

**60 Harper Apartments  
HMA/ECS  
August 2023**

Response Activity or Continuing Obligation	Required Activities	Party Responsible for Completing Activity	Timing of Activity	Cost	Required Follow-up or Reporting
<b>ResAP – Impacted Soil</b>	Remove Impact Soil Across the Subject Property, mainly non-native urban fill material. In locations of the proposed building foundation depths of material to be removed are approximately 5 -6 feet. Across the remaining portions of the Subject Property depths are approximately 3 feet.	Contractor/ Environmental Consultant	During Construction	\$854,500	Include results in DDCC report.
<b>ResAP – Verification of Remediation Sampling</b>	Verification of Remediation Sampling will be conducted at bottom of excavation depths across the Subject Property to ensure that adequate impacted soil has been removed and clean soil remains. Soil will be analyzed by laboratory prior to clean backfill material being placed at the Subject Property.	Environmental Consultant	After Impacted Soil Removal/Prior to Clean Fill Installation	\$48,100	Include results in DDCC report.
<b>ResAP – Clean Fill</b>	The fill material brought to the site will be documented as clean by analytical results from samples collected from the site of origin documenting that the material does not contain volatile organic compounds, polynuclear aromatic hydrocarbons, or Michigan Ten Metals at concentrations above the applicable generic cleanup criteria. With final grade topographic survey.	Contractor/ Environmental Consultant	During Construction	\$503,700	Include results in DDCC report.
<b>Documentation of Due Care Compliance</b>	<p>A. Complete a DDCC report and submit to the City of Detroit Environmental Review Officer for review prior to submitting to EGLE. Engineering controls will require an Operations and Maintenance plan.</p> <p>B. Additional requirements such as a Restrictive Covenants and/or a recorded Notice to Title may be requested depending on site conditions.</p>	Environmental Consultant	During Construction	\$6,000	Provide report to HRD’s ER Team
<b>ResAP – Vapor Mitigation</b>	No vapor mitigation necessary based on proposed response actions.	Environmental Consultant	N/A	N/A	N/A

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<b>Section 106 – Conditional No Adverse Effect Requirements</b>	A. Prior to the start of any work, building plans, specifications and photos must be submitted to the Preservation Specialist for review and Conditional Approval	General Contractor	Prior to Construction	N/A - Completed	Submit work to Preservation Specialist.
	B. If there is a change in the scope of work, those changes will be required to undergo additional Section 106 Review prior to the execution of any work.	General Contractor	At any time		Notify Preservation Specialist
<b>Section 106 – Unanticipated Discoveries Plan</b>	Once construction has started, the SHPO approved Unanticipated Discoveries Plan shall be followed for the duration of the project.	Construction Crew, Foremen, Developer	During Construction	N/A	Unanticipated Discoveries Plan with SHPO approval
<b>Noise Analysis – Unacceptable Noise</b>	Appropriate construction materials will be incorporated in the building to mitigate noise levels within the acceptable range.	Architect, Construction, Crew, Foremen, Developer,	During Construction	N/A – Part of Construction	Building specs