

MITIGATION PLAN
Preserve on Ash I (POA I)
GEI Consultants, Inc.
January 2024

Response Activity or Continuing Obligation	Required Activities	Party Responsible for Completing Activity	Timing of Activity	Estimated Cost	Required Follow-up or Reporting
ResAP – Clean Fill	The fill material brought to the site will be documented as clean by analytical results from samples collected from the site of origin documenting that the material does not contain volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), or metals at concentrations above the applicable generic direct contact criteria.	Contractor	During Construction	\$576,675	Include results in DDCC report.
Documentation of Due Care Compliance	<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>	Consultant	During Construction	\$20,000	Provide report to HRD’s ER Team
ResAP – Vapor Mitigation	Vapor intrusion will be mitigated with installation of an active vapor mitigation system (AVMS) in accordance with EGLE approved Response Activity Plans. Response Activity Plans have additional detail regarding the Mitigation Plan. The AVMS will be installed in each building and consist of a vapor barrier with active sub-slab depressurization system (SSDS) beneath the building structure. The SSDS will consist of a porous, crushed stone layer with sub-slab vent piping connected to the vapor collection and exhaust riser extending above the roof. Specifications for the implementation of these plans will be provided to the Contractor, and installation will be overseen by	Contractor, Consultant	During Construction	\$225,000 for installation and construction testing	Construction Testing and Verification to EGLE in DCCC

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	the environmental Consultant. This work will be performed at the time of construction of the buildings and other site improvements.				
Long-term Inspection and O&M Plan	A long-term Operation and Maintenance Plan will be prepared for the buildings. This plan will identify potential exposure routes, methods for the prevention of exposure, inspection frequency, and methods for repair of remedies to maintain exposure barriers.	Consultant, Building Management	Post Construction	\$2,000 annually for inspection, repair costs dependent on required repairs	Periodic Inspection of exposure prevention measures. Reporting maintained on-site.
Section 106 – No Adverse Effects Requirements	The objects collected during the trenching investigation will be donated to Wayne State University (WSU).	Consultant	Prior to Construction	N/A	Submit objects to WSU. Notify Preservation Specialist
Section 106 – Unanticipated Discoveries Plan	Once construction has started, the City of Detroit’s Unanticipated Discoveries Plan shall be followed for the duration of the project.	Construction Crew, Foremen, Developer	During Construction	N/A	As required in the City of Detroit’s Unanticipated Discoveries Plan, depending on the type of unanticipated discovery. Notify Preservation Specialist