (EPSG:3857)</p>
	<p> Farmland of local importance, if irrigated</p>		<p>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.</p>
			<p>This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.</p>
			<p>Soil Survey Area: Wayne County, Michigan Survey Area Data: Version 7, Sep 7, 2021</p>
			<p>Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.</p>
			<p>Date(s) aerial images were photographed: Aug 5, 2020—Aug 12, 2020</p>
			<p>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.</p>



## Farmland Classification

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
LvnubB	Livonia-Urban land complex, dense substratum, 0 to 4 percent slopes	Not prime farmland	0.6	100.0%
<b>Totals for Area of Interest</b>			<b>0.6</b>	<b>100.0%</b>

### Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

### Rating Options

*Aggregation Method:* No Aggregation Necessary

*Tie-break Rule:* Lower

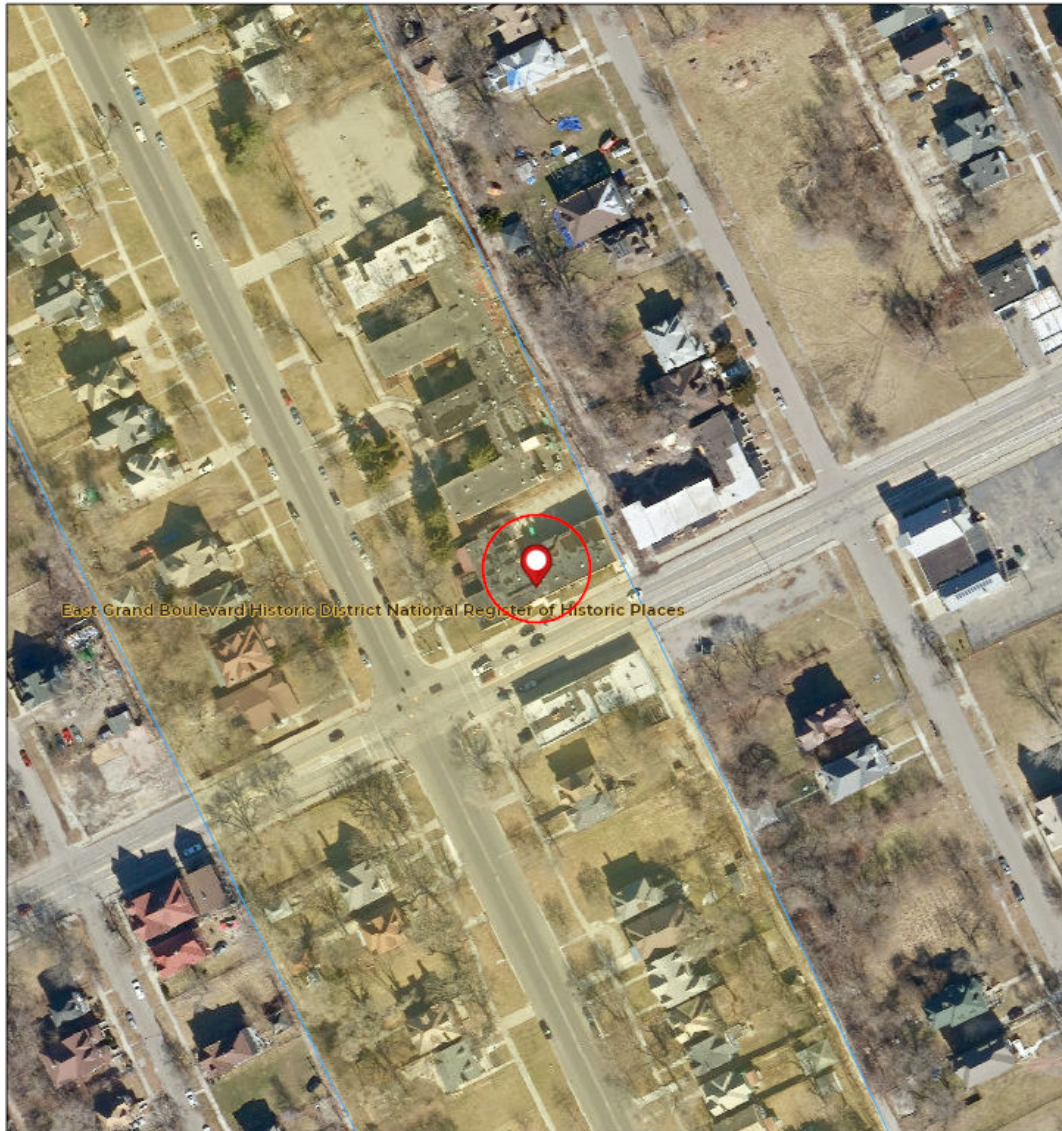


# Screening Report

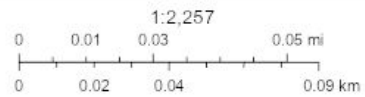
## Area of Interest (AOI) Information

Area : 8,738.61 ft<sup>2</sup>

Mar 21 2022 13:53:07 Eastern Daylight Time



 National Register of Historic Places Listed Sites



## Summary

Name	Count	Area(ft <sup>2</sup> )	Length(ft)
DetroitHistoricResources_Features_view	0	0	N/A
Eligible/Listed Sites by Status	0	0	N/A
Detroit Local Historic Districts	0	0	N/A
National Register of Historic Places Listed Sites	1	8,738.57	N/A

## National Register of Historic Places Listed Sites

#	District Name	Location	Created Date:	Area(ft <sup>2</sup> )
1	East Grand Boulevard Historic District	East Grand Blvd between East Jefferson Ave. and Mack	11/29/1999	8,738.57



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

Phone: 313.224.6380  
Fax: 313.224.1629  
www.detroitmi.gov

February 2, 2022

Penny Dwoinen  
City of Detroit Housing & Revitalization Department  
Coleman A. Young Municipal Center  
2 Woodward Avenue, Suite 908  
Detroit, MI 48226

**RE: Section 106 Review of a CDBG-Funded Project Located at 440 E Grand Blvd in the City of Detroit, Wayne County, Michigan**

Dear Mrs. Dwoinen,

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). The City of Detroit intends to procure a non-profit partner to purchase the building at 440 E Grand Blvd using ESG-CV funding to provide a non-congregate emergency shelter for households experiencing homelessness.

Based on the information submitted to this office on 1/10/2022, we have determined that the building at **440 E Grand Blvd is listed on** the National Register of Historic Places as part of the East Grand Boulevard Historic District. Therefore, per Stipulation V.B of the Programmatic Agreement (PA), the project shall be carried out in accordance with the *Secretary of the Interior’s Standards for Rehabilitation*. This building is considered “non-contributing” to the district. A building not contributing to the historic significance of a district is one which does not add to the district's sense of time and place and historical development.

This project is intended to provide funding for purchase of the building through competitive NOFA process to convert a nursing home into a supportive housing shelter. If additional federal funding is used for exterior building rehabilitation, the scope of work required for this adaptive use will be subject to additional approval.

This project has been given a **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. If you have any questions, you may contact the Preservation Specialist at [Ciavattonet@detroitmi.gov](mailto:Ciavattonet@detroitmi.gov).

Sincerely,



**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](http://www.detroitmi.gov)

Tiffany Ciavattone  
Preservation Specialist  
City of Detroit  
Housing & Revitalization Department

## Noise (CEST Level Reviews)

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
References		
<a href="https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control">https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control</a>		

### 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.

→ *Continue to Question 4.*

- Rehabilitation of an existing residential property

NOTE: For modernization projects in all noise zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ *Continue to Question 2.*

- A research demonstration project which does not result in new construction or reconstruction, interstate, land sales registration, or any timely emergency assistance under disaster assistance provisions 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

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

- None of the above

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

**2. Do you have standardized noise attenuation measures that apply to all modernization and/or minor rehabilitation projects, such as the use of double glazed windows or extra insulation?**

Yes

**Indicate the type of measures that will apply (check all that apply):**

Improved building envelope components (better windows and doors, strengthened sheathing, insulation, sealed gaps, etc.)

Redesigned building envelope (more durable or substantial materials, increased air gap, resilient channels, staggered wall studs, etc.)

Other

**Explain:**

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below and provide any supporting documentation.*

No

→ *Continue to Question 3.*

**3. 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). Describe findings of the Preliminary Screening:**

→ *Continue to Question 6.*

**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.

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.

Noise generators were found within the threshold distances.

→ Continue to Question 5.

**5. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:**

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

Indicate noise level here:

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.

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))

Indicate noise level here:

**Is the project in a largely undeveloped area<sup>1</sup>?**

No

→Your project requires completion of an Environmental Assessment (EA) pursuant to 51.104(b)(1)(i). Elevate this review to an EA-level review.

Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

Yes

→Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). Elevate this review to an EIS-level review.

Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

---

<sup>1</sup> A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses or does not have water and sewer capacity to serve the project.



Unacceptable: (Above 75 decibels)

Indicate noise level here:

**Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). You may either complete an EIS or provide a waiver signed by the appropriate authority. Indicate your choice:**

Convert to an EIS

→ Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

Provide waiver

→ Provide an Environmental Impact Statement waiver from the Certifying Officer or the Assistant Secretary for Community Planning and Development per 24 CFR 51.104(b)(2) and noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

**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:

→ Provide drawings, specifications, and other materials as needed to describe the project's noise mitigation measures.

Continue to the Worksheet Summary.

No mitigation is necessary.

**Explain why mitigation will not be made here:**

→ Continue to the Worksheet Summary.

### **Worksheet Summary**

#### **Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

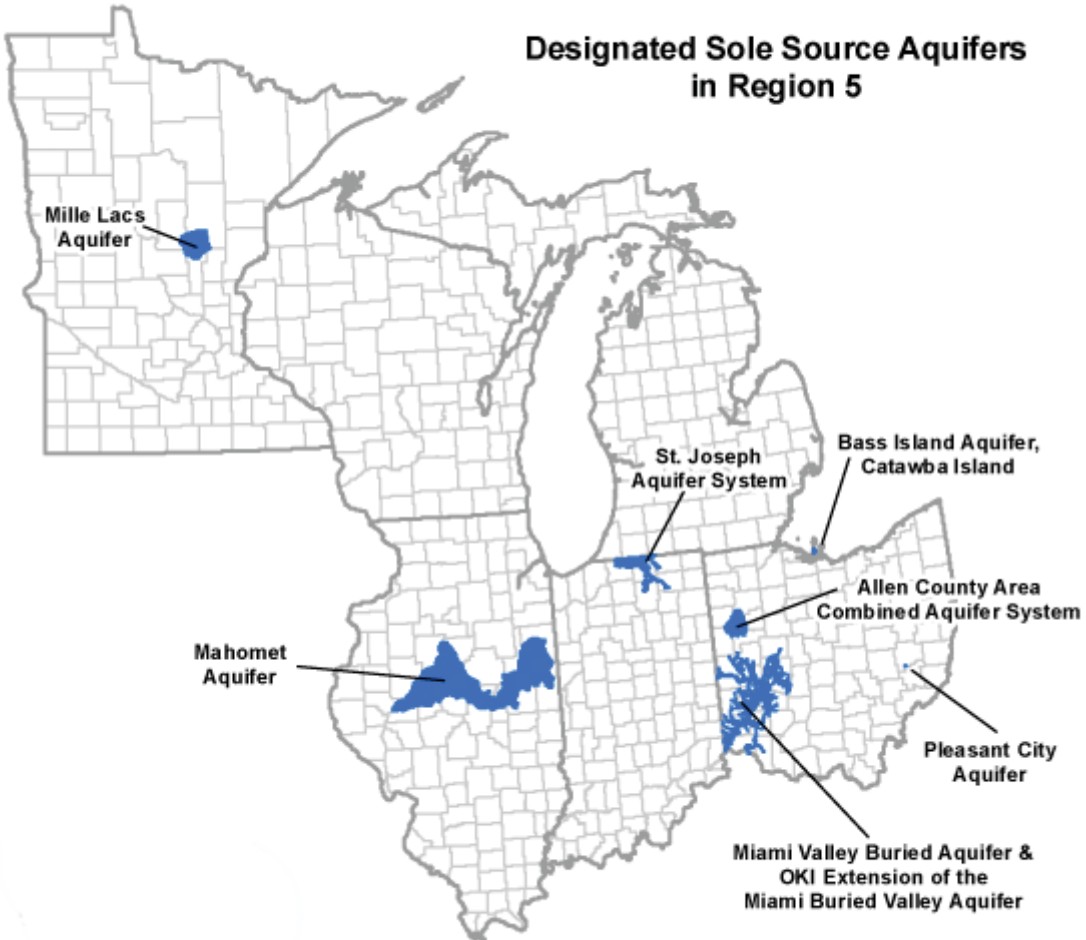
The City of Detroit is providing funding to a local non-profit to purchase this site to provide a non-congregate emergency shelter for households experiencing homelessness. The project scope does not include development, construction, Rehabilitation of an existing residential property or a research demonstration project which does not result in new construction or reconstruction, interstate, land sales registration, or any timely emergency assistance. No further evaluation is required.

**Are formal compliance steps or mitigation required?**

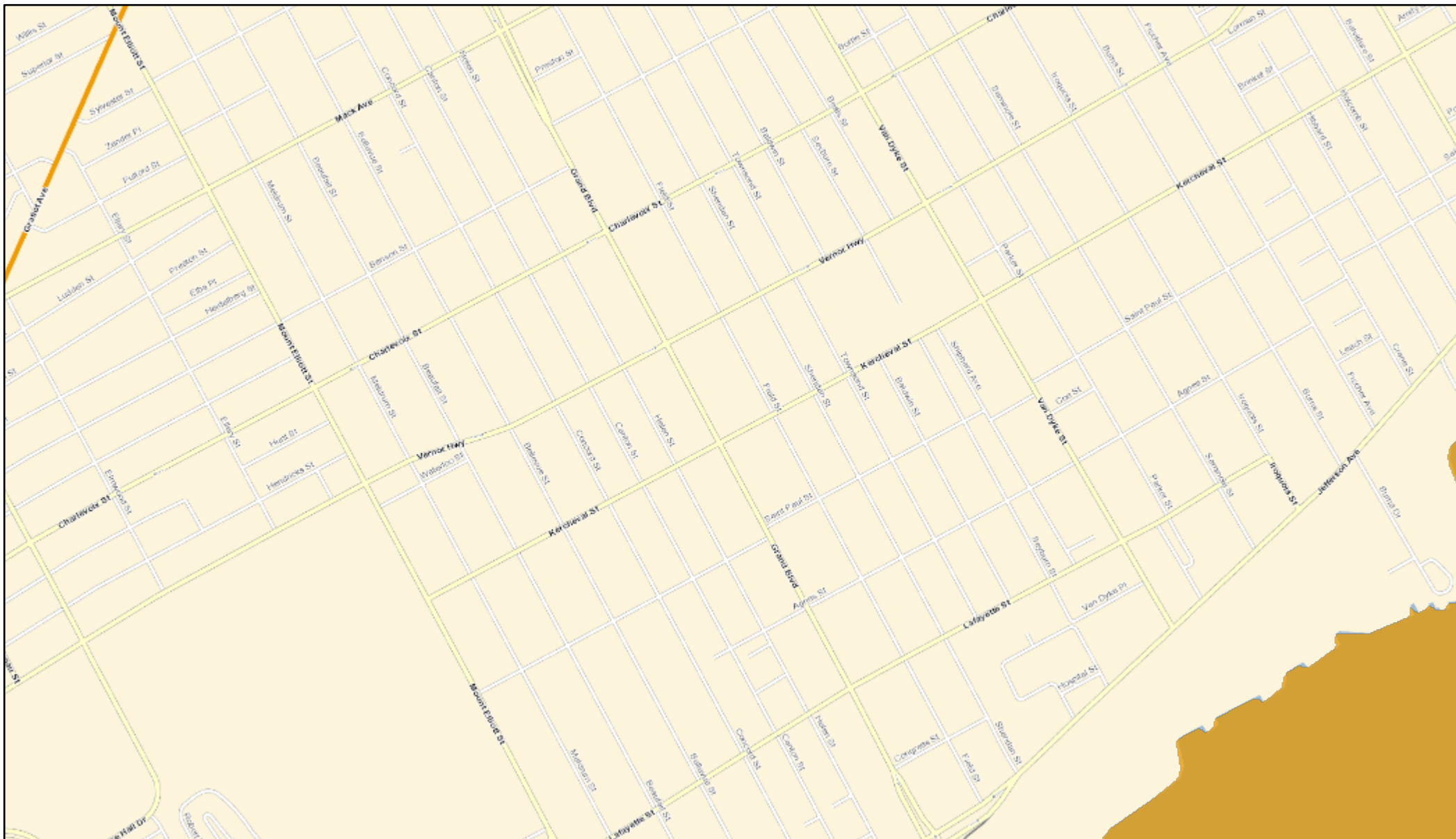
Yes

No

**Designated Sole Source Aquifers  
in Region 5**



# Wetlands Map Viewer



February 3, 2022

Part 303 Final Wetlands Inventory

Wetlands as identified on NWI and MIRIS maps

Soil areas which include wetland soils



Wetlands as identified on NWI and MIRIS maps and soil areas which include wetland soils



Wetland (Hydric) Soils



National Wetlands Inventory 2005

1:12,197

0 0.1 0.2 0.4 mi

0 0.15 0.3 0.6 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

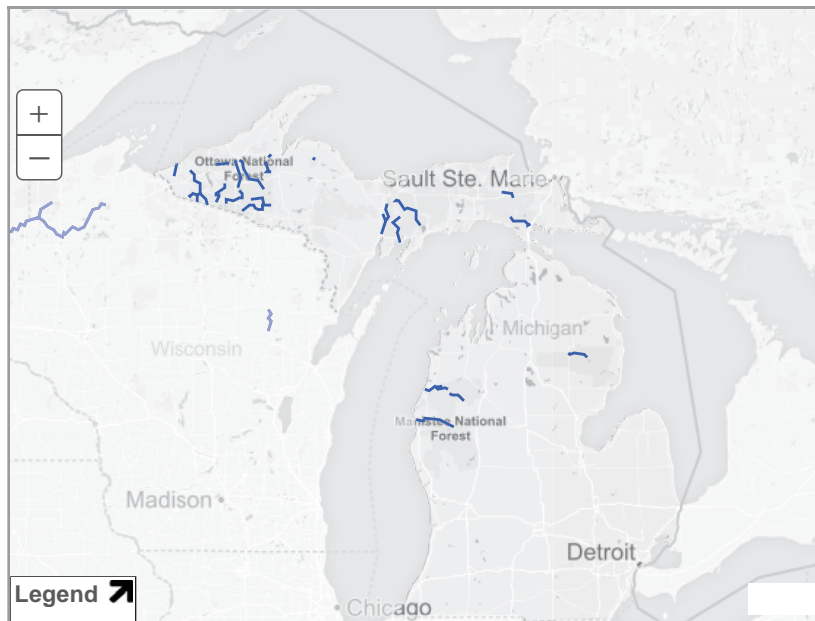
Disclaimer: This map is not intended to be used to determine the specific



NATIONAL SYSTEM | MANAGEMENT | RESOURCES | PUBLICATIONS | CONTACT US | 50 YEARS | SITE INDEX

## 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

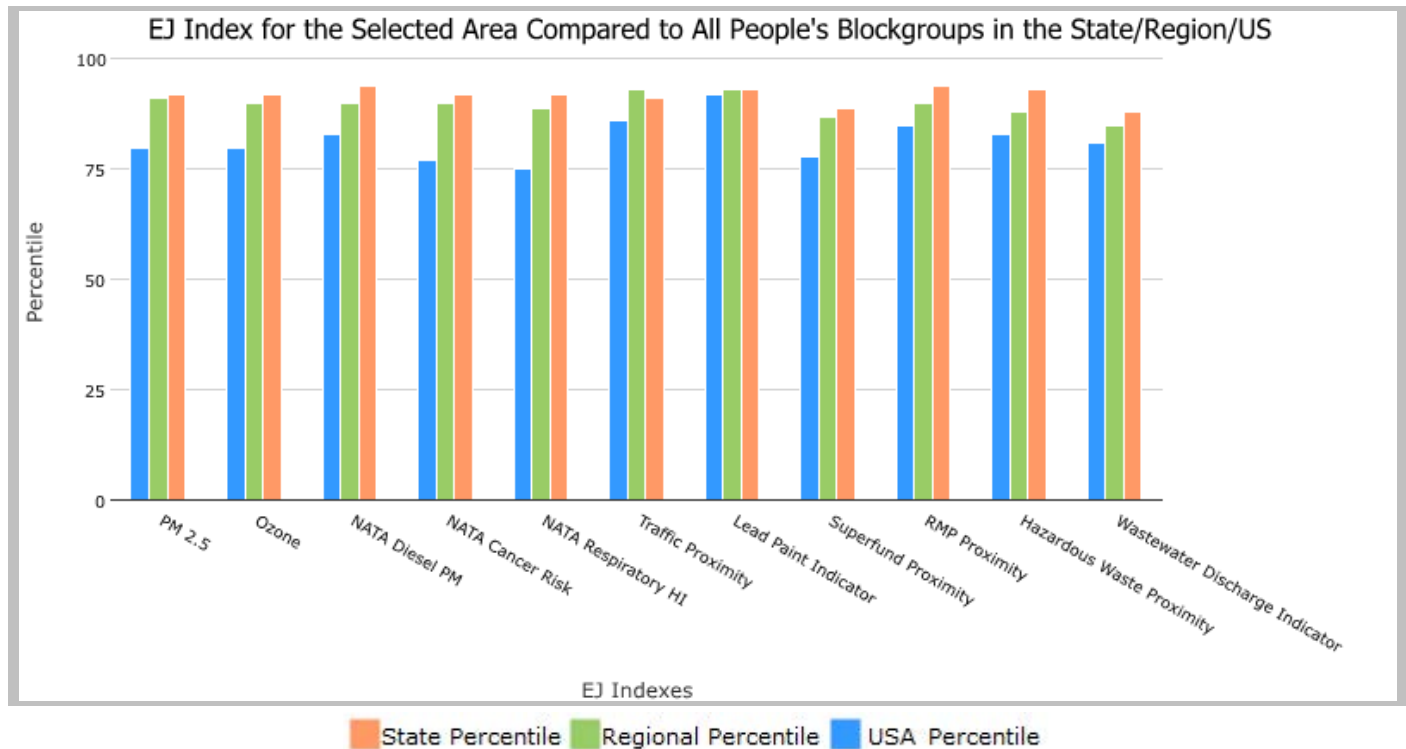
1 mile Ring Centered at 42.356011,-83.007037, MICHIGAN, EPA Region 5

Approximate Population: 13,832

Input Area (sq. miles): 3.14

440 E. Grand Blvd

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	92	91	80
EJ Index for Ozone	92	90	80
EJ Index for NATA* Diesel PM	94	90	83
EJ Index for NATA* Air Toxics Cancer Risk	92	90	77
EJ Index for NATA* Respiratory Hazard Index	92	89	75
EJ Index for Traffic Proximity and Volume	91	93	86
EJ Index for Lead Paint Indicator	93	93	92
EJ Index for Superfund Proximity	89	87	78
EJ Index for RMP Proximity	94	90	85
EJ Index for Hazardous Waste Proximity	93	88	83
EJ Index for Wastewater Discharge Indicator	88	85	81



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

1 mile Ring Centered at 42.356011,-83.007037, MICHIGAN, EPA Region 5

Approximate Population: 13,832

Input Area (sq. miles): 3.14

440 E. Grand Blvd



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

## EJSCREEN Report (Version 2020)

1 mile Ring Centered at 42.356011,-83.007037, MICHIGAN, EPA Region 5

Approximate Population: 13,832

Input Area (sq. miles): 3.14

440 E. Grand Blvd

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	9.43	8.11	91	8.4	88	8.55	79
Ozone (ppb)	44.5	43.1	76	43.8	54	42.9	67
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.636	0.338	91	0.446	80-90th	0.478	70-80th
NATA* Cancer Risk (lifetime risk per million)	30	24	93	26	70-80th	32	<50th
NATA* Respiratory Hazard Index	0.35	0.29	83	0.34	60-70th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	850	650	76	530	84	750	79
Lead Paint Indicator (% Pre-1960 Housing)	0.77	0.38	84	0.38	86	0.28	91
Superfund Proximity (site count/km distance)	0.059	0.15	47	0.13	50	0.13	48
RMP Proximity (facility count/km distance)	1.1	0.53	84	0.83	74	0.74	78
Hazardous Waste Proximity (facility count/km distance)	2.7	1.2	86	2.4	71	5	72
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	9.8E-05	1.7	55	2.4	43	9.4	53
<b>Demographic Indicators</b>							
Demographic Index	68%	29%	91	28%	92	36%	88
People of Color Population	81%	25%	91	25%	92	39%	84
Low Income Population	56%	33%	84	30%	86	33%	85
Linguistically Isolated Population	0%	2%	64	2%	60	4%	45
Population With Less Than High School Education	20%	9%	89	10%	87	13%	78
Population Under 5 years of age	4%	6%	29	6%	27	6%	27
Population over 64 years of age	22%	16%	79	16%	81	15%	82

\* 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](http://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.