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

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

Project Information

Project Name: Russell-Woods-Senior-Living

HEROS Number: 90000010382381

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

RE Preparer: Kim Siegel

State / Local Identifier: Detroit, Michigan

Certifying Officer: Julie Schneider

Grant Recipient (if different than Responsible Ent ity):

Point of Contact:

Consultant (if applicabl GRand Environmental, LLC e):

Point of Contact: Christina Bakos

Project Location: 11421 Dexter Ave, Detroit, MI 48206

Additional Location Information: N/A

Direct Comments to: Penny Dwoinen, Environmental Review Officer, City of Detroit Email: DwoinenP@detroitmi.gov

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

The Adaptive Reuse project proposes rehabilitation of a vacant, poured concrete, 12-story apartment building that was constructed in 1974 at 11421 Dexter Avenue, Detroit. The Russell Woods Senior Living Community (RWSLC) is a proposed 4% and 9% LIHTC co-located development consisting of a total of 77 units of age-restricted housing for seniors at up to 60% of AMI. Fifteen percent of the proposed units will be reserved for deep income targeting at 30% AMI. Project Based Voucher subsidy will be provided by the Inkster Housing Commission. The development will include 35 units as 9% LIHTC and 42 units as 4% LIHTC for a total of 68,874 square feet of gross rentable area. The first floor will consist of community areas including a library, fitness room and meeting areas totaling approximately 1,002 square feet. The redevelopment scope consists of all new systems, a complete gut rehab of the interior structure and reconfiguring the unit sizes from 138 to 77 units. There will be no new construction to the exterior of the structure. Improvements external to the building include sidewalk and curb replacement, landscaping and parking lot milling and resurfacing. As work proceeds it will be determined whether utility connections external to the building will require replacement or upgrade. Russell Woods Senior Living I LDHA LLC and Russell Woods II LDHA LLC intend to purchase the Subject Property on or after October 12, 2024. Supportive services will be provided by PACE with monthly Tenant Services for residents and the community provided by Hannan Center and Wayne Health Mobile Unit. Supportive communications and technology will be incorporated to connect residents to one another, care givers, family and friends. This review is for \$461,448.47 in HOME 2022, \$2,038,551.53 in HOME 2023, \$1,095,576.96 in CDBG 2023 and \$404,423.04 in CDBG 2024 from the City of Detroit and 77 vouchers from the Inkster Housing Commission. This environmental review is valid for up to five years

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

The project is designed to provide much needed affordable and accessible senior residential housing in the Russell Woods / Nardin Park neighborhood of Detroit. The development is intended to meet the income distribution and size needs identified in the market study as well as provide desirable community space for the tenants. Amenities include monthly supportive services by Hannan Center and Wayne Health Mobile Unit. The project is located within a targeted revitalization and investment area designated for the Strategic Neighborhood Fund (SNF) in the City's neighborhood revitalization plan.

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

The project site is a currently underutilized vacant building that is a security risk. The site is located on the west side of Dexter Avenue with Dexter Ave serving as a major artery in the Russell Woods/Nardin Park neighborhood, the development of the Russell Woods Senior Living Community marks a major turning point in concentrated density and catalyzing large scale residential development in this historic district. The

area would likely remain vacant without the proposed project. The surrounding land is a mix of single family residential, commercial, and community uses. The Subject Property has a municipal bus route stop across Dexter Avenue and is within easy walking distance of a variety of business, retail and religious opportunities. The adjoining St Paul AME Zion Church was built in 1929. The church has been an active community engager in the neighborhood and continues to invest and promote cultural activities in the neighborhood for the local residents. As described above, the market study documented a shortage of affordable housing particularly for seniors with incomes at or below 60% of Area Median Income (AMI) and trend factors indicating that this shortage will become even greater in the near, medium, and long term. Households aged 65 and older are projected to increase by 4.1% in Wayne County and low income senior renters will represent approximately 81% of all senior renters within the market. Private sector housing development in this area is infeasible in the foreseeable future. The new development will incorporate much needed residential living units at as well as common space and amenities. Failure to redevelop the vacant building would not address the current shortage of such housing or the projected long term continued shortage.

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

<u>Figure 1 - Site Location Map(1).pdf</u> <u>Figure 2 - Site Development Plan with Utilities.pdf</u> Att 19 - Market Study Oct 2022(1).pdf

Determination:

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

Approval Documents:

Signature Page - Russell Woods.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	Funding Amount
B23MC260006	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$1,095,576.96
B24MC260006	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$404,423.04
M22MC260202	Community Planning and Development (CPD)	HOME Program	\$461,448.47
M23MC260202	Community Planning and Development (CPD)	HOME Program	\$2,038,551.53
MI027	Other	Inkster Housing Commision PBVs	\$0.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$4,000,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) \$28,181,651.00 **(5)]:**

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORD	DERS, AND REGULATIC	DNS LISTED AT 24 CFR §50.4 & § 58.6
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	□ Yes ☑ No	The project is within 15,000 feet of a military airport or within 2,500 of a civilian airport. However, it is not within an APZ or RPZ/CZ. The project is in compliance with Airport Hazards requirements. The property is located approximately 6.5 miles from the Coleman A Young Municipal Airport, 11 miles from the Windsor International Airport and 14 miles from the Detroit Metropolitan Wayne County Airport, which are the nearest US military, civil or commercial service airports. The project site is not within an Airport Clear Zone or Accident Potential Zone. No

	1	
		military airfields are located in Wayne
		County or the nearby vicinity.
Coastal Barrier Resources Act	🗆 Yes 🗹 No	This project is not located in a CBRS
Coastal Barrier Resources Act, as		Unit. Therefore, this project has no
amended by the Coastal Barrier		potential to impact a CBRS Unit and is in
Improvement Act of 1990 [16 USC		compliance with the Coastal Barrier
3501]		Resources Act. The project site is not
		within a Coastal Barrier Resource
		System (CBRS) Unit, or CBRS buffer
		zone, as defined under the Coastal
		Barrier Improvement Act of 1990 [16
		Resources Act of 1982 (PL 97-348), as
		amended by the Coastal Barrier
		Improvement Act of 1990 (PL 101-591).
Flood Insurance	□ Yes ☑ No	The structure or insurable property is
Flood Disaster Protection Act of		not located in a FEMA-designated
1973 and National Flood Insurance		Special Flood Hazard Area. While flood
Reform Act of 1994 [42 USC 4001-		insurance may not be mandatory in this
4128 and 42 USC 5154a]		instance, HUD recommends that all
		insurable structures maintain flood
		insurance under the National Flood
		Insurance Program (NFIP). The project is
		in compliance with flood insurance
		requirements. The property is not
		located within a Special Flood Hazard
		Area as depicted on the Flood Insurance
		Rate Map panel 26163C0125E effective
		February 2, 2012. It is located in Zone X.
		The project would not involve either
		direct or indirect support of
		development in a floodplain. Flood
		Insurance is not needed.
STATUTES, EXECUTIVE ORI	DERS, AND REGULA	TIONS LISTED AT 24 CFR §50.4 & § 58.5
Air Quality	□ Yes ☑ No	The project's county or air quality
Clean Air Act, as amended,		management district is in non-
particularly section 176(c) & (d); 40		attainment status for the following:
CFR Parts 6, 51, 93		Sulfur dioxide. This project does not
, - ,		exceed de minimis emissions levels or
		the screening level established by the
		state or air quality management district
		for the pollutant(s) identified above.
		The project is in compliance with the
		Clean Air Act. Clean Air Act - Wayne
		County is designated as being in
		attainment for carbon monoxide, lead,
		actainment for carbon monoxide, lead,

		nitrogen dioxide, particulate matter (PM10 & PM2.5). Southeast Michigan is in an Attainment/Maintenance area for ozone as of May 19, 2023, and the eastern portion of Wayne County is in a Nonattainment area for Sulfur Dioxide. The Subject Property appears to be outside the non-attainment boundary for Sulfur dioxide. The State of Michigan has an approved State Implementation Plan in place and continues to monitor the concentrations of Sulfur Dioxide in portions of Wayne County. The EPA has made an interim final determination for this plan. Local and Regional air quality
		will not be affected by this rehabilitation project. A General Conformance Letter was received from EGLE and is attached.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	□ Yes ☑ No	This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. The Property is not located in a coastal zone per State of Michigan Office of the Great Lakes or the National Oceanic and Atmospheric Administration.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☑ Yes □ No	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, Remediation or clean-up plan, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. Radon analysis indicated elevated levels of radon or consideration of radon will occur following construction. Adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. A Phase I ESA in conformance with the scope and

limitations of ASTM E 1527-21 and
MSHDA Environmental Review for
Requirements the Subject Property was
completed on January 30, 2024. The
Phase I ESA revealed four recognized
environmental conditions (RECs) across
the Subject Property. Phase II
subsurface soil, groundwater and vapor
investigations revealed phenanthrene,
ethylbenzene, naphthalene, 1,3,5-TMB,
n-butylbenzene, isopropyl benzene and
n-propyl benzene in the soil and lead in
the groundwater in one location exceed
the Michigan Department of
Environment, Great Lakes & Energy's
(EGLE's) Generic Residential Cleanup
Criteria (GRCC) and/or Site Specific
Volatilization to Indoor Air Criteria
(SSVIAC) provided by EGLE defining the
Subject Property as a 'facility' per Part
201 or 'property' per Part 213. The soil
contaminants exceed leaching to
drinking water (DW), groundwater to
surface water interface protection
(GSIP) and/or soil volatilization to
indoor air (SVIA) site specific criteria.
The groundwater contaminant exceeds
the drinking water and groundwater to
surface water interface criteria. A BEA
report was prepared on May 16, 2024,
submitted and received by EGLE on May
23, 2024 and June 11, 2024. The
acknowledgement letters are attached.
Furthermore, to address the site
contamination concerns, a Response
Activity Plan (ResAP) was prepared,
submitted and reviewed by EGLE. EGLE
approved the report on July 31, 2024.
The plans outline the required structural
and non-structural barriers across the
Subject Property as well as the required
Operations and Maintenance on a guarterly basis. A DDCC will be
quarterly basis. A DDCC will be
submitted to EGLE for approval at the
end of the project. The approved DDCC
will establish that the site is in

10/16/2024 16:51 Page 7 of 67

		compliance with Part 201 for the
		intended residential use. An asbestos
		survey was conducted by Environmental
		& Occupational Consulting & Training of
		Michigan, Inc, (EOCT) on January 25 and
		26, 2024. The results of the survey
		revealed a paper vapor barrier
		associated with ceramic tile throughout
		the building and caulk on the exterior
		building entrance were positive for
		3
		asbestos. Quotes for abatement were
		obtained by the developer. A Lead
		Inspection & Risk Assessment report
		was prepared by EOCT dated February
		28, 2024. The results revealed ceramic
		tiles in the bathrooms were positive for
		lead greater than 1.0mg/cm2. Quotes
		for abatement were obtained by the
		developer. Per the HUD CPD-23-103
		Policy for Addressing Radon, the City of
		Detroit has elected to follow
		Consideration III A ii. 3) Scientific Data
		Review to determine whether the
		project site is located in an area that has
		average documented radon levels at or
		above 4 pCi/L. The Housing and
		Revitalization Department (HRD) has
		collected radon samples throughout the
		City of Detroit. According to the HRD
		Indoor Radon Map, the City is in a
		geographic area with radon under the
		levels suggested for mitigation. Since
		November 2023, fifty-nine (59) tests
		were taken throughout the City. The
		average results of the tests are 0.74
		pCi/L. Based on the samples taken in the
		City and the results averaging under 4
		pCi/L, no additional testing is required
Endangered Species Act	□ Yes ☑ No	This project will have No Effect on listed
Endangered Species Act of 1973,		species due to the nature of the
particularly section 7; 50 CFR Part		activities involved in the project. This
402		project is in compliance with the
		Endangered Species Act. The project is
		located within a historically densely
		developed environment where the
		vegetation and wildlife have adapted.

Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	□ Yes ☑ No	The project has been developed for commercial and residential uses since the early 1900's. An Official Species List was obtained from the USFWS that identifies potential Threatened and Endangered (T&E) species in the area of the proposed project. Based on observations and additional data gathered in this assessment, there are no T&E species or critical habitats along the Dexter Avenue corridor. Therefore, the project would have "No Effect" on listed species and no Best Management Practices would be required to mitigate potential effects to them. The USFWS indicates "There are no Critical Habitats at this Location". The project is within a Developed Area and is not within or adjacent to any unlandscaped areas that support native vegetation. The project is not within a suitable habitat for listed species and therefore no listed species or designated critical habitat is anticipated to be directly or indirectly affected by this action. Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements. The project does not involve explosive or flammable materials or operations. There is no visual evidence or indication of unobstructed or unshielded above ground storage tanks (fuel oil, gasoline, propane, etc.) or operations utilizing explosive/flammable material at or in close proximity to the property. The environmental database report obtained as part of the Phase I ESA did not reveal any ASTs within 1/4 mile. GRand reviewed the National Pipeline
		not reveal any ASTs within 1/4 mile.

Farmlands Protection	🗆 Yes	🗹 No	This project does not include any
Farmland Protection Policy Act of			activities that could potentially convert
1981, particularly sections 1504(b)			agricultural land to a non-agricultural
and 1541; 7 CFR Part 658			use. The project is in compliance with
			the Farmland Protection Policy Act.
			The project site consists of urban land;
			therefore, the project would not affect
			farmlands. According to the US
			Department of Agriculture Natural
			Resources Conservation Service
			Resource Assessment Division Map for
			Michigan there are no protected
			farmlands in the City of Detroit. The
			soils are classified as Shebeon-Urban
			land - Avoca complex, which are not
			prime farmland.
Floodplain Management	□ Yes		This project does not occur in the
Executive Order 11988, particularly			FFRMS floodplain. The project is in
section 2(a); 24 CFR Part 55			compliance with Executive Orders
			11988 and 13690. The property is not
			located within a Special Flood Hazard
			Area as depicted on the Flood Insurance
			Rate Map panel 26163C0125E effective
			February 2, 2012. It is located in Zone X.
			The project would not involve either
			direct or indirect support of
	_	_	development in a floodplain.
Historic Preservation	🗹 Yes	🗆 No	Based on Section 106 consultation the
National Historic Preservation Act of			project will have No Adverse Effect on
1966, particularly sections 106 and			historic properties. Conditions:
110; 36 CFR Part 800			Avoidance. Upon satisfactory
			implementation of the conditions,
			which should be monitored, the project
			is in compliance with Section 106. An
			Application for Section 106 review was
			submitted to the City of Detroit Housing
			& Revitalization Department's
			Preservation Specialist. Per Stipulation
			VI of Programmatic Agreement (PA), the
			proposed undertaking qualified for
			review by SHPO's archaeologist and
			consultation with Tribes. A technical
			report, completed by Misty Jackson of
			Arbre Croche Cultural Resources LLC,
			concluded is unlikely that intact
			archaeological deposits are present
	I		

		within the project area. In a letter dated March 27, 2024, SHPO concurred with the determination of no historic properties affected within the area of potential effects of this undertaking. A finding of No Adverse Effect within the area of potential effects was provided in a letter dated March 28, 2024. This project may proceed without further coordination with the City of Detroit Preservation Specialist unless the scope of work is modified, or artifacts are uncovered during the course of construction.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	☐ Yes ☑ No	A Noise Assessment was conducted. The noise level was acceptable: 61.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation. The Subject Property is located along Dexter Avenue which is considered a busy roadway but is not within 3,000 feet of a rail line. The property is located approximately 6.5 miles from the Coleman A Young Municipal Airport, 11 miles from the Windsor International Airport and 14 miles from the Detroit Metropolitan Wayne County Airport. A Noise Exposure Map was obtained for all three airports, which indicated acceptable noise limits on the Subject Property since it was well beyond the 65dB contour. A Noise Assessment according to HUD guidelines for the Subject Property was completed on January 30, 2024. The results revealed a Day Night Average Noise Level (DNL) of 61dB, which included 10-year projections with 2% growth, an assumption of 20% medium and heavy trucks and 15%-night fraction of traffic. It is classified as Acceptable with no additional abatement requirements.
Sole Source Aquifers	□ Yes ☑ No	Based on the project description, the
Safe Drinking Water Act of 1974, as		project consists of activities that are unlikely to have an adverse impact on

amended, particularly section		groundwater resources. The project is in
1424(e); 40 CFR Part 149		compliance with Sole Source Aquifer
		requirements. The project is
		rehabilitation of an existing building.
		There are no US EPA designated sole-
		source aquifers in Michigan. The
		proposed site is not located within a
		sole source aquifer watershed and
		would not affect a sole-source aquifer
		or negatively impact the water quality
		or any aquifers in the area.
Wetlands Protection	🗆 Yes 🗹 No	The project will not impact on- or off-
Executive Order 11990, particularly		site wetlands. The project is in
sections 2 and 5		compliance with Executive Order 11990.
		The project site is not located near, or
		within, a wetland area. The surrounding
		area is densely populated urban area.
		Therefore, the project would not affect
		wetland or riparian areas.
Wild and Scenic Rivers Act	🗆 Yes 🗹 No	This project is not within proximity of a
Wild and Scenic Rivers Act of 1968,		NWSRS river. The project is in
particularly section 7(b) and (c)		compliance with the Wild and Scenic
		Rivers Act. No Wild and Scenic Rivers
		are located within the City of Detroit.
HUD HO	DUSING ENVIRONMEN	ITAL STANDARDS
	ENVIRONMENTAL J	USTICE
Environmental Justice	🗆 Yes 🗹 No	No adverse environmental impacts were
Executive Order 12898		identified in the project's total
		environmental review. The project is in
		compliance with Executive Order 12898.
		The building will serve low-income and
		minority populations. The project would
		not result in disproportionately adverse
		environmental effects on minority or
		low income populations. New facilities
		and residences are intended to enhance
		the quality of life for new and existing
		residents and the community.

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

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

(1) Minor beneficial impact

(2) No impact anticipated

(3) Minor Adverse Impact – May require mitigation

(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental	Impact	Impact Evaluation	Mitigation			
Assessment Factor	Code					
LAND DEVELOPMENT						
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	This redevelopment project is in agreement with both the City of Detroit Master Plan and Zoning Ordinances. The site is currently zoned PD (planned development) and adjoins R2 (Single-family residential district) and B4 (general business) along Dexter Avenue. A historic district is to the southeast for the church. See Attachment 15 for Zoning Map. This development is compatible with the City's goals for residential development and will have a positive impact on the area within which it exists. The proposed renovation activities are anticipated to help revitalize the area immediately surrounding the project. The building exterior will not change. The design has been completed to be compatible with the surrounding area in use and scale and has been approved by the city. Revitalization of a currently vacant, boarded up building while providing needed senior housing and increasing the tax base will be beneficial.				
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Topography The development site consists of virtually level ground, at an equal elevation to adjoining properties. After construction, the site will have slopes of less than 2% (see Figures). Site Geology Soil borings conducted in past documented investigations indicate the site consists of sandy fill material above a native dry clay. The soils depicted on the soil survey are identified as Shebeon-Urban land - Avoca complex. Erosion Erosion by natural forces is not anticipated to be of concern following development of the site. The				

	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code		
Assessment Factor Hazards and Nuisances including Site Safety and Site- Generated Noise	-	Impact Evaluation majority of the site is paved parking surface. During renovation, the project site will be surrounded by approved soil erosion and sedimentation control systems. These systems shall be maintained throughout the construction phases of the project to minimize the potential for water borne migration of soils off site to protect adjacent and downstream storm water inlets. Storm water runoff is not expected to increase since there are few exterior changes. Stormwater Stormwater runoff at the project site will enter the municipal storm sewer system. There is no change to the system planned. City of Detroit has enough availability to service the Subject Property. See Attachment 9 for the soil map and Attachment 16 for the Detroit Stormwater Management Plan and Figure 1 A noise assessment was conducted for the property and the measurements found exterior noise levels on the site to be up to a Day-Night Average Sound Level (DNL) of 61 dB, which is acceptable. Noise intensive renovation activities will be limited to the days and hours specified under the City's noise ordinance. These days and hours shall also apply to any servicing of equipment and to the delivery and removal of materials to and from the site. All construction equipment shall be equipped with mufflers and sound control devices (e.g., intake silencers and noise shrouds) no less effective than those provided on the original equipment and no equipment shall have an un-muffled exhaust. Stationary equipment shall be placed so as to maintain the greatest possible distance from sensitive uses. Road hazards will not change, although the	Mitigation

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code		iningution
		city's control. Air Quality is not expected to be affected by the project though short term dust during construction is a potential concern and will be addressed by utilizing all best practices approach with dust control measures in place during construction activities. Any emissions would be short- term and localized and would not result in any significant adverse effects on overall ambient air quality. See Attachments 5 and	
Employment and Income Patterns	1	SOCIOECONOMIC The proposed project is expected to positively alter the demographic nature and character of the community due to the increase in the local population. The project will provide temporary construction jobs during the renovation phase and continuing full time employment for maintenance and management of the development. Future residents of this development will help to support existing and future commercial enterprises in the area and the project will also increase long term tax base by placing the existing vacant and unused property into productive use.	
Demographic Character Changes / Displacement	1	See Attachment 19 for the Market Study The proposed project would not result in physical barriers or reduced access that would isolate a particular neighborhood or population group. The building will be renovated and the renovation is making the structure more accessible. The proposed project would not induce a substantial amount of unplanned growth and is in fact part of the City's planned growth. The project will increase the number of available senior living residential units and thus would result in a slight increase to population, although less than the building previously allowed. The renovation into additional low income senior housing will assist in stabilizing and diversifying the	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor			C C
	neighborhood. Displacement This residential renovation project will occur in a currently vacant and unused building, therefore no persons will be displaced due to this project. See Attachment 18 and		
Environmental Justice EA Factor	5		
	COMMU	JNITY FACILITIES AND SERVICES	
Educational and Cultural Facilities (Access and Capacity)	ties effect the local educational fa is a senior living developmen education is offered in the ar Public Schools. Several presc elementary, middle and high located within ten miles of th Property. Wayne State Unive Lawrence Technological Univ within Detroit. The City of maintains multiple museums performance halls, theatres a The Detroit Institute of Art, N Museum, Opera House, Com Little Caesars Arena among o within approximately five mil Subject Property and accessil transportation. The proposed expected to significantly impo capacity of the existing cultur See Attachment 20 for maps educational facilities and cult		
Commercial Facilities (Access and Proximity)	cial Facilities 2 The project is not expected to negatively impact existing commercial facilities that		

Environmental Assessment Factor			Mitigation
		residents, which will benefit the neighboring commercial establishments. See Attachment 18	
Health Care / Social Services (Access and Capacity)	2	See Attachment 10The area of the project site has adequate health care service providers for the city and surrounding communities. The project site is less than three miles away from Henry Ford Hospital and several senior care and urgent care facilities are located within five miles. In addition, the residents will be serviced by a local health care facility on site. See Attachment 20 for maps and lists documenting the neighboring hospitals, senior care facilities and urgent care facilities. Adequate social services are available to residents of the City of Detroit. Area organizations provide a wide range of services to low-income persons. The area wide services include homeless programs, 	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The project site will be served by the existing local utility service (Advanced Disposal, part of Waste Management) and the renovation is not expected to negatively impact the solid waste disposal service. Following renovation, the project site will utilize solid waste dumpsters that will be serviced by the local contractor on a weekly basis. The City of Detroit Public Works is committed to a fully integrated solid waste management system. The system includes waste reduction, reuse, recycling, incineration, energy recovery and land filling. See Attachment 22 for a map and listing of nearby waste services	
Waste Water and Sanitary Sewers	2	The Stormwater and Sewer system is operated the by the City of Detroit Water and Sewerage Department. The sewer	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code		
(Feasibility and		network consists of more than 3,000 miles	
Capacity)		of sewer collection piping. Wastewater	
		generated at the project site would be	
		collected and processed by the city sanitary	
		system. The City of Detroit has adequate	
		facilities to handle any waste water	
		generated from this project since it	
		previously supported more than 130 units	
		and will be renovated to 77 units. The	
		project site is not anticipated to generate	
		new significant quantities of waste water.	
Water Supply	2	The project site area receives water from	
(Feasibility and		the City of Detroit. The City of Detroit is in	
Capacity)		compliance with State and Federal Drinking	
		Water Acts and has adequate facilities to	
		supply water to the project site. The	
		drinking water meets or exceeds the water	
		quality requirements of the EPA. See	
		Attachment 23 - about DWSD	
Public Safety -	2 The project site is served by the City of		
Police, Fire and		Detroit Police and Fire Department. The	
Emergency Medical		Police Department has a dedicated	
		Neighborhood Police Officer assigned to the	
		area in addition to standard emergency	
		police services. Detroit firefighters are	
		trained as emergency medical technicians,	
		and some firefighters are also paramedics.	
		Detroit FD operates 46 firehouses with	
		between 4 and 12 firefighters per station.	
		They are licensed and outfitted with	
		medical first response equipment. EMT and	
		ambulance services are also available with	
		private services. Furthermore, Detroit	
		ensures fire safety and emergency	
		accessibility within new and existing	
		developments through provisions of its	
		Building and Fire Codes. The renovation of	
		the project site will improve the safety of	
		walking routes as well as the overall public	
		safety of the community and tenants. Since	
		the site was previously developed, no	
		significant increased demands are	
		anticipated for the public services. See	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code		
Unique Natural	2	The existing natural landscape is not	
Features /Water	-	unique, no water features are present	
Resources		onsite or adjoining. Implementation of the	
		project would not affect water resources,	
		nor would it increase demands on	
		groundwater resources since it is an interior	
		rehabilitation project. As noted above,	
		water service would be provided by City of	
		Detroit. No surface waters (e.g., lakes,	
		rivers, ponds) are located on or adjacent to	
		the project site. Stormwater at the project	
		would be collected and treated by the City	
		through the currently existing system. The	
		project was checked for unique natural	
		features and endangered species in Wayne	
		County and did not find any that would	
		apply to the project or impact the project	
		site.	
Vegetation / Wildlife	2	The project site is located within an urban	
(Introduction,		environment where the vegetation and	
Modification,		wildlife have adapted. The site has been	
Removal, Disruption,		previously developed since the early 1900's,	
etc.)		with no indication of unique vegetation or	
		wildlife. This project will not disrupt any	
		existing natural landscape or wildlife.	
Other Factors 1			
Other Factors 2			
	•	CLIMATE AND ENERGY	1
Climate Change	2	The rehabilitation of an existing vacant	
		building is not expected to impact climate	
		change. It will not increase factors typically	
		associated with contributing to climate	
		change and could improve the factors by	
		reducing the development of green space or	
		additional single-family development for	
		senior housing. Based on the FEMA National	
		Risk Factors Index, the Risk Index is Very	
		High for Cold Wave, Strong Wind and	
		Tornado. The Community Resilience is	
		Relatively Moderate. These risks are not	
		likely to impact the Subject Property due to	
		the energy efficiency features to combat a	
		cold wave, and the concrete construction of	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		the building is resistant to strong winds and tornados (see Attachment 28).	
Energy Efficiency	1	The project will meet current State and local codes concerning energy consumption. It is not anticipated to have a substantial effect on the use, extraction, or depletion of a natural resource. Energy utilization during renovation is expected to be consistent with typical renovation equipment. The location is served by local utility providers. The development will be completed in accordance with NGBD Silver, or equivalent green design standard employing many resource and energy conservation strategies. The project site will incorporate energy efficient home performance standards to decrease consumption of energy. The structure will include modern features including efficient windows, insulation and have high efficiency furnaces, energy star appliances and LED lighting. See Attachment 17 for Project Narratives	

Supporting documentation

Att 28 - climate Changes Community Report Wayne County Michigan National Risk Index.pdf Figure 1 - Site Location Map.pdf Fig 2 - Site Development Plan with Utilities.pdf Att 5 - Gen Conformity Letter Russel Woods Senior Housing Development Feb 2024(1).pdf Att 5 - Air_attainment_status_maps_407842_7(1).pdf Attch 26 - DDOT System Map.pdf Att 26 - transportation - Google Maps.pdf Att 25 - parks - Google Maps.pdf Att 24 - police - Google Maps.pdf Att 24 - fire stations - Google Maps.pdf Att 23 - Detroit Water Quality Report 2022.pdf Att 23 - About DWSD _ City of Detroit.pdf Att 22 - waste services near me - Google Maps.pdf Att 21 - social services near me - Google Maps.pdf Att 21 - hospitals urgent care near me - Google Maps.pdf

Att 21 - healthcare facilities - Google Maps.pdf

Russell-Woods-Senior-Living

Att 20 - schools - Google Maps.pdf Att 20 - Cultural facilities -.pdf Att 20 - cultural facilities - Google Maps.pdf Att 19 - Market Study Oct 2022.pdf Att 18 - RussellWoodsSenior_Ex 21_Community Revitalization narrative.pdf Att 15 - Zoning Map.pdf Att 11 - Noise-EA-Partner-Worksheet(1).docx

Additional Studies Performed:

Market Study Environmental Due Diligence Reports

Field Inspection [Optional]: Date and completed

by: Christina Bakos

1/25/2024 12:00:00 AM

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

Michigan Department of Environment, Great Lakes & Energy Detroit Historic Preservation Office United States Fish and Wildlife Service FEMA

List of Permits Obtained:

1. Building permits through the City of Detroit Building Safety Engineering, and Environmental Department (BSEED) are in review with the City of Detroit. 2. MSHDA Design Review and Approval is in review.

Public Outreach [24 CFR 58.43]:

All historical, local and federal contacts on the attached Interested Parties List were sent a copy of the Notice of Intent to Request for Release of Funds to use HUD funding for the project and were asked to comment on the project. A virtual community meeting was held with the City of Detroit Planning & Development Department and three different media news outlets.

Cumulative Impact Analysis [24 CFR 58.32]:

The cumulative impacts anticipated for this project are primarily associated with reinstatement of residential use such as increased traffic and use of resources and services (roads, schools, police, etc). The project is consistent with the anticipated growth of the immediate and surrounding neighborhoods and therefore not considered detrimental. Other cumulative impacts include generation and consumption of materials during renovation and waste generated during renovation

which are expected to be minimalized through the use of industry best practices, Enterprise Silver Environmental Criteria and high efficiency appliances. The proposed project will have a positive effect within the City of Detroit by placing the inactive property back into productive use; reducing property vacancies; providing additional, much needed, affordable and low-income modern housing for seniors; and eliminating the decline of neighborhood housing values. Improvement of this portion of the community may spur additional renovations in the area, address identified community revitalization plan goals, and add residential tenants in an important area of the community. No significant adverse impacts to the human environment are anticipated.

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

The layout of the building was designed and modified to achieve the highest and best use, therefore previous plans were changed to allow for this, with no adverse impacts to the human environment. The number and layout of the units has been modified to provide for project-based voucher units as well as rents at 60% AMI units and 15% of the proposed units will be reserved for deep income targeting at 30% AMI. The redevelopment plans have been carefully proposed to allow the thoughtful redevelopment of an unused abandoned building within the City of Detroit Russell Woods Neighborhood. Private Development - Redevelopment using private funds is not economically feasible considering current rental rates within the target area. More Units - Option for construction of a larger development was considered but not selected due to market conditions anticipated at this time. Fewer Units -Development and operating costs are not feasible for a facility with fewer units. Alternate Site - The market study and related research did not identify any sites within the market area of comparable size that are currently vacant or with similar proximity to resources. Redevelopment of occupied alternative sites with suitable characteristics would require the displacement of current residents or businesses that is not consistent with the community's focus on growth and sustainability.

No Action Alternative [24 CFR 58.40(e)]

The no action alternative would fail to stabilize the neighborhood and property values. The project site would remain vacant and unused, which is a potential hazard and does not benefit the City of Detroit community. The no action alternative would fail to address the documented critical need for senior low-income modern housing or fulfill the goals of the community revitalization. Because no adverse impacts have been identified, the alternative of No Action is not reasonable

Summary of Findings and Conclusions:

The project would provide much needed affordable, private-unit senior residential housing and a community gathering space in a transitional area of Detroit. The development is designed to meet the income distribution and household size needs

identified in the market study as well as provide desirable community space for the residents as well as additional amenities. The property has been vacant and unused for several years, and the proposed end use will provide important community engagement and living area in a vital area of the city. The no action alternative would fail to stabilize the neighborhood and property values. The project site would remain vacant and unused, which does not benefit the City of Detroit community. Furthermore, the impacts of the development are minimal and can be managed by typical mitigation measures. Overall, the project is a benefit to the City of Detroit.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Historic Preservation	This project may proceed without further coordination with the City of Detroit Preservation Specialist unless the scope of work is modified, or artifacts are uncovered during the course of construction.	N/A	Unanticipated Discovery Plan	
Contamination and Toxic Substances	Use of engineering controls as approved within a detailed Response Activity Plan provided to EGLE for review, approved on August 1, 2024.	N/A	Approved Response Activity Plan with OM&M Plan and Documentation of Due Care Compliance reporting	
Contamination and Toxic Substances	Asbestos abatement and lead based paint abatement will be conducted prior to / during renovation by a licensed contractor.	N/A	Summary close-out reports will be prepared for each.	

Russell-Woods-Senior-Living

Project Mitigation Plan See attached Mitigation Plan

Russell Woods Final Mitigation Plan.pdf

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

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

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

Yes

2. Is your project located within a Runway Protection Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ) ?

Yes, project is in an APZ

Yes, project is an RPZ/CZ

✓ No, project is not within an APZ or RPZ/CZ

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within either zone below.

Screen Summary

Compliance Determination

The project is within 15,000 feet of a military airport or within 2,500 of a civilian airport. However, it is not within an APZ or RPZ/CZ. The project is in compliance with Airport Hazards requirements. The property is located approximately 6.5 miles from the Coleman A Young Municipal Airport, 11 miles from the Windsor International Airport and 14 miles from the Detroit Metropolitan Wayne County Airport, which are

the nearest US military, civil or commercial service airports. The project site is not within an Airport Clear Zone or Accident Potential Zone. No military airfields are located in Wayne County or the nearby vicinity.

Supporting documentation

Att 2 - Windsor International Airport to 11421 Dexter Ave Detroit MI 48206 Google <u>Maps.pdf</u> Att 2 - Coleman A Young International Airport to 11421 Dexter Ave Detroit MI 48206 <u>Google Maps.pdf</u> Att 2 - Detroit Metropolitan Wayne County Airport to 11421 Dexter Ave Detroit MI 48206 Google Maps(1).pdf Att 2 - Airport-Runway-Clear-Zones-Partner-Worksheet.docx Att 2 - Airport-Hazards-Partner-Worksheet.docx Att 1 - Airport Noise Contour Maps.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

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

1. Is the project located in a CBRS Unit?

✓ No

Document and upload map and documentation below.

Yes

Compliance Determination

This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act. The project site is not within a Coastal Barrier Resource System (CBRS) Unit, or CBRS buffer zone, as defined under the Coastal Barrier Improvement Act of 1990 [16 Resources Act of 1982 (PL 97-348), as amended by the Coastal Barrier Improvement Act of 1990 (PL 101-591).

Supporting documentation

<u>Att 3 - CBRS MI Map.pdf</u> <u>Att 3 - Coastal Zone Boundary Maps by county and township.pdf</u> <u>Att 3 - CBRS Map.pdf</u>

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

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

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

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:

Att 4 - Floodplain Map EMES.pdf

The Federal Emergency Management Agency (FEMA) designates floodplains. The <u>FEMA</u> <u>Map Service Center</u> 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 FEMAdesignated Special Flood Hazard Area?

✓ No

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

Yes

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

Yes

✓ No

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. The property is not located within a Special Flood Hazard Area as depicted on the Flood Insurance Rate Map panel 26163C0125E effective February 2, 2012. It is located in Zone X. The project would not involve either direct or indirect support of development in a floodplain. Flood Insurance is not needed.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered	Clean Air Act (42 USC 7401 et	40 CFR Parts 6, 51
by the U.S. Environmental	seq.) as amended particularly	and 93
Protection Agency (EPA), which	Section 176(c) and (d) (42 USC	
sets national standards on	7506(c) and (d))	
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.		

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

✓ Yes

No

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

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

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

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

Lead

Nitrogen dioxide

✓ Sulfur dioxide

✓ Ozone

Particulate Matter, <2.5 microns

Particulate Matter, <10 microns

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

Sulfur dioxide100.00ppb (parts per billion)Ozone100.00ppb (parts per million)

Provide your source used to determine levels here:

EPA De Minimis Tables

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

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

Enter the estimate emission levels:

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

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

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

Screen Summary

Compliance Determination

The project's county or air quality management district is in non-attainment status for the following: Sulfur dioxide. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act. Clean Air Act - Wayne County is designated as being in attainment for carbon Russell-Woods-Senior-Living

monoxide, lead, nitrogen dioxide, particulate matter (PM10 & PM2.5). Southeast Michigan is in an Attainment/Maintenance area for ozone as of May 19, 2023, and the eastern portion of Wayne County is in a Nonattainment area for Sulfur Dioxide. The Subject Property appears to be outside the non-attainment boundary for Sulfur dioxide. The State of Michigan has an approved State Implementation Plan in place and continues to monitor the concentrations of Sulfur Dioxide in portions of Wayne County. The EPA has made an interim final determination for this plan. Local and Regional air quality will not be affected by this rehabilitation project. A General Conformance Letter was received from EGLE and is attached.

Supporting documentation

<u>Att 5 - De Minimis Tables _ US EPA.pdf</u> <u>Att 5 - Gen Conformity Letter Russel Woods Senior Housing Development Feb</u> <u>2024.pdf</u> <u>Att 5 - Air_attainment_status_maps_407842_7.pdf</u>

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

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

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 is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. The Property is not located in a coastal zone per State of Michigan Office of the Great Lakes or the National Oceanic and Atmospheric Administration.

Supporting documentation

<u>Att 3 - Coastal Zone wayne_county_mczmpr.pdf</u> Att 3 - Coastal Zone Boundary Maps by county and township(1).pdf</u>

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

Living

General Requirements	Legislation	Regulations		
It is HUD policy that all properties that are being		24 CFR		
proposed for use in HUD programs be free of		58.5(i)(2)		
hazardous materials, contamination, toxic		24 CFR 50.3(i)		
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.				
Reference				
https://www.onecpd.info/environmental-review/site-contamination				

1. How was site contamination evaluated?* Select all that apply.

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances* (excluding radon) 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?)

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

No

Explain:

✓ Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

** Utilize EPA's Enviromapper, NEPAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice <u>CPD-23-103</u>?

Yes

Explain:

🗸 No

* Notes:

• Buildings with no enclosed areas having ground contact.

• Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.

• Buildings that are not residential and will not be occupied for more than 4 hours per day.

• Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.

• Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

4. Is the proposed project new construction or substantial rehabilitation where testing will

be conducted but cannot yet occur because building construction has not been completed?

Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

✓ No

5. Was radon testing or a scientific data review conducted that provided a radon concentration level in pCi/L?

✓ Yes

No

If no testing was conducted and a review of science-based data offered a lack of science-based data for the project site, then document and upload the steps taken to look for documented test results and science-based data as well as the basis for the conclusion that testing would be infeasible or impracticable.

Explain:

File Upload:

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Non-radon contamination was found in a previous question.

6. How was radon data collected?

All buildings involved were tested for radon

✓ A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data:

0.74

Provide the documentation* used to derive this value:

Per the HUD CPD-23-103 Policy for Addressing Radon, the City of Detroit has elected to follow Consideration III A ii. 3) Scientific Data Review to determine whether the project site is located in an area that has average documented radon levels at or above 4 pCi/L. The Housing and Revitalization Department (HRD) has collected radon samples throughout the City of Detroit. According to the HRD Indoor Radon Map, the City is in a geographic area with radon under the levels suggested for mitigation. Since November 2023, fifty-nine (59) tests were taken throughout the City. The average results of the tests are 0.74 pCi/L. Based on the samples taken in the City and the results averaging under 4 pCi/L, no additional testing is required.

File Upload:

HRD Indoor Radon Map 04-18-24(1).pdf

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Radon concentration value is greater than or equal to 4.0 pCi/L and/or non-radon contamination was found in a previous question. Continue to Mitigation.

* For example, if you conducted radon testing then provide a testing report (such as an ANSI/AARST report or DIY test) if applicable (note: DIY tests are not eligible for use in multifamily buildings), or documentation of the test results. If you conducted a scientific data review, then describe and cite the maps and data used and include copies of all supporting documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

8. Mitigation

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

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

No, all adverse environmental impacts cannot feasibly be mitigated. Project cannot proceed at this location.

 Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
 Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice <u>CPD-23-103</u> for additional information on radon mitigation plans. ** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

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

Use of engineering controls as approved within a detailed Response Activity Plan provided to EGLE for review, approved on August 1, 2024.

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

Complete removal

Risk-based corrective action (RBCA)

Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

** Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when

contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, Remediation or clean-up plan, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. Radon analysis indicated elevated levels of radon or consideration of radon will occur following construction. Adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. A Phase I ESA in conformance with the scope and limitations of ASTM E 1527-21 and MSHDA Environmental Review for Requirements the Subject Property was completed on January 30, 2024. The Phase I ESA revealed four recognized environmental conditions (RECs) across the Subject Property. Phase II subsurface soil, groundwater and vapor investigations revealed phenanthrene, ethylbenzene, naphthalene, 1,3,5-TMB, nbutylbenzene, isopropyl benzene and n-propyl benzene in the soil and lead in the groundwater in one location exceed the Michigan Department of Environment, Great Lakes & Energy's (EGLE's) Generic Residential Cleanup Criteria (GRCC) and/or Site Specific Volatilization to Indoor Air Criteria (SSVIAC) provided by EGLE defining the Subject Property as a 'facility' per Part 201 or 'property' per Part 213. The soil contaminants exceed leaching to drinking water (DW), groundwater to surface water interface protection (GSIP) and/or soil volatilization to indoor air (SVIA) site specific criteria. The groundwater contaminant exceeds the drinking water and groundwater to surface water interface criteria. A BEA report was prepared on May 16, 2024, submitted and received by EGLE on May 23, 2024 and June 11, 2024. The acknowledgement letters are attached. Furthermore, to address the site contamination concerns, a Response Activity Plan (ResAP) was prepared, submitted and reviewed by EGLE. EGLE approved the report on July 31, 2024. The plans outline the required structural and non-structural barriers across the Subject Property as well as the required Operations and Maintenance on a quarterly basis. A DDCC will be submitted to EGLE for approval at the end of the project. The approved DDCC will establish that the site is in compliance with Part 201 for the intended residential use. An asbestos survey was conducted by Environmental & Occupational Consulting & Training of Michigan, Inc, (EOCT) on January 25 and 26, 2024. The results of the survey revealed a paper vapor barrier associated with ceramic tile throughout the building and caulk on the exterior building entrance were positive for asbestos. Quotes for

abatement were obtained by the developer. A Lead Inspection & Risk Assessment report was prepared by EOCT dated February 28, 2024. The results revealed ceramic tiles in the bathrooms were positive for lead greater than 1.0mg/cm2. Quotes for abatement were obtained by the developer. Per the HUD CPD-23-103 Policy for Addressing Radon, the City of Detroit has elected to follow Consideration III A ii. 3) Scientific Data Review to determine whether the project site is located in an area that has average documented radon levels at or above 4 pCi/L. The Housing and Revitalization Department (HRD) has collected radon samples throughout the City of Detroit. According to the HRD Indoor Radon Map, the City is in a geographic area with radon under the levels suggested for mitigation. Since November 2023, fifty-nine (59) tests were taken throughout the City. The average results of the tests are 0.74 pCi/L. Based on the samples taken in the City and the results averaging under 4 pCi/L, no additional testing is required

Supporting documentation

HRD Indoor Radon Map 04-18-24.pdf Attch 6 - ResAP 7a1b Approval Letter 11421 Dexter Ave Detroit.pdf Flueranvil Russell Woods I LDHA - Owens EGLE - Acknowledgement of BEA Submittal.pdf Final ResAP 11421 Dexter REV signed 7252024r.pdf Final Complete BEA 11421 Dexter 051624 r.pdf Phase I ESA 11421 Dexter Ave Russell Woods complete signed r.pdf Att 6 - LIRA EBL Report Russell Woods Dev.pdf Att 6 - Asbestos Survey Report Russell Woods Dev r.pdf Att 6 - Radon Map 0624 EGLE.pdf Att 6 - Map-Of-Michigan-Radon-Levels.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)	The Endangered	50 CFR Part
mandates that federal agencies ensure that	Species Act of 1973	402
actions that they authorize, fund, or carry out	(16 U.S.C. 1531 et	
shall not jeopardize the continued existence of	seq.); particularly	
federally listed plants and animals or result in	section 7 (16 USC	
the adverse modification or destruction of	1536).	
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").		

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

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

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 will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act. The project is located within a historically densely developed environment where the vegetation and wildlife have adapted. The project has been developed for commercial

and residential uses since the early 1900's. An Official Species List was obtained from the USFWS that identifies potential Threatened and Endangered (T&E) species in the area of the proposed project. Based on observations and additional data gathered in this assessment, there are no T&E species or critical habitats along the Dexter Avenue corridor. Therefore, the project would have "No Effect" on listed species and no Best Management Practices would be required to mitigate potential effects to them. The USFWS indicates "There are no Critical Habitats at this Location". The project is within a Developed Area and is not within or adjacent to any unlandscaped areas that support native vegetation. The project is not within a suitable habitat for listed species and therefore no listed species or designated critical habitat is anticipated to be directly or indirectly affected by this action.

Supporting documentation

Att 7 - Updated Species List_Michigan Ecological Services Field Office (1).pdf Att 7 - Species List_Michigan Ecological Services Field Office (1).pdf

Are formal compliance steps or mitigation required?

Yes

Explosive and Flammable Hazards

1.1	•		
	General requirements	Legislation	Regulation
	HUD-assisted projects must meet	N/A	24 CFR Part 51
	Acceptable Separation Distance (ASD)		Subpart C
	requirements to protect them from		
	explosive and flammable hazards.		

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

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements. The project does not involve explosive or flammable materials or operations. There is no visual evidence or indication of unobstructed or unshielded above ground storage tanks (fuel oil, gasoline, propane, etc.) or operations utilizing explosive/flammable material at or in close proximity to the property. The environmental database report obtained as part of the Phase I ESA did not reveal any ASTs within 1/4 mile. GRand reviewed the National Pipeline map and no gas pipelines, plants or breakout tanks within a mile of the Subject Property

Supporting documentation

<u>Att 8 - Explosives-Partner-Worksheet (2).docx</u> <u>Att 8 - NPMS Public Viewer.pdf</u>

Are formal compliance steps or mitigation required?

Yes

Farmlands Protection

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

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:

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

Screen Summary

Compliance Determination

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. The project site consists of urban land; therefore, the project would not affect farmlands. According to the US Department of Agriculture Natural Resources Conservation Service Resource Assessment Division Map for Michigan there are no protected farmlands in the City of Detroit. The soils are classified as Shebeon-Urban land - Avoca complex, which are not prime farmland.

Supporting documentation

<u>Att 9 - Soil_Map.pdf</u> Att 9 - Farmlands-Partner-Worksheet (2).docx

Are formal compliance steps or mitigation required?

Yes

Floodplain Management

Legislation	Regulation
Executive Order 11988	24 CFR 55
* Executive Order 13690	
* 42 USC 4001-4128	
* 42 USC 5154a	
* only applies to screen 2047	
and not 2046	
	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

✓ No

2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.

Yes

Describe:

✓ No

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool , data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

 ✓ 0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

¹ Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

² If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your <u>local environmental officer</u> with additional compliance questions.

³ Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at 24 CFR 55.2(b)(12).

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. The property is not located within a Special Flood Hazard Area as depicted on the Flood Insurance Rate Map panel 26163C0125E effective February 2, 2012. It is located in Zone X. The project would not involve either direct or indirect support of development in a floodplain.

Supporting documentation

Att 4 - Floodplain and Wetland Maps(2).pdf

Are formal compliance steps or mitigation required?

Yes

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.) No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

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

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Offer (SHPO) Completed
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
 - **√**

✓ Bay Mills Indian Community

Completed Completed

✓ Forest County Potawatomi Community of Wisconsin	Completed
 ✓ Grand Traverse Band of Ottawa & Chippewa Indians 	Completed
✓ Hannahville Indian Community	Completed
✓ Ketegitigaaning Ojibwe Nation / Lac Vieux Desert	Completed
✓ Keweenaw Bay Indian Community of Lk	Completed
Superior	
✓ Lac du Flambeau Band of Lk Superior Chippewa	Completed
 ✓ Little River Band of Ottawa Indians 	Completed
 Little Traverse Bay Bands of Odawa 	Completed
Indians ✓ Match-E-Be-Nash-She-Wish Band of	Completed
Pottawatomi	completed
✓ Menominee Indian Tribe of Wisconsin	Completed
✓ MI Anishinaabek Cultural Prev &	Completed
Repatriation ✓ Miami Tribe of Oklahoma	Completed
 ✓ Nottawaseppi Huron Band of the 	Completed
Potawatomi	
 ✓ Pokagon Band of Potawatomi Indians, MI and IN 	Completed
✓ Saginaw Chippewa Indian Tribe of	Completed
Michigan	
✓ Sault Ste. Marie Tribe of Chippewa	Completed
Indians ✓ Seneca Cayuga Nation	Completed
	completed

Other Consulting Parties

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

The City of Detroit works under a programmatic agreement with the Michigan SHPO and Advisory Council on Historic Preservation. Consulting Partes were invited to participate in the creation of the agreement, including the City of Detroit Historic Designation Advisory Board and Planning and Development Department, Preservation Detroit, and the Michigan Historic Preservation Network.

Document and upload all correspondence, notices and notes (including comments and

Russell-Woods-Senior-Living

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:

The APE for indirect effects is the building where the exterior renovation is proposed and the surrounding parking lot. As the building and parking lots already exist, the proposed project will not change the setting or views of surrounding properties. The only other potential effects are a slight increase in pedestrian and vehicular traffic once residents occupy a currently vacant building and parking lot. No other potential effects are anticipated. The indirect APE is shown on the attached street map and aerial map.

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	National Register	SHPO Concurrence	Sensitive
/ District	Status		Information

Additional Notes:

Section 106 application and supporting documentation uploaded

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:

Sensitive Information, not uploaded

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. (<u>36 CFR 800.5</u>)] Consider direct and indirect effects as applicable as per guidance on <u>direct and indirect effects</u>.

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:**

An Application for Section 106 review was submitted to the City of Detroit Housing & Revitalization Department's Preservation Specialist. Per Stipulation VI of Programmatic Agreement (PA), the proposed undertaking qualified for review by SHPO's archaeologist and consultation with Tribes. A technical report, completed by Misty Jackson of Arbre Croche Cultural Resources LLC, concluded is unlikely that intact archaeological deposits are present within the project area. In a letter dated March 27, 2024, SHPO concurred with the determination of no historic properties affected within the area of potential effects of this undertaking. A finding of No Adverse Effect within the area of potential effects was provided by the City of Detroit in a letter dated March 28, 2024

Does the No Adverse Effect finding contain conditions?

✓ Yes (check all that apply)

Avoidance

Modification of project

✓ Other

Describe conditions here:

This project may proceed without further coordination with the City of Detroit Preservation Specialist unless the scope of work is modified, or artifacts are uncovered during the course of construction.

No

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: Avoidance. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106. An Application for Section 106 review was submitted to the City of Detroit Housing & Revitalization Department's Preservation Specialist. Per Stipulation VI of Programmatic Agreement (PA), the proposed undertaking qualified for review by SHPO's archaeologist and consultation with Tribes. A technical report, completed by Misty Jackson of Arbre Croche Cultural Resources LLC, concluded is unlikely that intact archaeological deposits are present within the project area. In a letter dated March 27, 2024, SHPO concurred with the determination of no historic properties affected within the area of potential effects of this undertaking. A finding of No Adverse Effect within the area of potential effects was provided in a letter dated March 28, 2024. This project may proceed without further coordination with the City of Detroit

Russell-Woods-Senior-Living

Preservation Specialist unless the scope of work is modified, or artifacts are uncovered during the course of construction.

Supporting documentation

96-12411421 Dexter NP.pdf Tribal Consultaiton- Russell Woods FCP.pdf Russell Woods Senior Apartments_Saginaw.pdf COD TC email- Russell Woods Senior.pdf City of Detroit HRD_MBPI Response 042624.pdf [EXTERNAL] 11421 Dexter Avenue_Notawaseppi.pdf Russell Woods_TC NHPA Sec106 Review Letter.pdf Detroit Unanticipated Discoveries Plan_Russell Woods Senior.pdf Detroit Section 106 Request Application 2023.pdf 11421 Dexter SHPO inventory form.pdf 11421 Dexter Avenue Kidorf Section 106 report.pdf

Are formal compliance steps or mitigation required?

✓ Yes

No

Noise Abatement and Control

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

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

New construction for residential use

✓ Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

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

An interstate land sales registration

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

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

Indicate the findings of the Preliminary Screening below:

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

✓ Noise generators were found within the threshold distances.

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

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

Indicate noise level here: 61

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

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))

Unacceptable: (Above 75 decibels)

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

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

Indicate noise level here: 61

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

Screen Summary

Compliance Determination

A Noise Assessment was conducted. The noise level was acceptable: 61.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation. The Subject Property is located along Dexter Avenue which is considered a busy roadway but is

Russell-Woods-Senior-Living

not within 3,000 feet of a rail line. The property is located approximately 6.5 miles from the Coleman A Young Municipal Airport, 11 miles from the Windsor International Airport and 14 miles from the Detroit Metropolitan Wayne County Airport. A Noise Exposure Map was obtained for all three airports, which indicated acceptable noise limits on the Subject Property since it was well beyond the 65dB contour. A Noise Assessment according to HUD guidelines for the Subject Property was completed on January 30, 2024. The results revealed a Day Night Average Noise Level (DNL) of 61dB, which included 10-year projections with 2% growth, an assumption of 20% medium and heavy trucks and 15%-night fraction of traffic. It is classified as Acceptable with no additional abatement requirements.

Supporting documentation

<u>Att 11 - Noise Assessment r.pdf</u> <u>Att 11 - Noise-EA-Partner-Worksheet.docx</u>

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

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

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

Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements. The project is rehabilitation of an existing building. There are no US EPA designated sole-source aquifers in Michigan. The proposed site is not located within a sole source aquifer watershed and would not affect a sole-source aquifer or negatively impact the water quality or any aquifers in the area.

Supporting documentation

Att 12 - Sole Source Aquifer map.pdf

Are formal compliance steps or mitigation required?

Yes

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or	Executive Order	24 CFR 55.20 can be
indirect support of new construction impacting	11990	used for general
wetlands wherever there is a practicable		guidance regarding
alternative. The Fish and Wildlife Service's		the 8 Step Process.
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.		

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

No

✓ Yes

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

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

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

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

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

Screen Summary

Russell-Woods-Senior-Living

Compliance Determination

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. The project site is not located near, or within, a wetland area. The surrounding area is densely populated urban area. Therefore, the project would not affect wetland or riparian areas.

Supporting documentation

Att 4 - Wetland Map EMES.pdf

Are formal compliance steps or mitigation required?

Yes

Wild and Scenic Rivers Act

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

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

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. No Wild and Scenic Rivers are located within the City of Detroit.

Supporting documentation

Att 13 - State National Scenic Rivers Map.pdf

Are formal compliance steps or mitigation required?

Yes

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project	Executive Order 12898	
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.		

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

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. The building will serve low-income and minority populations. The project would not result in disproportionately adverse environmental effects on minority or low income populations. New facilities and residences are intended to enhance the quality of life for new and existing residents and the community.

Supporting documentation

<u>Att 14 - Environmental-Justice-Partner-Worksheet (2).docx</u> <u>Att 14 - EJScreen Community Report.pdf</u>

Are formal compliance steps or mitigation required?

Yes



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

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

Project Information

Project Name: Russell-Woods-Senior-Living

HEROS Number: 90000010382381

Project Location: 11421 Dexter Ave, Detroit, MI 48206

Additional Location Information:

N/A

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

The Adaptive Reuse project proposes rehabilitation of a vacant, poured concrete, 12-story apartment building that was constructed in 1974 at 11421 Dexter Avenue, Detroit. The Russell Woods Senior Living Community (RWSLC) is a proposed 4% and 9% LIHTC co-located development consisting of a total of 77 units of age-restricted housing for seniors at up to 60% of AMI. Fifteen percent of the proposed units will be reserved for deep income targeting at 30% AMI. The development will include 35 units as 9% LIHTC and 42 units as 4% LIHTC for a total of 68,874 square feet of gross rentable area. The first floor will consist of community areas including a library, fitness room and meeting areas totaling approximately 1,002 square feet. The redevelopment scope consists of all new systems, a complete gut rehab of the interior structure and reconfiguring the unit sizes from 138 to 77 units. There will be no new construction to the exterior of the structure. Improvements external to the building include sidewalk and curb replacement, landscaping and parking lot milling and resurfacing. As work proceeds it will be determined whether utility connections external to the building will require replacement or upgrade. Russell Woods Senior Living I LDHA LLC and Russell Woods II LDHA LLC intend to purchase the Subject Property on or after October 12, 2024. Supportive services will be provided by PACE with monthly Tenant Services for residents and the community provided by Hannan Center and Wayne Health Mobile Unit. Supportive communications and technology will be incorporated to connect residents to one another, care givers, family and friends. This review is for \$461,448.47 in HOME 2022, \$2,038,551.53 in HOME 2023, \$1,095,576.96 in CDBG 2023 and \$404,423.04 in CDBG 2024 from the City of Detroit and 77 vouchers from the Inkster Housing Commission. This environmental review is valid for up to five years

Funding Information

Grant Number	HUD Program	Program Name	
B23MC260006	MC260006 Community Planning and Community Development Block		\$1,095,576.96
	Development (CPD)	Grants (CDBG) (Entitlement)	
B24MC260006	Community Planning and	Community Development Block	\$404,423.04

Russell-Woods-Senior-Living

Detroit, MI

	Development (CPD)	Grants (CDBG) (Entitlement)	
M22MC260202	Community Planning and	HOME Program	\$461,448.47
	Development (CPD)		
M23MC260202	Community Planning and	HOME Program	\$2,038,551.53
	Development (CPD)		
MI027	Other	Inkster Housing Commision PBVs	\$0.00

Estimated Total HUD Funded Amount: \$4,000,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$28,181,651.00

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

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

Law, Authority, or Factor	Mitigation Measure or Condition
Historic Preservation	This project may proceed without further
	coordination with the City of Detroit Preservation
	Specialist unless the scope of work is modified, or
	artifacts are uncovered during the course of
	construction.
Contamination and Toxic Substances	Use of engineering controls as approved within a
	detailed Response Activity Plan provided to EGLE for
	review, approved on August 1, 2024.
Permits, reviews, and approvals	1. Building permits through the City of Detroit
	Building Safety Engineering, and Environmental
	Department (BSEED) are in review with the City of
	Detroit. 2. MSHDA Design Review and Approval is in
	review.

Project Mitigation Plan

See attached HRD Mitigation Plan HRD Model Mitigation Plan - 072924.pdf

Determination:

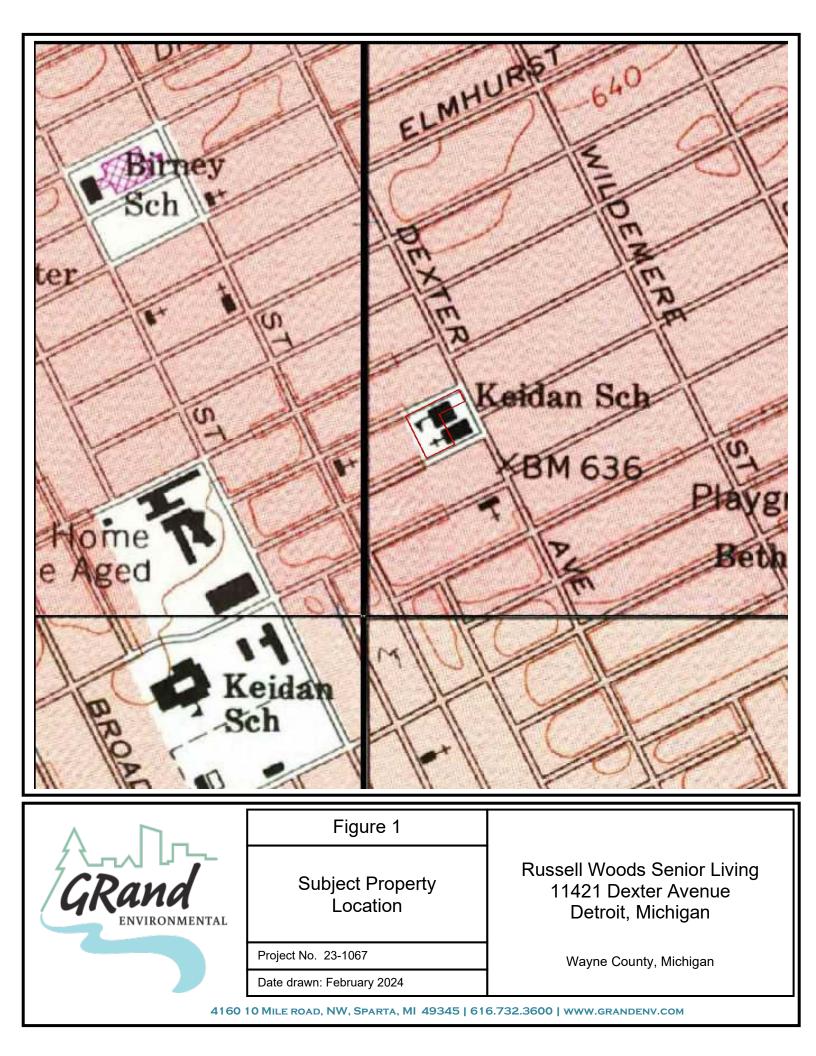
X	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1	1508.13] The project will not result
	in a significant impact on the quality of human environment	
	Finding of Significant Impact	
Prepare	r Signature:	9/24/2024

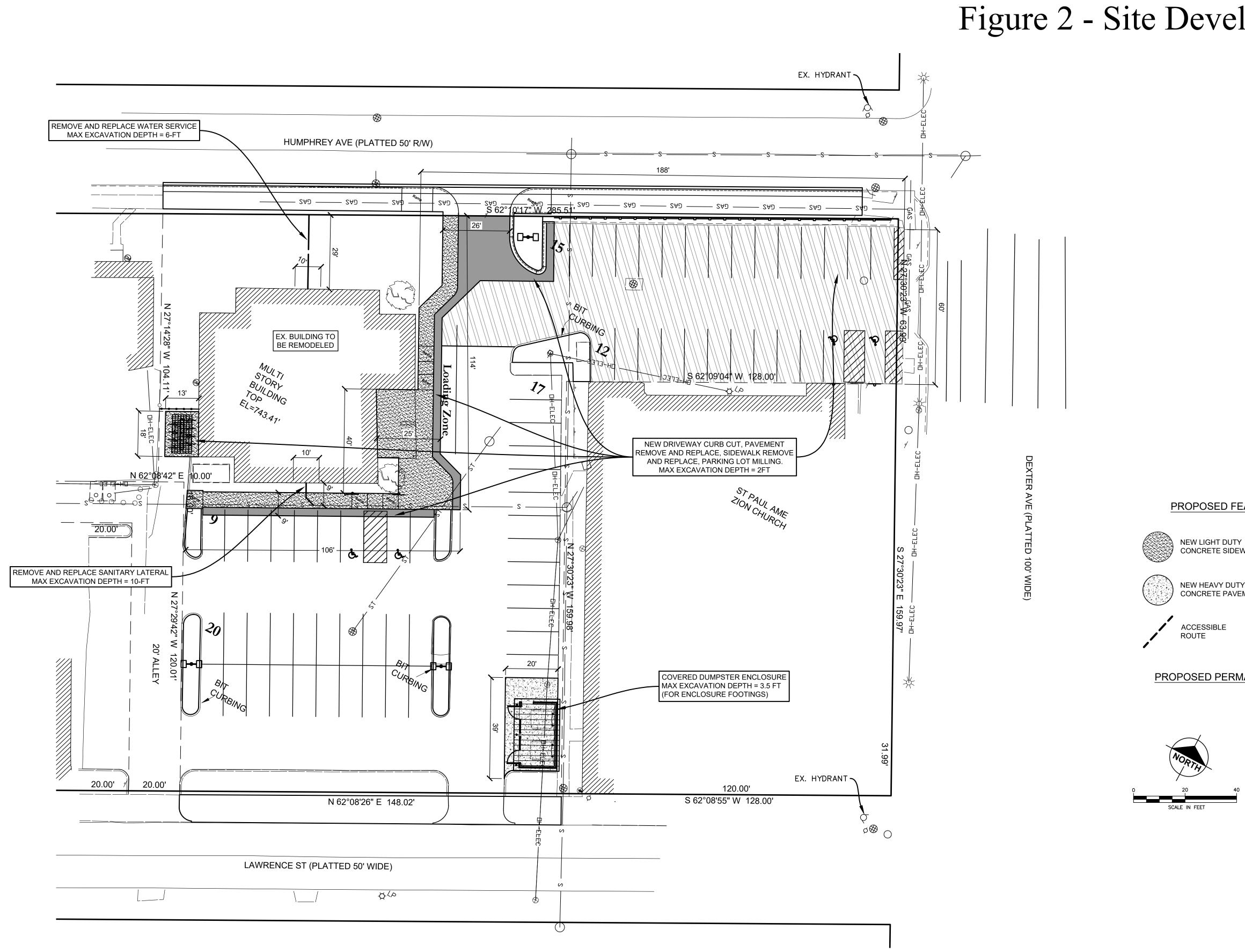
Name / Title / Organization: Kim Siegel / / DETROIT

Russell-Woods-Senior-Living	Detroit, MI	900000010382381
Certifying Officer Signature:	DocuSigned by: July M. Uly E17030313DAP4CS	Date:

Name/Title: Julie Schneider, Director, Housing and Revitalization Department

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



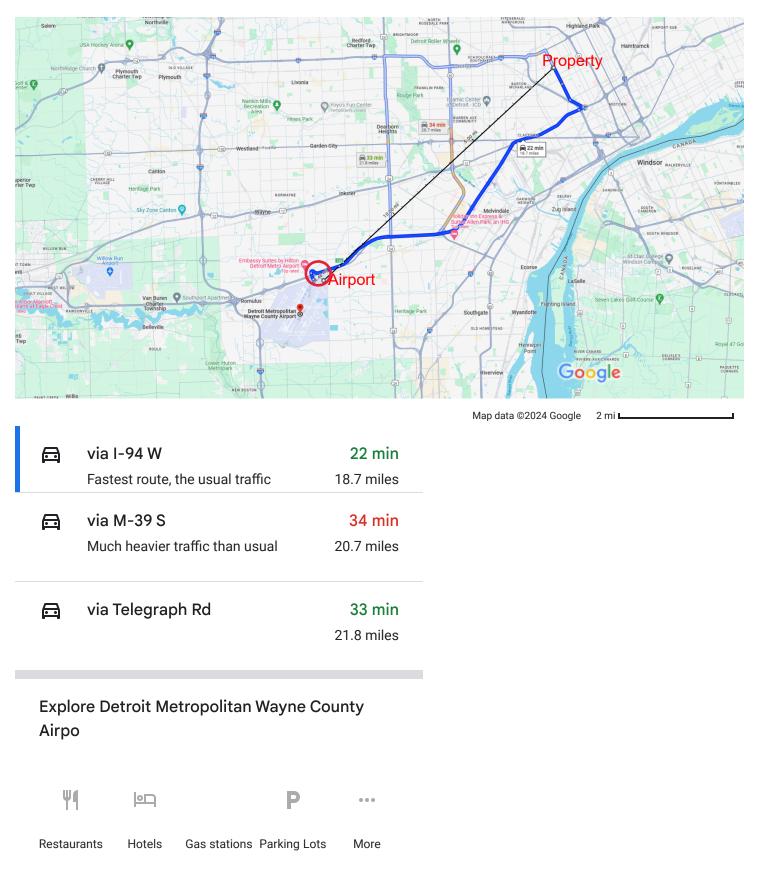




elopme	ent Plan with Utilities	Callen Engineering, Inc. 108 East Savidge Street Spring Lake, MI 49456 T.616.414.5260 www.callenengineering.com
		Civil engineers
		MHT HOUSING, INC. 32500 TELEGRAPH ROAD, SUITE 100 BINGHAM FARMS, MI 48025 248-833-0552
FEATURES LEGEN	<u>1D</u>	DATE 12-14-23
UTY IDEWALK AREA	NEW HMA PAVEMENT AREA	BY A.J.B.
DUTY AVEMENT AREA	MILL / OVERLAY AREA	ISSUANCE / REVISION FOR ENVIRONMENTAL ACCORDANCE WTH CONSTRUCTION RECORDS
R7-6-9		LE VEC
40	PRELIMINARY - NOT FOR CONSTRUCTION	RUSSELL WOODS SENIOR LIVING 11421 DEXTER AVENUE CITY OF DETROIT, MI 48206 WAYNE COUNTY, MICHIGAN SITE PLAN
BII.	Plan Prepared By: Bruce A. Callen, PE Callen Engineering, Inc. 108 E. Savidge St. Spring Lake, Michigan 49456 Tel: 616-414-5260 email: bcallen@callenengineering.com	DRAWN BY DATE J.W.C. NOV '23 ENGINEER DATE B.A.C. NOV '23 EDIT DATE SCALE DRAWING PLOT SCALE AS NOTED 1:1
hat's below. before you dig.	For protection of underground utilities, the CONTRACTOR shall dial 1-800-482-7171 OR 811 a minimum of three working days, excluding Saturdays, Sundays and holidays, prior to excavation in the vicinity of utility lines. All "MISS DIG" participating members will thus be routinely notified. This does not relieve the CONTRACTOR of the responsibility of notifying the utility owners who may not be part of the "MISS DIG" alert system.	PROJECT 023 PLISSELL
	DATE OF PLAN: 12-14-23	

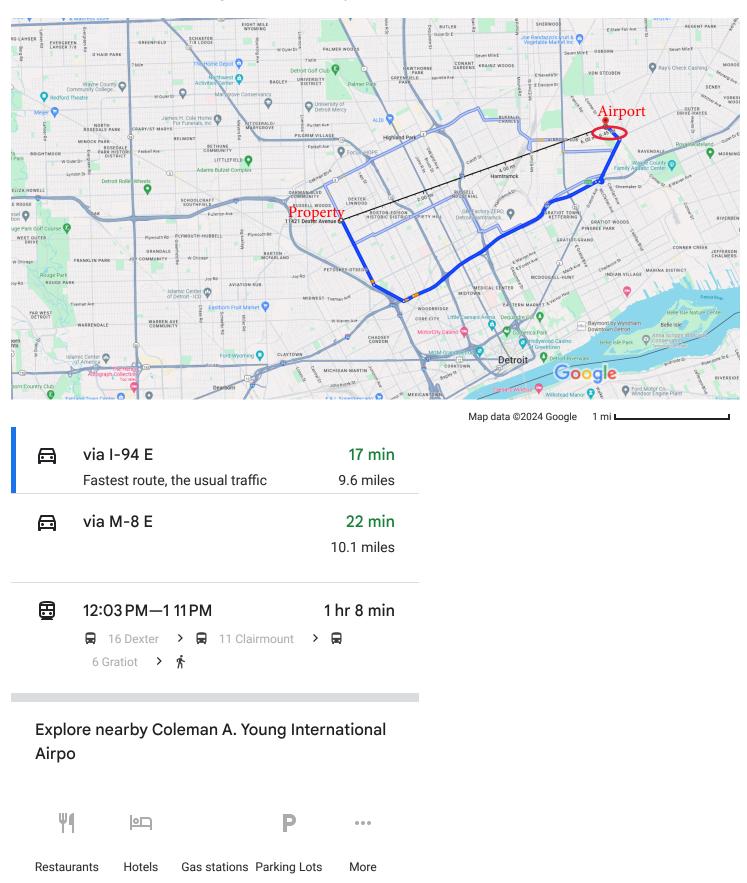
Google Maps

11421 Dexter Avenue, Detroit, MI to Detroit Metropolitan Wayne County Airport



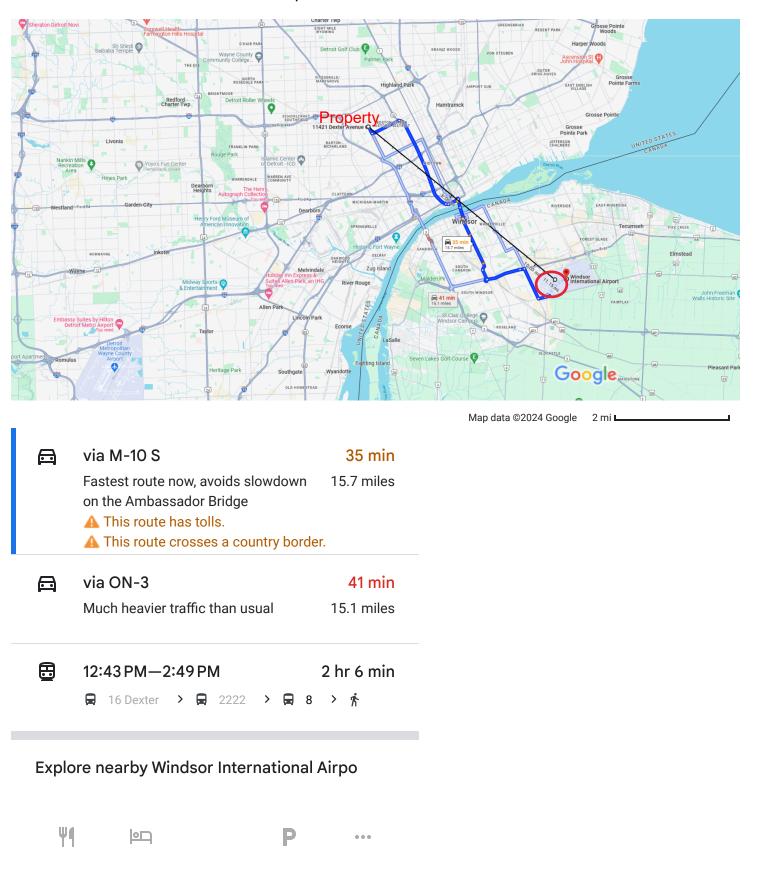
Google Maps

11421 Dexter Avenue, Detroit, MI to Coleman A. Young International Airport

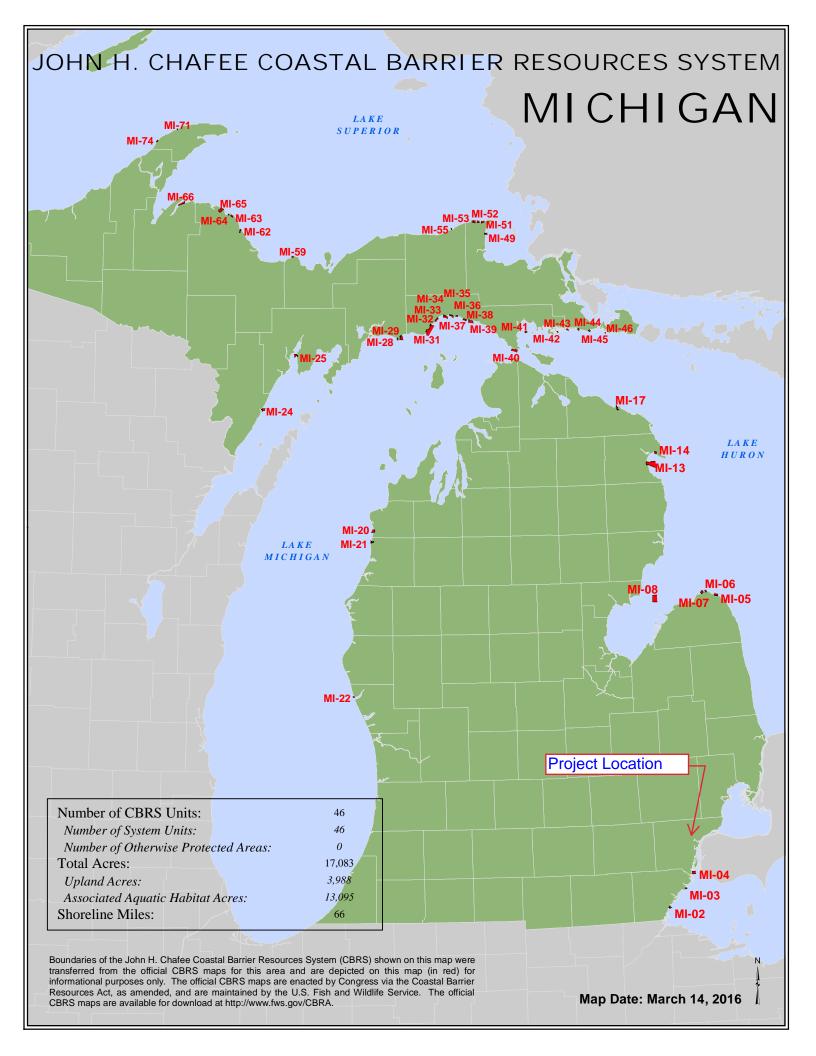


Google Maps

11421 Dexter Avenue, Detroit, MI to Windsor International Airport



Restaurants Hotels Gas stations Parking Lots More



U.S. Fish and Wildlife Service

Coastal Barrier Resources System Mapper Documentation



CBRS Units

- Otherwise Protected Area
- System Unit
- CBRS Buffer Zone

-83.123959, 42.377731

0 30 60 120 180 ft 1:2,257

• The pin location displayed on the map is a point selected by the user. Failure of the user to ensure that the pin location displayed on this map correctly corresponds with the user supplied address/location description below may result in an invalid federal flood insurance policy. The U.S. Fish and Wildlife Service (Service) has not validated the pin location with respect to the user supplied address/location description below. The Service recommends that all pin locations be verified by federal agencies prior to use of this map for the provision or denial of federal funding or financial assistance . Please note that a structure bisected by the Coastal Barrier Resources System (CBRS) boundary (i.e., both "partially in" and "partially out") is within the CBRS and therefore affected by CBRA's restrictions on federal flood insurance. A pin placed on a bisected structure must be placed on the portion of the structure within the unit (including any attached features such as a deck or stairs).

User Name: Russell Woods Senior Living User Supplied Address/Location Description: 11421 Dexter Avenue, Detroit Pin Location: Outside CBRS Pin Flood Insurance Prohibition Date: N/A Pin System Unit Establishment Date: N/A

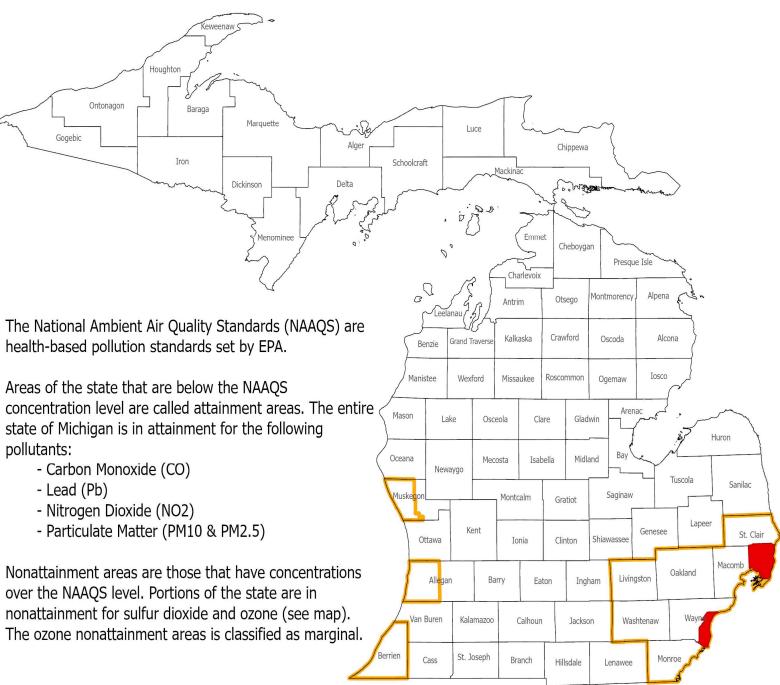
The user placed pin location is not within the CBRS. The official CBRS maps are accessible at https://www.fws.gov/cbra/maps/index.html .

The CBRS information is derived directly from the CBRS web service provided by the Service. This map was exported on 2/12/2024 and does not reflect changes or amendments subsequent to this date. The CBRS boundaries on this map may become superseded by new boundaries over time.

This map image may be void if one or more of the following map elements do not appear: basemap imagery, CBRS unit labels, prohibition date labels, legend, scale bar, map creation date. For additional information about flood insurance and the CBRS, visit: <u>https://www.fws.gov/cbra/Flood-Insurance.html</u>.



Attainment Status for the National Ambient Air Quality Standards



LEGEND

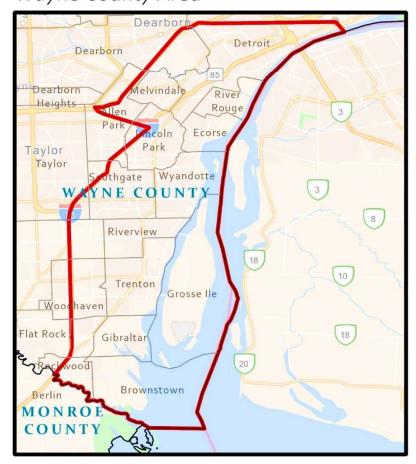
Sulfur Dioxide Nonattainment Area

💳 Ozone Nonattainment Area

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

Close-Up Maps of Partial County Nonattainment Areas

Sulfur Dioxide Nonattainment Areas Wayne County Area St. Clair County Area



Ozone Nonattainment Areas

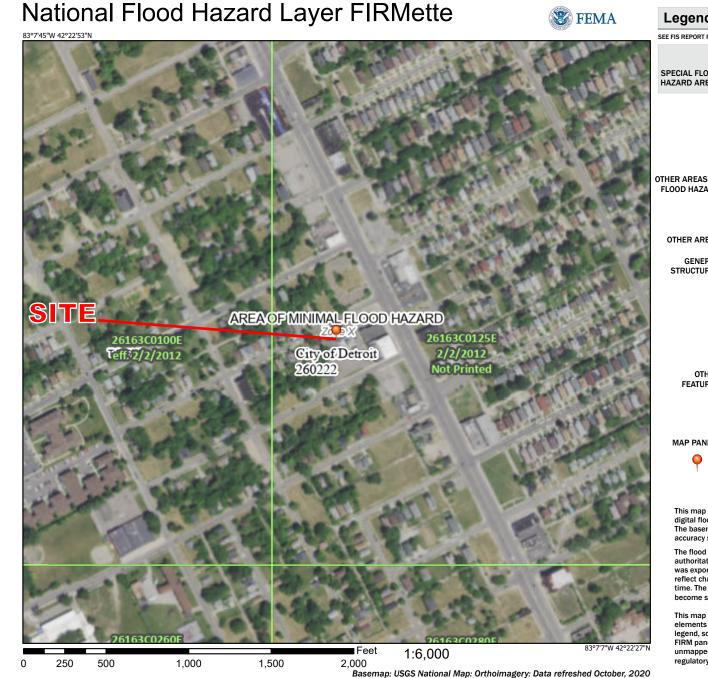
Allegan County Area Holland Leeland Zeeland Park OTTAWA COUNTY Jamestown Salem aketowr Overisel Fillmore 40 Saugatuck Village of Douglas Heath Manlius Monterey Saugatuck Fennville COUNTY Allegan Ganges Clyde Valley Allegan Trowbridge Cheshire Casco Lee Geneva BUREN COUNT Bloomingdale South Haven

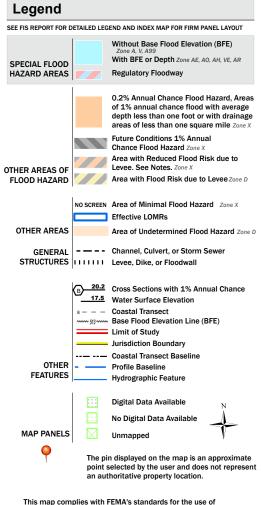


Muskegon County Area



Prepared by EGLE, Air Quality Division, State Implementation Plan Development Unit





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 8/18/2022 at 2:27 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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



FEMA FLOODPLAIN MAP RUSSELL WOODS SENIOR LIVING COMMUNITY 11421 DEXTER AVENUE, DETROIT, MI 48206





GRETCHEN WHITMER

GOVERNOR

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

LANSING



PHILLIP D. ROOS DIRECTOR

February 29, 2024

Fabiola Fleuranvil Russell Woods Senior Living I LDHA, LLC 900 Biscayne Boulevard, Suite 503 Miami, Florida 33132

Via Email Only

Dear Fabiola Fleuranvil:

Subject: Russell Woods Senior Living Community Project, Detroit, Michigan

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

On August 3, 2018, Wayne County was designated nonattainment for the 2015 ozone standard; and thus, general conformity must be evaluated when completing construction projects of a given size and scope. EGLE has completed the required SIP submittals for this area and on May 19, 2023, the United States Environmental Protection Agency (USEPA) redesignated the seven-county southeast Michigan area (including Wayne County) from nonattainment to attainment/maintenance. General conformity does, however, still require an evaluation during the maintenance period. For this evaluation, EGLE considered the following information from the USEPA general conformity guidance, which states, "historical analysis of similar actions can be used in cases where the proposed projects are similar in size and scope to previous projects."

EGLE has reviewed the Russell Woods Senior Living Community Project proposed to be completed with federal grant monies, including redevelopment of the existing 12-story apartment building. The redevelopment will consist of a complete rehabilitation of the interior structure and reconfiguration of the unit sizes from 138 to 77 units. There will be no improvements to the exterior building structure. Additional property improvements will include landscaping, some walkway and curb renovations, and milling/resurfacing of the parking areas. The project located on approximately 0.97 acres, at 11421 Dexter Avenue in Detroit, will bring much needed affordable senior housing to the Russell Woods/Nardin Park neighborhood. The project is a proposed low-income housing tax credit co-located development with approximately 15 percent of the proposed units reserved for deep income targeting at 30 percent of the area median income. Construction is expected to start in early September 2024 and will be completed in approximately 18 months.

Fabiola Fleuranvil Page 2 February 29, 2024

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

The size, scope and duration of the Russell Woods Senior Living Community Project proposed for completion in Detroit, Michigan is much smaller in scale than the Uptown Orange Apartments project described above and should not exceed the de minimis levels included in the federal general conformity requirements. Therefore, it does not require a detailed conformity analysis.

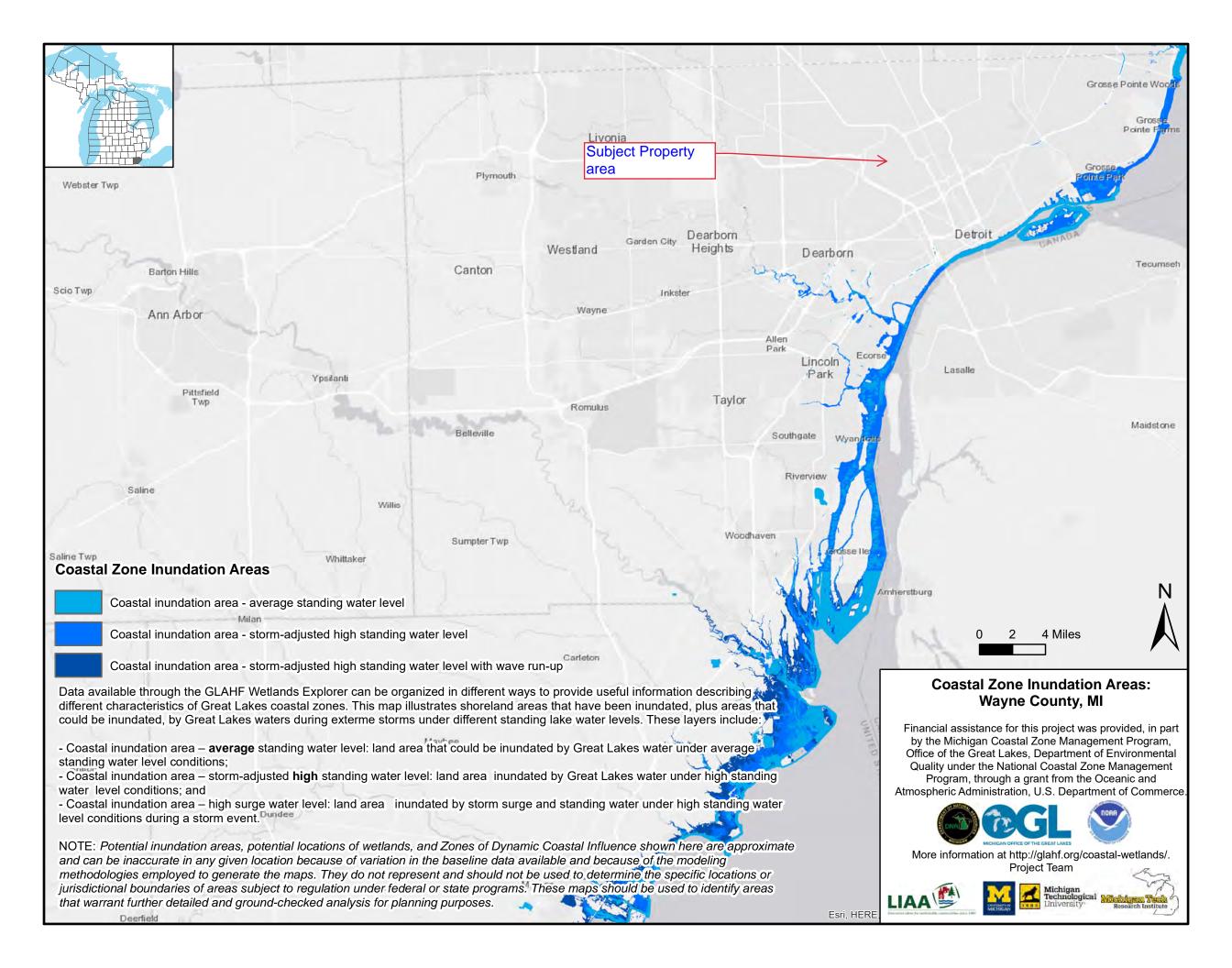
If you have any further questions regarding this matter, please contact me at 517-648-6314; BukowskiB@Michigan.gov; or EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,

Breanne Brikanski

Breanna Bukowski Environmental Quality Analyst Air Quality Division

 Michael Leslie, USEPA Region 5
 Penny Dwoinen, City of Detroit Housing and Revitalization Department Megan Castro, Michigan State Housing Development Authority Mary Weidel, U.S. Department of Housing & Urban Development Christy Bakos, Grand Environmental, LLC





GRETCHEN WHITMER

GOVERNOR

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

LANSING



PHILLIP D. ROOS DIRECTOR

July 30, 2024

VIA EMAIL

Fabiola Fleuranvil Russell Woods Senior Living I LDHA, LLC Russell Woods Senior Living II LDHA, LLC 900 Biscayne Boulevard, Suite 503 Miami, Florida 33132

Dear Fabiola Fleuranvil:

SUBJECT: Notice of Approval of the Response Activity Plan to Comply with 7a(1)(b) 11421 Dexter Avenue, Detroit, Wayne County, Michigan Parcel ID Number: 14-003736-45 Facility ID Number: 82009052

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) Remediation and Redevelopment Division (RRD) has reviewed the Response Activity Plan (ResAP) to Comply with Section 20107a(1)(b) of Part 201 Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) for the above-referenced property. The ResAP outlines the response activities to be undertaken at the above-referenced address and was submitted on your behalf pursuant to Section 20114b of the NREPA on June 6, 2024, by Christy Bakos of GRand Environmental, LLC. The final revised version was received by EGLE on July 25, 2024.

Based upon the representations and information contained in the submittal, the ResAP is approved. EGLE expresses no opinion as to whether other conditions that may exist will be adequately addressed by the response activities that are proposed in the plan. If environmental contamination is found to exist that is not addressed by the ResAP and you are otherwise liable for the contamination, additional response activities may be necessary.

The owner and operator of this property may also have responsibility under applicable state and federal laws, including but not limited to, Part 201, Environmental Remediation; Part 111, Hazardous Waste Management; Part 211, Underground Storage Tank Regulations; Part 213, Leaking Underground Storage Tanks; Part 615, Supervisor of Wells, of the NREPA; and the Michigan Fire Prevention Code, 1941 PA 207, as amended.

This approval is pursuant to the applicable requirements of the NREPA. The Michigan State Housing Development Authority may have additional site selection requirements beyond the NREPA statutory obligations for site characterization and remedial actions or response activities necessary to prevent, minimize, or mitigate injury to public health, safety, or welfare, or to the environment.

If you should have further questions or concerns, please contact Martha Thompson, RRD, Brownfield Assessment and Redevelopment Section, at 517-285-3461, or by email at ThompsonM31@Michigan.gov.

Sincerely,

arrie X.Le

Carrier Geyer, Manager Brownfield Assessment and Redevelopment Section Remediation and Redevelopment Division GeyerC1@Michigan.gov

cc: Christy Bakos, GRand Environmental, LLC Paul Owens, EGLE Jarrett McFeters, EGLE



United States Department of the Interior

FISH AND WILDLIFE SERVICE Michigan Ecological Services Field Office 2651 Coolidge Road Suite 101 East Lansing, MI 48823-6360 Phone: (517) 351-2555 Fax: (517) 351-1443



In Reply Refer To: Project Code: 2024-0043278 Project Name: Russell Woods Senior Living

06/18/2024 15:11:37 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

Official Species List

The attached species list identifies any Federally threatened, endangered, proposed and candidate species that may occur within the boundary of your proposed project or may be affected by your proposed project. The list also includes designated critical habitat if present within your proposed project area or affected by your project. This list is provided to you as the initial step of the consultation process required under section 7(c) of the Endangered Species Act, also referred to as Section 7 Consultation.

Under 50 CFR 402.12(e) (the regulations that implement section 7 of the Endangered Species Act), the accuracy of this species list should be verified after 90 days. You may verify the list by visiting the IPaC website (<u>https://ipac.ecosphere.fws.gov/</u>) at regular intervals during project planning and implementation. To update an Official Species List in IPaC: from the My Projects page, find the project, expand the row, and click Project Home. In the What's Next box on the Project Home page, there is a Request Updated List button to update your species list. Be sure to select an "official" species list for all projects.

Consultation requirements and next steps

Section 7 of the Endangered Species Act of 1973 requires that actions authorized, funded, or carried out by Federal agencies not jeopardize Federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-Federal representative) must consult with the Fish and Wildlife Service if they determine their project may affect listed species or critical habitat.

There are two approaches to evaluating the effects of a project on listed species.

<u>Approach 1. Use the All-species Michigan determination key in IPaC.</u> This tool can assist you in making determinations for listed species for some projects. In many cases, the determination key

will provide an automated concurrence that completes all or significant parts of the consultation process. Therefore, we strongly recommend screening your project with the **All-Species Michigan Determination Key (Dkey)**. For additional information on using IPaC and available Determination Keys, visit <u>https://www.fws.gov/media/mifo-ipac-instructions</u> (and click on the attachment). Please carefully review your Dkey output letter to determine whether additional steps are needed to complete the consultation process.

Approach 2. Evaluate the effects to listed species on your own without utilizing a determination key. Once you obtain your official species list, you are not required to continue in IPaC, although in most cases using a determination key should expedite your review. If the project is a Federal action, you should review our section 7 step-by-step instructions before making your determinations: https://www.fws.gov/office/midwest-region-headquarters/midwest-section-7-technical-assistance. If you evaluate the details of your project and conclude "no effect," document your findings, and your listed species review is complete; you do not need our concurrence on "no effect" determinations. If you cannot conclude "no effect," you should coordinate/consult with the Michigan Ecological Services Field Office. The preferred method for submitting your project description and effects determination (if concurrence is needed) is electronically to EastLansing@fws.gov. Please include a copy of this official species list with your request.

For all **wind energy projects**, please contact this field office directly for assistance, even if no Federally listed plants, animals or critical habitat are present within your proposed project area or may be affected by your proposed project.

Migratory Birds

Please see the "Migratory Birds" section below for important information regarding incorporating migratory birds into your project planning. Our Migratory Bird Program has developed recommendations, best practices, and other tools to help project proponents voluntarily reduce impacts to birds and their habitats. The Bald and Golden Eagle Protection Act prohibits the take and disturbance of eagles without a permit. If your project is near an eagle nest or winter roost area, see our Eagle Permits website at https://www.fws.gov/program/eagle-management to help you avoid impacting eagles or determine if a permit may be necessary.

Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your consideration of threatened and endangered species during your project planning. Please include a copy of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Michigan Ecological Services Field Office

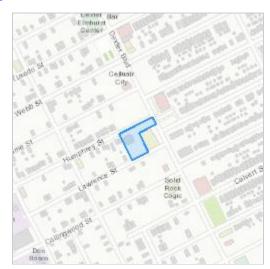
2651 Coolidge Road Suite 101 East Lansing, MI 48823-6360 (517) 351-2555

PROJECT SUMMARY

Project Code:	2024-0043278
Project Name:	Russell Woods Senior Living
Project Type:	Residential Construction
Project Description:	Renovate the existing building into low income housing apartments,
	renovate the existing parking areas including upgrading the landscaping.

Project Location:

The approximate location of the project can be viewed in Google Maps: <u>https://www.google.com/maps/@42.37765735,-83.12375772603127,14z</u>



Counties: Wayne County, Michigan

ENDANGERED SPECIES ACT SPECIES

There is a total of 8 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 4 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. <u>NOAA Fisheries</u>, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

MAMMALS NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/5949</u> General project design guidelines: <u>https://ipac.ecosphere.fws.gov/project/U5DEI5VITZHOLDUVUN2NYDAL4I/documents/</u> <u>generated/6982.pdf</u>	Endangered
 Northern Long-eared Bat Myotis septentrionalis No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: This species only needs to be considered if the project includes wind turbine operations. Species profile: https://ecos.fws.gov/ecp/species/9045 	Endangered
 Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: This species only needs to be considered if the project includes wind turbine operations. Species profile: https://ecos.fws.gov/ecp/species/10515 	Proposed Endangered
BIRDS NAME	STATUS
 Rufa Red Knot <i>Calidris canutus rufa</i> There is proposed critical habitat for this species. This species only needs to be considered under the following conditions: Only actions that occur along coastal areas during the Red Knot migratory window of MAY 1 - SEPTEMBER 30. Species profile: https://ecos.fws.gov/ecp/species/1864 	Threatened
NAME	STATUS
Eastern Massasauga (=rattlesnake) Sistrurus catenatus No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: • For all Projects: Project is within EMR Range Species profile: https://ecos.fws.gov/ecp/species/2202 General project design guidelines: https://ipac.ecosphere.fws.gov/project/U5DEI5VITZHOLDUVUN2NYDAL4I/documents/ generated/5280.pdf	Threatened



NAME

STATUS

Endangered

Northern Riffleshell *Epioblasma rangiana* No critical habitat has been designated for this species.

STATUS

NAME

Species profile: <u>https://ecos.fws.gov/ecp/species/527</u>

INSECTS	
NAME	STATUS
Monarch Butterfly Danaus plexippus	Candidate
No critical habitat has been designated for this species.	
Species profile: <u>https://ecos.fws.gov/ecp/species/9743</u>	

FLOWERING PLANTS

NAME	STATUS
Eastern Prairie Fringed Orchid <i>Platanthera leucophaea</i> No critical habitat has been designated for this species.	Threatened
Species profile: <u>https://ecos.fws.gov/ecp/species/601</u>	

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the <u>National Wildlife Refuge</u> system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the <u>"Supplemental Information on Migratory Birds and Eagles"</u>.

- 1. The <u>Bald and Golden Eagle Protection Act</u> of 1940.
- 2. The <u>Migratory Birds Treaty Act</u> of 1918.

3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

THERE ARE NO BALD AND GOLDEN EAGLES WITHIN THE VICINITY OF YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the <u>"Supplemental Information on Migratory Birds and Eagles"</u>.

- 1. The <u>Migratory Birds Treaty Act</u> of 1918.
- 2. The <u>Bald and Golden Eagle Protection Act</u> of 1940.
- 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Canada Warbler <i>Cardellina canadensis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <u>https://ecos.fws.gov/ecp/species/9643</u>	Breeds May 20 to Aug 10
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <u>https://ecos.fws.gov/ecp/species/9406</u>	Breeds Mar 15 to Aug 25
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <u>https://ecos.fws.gov/ecp/species/9398</u>	Breeds May 10 to Sep 10
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA <u>https://ecos.fws.gov/ecp/species/9478</u>	Breeds elsewhere

NAME	BREEDING SEASON
Wood Thrush Hylocichla mustelina	Breeds May 10 to Aug
This is a Bird of Conservation Concern (BCC) throughout its range in the	31
continental USA and Alaska.	
https://ecos.fws.gov/ecp/species/9431	

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read <u>"Supplemental Information on Migratory Birds and Eagles"</u>, specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (=)

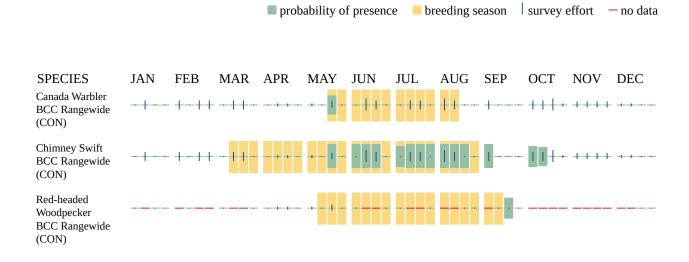
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort ()

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.



Rusty Blackbird BCC - BCR	<u>++++</u> +++++ II +++ ++++ +++++ ++++++++++++++
Wood Thrush BCC Rangewide (CON)	+++++ +++++ +++++ HII + H +++ ++++ ++++ +++++ +++++

Additional information can be found using the following links:

- Eagle Management <u>https://www.fws.gov/program/eagle-management</u>
- Measures for avoiding and minimizing impacts to birds <u>https://www.fws.gov/library/</u> <u>collections/avoiding-and-minimizing-incidental-take-migratory-birds</u>
- Nationwide conservation measures for birds <u>https://www.fws.gov/sites/default/files/</u> <u>documents/nationwide-standard-conservation-measures.pdf</u>
- Supplemental Information for Migratory Birds and Eagles in IPaC <u>https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action</u>

WETLANDS

Impacts to <u>NWI wetlands</u> and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local <u>U.S. Army Corps of Engineers District</u>.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency:Detroit cityName:Christy BakosAddress:4160 10 MILE ROAD NWCity:SpartaState:MIZip:49345Emailchristy@grandenv.comPhone:6167323600

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Detroit city

Name: Kim Siegel

Email: kim.siegel@detroitmi.gov

Phone: 3136281122



United States Department of the Interior

FISH AND WILDLIFE SERVICE Michigan Ecological Services Field Office 2651 Coolidge Road Suite 101 East Lansing, MI 48823-6360 Phone: (517) 351-2555 Fax: (517) 351-1443



In Reply Refer To: Project Code: 2024-0043278 Project Name: Russell Woods Senior Living January 31, 2024

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

Official Species List

The attached species list identifies any Federally threatened, endangered, proposed and candidate species that may occur within the boundary of your proposed project or may be affected by your proposed project. The list also includes designated critical habitat if present within your proposed project area or affected by your project. This list is provided to you as the initial step of the consultation process required under section 7(c) of the Endangered Species Act, also referred to as Section 7 Consultation.

Under 50 CFR 402.12(e) (the regulations that implement section 7 of the Endangered Species Act), the accuracy of this species list should be verified after 90 days. You may verify the list by visiting the IPaC website (<u>https://ipac.ecosphere.fws.gov/</u>) at regular intervals during project planning and implementation. To update an Official Species List in IPaC: from the My Projects page, find the project, expand the row, and click Project Home. In the What's Next box on the Project Home page, there is a Request Updated List button to update your species list. Be sure to select an "official" species list for all projects.

Consultation requirements and next steps

Section 7 of the Endangered Species Act of 1973 requires that actions authorized, funded, or carried out by Federal agencies not jeopardize Federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-Federal representative) must consult with the Fish and Wildlife Service if they determine their project may affect listed species or critical habitat.

There are two approaches to evaluating the effects of a project on listed species.

<u>Approach 1. Use the All-species Michigan determination key in IPaC.</u> This tool can assist you in making determinations for listed species for some projects. In many cases, the determination key

will provide an automated concurrence that completes all or significant parts of the consultation process. Therefore, we strongly recommend screening your project with the **All-Species Michigan Determination Key (Dkey)**. For additional information on using IPaC and available Determination Keys, visit <u>https://www.fws.gov/media/mifo-ipac-instructions</u> (and click on the attachment). Please carefully review your Dkey output letter to determine whether additional steps are needed to complete the consultation process.

Approach 2. Evaluate the effects to listed species on your own without utilizing a determination key. Once you obtain your official species list, you are not required to continue in IPaC, although in most cases using a determination key should expedite your review. If the project is a Federal action, you should review our section 7 step-by-step instructions before making your determinations: https://www.fws.gov/office/midwest-region-headquarters/midwest-section-7-technical-assistance. If you evaluate the details of your project and conclude "no effect," document your findings, and your listed species review is complete; you do not need our concurrence on "no effect" determinations. If you cannot conclude "no effect," you should coordinate/consult with the Michigan Ecological Services Field Office. The preferred method for submitting your project description and effects determination (if concurrence is needed) is electronically to EastLansing@fws.gov. Please include a copy of this official species list with your request.

For all **wind energy projects** and **projects that include installing communications towers** >**450 feet that use guy wires**, please contact this field office directly for assistance, even if no Federally listed plants, animals or critical habitat are present within your proposed project area or may be affected by your proposed project.

Migratory Birds

Please see the "Migratory Birds" section below for important information regarding incorporating migratory birds into your project planning. Our Migratory Bird Program has developed recommendations, best practices, and other tools to help project proponents voluntarily reduce impacts to birds and their habitats. The Bald and Golden Eagle Protection Act prohibits the take and disturbance of eagles without a permit. If your project is near an eagle nest or winter roost area, see our Eagle Permits website at https://www.fws.gov/program/eagle-management/eagle-permits to help you avoid impacting eagles or determine if a permit may be necessary.

Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your consideration of threatened and endangered species during your project

planning. Please include a copy of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Michigan Ecological Services Field Office

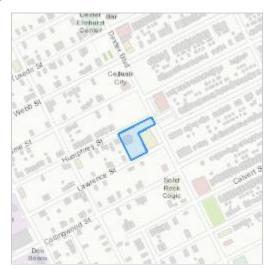
2651 Coolidge Road Suite 101 East Lansing, MI 48823-6360 (517) 351-2555

PROJECT SUMMARY

Project Code:	2024-0043278
Project Name:	Russell Woods Senior Living
Project Type:	Residential Construction
Project Description:	Renovate the existing building into low income housing apartments,
	renovate the existing parking areas including upgrading the landscaping.

Project Location:

The approximate location of the project can be viewed in Google Maps: <u>https://www.google.com/maps/@42.37765735,-83.12375772603127,14z</u>



Counties: Wayne County, Michigan

ENDANGERED SPECIES ACT SPECIES

There is a total of 7 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 2 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. <u>NOAA Fisheries</u>, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i>	Endangered
There is final critical habitat for this species. Your location does not overlap the critical habitat.	U U
Species profile: <u>https://ecos.fws.gov/ecp/species/5949</u>	
General project design guidelines:	
https://ipac.ecosphere.fws.gov/project/U5DEI5VITZHOLDUVUN2NYDAL4I/documents/	
generated/6982.pdf	
Tricolored Bat Perimyotis subflavus	Proposed
No critical habitat has been designated for this species.	Endangered
Species profile: <u>https://ecos.fws.gov/ecp/species/10515</u>	
BIRDS	
NAME	STATUS
Rufa Red Knot Calidris canutus rufa	Threatened
There is proposed critical habitat for this species.	
This species only needs to be considered under the following conditions:	

 Only actions that occur along coastal areas during the Red Knot migratory window of MAY 1 - SEPTEMBER 30.

Species profile: <u>https://ecos.fws.gov/ecp/species/1864</u>

REPTILES

NAME	STATUS
Eastern Massasauga (=rattlesnake) Sistrurus catenatus	Threatened
No critical habitat has been designated for this species.	
This species only needs to be considered under the following conditions:	
 For all Projects: Project is within EMR Range 	
Species profile: <u>https://ecos.fws.gov/ecp/species/2202</u>	
General project design guidelines:	
https://ipac.ecosphere.fws.gov/project/U5DEI5VITZHOLDUVUN2NYDAL4I/documents/	
generated/5280.pdf	

CLAMS

NAME	STATUS
Northern Riffleshell Epioblasma rangiana	Endangered
No critical habitat has been designated for this species.	
Species profile: <u>https://ecos.fws.gov/ecp/species/527</u>	
INSECTS NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i>	Candidate
No critical habitat has been designated for this species.	
Species profile: <u>https://ecos.fws.gov/ecp/species/9743</u>	

FLOWERING PLANTS

NAME	STATUS
Eastern Prairie Fringed Orchid Platanthera leucophaea	Threatened
No critical habitat has been designated for this species.	
Species profile: <u>https://ecos.fws.gov/ecp/species/601</u>	

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the <u>National Wildlife Refuge</u> system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the <u>"Supplemental Information on Migratory Birds and Eagles"</u>.

- 1. The <u>Bald and Golden Eagle Protection Act</u> of 1940.
- 2. The <u>Migratory Birds Treaty Act</u> of 1918.
- 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

THERE ARE NO BALD AND GOLDEN EAGLES WITHIN THE VICINITY OF YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the <u>"Supplemental Information on Migratory Birds and Eagles"</u>.

- 1. The Migratory Birds Treaty Act of 1918.
- 2. The <u>Bald and Golden Eagle Protection Act</u> of 1940.
- 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Canada Warbler <i>Cardellina canadensis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <u>https://ecos.fws.gov/ecp/species/9643</u>	Breeds May 20 to Aug 10
Chimney Swift Chaetura pelagica This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <u>https://ecos.fws.gov/ecp/species/9406</u>	Breeds Mar 15 to Aug 25

NAME	BREEDING SEASON
Rusty Blackbird Euphagus carolinus	Breeds elsewhere
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation	
Regions (BCRs) in the continental USA	
https://ecos.fws.gov/ecp/species/9478	
Wood Thrush Hylocichla mustelina	Breeds May 10 to Aug
This is a Bird of Conservation Concern (BCC) throughout its range in the	31
continental USA and Alaska.	
https://ecos.fws.gov/ecp/species/9431	

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read <u>"Supplemental Information on Migratory Birds and Eagles"</u>, specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (=)

Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort ()

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.

	p robabi	season survey effort — no data	
SPECIES Canada Warbler BCC Rangewide	JAN FEB MAR APR M ++++ ++++ ++++ +++++ +	$\mathbf{IAY} \mathbf{JUN} \mathbf{JUL} \mathbf{AUG}$	
(CON)			
Chimney Swift BCC Rangewide (CON)	++++ ++++ + <mark>+++</mark>	111 110 110 110	· · · · · · · · · · · · · · · · · · ·

(CON)

Additional information can be found using the following links:

- Eagle Management <u>https://www.fws.gov/program/eagle-management</u>
- Measures for avoiding and minimizing impacts to birds <u>https://www.fws.gov/library/</u> <u>collections/avoiding-and-minimizing-incidental-take-migratory-birds</u>
- Nationwide conservation measures for birds <u>https://www.fws.gov/sites/default/files/</u> <u>documents/nationwide-standard-conservation-measures.pdf</u>
- Supplemental Information for Migratory Birds and Eagles in IPaC <u>https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action</u>

WETLANDS

Impacts to <u>NWI wetlands</u> and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local <u>U.S. Army Corps of</u> <u>Engineers District</u>.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency:Detroit cityName:Christy BakosAddress:4160 10 MILE ROAD NWCity:SpartaState:MIZip:49345Emailchristy@grandenv.comPhone:6167323600

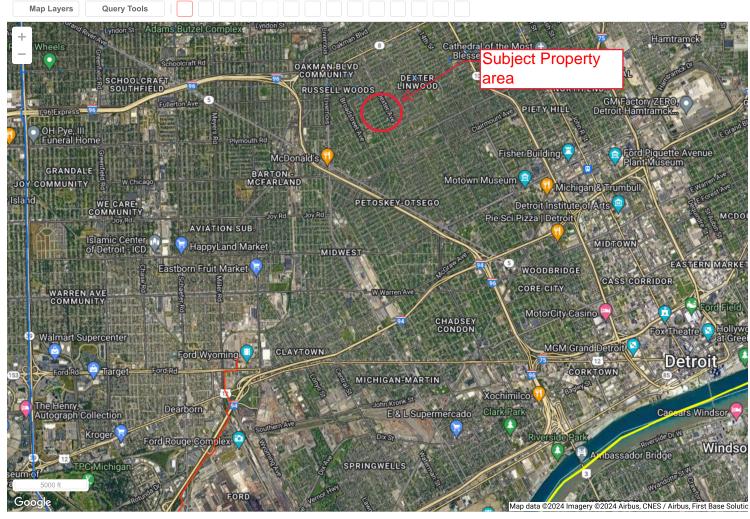
LEAD AGENCY CONTACT INFORMATION

Lead Agency: Detroit city

Name: Kim Siegel

Email: kim.siegel@detroitmi.gov

Phone: 3136281122



Ready Zoom Level: 13 of 19 (1:54,168) (lat,long): 42.341828, -82.933146

©USDOT PHMSA. All rights reserved.



National Cooperative Soil Survey

Conservation Service

MAPI	LEGEND	MAP INFORMATION
Area of Interest (AOI)	Spoil Area	The soil surveys that comprise your AOI were mapped at
Area of Interest (AOI)	Stony Spot	1:12,000.
Soils	M Very Stony Spot	Warning: Soil Map may not be valid at this scale.
Soil Map Unit Polygons	wet Spot	Enlargement of maps beyond the scale of mapping can cause
Map Unit Lines	∆ Other	misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of
Soil Map Unit Points	Special Line Features	contrasting soils that could have been shown at a more detailed
Special Point Features	Water Features	scale.
Blowout	Streams and Canals	Please rely on the bar scale on each map sheet for map
Borrow Pit	Transportation	measurements.
💥 Clay Spot	+++ Rails	Source of Map: Natural Resources Conservation Service
Closed Depression	Niterstate Highways	Web Soil Survey URL: Coordinate System: Web Mercator (EPSG:3857)
Gravel Pit	JS Routes	Maps from the Web Soil Survey are based on the Web Mercato
Gravelly Spot	Major Roads	projection, which preserves direction and shape but distorts
🚯 Landfill	Local Roads	distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more
🙏 🛛 Lava Flow	Background	accurate calculations of distance or area are required.
	Aerial Photography	This product is generated from the USDA-NRCS certified data of the version date(s) listed below.
Mine or Quarry		
Miscellaneous Water		Soil Survey Area: Wayne County, Michigan Survey Area Data: Version 9, Aug 25, 2023
Perennial Water		Soil map units are labeled (as space allows) for map scales
Rock Outcrop		1:50,000 or larger.
Saline Spot		Date(s) aerial images were photographed: Sep 8, 2022—Oct 2022
Sandy Spot		
Severely Eroded Spot		The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background
Sinkhole		imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.
Slide or Slip		Shining of map unit boundaries may be evident.
Sodic Spot		



Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
ShbubB	Shebeon-Urban land-Avoca complex, 0 to 4 percent slopes	19.9	100.0%
Totals for Area of Interest		19.9	100.0%





March 28, 2024

Coleman A. Young Municipal Center 2 Woodward Avenue. Suite 908 Detroit, Michigan 48226 Phone: 313.224.6380 Fax: 313.224.1629 www.detroitmi.gov

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 HOME Funded Project Located at 11421 Dexter Ave., Aka Russell Woods Senior Apartments, in the City of Detroit, Wayne County, Michigan

Dear Mrs. Dwoinen,

In accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, I am providing a determination of historic eligibility regarding the above-referenced project under the authority of the "Programmatic Agreement between the Michigan State Historic Preservation Office and the City of Detroit, Michigan...," dated December 21, 2022.

The project includes the rehabilitation of 11241 Dexter Ave., which is a vacant, poured concrete apartment building that was constructed in 1974. Based on research of the property the Area of Potential Effect (APE) has been defined as the property at 11421 Dexter, including the surrounding parking lots, roughly bounded by Humphrey Street on the north, Lawrence Avenue on the South, with a portion extending to Dexter on the east. The B'Nai Moshe-St. Paul A.M.E. Zion Local Historic District is located within in the indirect Area of Potential Effects (APE) for this project.

Per Stipulation VI of Programmatic Agreement (PA), the proposed undertaking qualified for review by SHPO's archaeologist and consultation with Tribes. A technical report, completed by Misty Jackson of Arbre Croche Cultural Resources LLC, concluded is unlikely that intact archaeological deposits are present within the project area. In a letter dated March 27, 2024, SHPO concurred with the determination of no historic properties affected within the area of potential effects of this undertaking.

On 2/22/2024, a request for Tribal Consultation was submitted to the following Tribes: Bay Mills Indian Community Forest County Potawatomi Community of Wisconsin Grand Traverse Band of Ottawa & Chippewa Indians Hannahville Indian Community Ketegitigaaning Ojibwe Nation/Lac Vieux Desert Band of Lake Superior Chippewa Indians Keweenaw Bay Indian Community of the Lake Superior Band of Chippewa Indians Lac du Flambeau Band of Lake Superior Chippewa Indians Little River Band of Ottawa Indians Little Traverse Bay Bands of Odawa Indians Menominee Indian Tribe of Wisconsin



Coleman A. Young Municipal Center 2 Woodward Avenue. Suite 908 Detroit, Michigan 48226 Phone: 313.224.6380 Fax: 313.224.1629 www.detroitmi.gov

Match-E-Be-Nash-She-Wish (Gun Lake) Band of Pottawatomi Indians Miami Tribe of Oklahoma Michigan Anishinaabek Cultural Preservation and Repatriation Alliance Nottawaseppi Huron Band of the Potawatomi Pokagon Band of Potawatomi Indians, Michigan and Indiana Saginaw Chippewa Indian Tribe of Michigan Sault Ste. Marie Tribe of Chippewa Indians Seneca Cayuga Nation

This consultation concluded with no objections to the proposed activities related to this undertaking. In the event of an unanticipated discovery, Tribal Consultation will be reinitiated under the direction of the unanticipated discoveries plan for this project.

I have determined that the undertaking will have **no adverse effect** on historic properties. This project may proceed without further coordination with the Preservation Specialist unless artifacts are uncovered during the course of construction. If you have any questions regarding this finding, please direct them to Tiffany Ciavattone at <u>CiavattoneT@detroitmi.gov</u>.

Sincerely,

iarallone

Tiffany Ciavattone Preservation Specialist City of Detroit Housing & Revitalization Department

Site ID	11421 Dexter Avenue
Record Date	01/30/2024
User's Name	C Bakos

Road # 1 Name:	Dexter Avenue - 10 year projection, 2% growth, 20% trucks

Road #1

Vehicle Type	Cars 🗹	Medium Trucks 🗹	Heavy Trucks 🗹
Effective Distance	220	220	220
Distance to Stop Sign			
Average Speed	35	35	35
Average Daily Trips (ADT)	3394	424	424
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	49	50	61
Calculate Road #1 DNL	61	Reset	

Add Road Source Add Rail Source

Airport Noise Level	<65

Loud	Impu	lse	Sour	ids?
100.01			000.	

Combined DNL for all Road and Rail sources	61
Combined DNL including Airport	NaN
Site DNL with Loud Impulse Sound	

Mitigation Options

Calculate Reset

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

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

Tools and Guidance

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

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

Site ID	11421 Dexter Avenue
Record Date	01/30/2024
User's Name	C Bakos

Road # 1 Name:	Dexter Avenue - 2013 Data	Assume 20% trucks since not reported

Road #1

Vehicle Type	Cars 🗹	Medium Trucks 🗹	Heavy Trucks 🗹
Effective Distance	220	220	220
Distance to Stop Sign			
Average Speed	35	35	35
Average Daily Trips (ADT)	2784	348	348
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	49	50	60
Calculate Road #1 DNL	61	Reset	

Add Road Source Add Rail Source

Airport Noise Level	<65

Combined DNL for all Road and Rail sources	61
Combined DNL including Airport	NaN
Site DNL with Loud Impulse Sound	

Mitigation Options

Calculate Reset

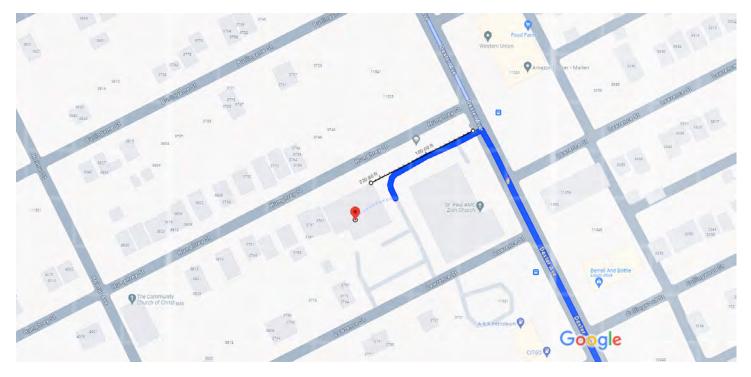
If your site DNL is in Excess of 65 decibels, your options are:

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

Tools and Guidance

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

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

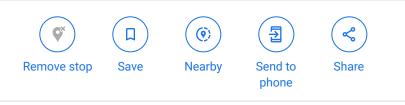


Map data ©2024 Google 50 ft L



11421 Dexter Ave

Building



11421 Dexter Ave, Detroit, MI 48206

Photos

 \bigcirc

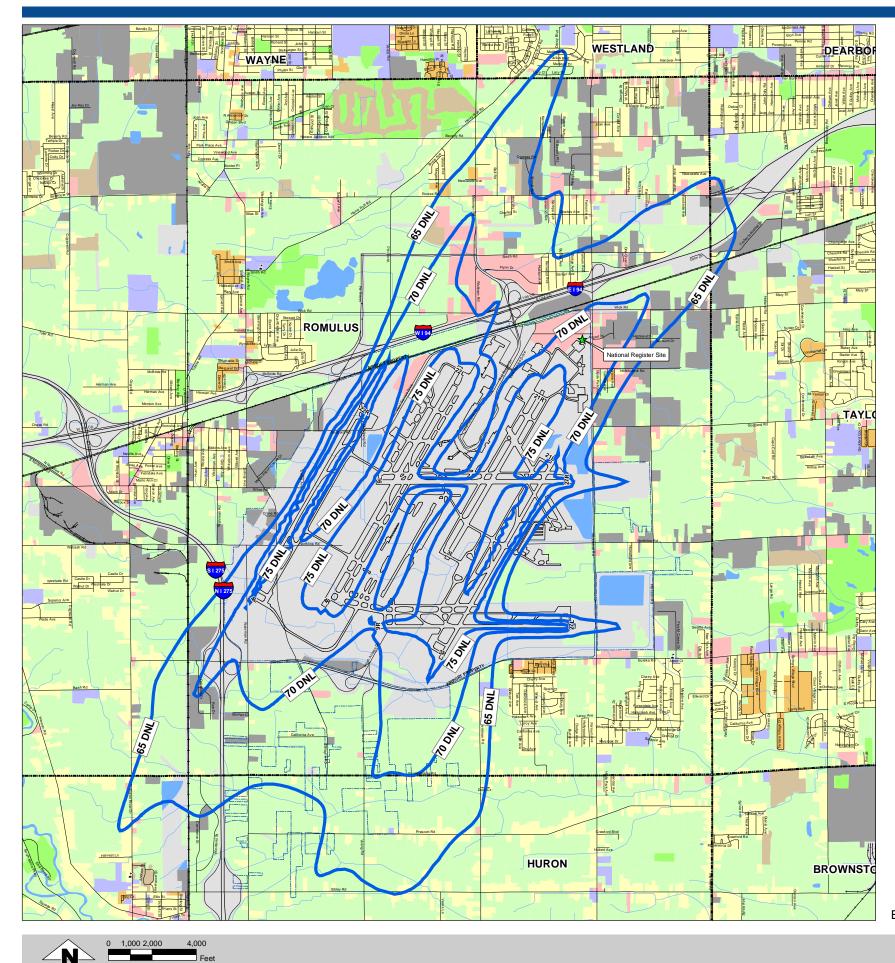
	144	I 🔺 1 -	P	PPI	01	001	0 Record	go go		
Location ID								MPO ID	8563	95976
Туре	SPOT							HPMS ID		
On NHS	No							On HPMS	No	
LRS ID	-							LRS Loc Pt.		
SF Group	01							Route Type		
AF Group								Route		
GF Group								Active	Yes	
Class Dist Grp								Category		
Seas Clss Grp										
WIM Group										
QC Group	Defau	t								
Fnct'l Class	-							Milepost		
Located On	Dexter	Ave								
Loc On Alias										
NORTH OF	Lawre	nce St								
.ess Detail 🔻										-
Co	unty	Nayne						FIPS County	Code	
Commu	unity I	Detroit						# L	anes.	0
Jurisdio	tion							Surface	Туре	
Dis	strict							Count	Cycle	
Control Sec	ction							Ctrl Sectio	n MP	
Perm Sta	ation	No						D	DI TC	
WIM Sta	ation	No						Lat	itude	42.378058
Vi	rtual	No						Long	itude	-83.123086
Mega	-Site	No						Speed		
	MPO			_					LTPP	
								State O	wned	No
Own	er ID	nankinsd						Rural/L	Irban	

Directions: 1-WAY SB

AADT 😧

Year	AADT	DHV-30	κ%	D %	PA	BC	Src
2013	3,250						

Trave	I Deman	d Model								
	Model Year	Mode AAD		AM PPV	MD PHV	MD PPV	PM PHV	PM PPV	NT PHV	NT PPV
VOLU	VOLUME COUNT						IE TREN	D 😨		
		Date		Int	Total	Year			al Growth	
ġ	Tu	ue 4/30/20	013	15	3,480	. oui		,a.		
SPEE	SPEED						FICATIO	DN		
	Date	Int	Pace	85th	Total		Date	Int	Int	
			No Data					No Data		
WFIG	H-IN-MO	TION 🔞)			PER VI	EHICLE			
	Date	Axles	Avg	GVW	Total		Date	Axles	85th	Total
		1	No Data					No Data		
GAP										
07.0	Dat	e	Int	To	tal					
		1	No Data							
PAR	TIAL CO	INT								
. /	Date Int 24-Hr Total									
NOTE	S/FILES									
				Note				D	ate	



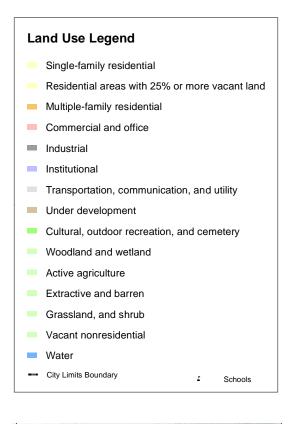


	Existing (2004)				
65-70 DNL	Population	Housing			
Huron Township	160	60			
Romulus	1,060	490			
Taylor	10	10			
Westland	110	50			
Subtotal	1,340	610			
70-75 DNL					
Romulus	<u>40</u>	<u>20</u>			
Subtotal	40	20			
65 DNL & Greater					
Huron Township	160	60			
Romulus	1,100	510			
Taylor	10	10			
Westland	110	50			
Subtotal	1,380	630			
60 DNL & Greater*					
Dearborn Heights	1,100	360			
Huron Twp.	2,460	920			
Inkster	4,420	1,870			
Romulus	4,340	1,810			
Sumpter Twp.	40	10			
Taylor	3,860	1,500			
Westland	2,970	1,250			
Total	19,190	7,720			
Source: 2000 US Census	Numbers rounded to				
Note: no residential uses	are located in the 75 D	NL and greater con			

* includes the 65 DNL & Greater

Based on 522,641 operations.

Figure D25 Existing (2004) Noise Exposure Map



The 65 DNL contour contains approximately 9,475 acres, 750 residential structures and 1,400 people. The 70 DNL contour contains approximately 4,505 acres, 30 residential structures and 40 people.

The 75 DNL contour contains approximately 1,580 acres, no residential structures and no people.

Planning jurisdictions are shown on the map.

Noise measurement sites and flight tracks are depicted on the Noise Measurement Sites and Flight Tracks Maps.

Residential land use, as defined by FAR Part 150, is an ncompatible use without proper sound attenuation within the 65 DNL or greater contour.

The Noise Exposure Maps and accompanying documentation for the Noise Exposure Map for Detroit Metropolitan Wayne County Airport, submitted in accordance with FAR Part 150 with the best available information, are hereby certified as true and complete to the best of my knowledge and belief.

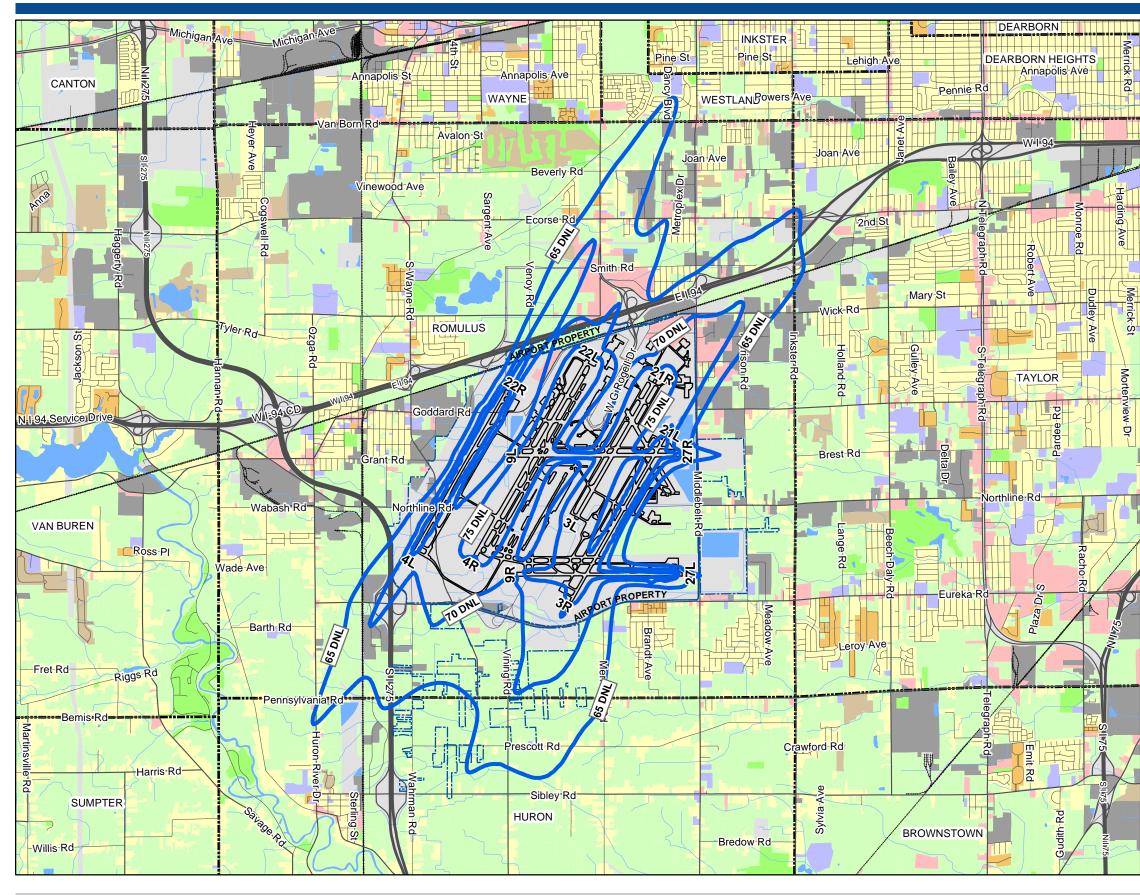
In addition, it is hereby certified that the public was afforded the opportunity to review and comment on the document and its contents Signed State Weblinson Date 3-6-06

or digits less than 5, rounded to 10.





Source: Michigan Department of Natural Resources, SEMCOG





July 5, 2005

Source: Michigan Department of Natural Resources, SEMCOG

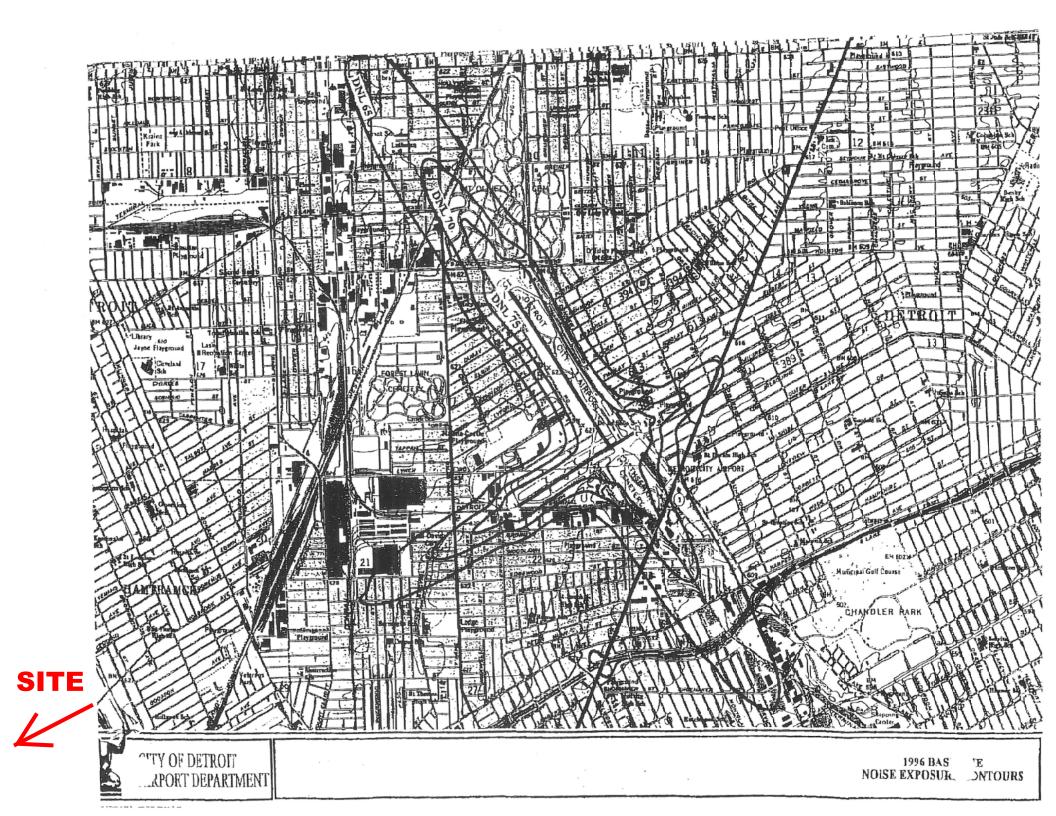
Figure D28 Future (2011) Noise Contour



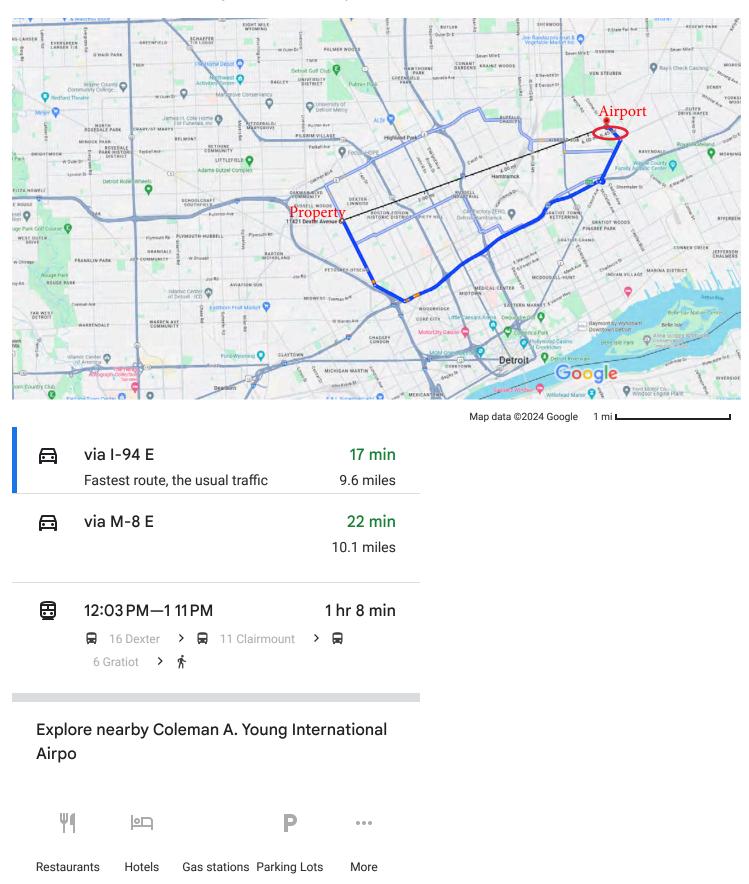
Land Use Legend

	Single-family residential
	Residential areas with 25% or more vacant land
	Multiple-family residential
	Commercial and office
	Industrial
	Institutional
	Transportation, communication, and utility
	Under development
	Cultural, outdoor recreation, and cemetery
	Woodland and wetland
	Active agriculture
	Extractive and barren
	Grassland, and shrub
	Vacant nonresidential
	Water
	City Limits Boundary
0	Future 2011 DNL Noise Contours

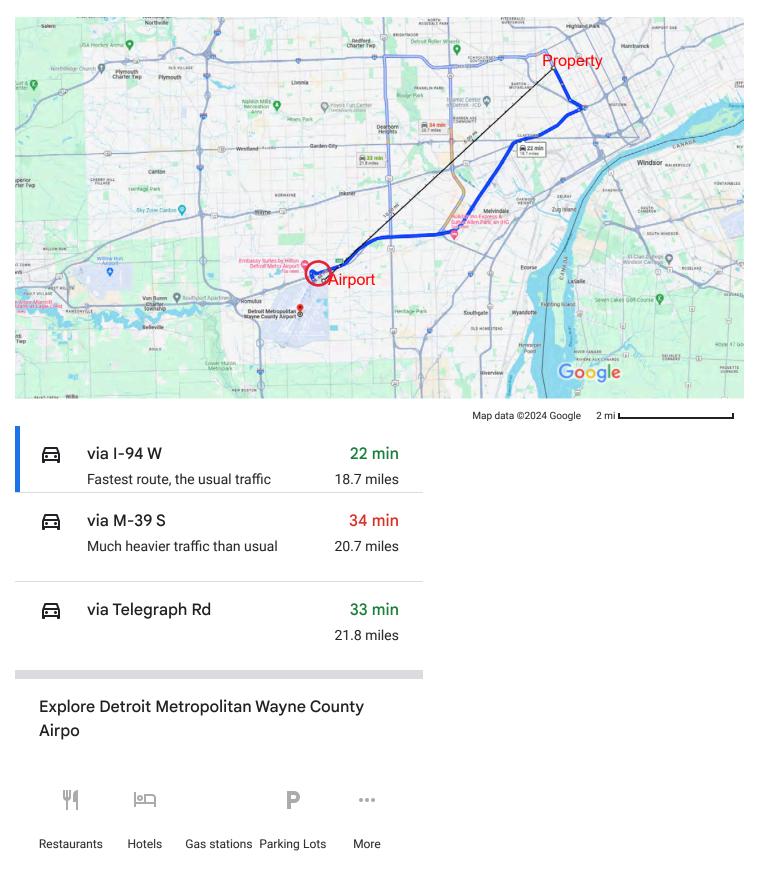




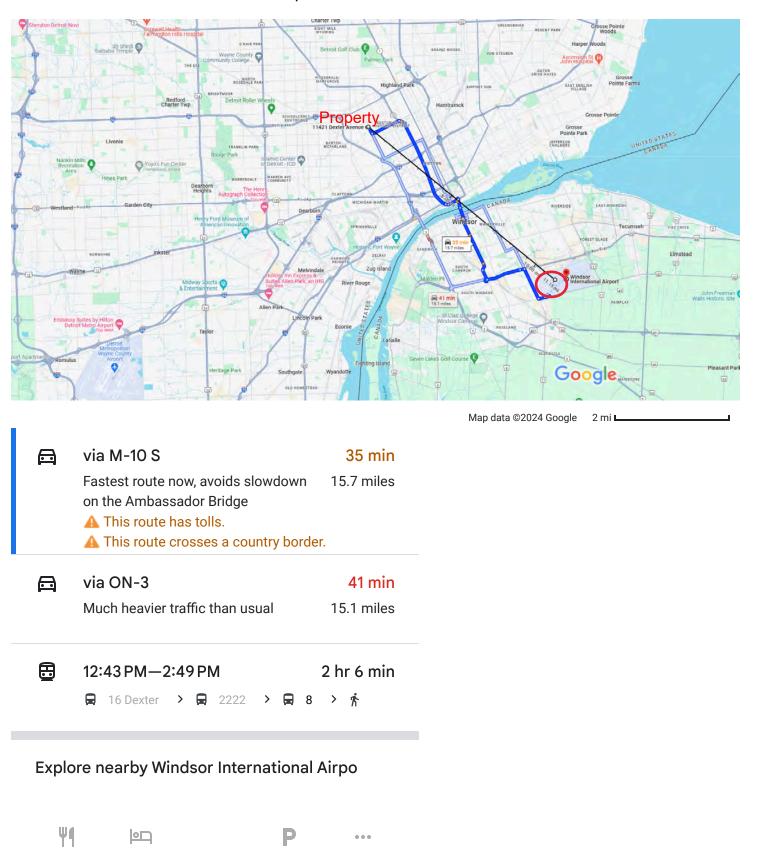
11421 Dexter Avenue, Detroit, MI to Coleman A. Young International Airport



11421 Dexter Avenue, Detroit, MI to Detroit Metropolitan Wayne County Airport



11421 Dexter Avenue, Detroit, MI to Windsor International Airport



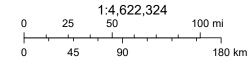
Restaurants Hotels Gas stations Parking Lots More

Sole Source Aquifers in Michigan



7/29/2024, 1:20:53 PM

Sole_Source_Aquifers

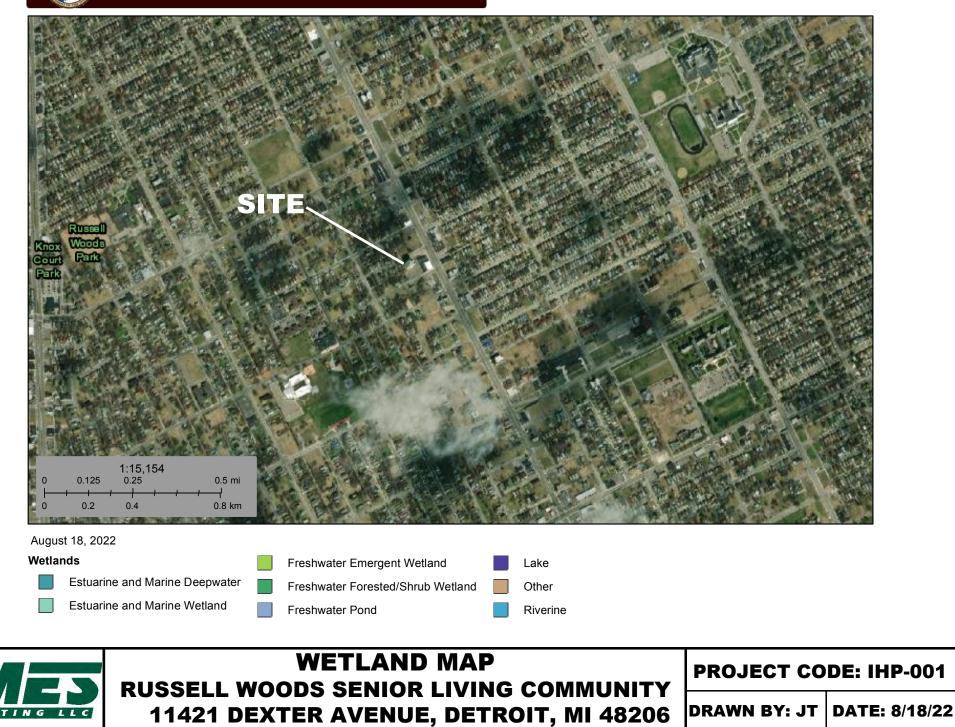


Esri, HERE, Garmin, NGA, USGS, NPS



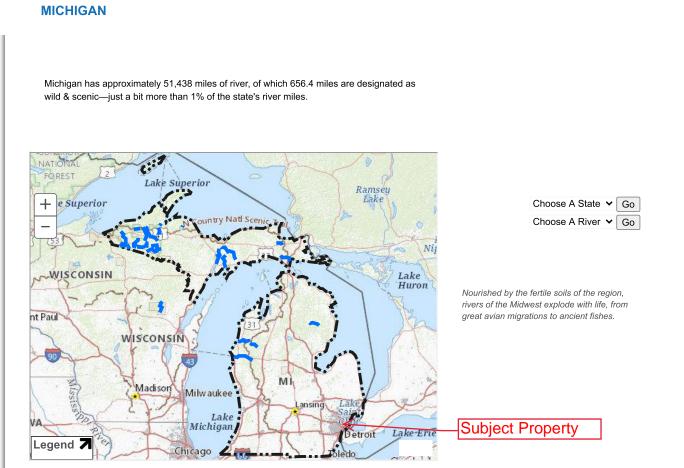
U.S. Fish and Wildlife Service National Wetlands Inventory

Wetland Map





NATIONAL SYSTEM MANAGEMENT RESOURCES PUBLICATIONS CONTACT US 50 YEARS SITE INDEX



+ 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

SEPA EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

1 mile Ring Centered at 42.377833,-83.123739 Detroit, MI Population: 15,534 Area in square miles: 3.14 A3 Landscape **COMMUNITY INFORMATION** Less than high Limited English Low income: People of color: school education: households: 96 percent 62 percent 15 percent **O** percent Persons with Unemployment: Male Female disabilities: 18 percent 48 percent 52 percent 26 percent \$18,765 **68** years Owner Number of **Average life** Per capita occupied: households: expectancy income 48 nercent 6.424 0.6 mi f 11421 Dexter Avenu **BREAKDOWN BY RACE** Earl Community Maps Contributors, Province of Ontario Earl, TomTom, Gamnin, SafeGraph, GeoTechnologier Inc, METINASA, USGS, EPA, NPS, US Census Bureau LANGUAGES SPOKEN AT HOME White: 4% Black: 91% American Indian: 0% Asian: 0% LANGUAGE PFRCFNT Hawaiian/Pacific Other race: 0% Two or more Hispanic: 1%

English	98%
Arabic	1%
Other and Unspecified	1%
Total Non-English	2%

BREAKDOWN BY AGE

races: 3%

Islander: 0%

From Ages 1 to 4	7%
From Ages 1 to 18	22%
From Ages 18 and up	78%
From Ages 65 and up	16%

LIMITED ENGLISH SPEAKING BREAKDOWN

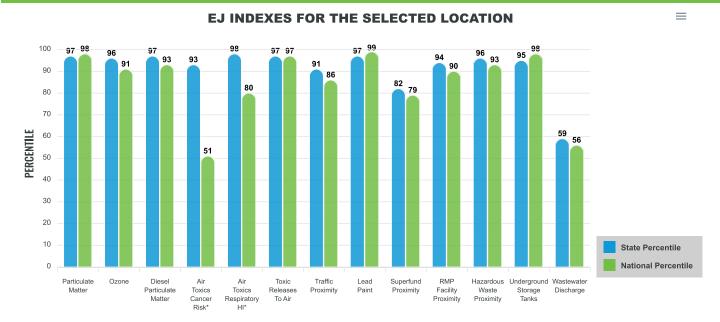
Speak Spanish	100%
Speak Other Indo-European Languages	0%
Speak Asian-Pacific Island Languages	0%
Speak Other Languages	0%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the EJScreen website.

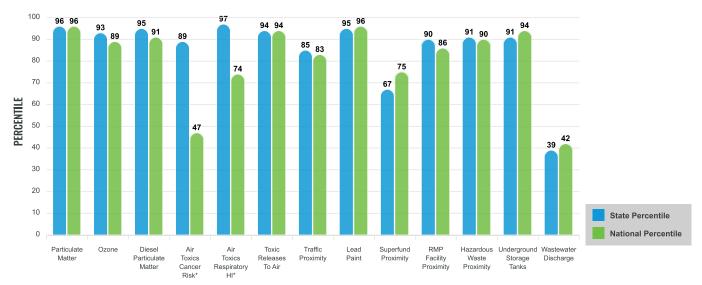
EJ INDEXES



The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.



SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION

These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

 \equiv

Report for 1 mile Ring Centered at 42.377833,-83.123739

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter (µg/m ³)	10.6	8.51	97	8.08	97
Ozone (ppb)	62.9	60	76	61.6	62
Diesel Particulate Matter (µg/m ³)	0.32	0.183	92	0.261	72
Air Toxics Cancer Risk* (lifetime risk per million)	20	19	14	25	5
Air Toxics Respiratory HI*	0.3	0.2	88	0.31	31
Toxic Releases to Air	4,400	2,500	88	4,600	84
Traffic Proximity (daily traffic count/distance to road)	160	120	78	210	69
Lead Paint (% Pre-1960 Housing)	0.89	0.38	93	0.3	96
Superfund Proximity (site count/km distance)	0.046	0.15	32	0.13	40
RMP Facility Proximity (facility count/km distance)	0.26	0.31	71	0.43	64
Hazardous Waste Proximity (facility count/km distance)	1.8	1.1	78	1.9	71
Underground Storage Tanks (count/km ²)	16	8	83	3.9	94
Wastewater Discharge (toxicity-weighted concentration/m distance)	3E-05	0.13	23	22	23
SOCIOECONOMIC INDICATORS					
Demographic Index	79%	28%	96	35%	95
Supplemental Demographic Index	25%	14%	91	14%	88
People of Color	96%	26%	95	39%	92
Low Income	62%	31%	89	31%	90
Unemployment Rate	18%	7%	92	6%	94
Limited English Speaking Households	0%	2%	0	5%	0
Less Than High School Education	15%	9%	82	12%	71
Under Age 5	7%	5%	69	6%	66
Over Age 64	16%	18%	48	17%	52
Low Life Expectancy	27%	20%	94	20%	96

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	0
Water Dischargers	0
Air Pollution	0
Brownfields	0
Toxic Release Inventory	0

Other community features within defined area:

Schools	4
Hospitals	0
Places of Worship	16

Other environmental data:

Air Non-attainment	Yes
Impaired Waters	No

Selected location contains American Indian Reservation Lands*	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community	Yes
Selected location contains an EPA IRA disadvantaged community	Yes

Report for 1 mile Ring Centered at 42.377833,-83.123739

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	27%	20%	94	20%	96
Heart Disease	9.2	6.6	94	6.1	94
Asthma	16.3	11.6	96	10	99
Cancer	5.7	6.6	24	6.1	39
Persons with Disabilities	24.2%	14.6%	93	13.4%	94

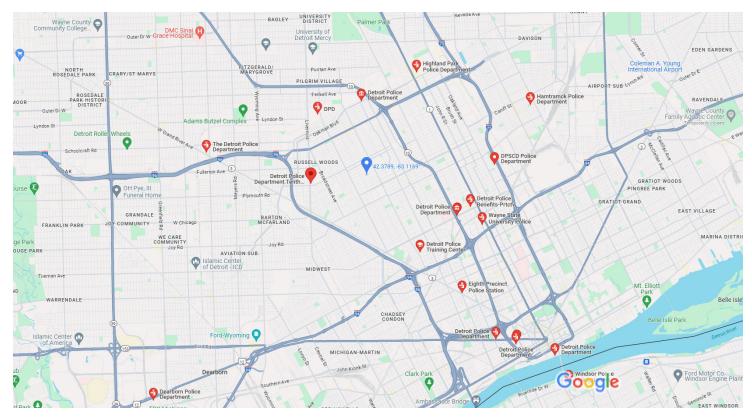
CLIMATE INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	2%	7%	22	12%	20
Wildfire Risk	0%	0%	0	14%	0

CRITICAL SERVICE GAPS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	33%	14%	94	14%	91
Lack of Health Insurance	8%	5%	11	9%	55
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

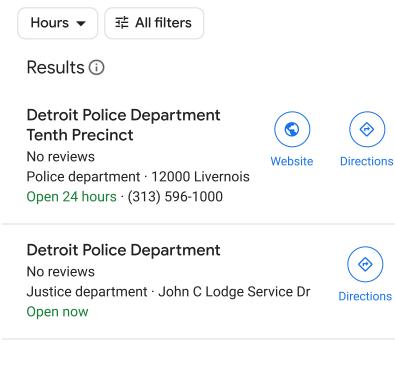
Report for 1 mile Ring Centered at 42.377833,-83.123739

police

departments near 11421 Dexter Ave



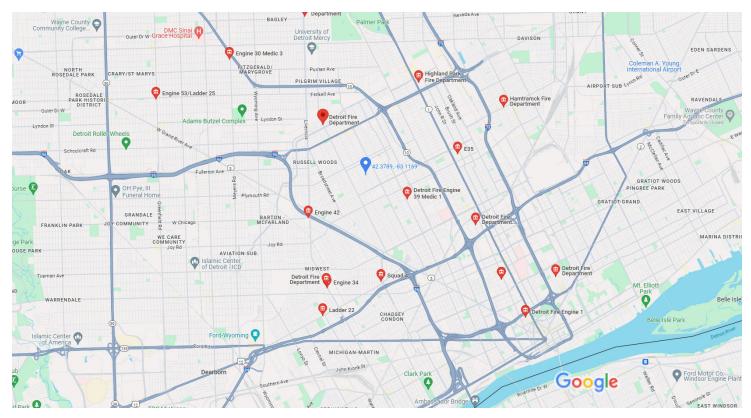
Map data ©2024 Google 1 mi



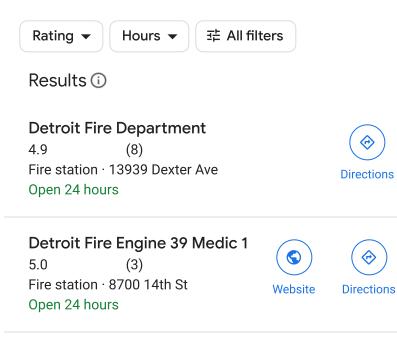
Detroit Police Department No reviews Justice department · Oakman Blvd	Directions
3rd Precinct NPO No reviews Police department · 2875 W Grand Blvd (313) 596-5300	Directions
DPD No reviews Police department · 14655 Dexter Ave	Directions
Detroit Police Benefits-Prtctv No reviews Police department · 3031 W Grand Blvd #43/405 Open · Closes 3 PM · (313) 870-9301	(The section s
Wayne State University Police No reviews Police department · 6050 Cass Ave (313) 577-2222	Directions
Hamtramck Police DepartmentImage: Constraint of the second secon	(The second seco
Highland Park Police DepartmentImage: Colorado StateNo reviewsWebsitePolice department · 14112WebsiteWoodward Ave (313) 852-7338Image: Colorado State	Directions
Eighth Precinct Police Station	

fire stations

near 11421 Dexter Ave



Map data ©2024 Google 1 mi L



E35 5.0 (2) Fire station · 111 Kenilworth St Open 24 hours



Detroit Fire Department Engine 17 Ladder 7 Chief 5 4.3 (6) Fire station · 6100 2nd Ave	Directions
Hamtramck Fire Department4.3(11)Fire station · 2625 Caniff StWebsiteOpen 24 hours · (313) 305-4503Website	Directions
Detroit Fire Department5.0(1)Fire station · 6535 Livernois	(The second seco
Engine 34 Image: Second state 5.0 (4) Fire station · 6345 Livernois Website (313) 596-2920 Website	Directions
Highland Park Fire DepartmentImage: Constraint of the station4.2(5)WebsiteFire station · 25 Gerald St (313) 852-3068Image: Constraint of the station o	Directions
Engine 42 5.0 (2) Fire station · 6324 W Chicago	Directions
Squad 4 5.0 (3)	



Where am I: Home / Water and Sewerage Department / DWSD Resources

About DWSD

The Detroit Water and Sewerage Department (DWSD) is one of the largest water and sewer utilities in the United States serving more than 200,000 Detroit residential and commercial accounts that includes a city population of nearly 680,000. DWSD's water network consists of more than 2,700 miles of transmission and distribution mains and nearly 3,000 miles of sewer collection piping.

On January 1, 2016, the City of Detroit began leasing regional water and sewer infrastructure, as well as water and wastewater treatment facilities, to the Great Lakes Water Authority (GLWA). The regional system built by DWSD, serves 126 municipalities in seven southeast Michigan counties. The agreement between DWSD and GLWA includes a \$50 million annual lease payment for 40 years to replace and rehabilitate DWSD's aging water and sewer system. DWSD continues to retain ownership of the regional assets.

DWSD has a rich history as a public utility dating back to 1836. Known for decades as the Department of Water Supply (DWS), the department officially became the Detroit Water and Sewerage Department in 1973 under Detroit's City Charter. Both DWSD and GLWA are headquartered in the Water Board Building located at 735 Randolph Street in Detroit.

DWSD is a branch of city government. In 1852, the City of Detroit's Common Council formed a Board of Trustees to operate the water system and provide it with hands-on management. In 1853, the state legislature transformed the Board of Trustees into the Board of Water Commissioners (BOWC) which continues as DWSD's governing body today. All seven current commissioners are Detroit residents, appointed by the Mayor.

DWSD is organized into five operating groups: Customer Care, Field Services, Finance and Procurement, Administration, and Meter Operations. By Michigan statute, water and sewer rates are based on the cost of service only. The department receives no subsidies from property taxes.

The BOWC holds an annual public hearing on DWSD's fiscal year budget which includes proposed water and sewer rates for the following fiscal year. DWSD's day-to-day operations are managed by Director Gary Brown who has more than 30-years of dedicated service to the citizens of Detroit. Brown was appointed by Mayor Mike Duggan in late 2015 and confirmed by the Board of Water Commissioners in January 2016.

The Detroit Water and Sewerage Department recognizes that good municipal citizenship involves more than operational efficiencies. The department is committed to identifying opportunities consistent with its mission to provide safe drinking water, reliable customer service and environmental integrity. In 2015, DWSD sponsored or participated in a wide-range of outreach activities. In addition to numerous community group and block club meetings, DWSD participated in the March of Dimes March for Babies, Detroit River Water Festival, Making Strides Against Breast Cancer Walk, among others.

Since 1985, DWSD participates in celebrating National Drinking Water Week and gives recognition to student winners for research in water-related projects through the annual Science and Engineering Fair of Metropolitan Detroit.



DWSD Public Affairs

dwsd-publicaffairs@detroitmi.gov

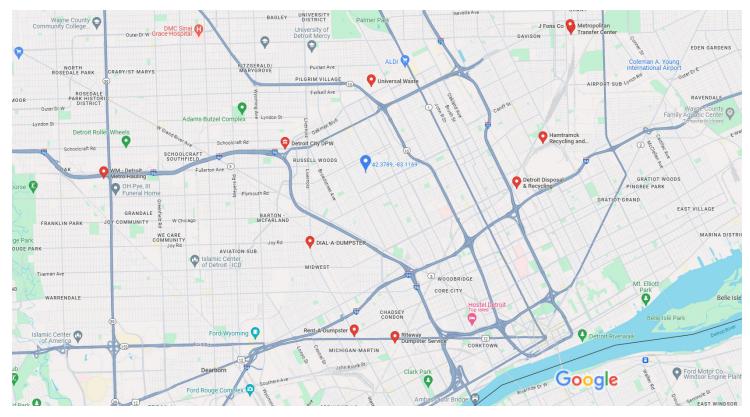
NEWS & EVENTS



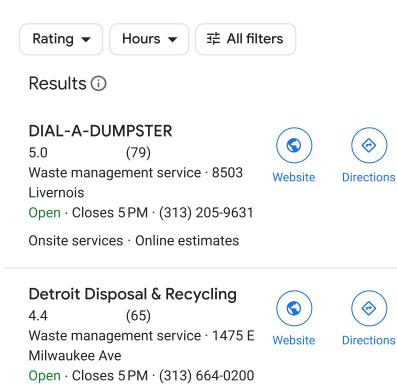
<u>Detroit Water and Sewerage Department Notice: Public Meeting for Sewer Rehabilitation FY25 Clean</u> <u>Water State Revolving Fund (CWSRF) Project</u>

garbage near me

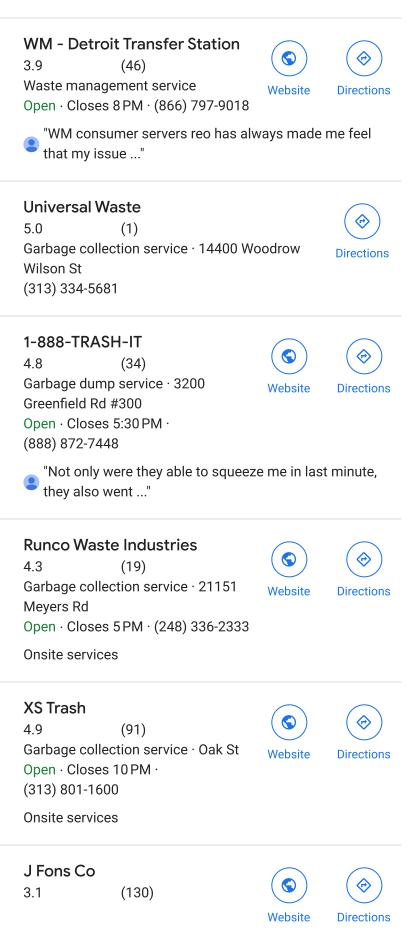
solid waste disposal / recycling near 11421 Dexter Ave



Map data ©2024 Google 1 mi

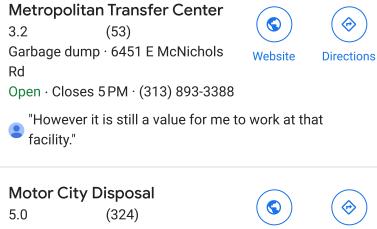


"... them watch my kids while me and the wife had a night on the town."



Garbage collection service · 6451 E McNichols Rd Open · Closes 5PM · (313) 893-6656

"I went for the first time around 8am on Tuesday. very professional."



Website

Directions

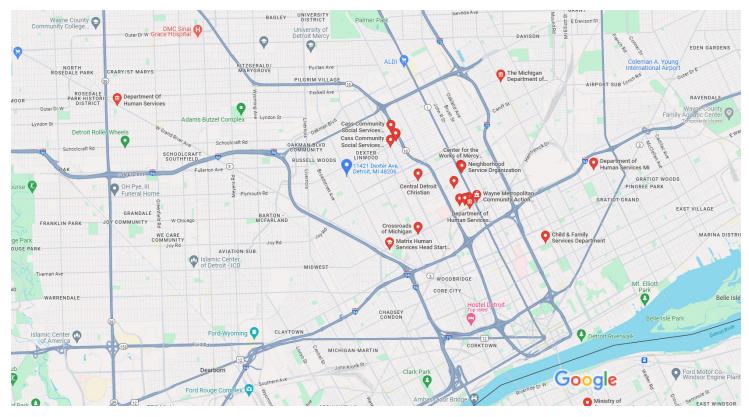
5.0 (324) Waste management service · 16482 13 Mile Rd Open · Closes 10 PM · (586) 842-2750

_ "Hauling trash and making multiple trips is a lot of

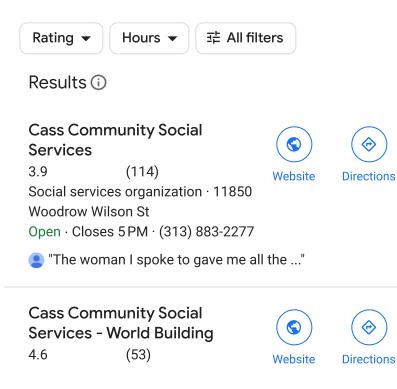


social services near me

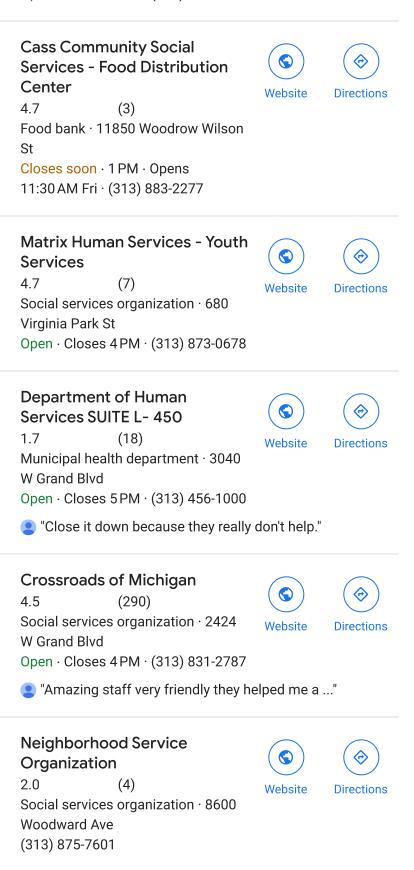
near 11421 Dexter Ave



Map data ©2024 Google 1 mi



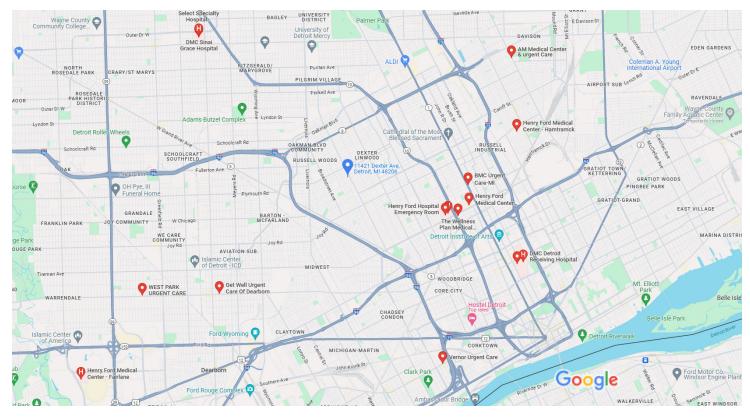
Non-profit organization · 11745 Rosa Parks Blvd Open · Closes 5 PM · (313) 883-2277



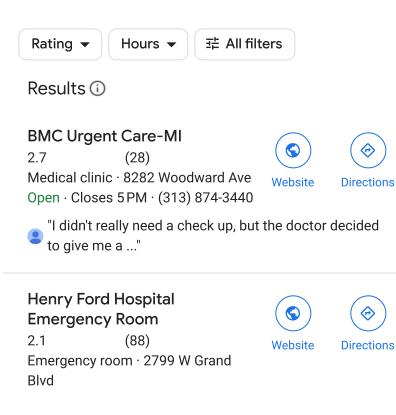
Wayne Metropolitan Community Action Agency4.2(232)Community center · 7310 Woodward AveOpen · Closes 6 PM · (313) 388-9799Image: They are excellent they help me w	Website	Directions
Central Detroit Christian4.5(101)Youth social services organization ·1550 Taylor StOpen · Closes 6 PM · (313) 873-0064Image: The services of th	Website	Directions
United Way for Southeastern Michigan 4.0 (38) Social services organization · 3011 W Grand Blvd #500	(S) Website	(The second seco

hospitals urgent care near me

near 11421 Dexter Ave

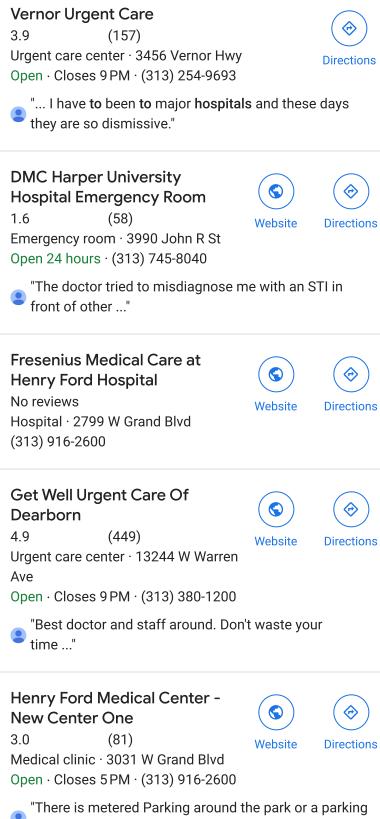


Map data ©2024 Google 1 mi



Open 24 hours · (313) 916-1545

"... for having me on the floor, so she went out of her way to ... Great ..."



garage ..."

A M Medical Center & urgent Care

2.3 (31) Urgent care center · 13031 Conant Open · Closes 8 PM · (313) 893-5490

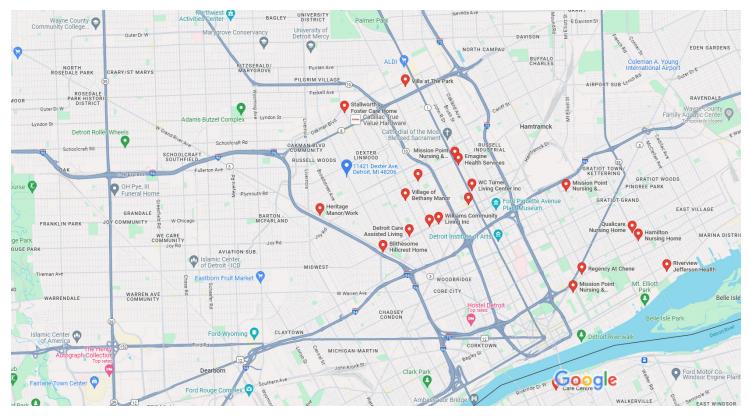


"He even did a covid test for me just because I asked him to because I ..."

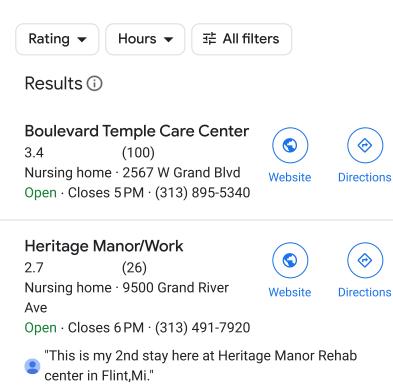
The Wellness Plan M Centers - Gateway M Center 2.6 (63) Medical clinic · 2888 W (Open · Closes 7 PM · (31) Got my teeth examine to the front to"	Aedical Grand Blvd 3) 875-4200	Website ygienist ser	Directions nds me	
Henry Ford Medical Fairlane 4.2 (1,032) Medical Center · 19401 I Open 24 hours · (313) 98	Hubbard Dr 32-8100	(©) Website	© Directions	
" care of me was super fast and efficient Urgent				

healthcare facilities

near 11421 Dexter Avenue



Map data ©2024 Google 1 mi



Mission Point Nursing & Physical Rehabilitation Center of Woodward 3.5 (35) Nursing home · 9146 Woodward Ave Open 24 hours · (313) 875-1263 Great facility, I was recently dischar rehabilitation center."	Website arged from	Directions
Villa at The Park 2.3 (18) Nursing home · 111 Ford St Open 24 hours · (313) 305-6600 "The facility is cleaned regularly ar The activities for"	Website Med does not	Directions
Taylor Street Primary Care Clinic No reviews Medical clinic · 1550 Taylor St Open · Closes 5 PM · (313) 486-5501	(S) Website	Directions
Qualicare Nursing Home3.9(37)Nursing home · 695 E Grand BlvdOpen 24 hours · (313) 925-6655Solution 100 Performed by the statement of the statement	Website er."	Directions
Williams Community Living Inc 5.0 (2) Assisted living facility · 2662 W Grand (313) 871-7542	Blvd	Oirections
Emagine Health Services 4.2 (5) Mental health service · 8904 Woodward Ave Open · Closes 7:30 PM · (313) 552-6630	(S) Website	Directions

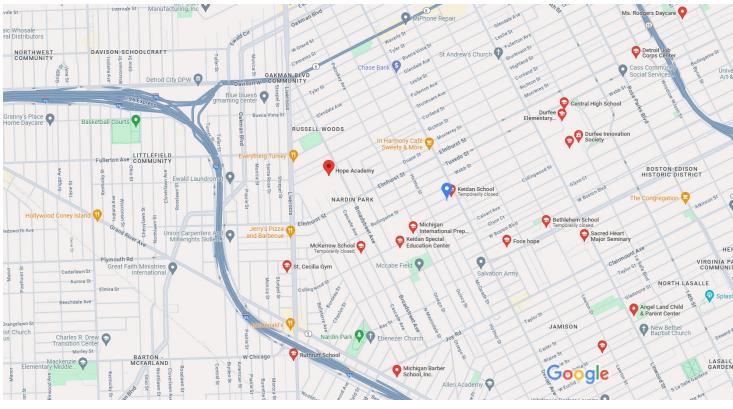
Blithesome Hillcrest Home 2.0 (4) Assisted living facility · 2008 W Grand Blvd (313) 898-3928



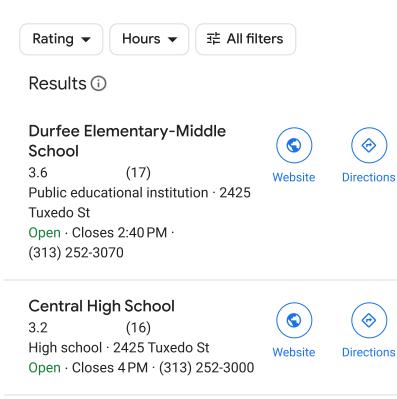
Detroit Care Assisted Living No reviews Mental health service · 2329 W Website Directions

schools

Educational facilities near 11421 Dexter Ave



Map data ©2024 Google 1000 ft



Hope Academy

3.5 (53) Preschool · 12121 Broadstreet Ave Open · Closes 4 PM · (313) 934-0054



"Great school and staff helping the community to strive"

Michigan International Prep School - Detroit No reviews Website Directions School · 4242 Collingwood St Open · Closes 3:30 PM · (248) 289-5521 **Keidan Special Education** Center 4.8 (4)Website Directions Middle school · 4441 Collingwood St (313) 873-9400 **Detroit Hogh School** No reviews School · 2900 W Philadelphia St Directions **Ruthruff School** 4.5 (2)High school · 6311 W Chicago Directions Michigan Barber School, Inc. (100)4.4 Barber school · 8990 Grand River Website Directions Ave Open · Closes 4:30 PM · (313) 894-2300 Onsite services · Online classes **BOOK ONLINE Gentle Hands Of Integrity**

5.0 (113) Nursing school · 2470 Collingwood St Suite 306



Website

Open · Closes 4 PM · (313) 979-1669

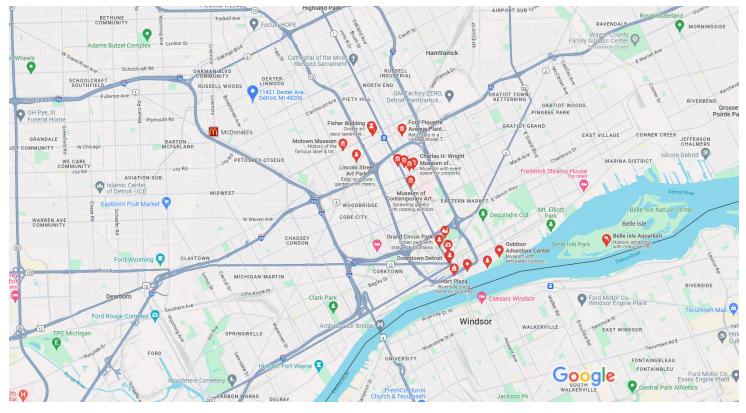
"10/10 if your looking for a school here ."

Angel Land Child & Parent Center 4.5 (11) Day care center · 8642 Linwood St Open · Closes 4 PM · (313) 894-4331

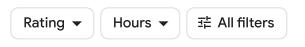


things to do detroit

Cultural Facilities near 11421 Dexter Ave



Map data ©2024 Google 1 mi



Results 🛈

Detroit Institute of Arts

4.8 (11,485)Tourist attraction · 5200 Woodward AveLarge art museum displaying global worksOpen · Closes 4 PM



"All in all, amazing touristy thing to do."

Motown Museum4.7(5,215)Tourist attraction · 2648 Berry Gordy Jr.Boulevard, 2648 W Grand BlvdHistory of the famous label & hit-maker



Open - Closes 6 PM
"Send a part of detroit history is always nice"

Michigan Science Center 4.4 (2,573) Tourist attraction · 5020 John R St Dynamic science museum for children Open · Closes 4 PM



"There is something to do for all ages. ... The Detroit science center is a round state in the community outreach for young kids of Detroit."

Detroit Historical Museum4.8(1,675)Tourist attraction · 5401 Woodward AveInteractive & educational city museumOpen · Closes 5 PM



"They showed retro **things that** used **to** be in **detroit that** are now not here."

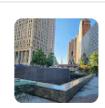
Detroit Riverwalk

4.8 (4,665) Tourist attraction · 1340 Atwater St Open · Closes 10 PM



"A lot of cool **things to see** and just a chill vibe being by the river and ..."

Campus Martius Park4.7(11,605)Tourist attraction · 800 Woodward AvePark features event space & bistroOpen · Closes 9 PM



"... **Detroit** at the foot of ... If **you**'re looking for **something to do**, or ..."

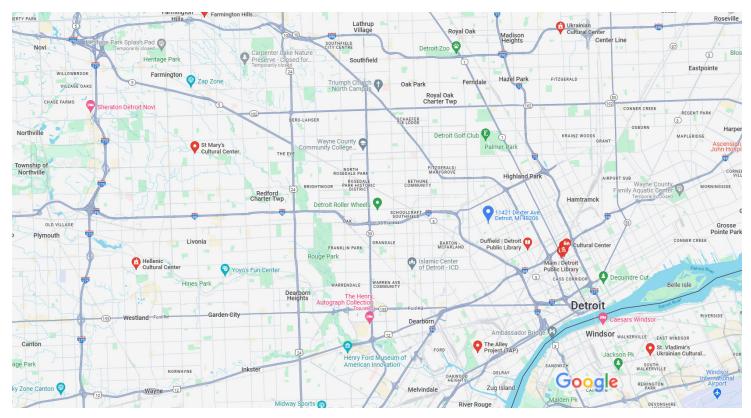
Lincoln Street Art Park 4.7 (470) Tourist attraction · 5926 Lincoln St Edgy sculpture garden with cheery murals Open 24 hours



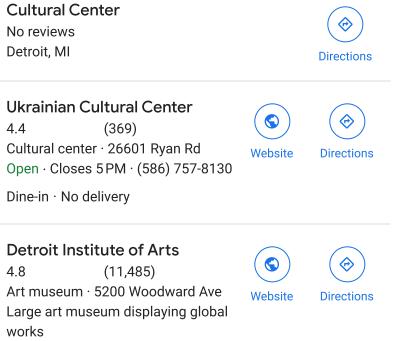
"... and **something** very special but I am not expert **to** ... Art park **that** is ..."

cultural facilities

cultural facilities near 11421 Dexter Avenue



Map data ©2024 Google 2 mi



Open · Closes 4 PM · (313) 833-7900

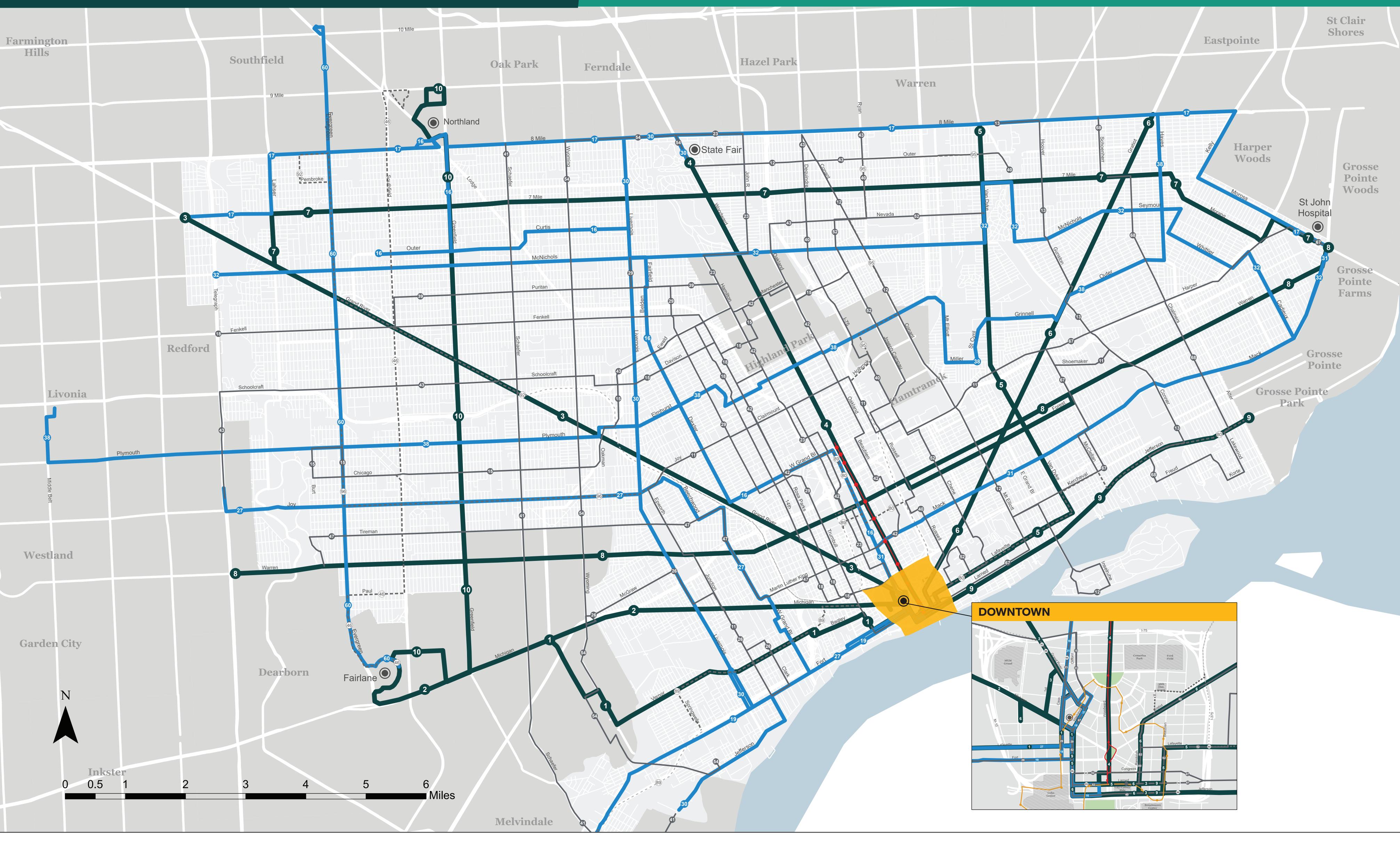
St Mary's Cultural Center4.6(554)Cultural center · 18100 Merriman Rd(734) 421-9220St Mary's Cultural Center"	Directions
Hellenic Cultural Center4.5(207)Banquet hall · 36375 Joy RdWebsiteOpen · Closes 5 PM · (734) 525-3550Dine-in · No takeout · No delivery	Directions
American Polish Cultural CenterImage: Center4.5(525)Banquet hall · 2975 E Maple RdPolish gathering spot with a restaurantOpen · Closes 6 PM · (248) 689-3636Dine-in · Takeout · Delivery	Directions
Duffield Detroit Public Library4.1(34)Public library · 2507 W Grand BlvdOpen · Closes 8 PM · (313) 481-1710Image: The facilities are clean and staff is always for the staf	Directions
St. Vladimir's Ukrainian Cultural Centre4.5(23)Cultural center · 2000 Tecumseh Rd E+1 519-254-8067	Directions
The Alley Project (TAP)4.4(33)Arts organization · 9101 Avis St(313) 744-2077	Directions

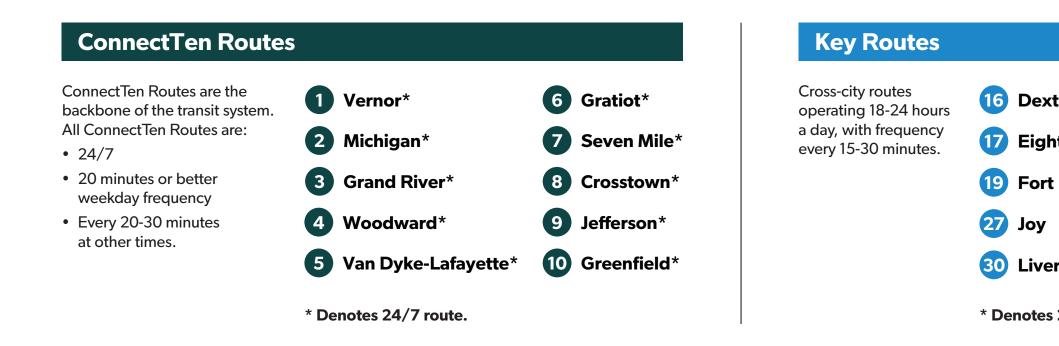
Italian American Cultural Society and Banquet Center

4.6 (707) Event venue · 43843 Romeo Plank Rd #1



D. DDOT System Map





16 Dexter* 31 Mack 17 Eight Mile* 32 McNichols **38** Plymouth 60 Evergreen **30** Livernois * Denotes 24/7 route.

Neighborhood Routes

during day and early

evening times, with

frequency every 30-60 minutes.

- Shorter routes operating 11 Clairmont
 - 12 Conant
 - 13 Conner 15 Chicago/Davison
 - 18 Fenkell

26 Junction

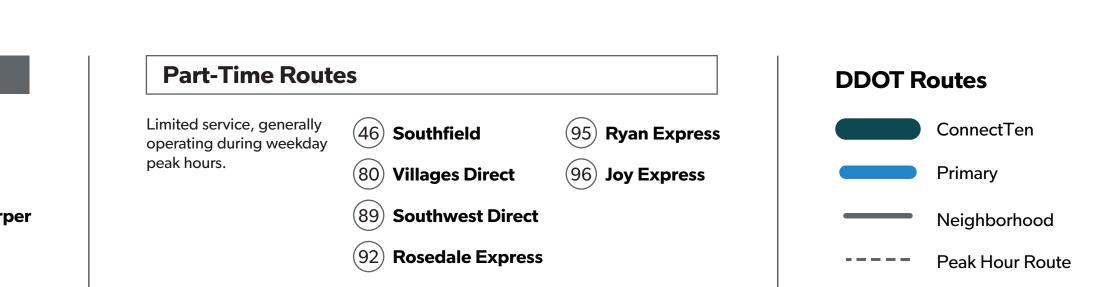
- 29 Linwood
- **39** Puritan
- 40 Russell

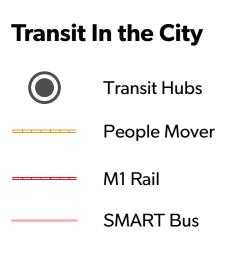
- 23 Hamilton/John R 41 Schaefer
 - 42 Mid-City Loop 54 Wyoming
 - 43 Schoolcraft
 - 47 Tireman
- 67 Cadillac/Harper

52 Chene

68 Chalmers

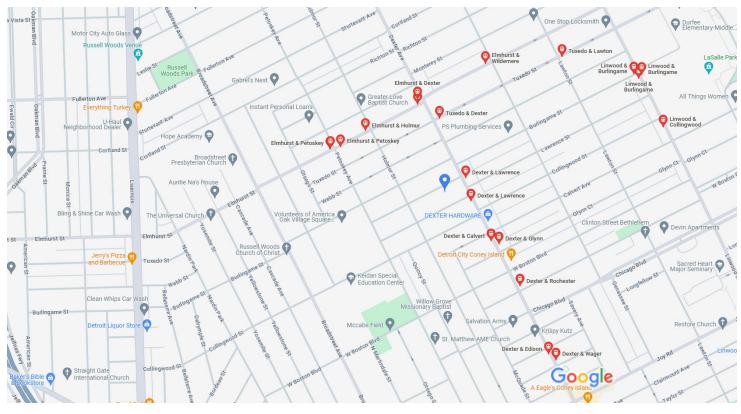
Last Revised: October 2020



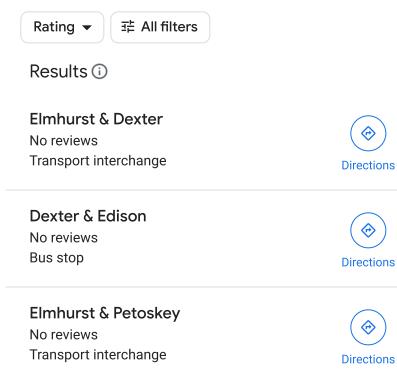


transportation

bus stops near 11421 Dexter Ave



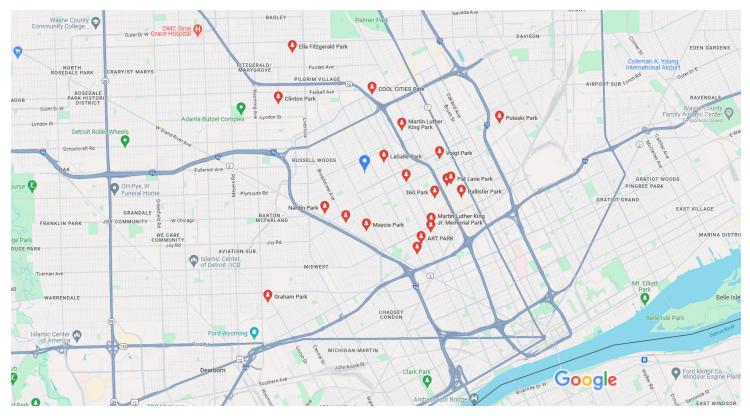
Map data ©2024 500 ft 🛾



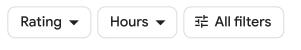
Dexter & Calvert 4.0 (1) Bus stop	Directions
Linwood & Burlingame No reviews Transport interchange	Directions
Elmhurst & Dexter 3.0 (1) Bus stop	Directions
Elmhurst & Petoskey No reviews Bus stop	Directions
Elmhurst & Petoskey No reviews Bus stop	Directions
Elmhurst & Wildemere No reviews Bus stop	Directions
Tuxedo & Dexter4.0(2)Bus stop	Directions

parks

near 11421 Dexter Ave



Map data ©2024 Google 1 mi L



Results 🛈

Nardin Park 4.5 (50) Park · 9516 Grand River Ave Open · Closes 10 PM



LaSalle Park 4.7 (6) Park · 2380 La Salle Blvd



Martin Luther King Park 4.0 (23) Park Open now



Pat Lane Park 4.2 (9) Park · 699 W Philadelphia St Open 24 hours



Voigt Park 4.4 (25) Park · 795 Longfellow St



McDuffy Park3.5(2)Park · 803 W Philadelphia St



TRAB'S PARK 5.0 (6) Park · 8881 Kimberly Ct

