

Part 58 Environmental Review Training

ERR Requirements for Consultants

Kim Siegel, Environmental Compliance Specialist
March 28, 2025



TAKE PART
Opportunity Rising



Introductions: HRD Environmental Review Team

Penny Dwoinen
Environmental Review Officer
dwoinenp@detroitmi.gov

Kim Siegel
Environmental Compliance Specialist
kim.siegel@detroitmi.gov

Melissa Owsiany
Environmental Compliance Specialist
melissa.owsiany@detroitmi.gov

Tiffany Ciavattone
Historic Compliance Team Lead
ciavattonet@detroitmi.gov

Mallory Bower
Historic Compliance Specialist
mallory.bower@detroitmi.gov

Sam Burns
Archeological Compliance Specialist
samuel.burns@detroitmi.gov

NEPA Update

- As of this presentation, there are no changes to HUD's guidance on how to comply with NEPA
- The City will continue to follow 24 CFR Part 58
- New guidance is expected from HUD within 10 months. The City of Detroit will provide revised guidance (as necessary) once HUD has made them available

Conduct the Environmental Review

HUD has specific requirements for Environmental Reviews and the “Environmental Review Record (ERR)”

- Detailed Project Description that aggregates all individual activities
- Statutory Checklist or Environmental Assessment Checklist with **all** backup documentation and any correspondence with federal and state agencies
 - For additional information or resources, see the [HUD Exchange](#) site
- All documentation for mitigation and any further work required

Submitting Your Report

- HUD requires the City of Detroit to submit all ERRs in the HEROS system. Therefore, all consultants must create and assign the ERR's to Kim Siegel through HEROS.
- Consultants must register as **Partner Users** through HUD's HEROS website to gain access to the program.
 - Information regarding HEROS access is [here](#)
 - The HEROS Access Form is [here](#)
 - HEROS Partner User Guide is [here](#)
- Additionally, consultants must submit a copy of their completed HEROS report and all attachments to Kim Siegel separately

HUD Environmental Review Online System

- As a Partner User, you can fill out the project information on behalf of your client
- Please select the correct level of review that the ER Team has determined for the project from the ER Memo provided prior to the ER Kick-Off Meeting
- You cannot check the box for formal mitigation or conditions – only the responsible entity (RE) can do so

HUD Environmental Review Online System

- Effective July 1, 2024: all new environmental reviews have a one-year deadline to receive the Authority to Use Grant Funds
- HEROS was updated to automatically display the date the environmental review was started in the system
- The City of Detroit considers this the start of the clock
- **Make sure you have obtained all Federal, State, and Local clearances prior to starting the ER in HEROS!**

HEROS Tips and Tricks

- If you do not currently have HEROS access, request HEROS access a minimum of two months prior to submission of the ERR
- Use HEROS early in the morning before west coast users log into the system
- **Save your work as often as possible!**
 - HEROS has multiple technical glitches
 - Some find it helpful to type out the answers in a Word doc and copy and paste the text into HEROS to ensure the work is properly saved within HEROS

Report Accessibility

- Overall, HUD wants to ensure that any member of the public interested in reviewing the ER can ascertain the project scope and the need for the project, can identify the location of the project on maps, can understand the outcome of the proposed project and its potential impacts to people and the environment

Components of the HUD Part 58 Environmental Review

Project Information

Project Information

1105 – Initial Screen (50/58 - Non-Tiered) Project Name: HRD-ENVIRONMENTAL-TRAINING

Environmental Review Record created on May 12, 2023 by Kim Siegel.

* Indicates that field is required

* **Project Name:**

* **HUD Funding Source:**
Include *only* funding sources for which this review will fulfill HUD's environmental review requirements. Do not include funding sources that will require a separate environmental review (e.g. if this project is from both Part 50 and Part 58 programs).

Grant/Project Identification Number	HUD Program	Program Name
<input type="text" value="B22MC260006"/>	Community Planning and Development (CPD) <input type="text"/>	HOME Program <input type="text"/>
<input type="text" value="M1001"/>	Public Housing <input type="text"/>	Project-Based Voucher Program <input type="text"/>

* **Estimated Total HUD Funded, Assisted, or Insured Amount(\$):** \$

* **Estimated Total Project Cost:** \$
This may be the same as the total HUD-funded, assisted, or insured amount.

* **Does this project anticipate the use of funds or assistance from another Federal agency in addition to HUD?**

No
 Yes

Explain:

State / Local Identifier [optional]:

- **Project Name:** Determined by Client
- **HUD Funding Source:**
 - Include all City of Detroit HUD Programs (including Detroit Housing Commission Vouchers)
 - Can use placeholder for grant number
- **Estimated Total HUD Funding:** Total allocation
- of HUD funding for City of Detroit
- **Estimated Total Project Cost:** All sources
- **Other Federal Agency Source:**
 - Some projects may include American Rescue Plan Act funding or other sources of federal funding outside of HUD.
 - List all other types and amounts of federal funds here
- **State/Local Identifier:** Detroit, Michigan

Project Information

Responsible Entity (RE) Information:

Organization Name: DETROIT
Address: PLANNING AND DEVELOPMENT DEPARTMENT
ACCOUNTING SECTION
150 WEST MICHIGAN AVENUE
DETROIT
Michigan
48226

*RE Preparer Information:

Name: Kim Siegel, City of Detroit

Certifying Officer Information (not required for exempt or CENST projects):

Name: Julie Schneider, Director

Grant Recipient Information (if different from Responsible Entity):

Complete this section only if the grant recipient is not acting as the Responsible Entity.

Search Other None

Consultant Information:

Complete this section only if you represent a consultant firm or other contractor assisting with the environmental review.

Search Other None

Name of Firm: PM Environmental

Name of Preparer: Name goes here

Cancel

Save and Continue

- **RE Preparer:** Kim Siegel, City of Detroit
- **Certifying Officer:** Julie Schneider, Director
- **Grant Recipient Information:**
Do not fill this out
- **Consultant Information:** The Name of Firm and the Name of Preparer for the EA

Common Issues: Project Information

- Including sources of funding other than City of Detroit federal funding and/or DHC/PIH funding to the “HUD Funding Sources” section
- Missing “Detroit, Michigan” as the State/Local Identifier
- Listing the developer or their LLC as the “Sub-recipient”

Project Summary

- **Description of Proposed Project**
 - Who, what, where, when, why, how
 - Describe what is currently at the site (i.e. vacant land, single-family homes, multi-family home, etc.)
 - State if the project includes acquisition or not
 - **We must aggregate the project; therefore, this description must include ALL work involved in the project regardless of the funding source**
 - The projects description in an RFP or a bid proposal should align with the ER project description at a minimum

Project Summary

- Provide a detailed scope that include the entire planned known undertaking that is feasible to occur within the next five years, including:
 - Action: Complete details about the entire project and what work will be done
 - i.e. The proposed project involves acquisition of the 1.0-acre site, demolition of an existing 10-story 40,000 square foot vacant building and new construction of two four-story 10,000 square-foot apartment buildings and one four-story 10,000 square-foot market rate building. The apartment building will contain five 500-square foot one-bedroom apartments and five 750 square foot two- bedroom apartments. All apartments will be affordable units at 40% AMI. The market rate building will contain 10 750 square-foot two-bedroom apartments. All units will have ground floor retail and provide Wi-Fi to residents. The exterior work includes overlaying the existing 5,000 square foot paved parking lot located east of the building with new concrete, upgrades to the storm sewers, construction of a new playground and a 2,000 square foot clubhouse for residents to utilize.
 - Project beneficiaries: affordable housing, mixed-use, senior housing, market rate, etc.
 - Include the statement, “This environmental review is valid for five years” at the bottom of the project description text box.

Project Summary

- **Project Location**

- **Street:** If there is more than one address, type “Multiple” here and add the list of addresses to the “Location Information” section
- **City:** Detroit
- **State:** Michigan
- **Zip:** Zip code of address(es)
- **Location Information:** Add multiple addresses here (if applicable)
- **Uploads:**
 - Site map
 - Project site plans
 - Market Study

Project Summary

- **Activities involved in the project:** Check ALL activities regardless of funding source
- **Change in land use:** Check this box for conversion from non-residential to residential, commercial to industrial or from one industrial to another
- **Planned use of the property after completion of the project:** Check all relevant uses

Common Issues: Project Summary

- Vague Project Descriptions that do not include the entire scope of work regardless of funding sources
- Not including all activities on the Project Summary Screen
- Missing site map, market study, and other documents on Project Summary Screen page

Levels of Review

- Exempt
- Categorically Excluded Not Subject to 58.5 (CENST)
- **Categorically Excluded Subject to 58.5 (CEST)**
- **Environmental Assessment (EA)**
- Environmental Impact Statement (EIS)

Levels of Review

- The determination of the level of review always comes from the ER Team
- The ER Team determines the preliminary level of review when a NOFA application receives a conditional award and confirms the level of review during the Environmental Kick-Off Meeting

Cooperating Agency

1365 - Cooperating Agency (50/58) **Project Name: HRD-ENVIRONMENTAL-TRAINING**

Your previous responses indicate that this project anticipates the use of Federal funds or assistance from another agency in addition to HUD. State, Federal and local agencies may participate or act in a joint lead or cooperating agency capacity in the preparation of joint environmental impact statements or joint environmental assessments (see 40 CFR 1501.5(b) and 1501.6). A single EIS or EA may be prepared and adopted by multiple users to the extent that the environmental review addresses the relevant environmental issues and there is a written agreement between the cooperating agencies which sets forth the coordinated and overall responsibilities. 24 CFR 58.14, 40 CFR 1501.5(b) and 1501.6.

Is there a formal Cooperating Agency Agreement governing the environmental review?

Yes

No

Check the reason an agreement was not reached:

Not initiated

Potential Cooperating Agency lacked special expertise and jurisdiction by law

Potential Cooperating Agency lacked authority to enter into an agreement to be a Cooperating Agency

Potential or active Cooperating Agency lacked agreement with the agency (e.g., unable to accept the scope of the analysis or the purpose and need for the proposed action; unable to accept responsibilities and/or milestones for analysis and documentation; unable to develop information/analysis of all reasonable alternatives; unable to prevent release of predecisional information; misrepresents the process or the findings presented in the analysis and documentation)

Potential or active Cooperating Agency lacked capacity (training or resources) to participate (e.g., unable to participate during scoping and/or throughout the preparation of the analysis and documentation as necessary to meet process milestones; unable to identify significant issues, eliminate minor issues, identify issues previously studied, or identify conflicts with the objectives of regional, State and local land use plans, policies and controls in a timely manner; unable to assist in preparing portions of the review and analysis and help resolve significant environmental issues in a timely manner; unable to provide resources to support scheduling and critical milestones)

Other

Explain "Other"

The American Rescue Plan Act funding is not subject to the environmental review requirements. Therefore, a formal CAA for this and subsequent City of Detroit HUD environmental reviews is not required.

Insert the name(s) of any Agency or agencies contacted:

N/A

- If federal funding outside of HUD is utilized in the project (i.e. ARPA, DOT, etc.), then the Cooperating Agency screen will appear in HEROS.
- The City of Detroit does not currently have a formal Cooperating Agency Agreement with any other federal agencies.
 - Therefore, you could select “Not Initiated” for non-HUD/non-ARPA funding and “Other” for ARPA funding
 - ARPA funding is not subject to environmental review requirements.
- Please reach out to the ER Team if other federal funding sources (other than ARPA) will be utilized in the project to coordinate the federal review

Project Justification (EA Only)

Purpose and Need

Provided by the Developer. Must be thorough.

- **Purpose** – Discuss the purpose the project is going to serve
 - i.e. construction of new housing or rehabbing blighted homes
- **Need** – Discuss how the proposed action is going to address housing and/or community development needs
 - i.e. providing housing in an area with a shortage of affordable housing or improving a blighted housing block

Existing Conditions and Trends

Provided by the Developer, usually in the market study. Must be thorough.

- What type of developments are in the area (residential housing, commercial, mix of residential and commercial, etc.)
- Discuss what trends would continue if the project does not occur
- Use census data

Common Issues: Project Justification

- Not enough information about why the project is needed
- Existing Trends & Conditions does not describe the project area and its surroundings and/or does not discuss what would happen to the project area if the project does not occur

Components of the HUD Part 58 Environmental Review

Related Laws and Authorities

Laws & Authorities: 24 CFR Part 58.5 & 58.6

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

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

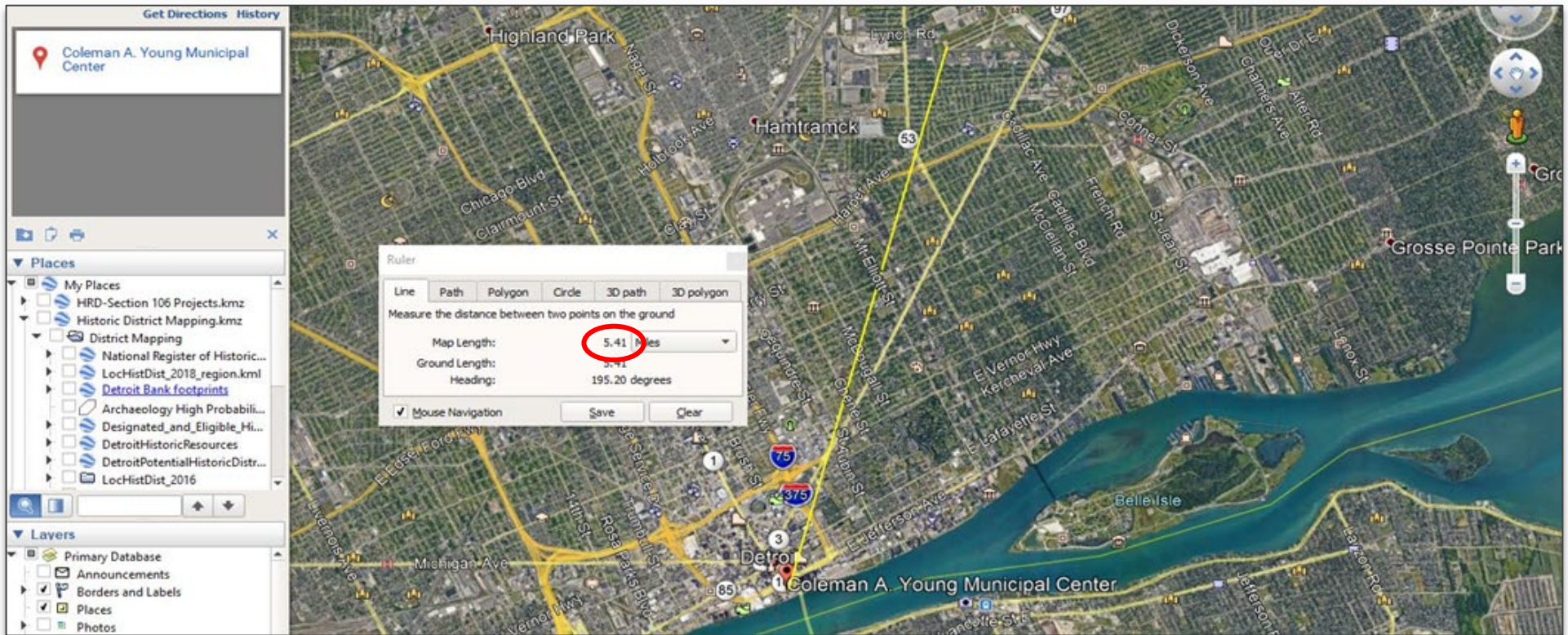
Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input type="checkbox"/>	
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Contamination and Toxic Substances	Yes No <input type="checkbox"/> <input type="checkbox"/>	

24 CFR Part 50.3(i) & 58.5(i)(2)		
Endangered Species	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402		
Explosive and Flammable Hazards	Yes No <input type="checkbox"/> <input type="checkbox"/>	
24 CFR Part 51 Subpart C		
Farmlands Protection	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658		
Floodplain Management	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Executive Order 11988, particularly section 2(a); 24 CFR Part 55		
Historic Preservation	Yes No <input type="checkbox"/> <input type="checkbox"/>	
National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800		
Noise Abatement and Control	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B		
Sole Source Aquifers	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149		
Wetlands Protection	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Executive Order 11990, particularly sections 2 and 5		
Wild and Scenic Rivers	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)		
ENVIRONMENTAL JUSTICE		



TAKE PART
Opportunity Rising

Airport Hazards



- Is your project within 15,000 feet (2.84 miles) of a military airport or 2,500 feet (0.47 miles) of a civilian airport?
 - No – Document with a map
 - Yes – Is your project located within an Accident Potential Zone or Runway Protection Zone?
- Use Google Earth or other mapping software to measure from end of the runway to the site “as the crow flies”
- Include measure from site to airports and indicate the distance to each airport.
- For more information, here is the link to the Airport Hazard page on the [HUD Exchange](#)

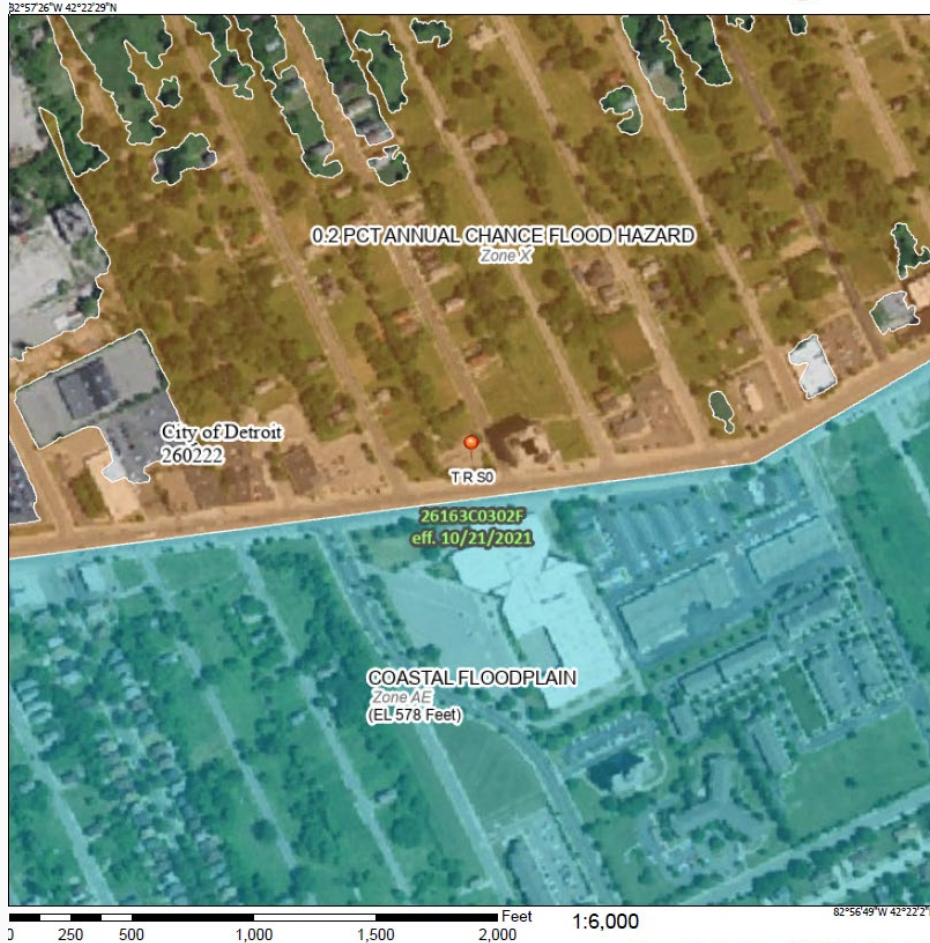
Coastal Barrier Resources

- There are no coastal barrier resources in Detroit
- Map must indicate where the project is located
- The CBRS maps at the U.S. Fish & Wildlife Service have changed!
 - Generate a site-specific map of the site or the county using [this link](#)



Flood Insurance

National Flood Hazard Layer FIRMette



Legend

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

SPECIAL FLOOD HAZARD AREAS	Without Base Flood Elevation (BFE) Zone A, V, AE99
	With BFE or Depth Zone AE, AO, AH, VE, AR
	Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD	0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
	Future Conditions 1% Annual Chance Flood Hazard Zone X
	Area with Reduced Flood Risk due to Levee. See Notes, Zone X
	Area with Flood Risk due to Levee Zone D
OTHER AREAS	NO SCREEN Area of Minimal Flood Hazard Zone X
	Effective LOMRs
	Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES	Channel, Culvert, or Storm Sewer
	Levee, Dike, or Floodwall
OTHER FEATURES	Cross Sections with 1% Annual Chance Water Surface Elevation
	Coastal Transect
	Base Flood Elevation Line (BFE)
	Limit of Study
	Jurisdiction Boundary
	Coastal Transect Baseline
	Profile Baseline
	Hydrographic Feature
MAP PANELS	Digital Data Available
	No Digital Data Available
	Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 3/20/2025 at 4:25 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.

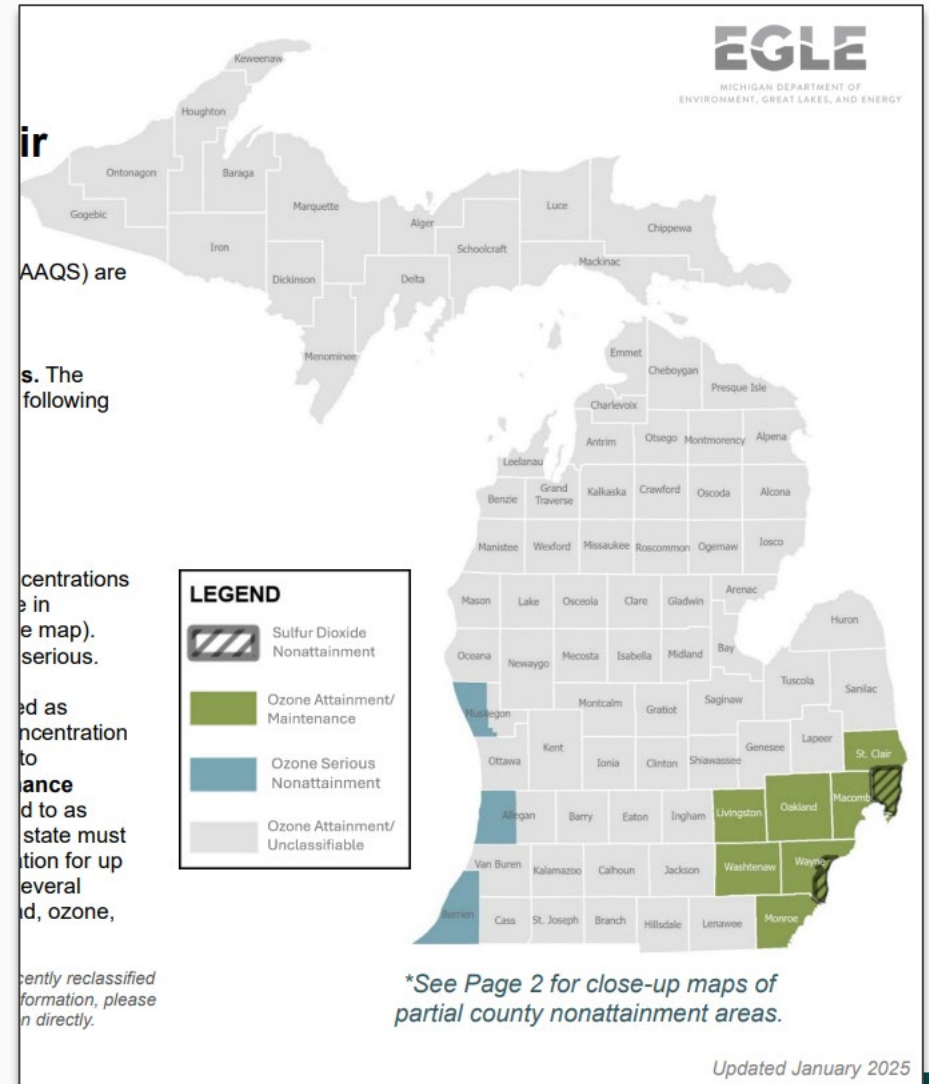
This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory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

- Important: If the project is in the Special Flood Hazard Area (SFHA), any current or future structures located in the SFHA will need flood insurance for the life of the building irrespective of the transfer of ownership – Zone A, AE
- Summary must include the map identification number, the effective date and the zone type in the project summary
- Obtain FIRMette map from FEMA using this [link](#)
- For more information, here is the link to the Flood Insurance page on the [HUD Exchange](#)



Clean Air

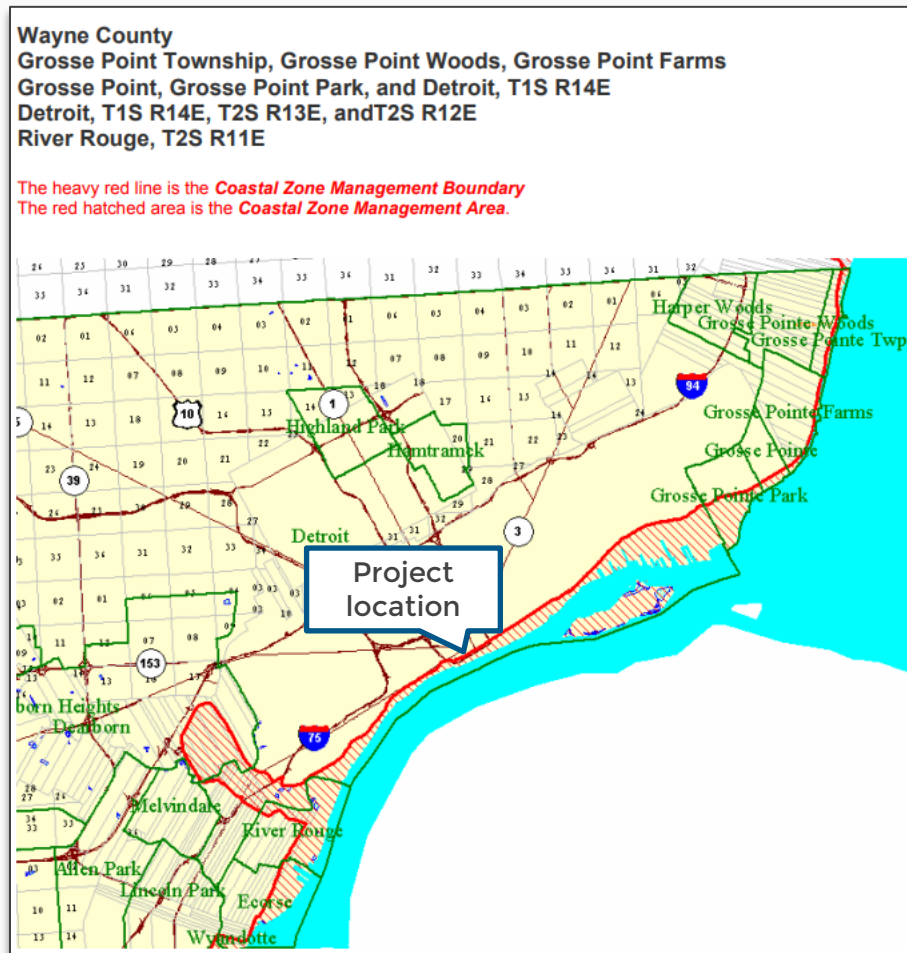
- Wayne County (including the City) in a **maintenance area** for Ozone and part of the County is in the non-attainment area for Sulfur Dioxide
- If the project does not involve new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units, further analysis is not required.
- Obtain and attach the Air Quality Map from EGLE using this [link](#)



Clean Air

- If the project scope does include construction, or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units, you must:
 - Determine the de minimis levels or screening levels
 - Can use EPA De Minimis Table or site other sources in the review
 - <https://www.epa.gov/general-conformity/de-minimis-tables>
 - Determine the estimated emissions levels from the project
 - Ask for a letter of concurrence letter from the Air Quality Division at EGLE on the project description not adding impact to the Ozone maintenance area and potentially Sulfur Dioxide non-attainment zone
 - Current contact at EGLE is Breanna Bukowski: BukowskiB@detroitmi.gov
 - Attach non-attainment map, non-conformity letter and De Minimis Levels source page
 - For more information, here is the link to the Air Quality page on the [HUD Exchange](#)

Coastal Zone Management



- Obtain a map from EGLE using this [link](#)
- Map must indicate where the project is located
- If your project is located in the CZM, you will need additional documentation from EGLE
- For more information, here is the link to the Coastal Zone Management page on the [HUD Exchange](#)

Contamination and Toxic Substances

- **For all multi-family and large projects, a Phase I ESA will be required**
 - Conduct the Phase I ESA according to ASTM E 1527-21
 - If the determination is the site has no Recognized Environmental Conditions (REC's), include in the Summary Section that (a) Phase I Environmental Site Assessments (ESA's) was/were completed for the site, list the date(s) of the report(s) and state that no REC's were identified.
 - If REC's are present, summarize the findings of the report in the summary section and attach the report

Contamination and Toxic Substances

- If the Phase I has REC's, a Phase II ESA is required
 - Phase II ESA field work may require consultation before finalizing the scope of work
 - City of Detroit will not dictate the Phase II ESA scope of work
 - Discuss if vapor was considered and if there is a potential vapor encroachment issue
- If no contamination above state criteria was found, summarize the findings of the report in the summary section and attach the report

Contamination and Toxic Substances

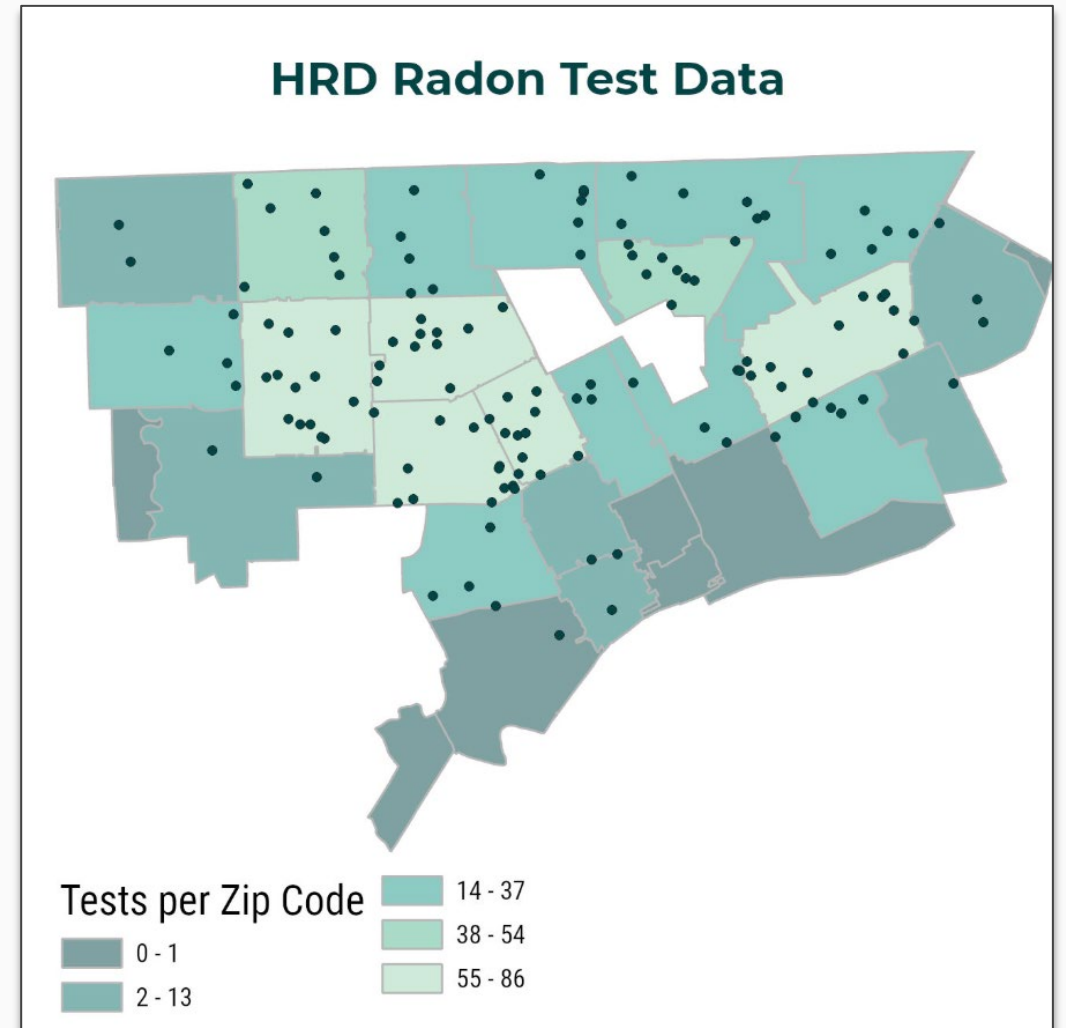
- For Sites that are considered a Facility:
 - HUD requires that any contamination above residential criteria has an EGLE approved plan to mitigate exposure to residents
 - Part 201 contamination – Response Activity Plan (ResAP)
 - Part 213 contamination – Final Assessment Report with a Corrective Action Plan (CAP)
 - Further Site characterization may be required to adequately assess the potential exposure pathways.
 - Ultimately, EGLE should be satisfied with the Site Characterization scope of work, or may require further assessment and additional sampling prior to approval of the ResAP

Contamination and Toxic Substances

- There are two separate paths to liaise with EGLE for City of Detroit projects
 - Projects without MSHDA funding go through the EGLE RRD Detroit office;
 - Projects co-funded with MSHDA go through the MSHDA EGLE staff members
- Again – begin consultation with EGLE as soon as contamination has been verified at the site.
- HUD Part 50 reviews (221d4 reviews and others) would require consultation with HUD to determine if an No Further Action is required
- **The City of Detroit cannot complete the Environmental Review Record without the State Agency approval letter for the required corrective actions**

Contamination and Toxic Substances

- HUD's policy on Radon has changed
- Each site need to be reviewed for the potential impact from radon
- The City of Detroit has elected to use scientific data review from tests taken throughout the City. The average results of the tests are 0.74 pCi/L.
- Therefore, the City does not require radon testing for development projects



Answer to HEROS Question 6

“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.”

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 CPD-23-103?

Yes
 No

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
 No

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

Yes
 No

6. How was the 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:

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

File Upload:

HRD Indoor Radon Map 04-18-24.pdf 

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

Contamination and Toxic Substances

- Demolition requires an asbestos survey and hazardous materials survey
- Renovation requires an asbestos and lead inspection risk assessment (LIRA) surveys
- These must be completed before EA is submitted to the City

Contamination and Toxic Substances

- Required information for the Summary section:
 - A list of all reports, including report type and dates completed
 - A brief summary of the findings of due diligence reports
 - A brief discussion about the response activities that will be completed (if applicable)
 - A summary of the findings of the lead and asbestos reports (if applicable)
 - A summary for radon determination
- **Make sure the summary is thorough and detailed! Contamination is one of the more challenging compliance aspects of HUD Environmental Review in the City of Detroit.**
- For more information, here is the link to the Site Contamination page on the HUD Exchange and a link to the EGLE Remediation & Redevelopment page

Endangered Species



The screenshot shows the U.S. Fish & Wildlife Service website. The header includes the agency logo and name. The main title is "Midwest Region Endangered Species". Below the title is a search bar and social media icons. The left sidebar contains navigation links for "In the Midwest", "Section 7 Consultation", and "Endangered Species Program". The main content area is titled "S7 Consultation Technical Assistance Decision Process for 'No Effect' Determinations" and "Projects within a Developed Area - Step 5". It includes a "Step 5: 'No Effect' Determination and Documentation" section with explanatory text and bullet points. At the bottom, there are fields for "Project Name:" and "Date:", a "Back" link, and a "Home" link.

U.S. Fish & Wildlife Service
Midwest Region Endangered Species

Search

In the Midwest
USFWS Midwest
Midwest Ecological Services
Contact Us

Section 7 Consultation
Midwest Endangered Species Home
Section 7 Home
Section 7: A Brief Explanation
Section 7: Technical Assistance
Biological Assessment Guidance
Section 7 Consultation Handbook
Contact Us

Endangered Species Program
The mission of the U.S. Fish and Wildlife Service's Endangered Species program is conserving and restoring threatened and endangered species and their ecosystems.

S7 Consultation Technical Assistance Decision Process for "No Effect" Determinations

Projects within a Developed Area - Step 5

Step 5: "No Effect" Determination and Documentation

Your project will have "no effect" on federally listed species. A "No Effect" determination is appropriate because your project is:

- within a Developed Area (an area that is already paved or supports structures and the only vegetation is limited to frequently mowed grass or conventional landscaping), and
- is not within or adjacent to any unlandscaped areas that support native vegetation (trees, shrubs, or grasses).

Since your project is not within suitable habitat for listed species, no listed species or designated critical habitat is anticipated to be directly or indirectly affected by this action.

To document your section 7 review and "no effect" determination, we recommend that you print this page (go to File<Print Preview), fill-in the project name and date, attach your species list, and file in your administrative record.

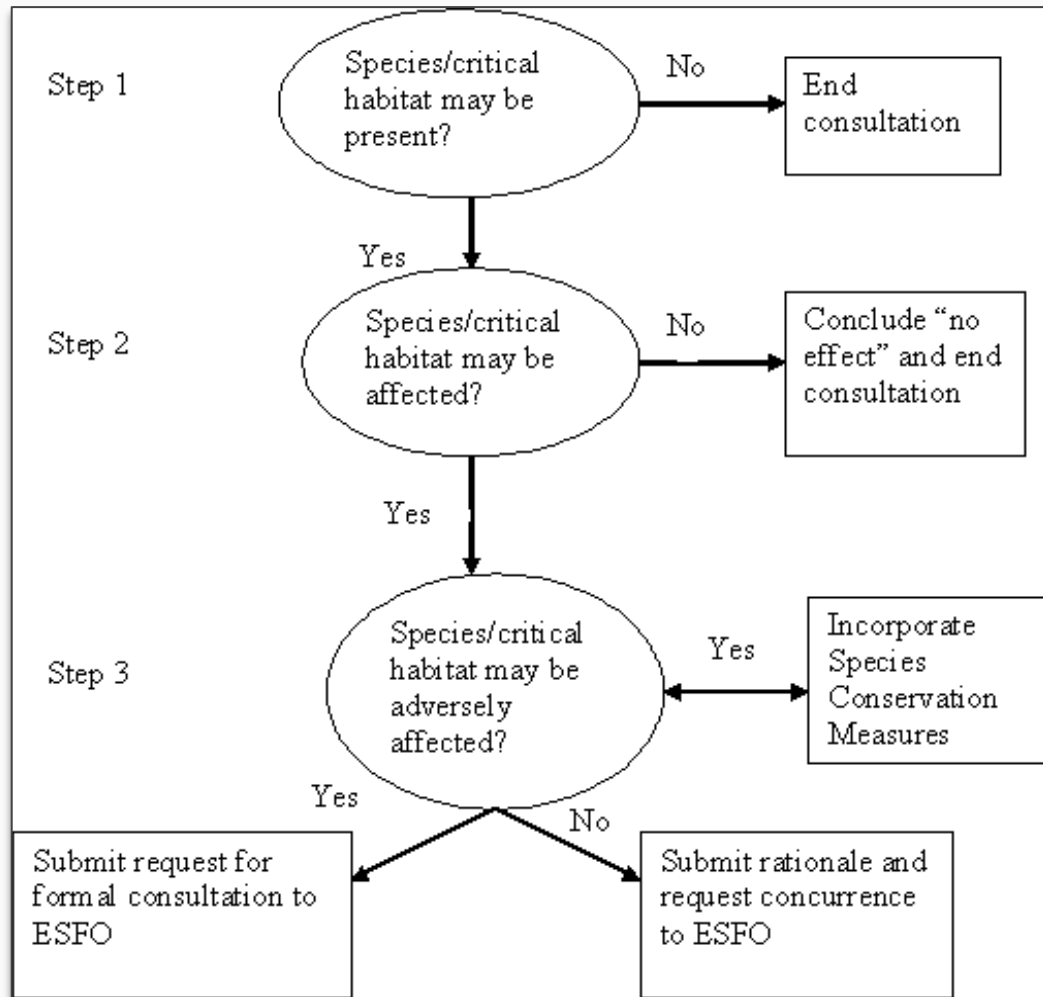
Project Name:

Date:

[Back](#)
[Home - "No Effect" Determination Process](#)

- Obtain a species list from the US Fish & Wildlife Service's website and determine if Threatened & Endangered (T&E) species are present, may be present or are not present
- The City of Detroit is in the highly urbanized area that has been re-developed multiple times. Additionally, most projects are located away from potential species habitat (rivers, wetlands, etc.). It is unlikely that T&E species will or may be found on these sites
 - You can use this as your HEROS summary

Endangered Species



- If you think the project will likely impact a T&E Species, please reach out to the ER Team to discuss next steps
 - This may require further consultation with the USFWS
- For further information about the Section 7 process, see this link to the [USFWS site](#)
- To acquire a species list form, use the US F&WS Information for Planning and Consultation [IPaC site](#)
- For more information, here is the link to the Endangered Species page on the [HUD Exchange](#)

Explosive and Flammable Hazards

There are potentially three questions you must answer in HEROS:

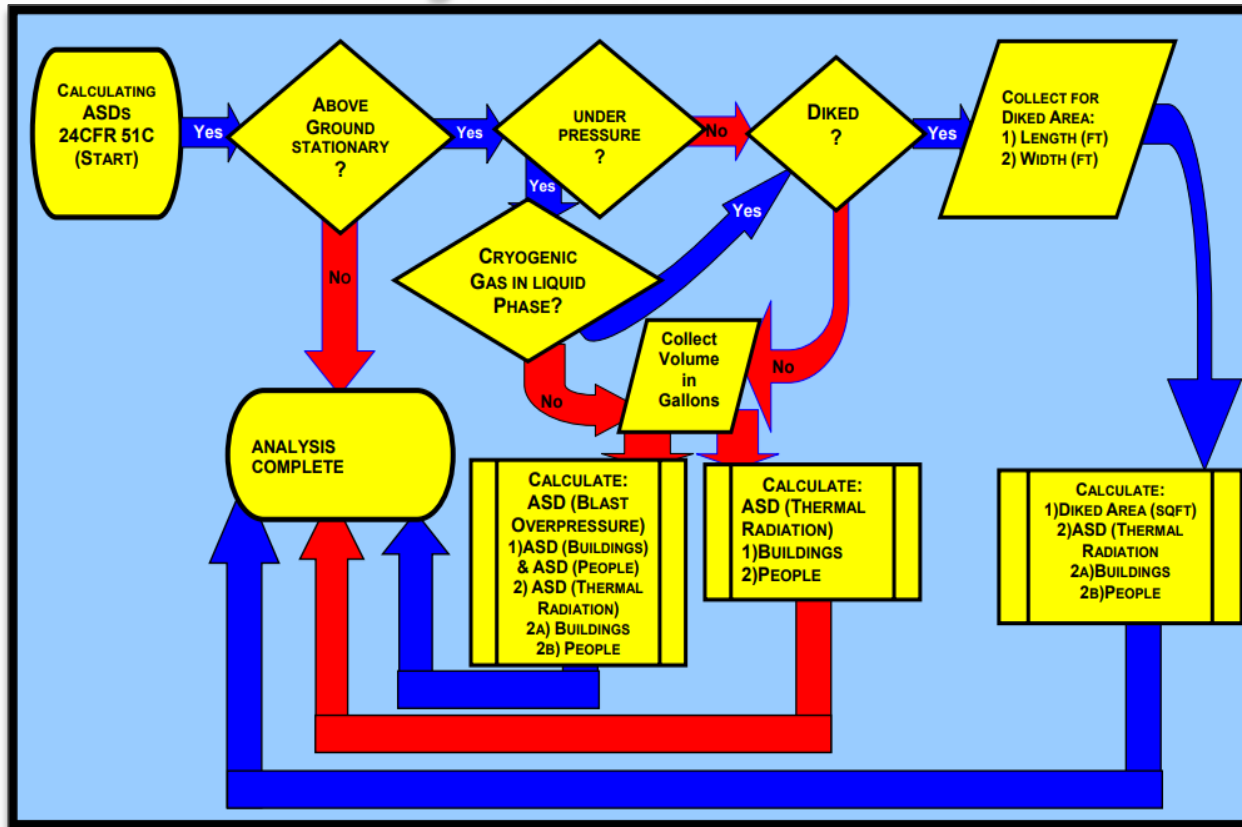
- Question 1: Is the proposed HUD-assisted project itself the development of a hazardous facility a facility that mainly stores, handles or processes combustible chemicals such as bulk fuel storage facilities and refineries?
 - None of our projects have fallen under this category; however, if they do, you must calculate the Acceptable Separation Distance (ASD) to ensure the site is an acceptable separation distance from residences and any other facility or area where people may congregate or be present
 - If not, this will require mitigation
- Question 2: Does the project include development, construction, rehabilitation that will increase residential densities, or conversion?
 - If not, include a completed Explosives HUD Partner Worksheet as an attachment (link)
 - If so...

Explosive and Flammable Hazards

- Question 3: Within 1 mile of the project site, are there any current or planned stationary above ground storage containers covered by 24 CFR 51C?
 - This does not include:
 - Containers 100 gallons or less in capacity, containing common liquid industrial fuels, OR
 - Containers of liquefied gas or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of the NFPA Code 58
 - Information can be found in the environmental database of the Phase I ESA, through the fire department or viewed on aerials
 - If no tanks exist, provide a map and documentation that shows the site is not within a mile of an AST

Explosive and Flammable Hazards

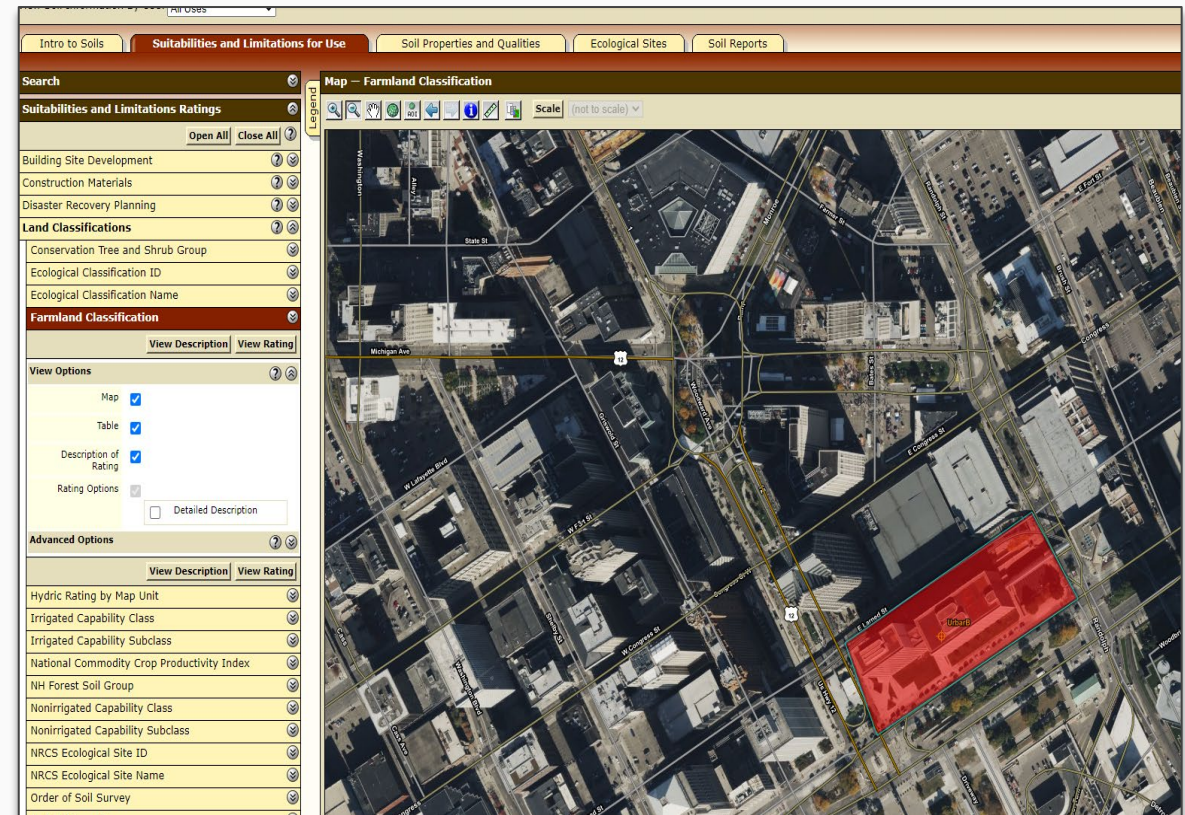
HUD Exchange ASD Calculation Flowchart



- If a container exist within a one-mile radius of the site, and they contain a flammable or explosive liquid, calculate each tanks ASD from each tank to the site using this [link](#)
 - For further information about HUD's tool, you can access the assessment tool guide [here](#)
- If the ASD is not met, mitigation is required. Contact the ER Team to discuss next steps
- If the ASD is met, attach a map that shows the location of the tanks, the distance from the site to the tanks and any additional calculations (if applicable)
- For more information, here is the link to the Explosives and Flammable Facilities page on the [HUD Exchange](#)

Farmlands Protection

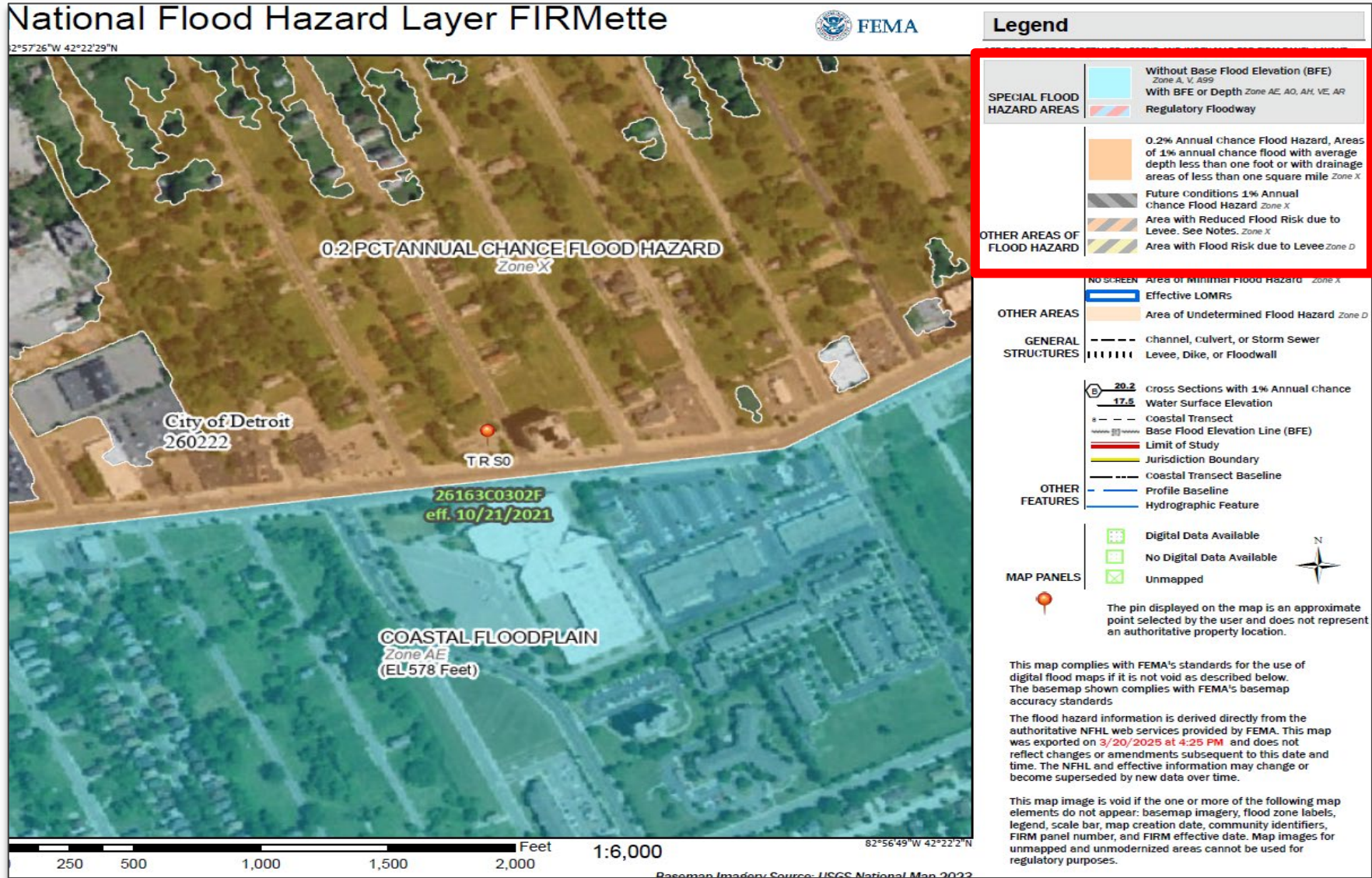
- There is no prime farmland in the City of Detroit
- Obtain documentation from USDA Web Soil Survey using [this link](#)
- There are other options for this data – just make sure that there is documentation to back up the urban land determination
- For more information, here is the link to the Farmland Protection page on the [HUD Exchange](#)



Floodplain Management

- HUD has recently revised its Floodplain Rule and defines a new floodplain of concern: the Federal Flood Risk Management Standard (FFRMS) floodplain
 - The FFRMS floodplain includes the 1% and 0.2% annual chance floodplain, or the 100-year and 500-year floodplain
 - **This means new construction and substantial rehabilitation projects in the 500-year floodplain must complete the Eight Step Process**
- There are three options for identifying and defining the FFRMS floodplain
 - The City currently accepts the 0.2 annual chance floodplain method
- Consultants should ideally obtain the FIRM map upon receiving notification of the project to determine if the site is in the floodplain
 - **If the site is in the FFRMS floodplain, notify the developer immediately**

Floodplain Management



Floodplain Management

- A floodplain specialist must attend the environmental kick-off meeting with the City and other relevant funding parties (MSHDA, DHC) to determine next steps
 - Typically, additional meetings are required to coordinate completing the eight-step process
- The floodplain specialist will:
 - Provide initial project and floodplain information to the ER Team to complete the initial floodplain publication (step two)
 - Complete the eight-step analysis and write-up
 - Submit any permits to EGLE and other relevant federal agencies (Army Corp, FEMA, etc.),
 - Provide the consultant with the mitigation steps for the HEROS entry and the project's mitigation plan
- The ER Team will:
 - Create and post the initial floodplain publication
 - Review the eight-step write-up and provide feedback/revision as needed
 - Create and post the final floodplain publication
- More information, see the [HUD Exchange](#)

Floodplain Management

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 information **1** to determine flood elevation. Include documentation and an explanation of why this is the best available information **2** for the site. Note that newly constructed and substantially improved structures **3** 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.

Continue to FFRMS Floodplain Question.

5. Does your project occur in the FFRMS floodplain?

- Yes

Continue to FFRMS Floodplain Category Question.

- No

6. Is your project located in any of the floodplain categories below?

Select all that apply:

- Floodway.
- Coastal High Hazard Area (V Zone) or Limit of Moderate Wave Action (LimWA).
- None of the above.

Continue to the 8-Step Process Question.

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

- 8-Step Process is inapplicable per 55.13.
- 5-Step Process is applicable per 55.14.
- 8-Step Process applies.

Provide a completed 8-Step Process in the Screen Summary below, including the early public notice and the final notice. Continue to Mitigation Question.



Floodplain Management

8. Mitigation

For the project to comply with this section, all adverse impacts must be mitigated. Explain in detail the measures that must be implemented to mitigate the impact or effect, including the timeline for implementation. Note: newly constructed and substantially improved structures within the FFRMS floodplain must be elevated to the FFRMS floodplain elevation or floodproofed, if applicable.

*Explain:

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

- Buyout and demolition or other supported clearance of floodplain structures.
- Insurance purchased in excess of statutory requirement under the Flood Disaster Protection Act of 1973.
- Permeable surfaces.
- Natural landscape enhancements that maintain or restore natural hydrology.
- Planting or restoring native plant species.
- Bioswales.
- Stormwater capture and reuse.
- Green or vegetative roofs with drainage provisions.
- Natural Resources Conservation Service conservation easements or similar easements.
- Floodproofing of structures as allowable (e.g. non-residential floors).
- Elevating structures (including freeboard above the required base flood elevations).
- Levee or structural protection from flooding.
- Channelizing or redefining the floodway or floodplain through a Letter of Map Revision (LOMR).

Part 58 Environmental Review Training

Historic Preservation in HEROS

Tiffany Ciavattone, Historic Compliance Team Lead
March 28, 2025



TAKE PART
Opportunity Rising



Historic Preservation in HEROS

- Not one size fits all
- The HEROS entry will look different depending on response to the question: Is Section 106 review required for your project?
 - No, because the project consists solely of activities listed as exempt in a Programmatic Agreement
 - 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).

Historic Preservation in HEROS: Step 1

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).

The Section 106 Process

After determining the need to do a Section 106 review, initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation. Note that consultation continues through all phases of the review.

Step 1: Initiate consultation
Step 2: Identify and evaluate historic properties
Step 3: Assess effects of the project on historic properties
Step 4: Resolve any adverse effects

Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to [HUD's website](#) for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the [When To Consult With Tribes checklist](#) within Notice CPD-12-006: Process for Tribal Consultation to determine if you should invite tribes to consult on a particular project. Use the [Tribal Directory Assessment Tool \(TDAT\)](#) to identify tribes that may have an interest in the area where the project is located. Note that consultants may not initiate consultation with Tribes.

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

State Historic Preservation Officer (SHPO) Status: *

Advisory Council on Historic Preservation Status: *

Indian Tribes including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
Consult the [When To Consult With Tribes checklist](#), and upload completed checklist in the Screen Summary at the conclusion of this screen.

Name: Status: *

Other Consulting Parties

Upload all correspondence, notices, and notes (including comments and objections received) in the Screen Summary at the conclusion of this screen.

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

- SHPO/THPO consultation
 - Select “not required” if archaeology was not triggered
 - Select “complete” if archaeology was triggered. The COD 106 Determination Letter will list tribes that received an invitation to consult
 - HRD will provide tribal consultation letters with comments returned upon initial EA submittal

*Process for selecting consulting parties: “The City of Detroit Housing & Revitalization Department has reviewed this project under a Programmatic Agreement (PA) between the Michigan State Historic Preservation Office (SHPO) and the City of Detroit, Michigan dated December 21, 2022. Consulting parties were identified in the development of the PA. The City has conducted consultation with relevant stakeholders and tribes identified in the TDAT system as required.”

Historic Preservation in HEROS: Step 2

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 in the Screen Summary at the conclusion of this screen:

Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register. Refer to [HUD Exchange](#) for guidance on identifying and evaluating historic properties.

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 objections, notes, and photos) that justify your National Register Status determination in the Screen Summary at the conclusion of this screen. [?](#)

Address ? /Location/District	National Register Status	SHPO Concurrence	Sensitive Information
<input type="text"/>	(not set) ?	(not set) ?	<input type="checkbox"/> Do not release
<input type="text"/>	(not set) ?	(not set) ?	<input type="checkbox"/> Do not release
<input type="text"/>	(not set) ?	(not set) ?	<input type="checkbox"/> Do not release
<input type="text"/>	(not set) ?	(not set) ?	<input type="checkbox"/> Do not release
<input type="text"/>	(not set) ?	(not set) ?	<input type="checkbox"/> Do not release

Additional notes:

* 2. Was a survey of historic buildings and/or archeological sites done as part of the project? [?](#)

Yes

Upload surveys and report(s) in the Screen Summary at the conclusion of this screen.

For Archeological surveys, refer to HP Fact Sheet #6, [Guidance on Archeological Investigations in HUD Projects](#)

Additional notes:

No

1. Define APE

- Historic resources identified in 106 Review will be listed in the COD 106 Determination Letter or 106 Application Form

2. Was a survey or report done?

- Yes, upload the 106 application and supporting documentation

Historic Preservation in HEROS: Step 3

Step 3 - Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)
Consider direct and indirect effects as applicable as per guidance on **direct and indirect effects**.

Check here if this information is sensitive and must remain confidential.

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

*Document reason for finding:

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

Avoidance
 Modification of project
 Other

*Describe conditions here:

No
 Adverse Effect

- Select appropriate determination as outlined in the COD 106 Determination Letter
- Does the finding contain conditions?
 - Outline any conditions outlined in the COD 106 Determination Letter

Historic Preservation Screen Summary

Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

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

Supporting documentation

Upload all supporting documents required in this section here:

[Attachment J - Section 106 Letter.pdf](#) ✖

Are formal compliance steps or mitigation required?
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

Yes
 No

- Compliance Determination
 - Pull this summary from the COD Section 106 Determination Letter
- Supporting Documentation
 - Upload the most recent COD 106 Determination Letter. There may be multiple letters depending on how the project progressed
 - Upload Section 106 Application and Reports, Tribal consultation letters, SHPO Letters, any other relevant documentation

Where can you find this information?

- City of Detroit Section 106 Determination Letters
- Section 106 Application Forms



Housing and Revitalization
Department

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

Phone: 313.224.6380
Fax: 313.224.1629
www.detroitmi.gov

June 13, 2023

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 60 Harper 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 proposed project is to construct a three-story tall apartment building with a small retail space on the first floor on a large vacant site on the south side of Harper just east of Woodward in the Midtown area of Detroit, approximately three miles north of downtown Detroit. The proposed building has a U-shaped footprint with the building facing Harper and the courtyard facing south toward an alley. Three separate parking lots with lighting are proposed to the south of the building, north and south of the alley and will be accessed by the alley to the west and the I-94 Service Drive to the south. Two of the parking lots are on the property south of the alley, on both sides of an existing house. There is currently a parking lot on the west side of the house where the new lot is proposed. Open lawn areas are proposed on the west side of the proposed building and between the parking lots. The courtyard in the rear of the building is proposed to be landscaped and have a gazebo and artwork.

APE Based on research of the property the Area of Potential Effect (APE) has been defined as the two properties at 60 Harper and 71 E. Edsel Ford Service Drive and the properties adjacent to the two parcels.

Per Stipulation VI of Programmatic Agreement (PA), the proposed undertaking qualified for review by SHPO's archaeologist and consultation with Tribes. In a letter dated, 6/2/2023, SHPO's archaeologist concurred with the recommendation of "no historic properties affected within the area of potential effects of this undertaking."

On 4/25/2023, a request for Tribal Consultation was submitted to the following Tribes:

Bay Mills Indian Community
Consulting Tribes Forest County Potawatomi Community of Wisconsin
Grand Traverse Band of Ottawa & Chippewa Indians



Housing and Revitalization
Department

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

Phone: 313.224.6380
Fax: 313.224.1629
www.detroitmi.gov

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
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

The Nottawaseppi Huron Band of the Potawatomi and Miami Tribe of Oklahoma provided responses. 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 reinstated under the direction of the unanticipated discoveries plan for this project.

Historic Resources Identified Based on historic research, The project is directly east of St. Joseph's Episcopal Church (now Holy Rosary Roman Catholic Church) and directly across Harper from a small portion of the Piquette Avenue Industrial Historic District, both of which are listed in the National Register of Historic Places. Therefore, per Stipulation V.B of the PA, the project shall be carried out in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

This project has been given a **Conditional No Adverse Effect** determination (Federal Regulations 36 CFR Part 800.5(b)) on properties that are listed or eligible for listing in the National Register of Historic Places, as long as the following conditions are met:

- No Adverse Effect Determination AND Conditions**
- The final scope of work is submitted to the Preservation Specialist for review, and any changes to the scope of work for the project shall be submitted to the Preservation Specialist for review and approval prior to the start of work.
 - In the event of an unanticipated discovery during construction, the unanticipated discoveries plan is followed.
 - Photos of the completed work are submitted to the Preservation Specialist.

Please note that the Section 106 Review process will not be complete until the above-mentioned conditions are met. If you have any questions, you may direct them to the Preservation Specialist at Ciavattone@detroitmi.gov.

Sincerely,



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

Phone: 313.224.6380
Fax: 313.224.1629
www.detroitmi.gov

May 8, 2024

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 HUD Funded 900 Tuscola Project Located at 900 Tuscola St 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 proposed project seeks to construct a five story, 94,314 square foot structure at 900 Tuscola Street. The Subject Property is currently a vacant lot in the Cass Corridor neighborhood. The project will also include 63 parking spaces divided in an enclosed parking garage and a surface parking lot.

Historic Resources

Based on historic research, we have determined a Historic Property is located within in the Area of Potential Effects (APE) for this project. The following resources are listed on the National Register of Historic Places: Wills-Selden Local Historic District, The Jefferson Intermediate School, and James Couzins School.

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 Commonwealth Heritage Group concluded the area was surveyed in 2018, and the 16 archaeological sites assessed as part of the previous survey were determined not eligible for listing on the National Register of Historic Places. Commonwealth recommended no further archaeological work in relation to the 900 Tuscola Project. In a letter dated 5/7/2024, SHPO concurred with Commonwealth's recommendation of no historic properties affected within the area of potential effects of this undertaking.

On 4/4/2024, a request for Tribal Consultation was submitted to the following Tribes:

Consulting 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



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

Phone: 313.224.6380
Fax: 313.224.1629
www.detroitmi.gov

- 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
- 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.

Section 106 Determination (no conditions) And reason for finding

I have determined that within in the Area of Potential Effects (APE), there will be **No Adverse Effect on historic properties** by the proposed undertaking and are in line with the Secretary of the Interior's Standards for Rehabilitation, specifically Standards 9 and 10. The new construction will be differentiated from the old and is compatible with the massing and scale of the adjacent historic resources. If removed in the future the historic properties will be unimpaired.

This project may proceed without further coordination with the Preservation Specialist unless the scope of work changes or artifacts are uncovered during the course of construction. If you have any questions regarding this finding, please direct them to Tiffany Ciavattone at CiavattoneT@detroitmi.gov.

Sincerely,

Tiffany Ciavattone
Preservation Specialist
City of Detroit
Housing & Revitalization Department

HRD Section 106 Application Forms

- Section III. Project information
 - III(c)(ii) will contain the project APE (HEROS Step 2 #1)
- Section IV. Identification Results
 - IV(b)(i) will contain information on historic resources identified (HEROS Step 2 Address/District/Location table)
- Section V. Determination of Effect
 - V(a) is the basis for determination of effect (HEROS Step 3 comment box)
 - V(b) is the determination (HEROS Step 3)
- Please note that the determination of effect that is recommended in the 106 application is not always the same as the final Determination issued by the COD or SHPO

The image shows a screenshot of the 'City of Detroit Housing & Revitalization Department Section 106 Review Application' form. At the top left is the City of Detroit logo and the department name. To the right, contact information is provided: Coleman A. Young Municipal Center, 2 Woodward Avenue, Suite 908, Detroit, Michigan 48226. Phone: 313.224.6380, Fax: 313.224.1629, www.detroitmi.gov.

City of Detroit Housing & Revitalization Department
Section 106 Review Application

Submit one application for each project for which 106 Review is requested. Consult the [Instructions for the Application for HRD Section 106 Consultation Form](#) when completing this application. Submit completed applications via Smartsheet to: <https://app.smartsheet.com/b/form/fc3bf1df5a90468d8ad104e1cd620f44>. Questions can be e-mailed to: ciavattonet@detroitmi.gov.

I. GENERAL INFORMATION New submittal More information relating to and existing project

a. Project Name: *Project name*
b. Project Address: *Street address*

II. CONTACT INFORMATION

a. Applicant: *Name of Applicant's agency/firm*
Contact Name: *Applicant contact's name*
Contact Address: *Applicant contact's mailing address* City: *Applicant's city* State: *Applicant contact's state* Zip: *Applicant contact's zip code*
Email: *Applicant contact's email* Phone: *Applicant contact's phone #*

b. Consulting Firm (if applicable): *Name of firm*
Contact Name: *Name(s) of consultants*
Contact Address: *Consultant's mailing address* City: *Consultant's city* State: *Consultant's State* Zip: *Consultant's zip code*
Email: *Consultant's email* Phone: *Consultant's phone number*

III. PROJECT INFORMATION

a. List sources of any **additional** federal funds (HUD, MSHDA, DHC PBV, MDOT, etc.) *Other federal funders*

b. Project Work Description
Describe the work to be done for the project.

c. Project Location and Area of Potential Effect (APE)

i. Maps. Please indicate all maps that will be submitted as attachments to this form.

- Street map, clearly displaying the direct and indirect APE boundaries
- Site map
- USGS topographic map-Name(s) of topo map(s): *Name(s) of topo map(s)*
- Aerial map
- Map of photographs
- Other: *Identify type(s) of map(s)*

ii. Site Photographs

iii. Describe the APE:
Description of APE

2 0 2 4 Page 1 | 5

Part 58 Environmental Review Training

ERR Requirements for Consultants (continued...)

Kim Siegel, Environmental Compliance Specialist
March 28, 2025



TAKE PART
Opportunity Rising



Noise Abatement and Control

- Initially, use the HUD Exchange Day/Night Noise Level (DNL) Calculator using this [link](#) to determine the overall DNL based on selected Noise Assessment Level Location(s)
- Ensure you include all applicable noises sources in the calculation(s)
 - 1000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles of a military or FAA-regulated civil airfield
 - Use the next 10 years of noise projections to determine noise from the roadway
- If the project has a “acceptable” (<65 dB) noise level, no approvals are required.
 - Include a copy of the DNL calculator and a map depicting the location of the NAL’s.

Resources and assistance to support HUD's community partners

HUD EXCHANGE
Secretary Ben Carson

My HUD Exchange Programs Resources Trainings Program Support

NEED HOUSING ASSISTANCE? Email Us

Home > Programs > Environmental Review > DNL Calculator

DNL Calculator

WARNING: HUD recommends the use of Microsoft Internet Explorer for performing noise calculations. The HUD Noise Calculator has an error when using Google Chrome unless the cache is cleared before each use of the calculator. HUD is aware of the problem and working to fix it in the programming of the calculator.

The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the [Day/Night Noise Level Calculator Electronic Assessment Tool Overview](#).

Guidelines

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- Note #2:** DNL Calculator assumes roadway data is always entered.

DNL Calculator

Site ID

Record Date

User's Name

Airport Noise Level

Loud Impulse Sounds? Yes No

Combined DNL for all Road and Rail sources

Combined DNL including Airport

Site DNL with Loud Impulse Sound

Mitigation Options

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

- No Action Alternative:** Cancel the project at this location
- Other Reasonable Alternatives:** Choose an alternate site
- Mitigation**
 - Contact your Field or Regional Environmental Officer
 - 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](#)
 - Construct noise barrier. See the [Barrier Performance Module](#)

Tools and Guidance

- Day/Night Noise Level Assessment Tool User Guide
- Day/Night Noise Level Assessment Tool Flowcharts

Noise Abatement and Control

- If your project has a “normally unacceptable” (65 – 75 dB) noise level, engage a license architect and incorporate noise attenuation measures into your project
 - This avoids formal mitigation for noise
- HUD’s Sound Transmission Classification Assessment Tool (STraCAT) must be used to determine if the amount of attenuation measures incorporated will reduce the interior DNL below 45 dB level enough to negate potential mitigation. The STraCAT can be found using this link
 - You must explain in HEROS why formal mitigation will not be required.
- The summary should include a description of the NAL location(s), the initial DNL calculation, the attenuation measures that will be incorporated into the project to reduce the interior noise and the final calculations
- Attach all calculations, the map of the NAL’s, the STraCAT and other additional documents in the HEROS review

The screenshot shows the HUD EXCHANGE website with the STraCAT tool interface. The page is titled "Sound Transmission Classification Assessment Tool (STraCAT)" and is divided into three main sections: Part I - Description, Part II - Wall Components, and Part III - Results.

Part I - Description

Project	Sponsor/Developer	
Location	Prepared by	
Noise Level	Date	Primary Source(s)
0	2019-09-17	

Part II - Wall Components

Wall Construction Detail	Area	STC
Add new wall	0 Sq. Feet	0

Window Construction Detail	Quantity	Sq Ft/Unit	STC
Add new window			

Door Construction Detail	Quantity	Sq Ft/Unit	STC
Add new door			

Part III - Results

Wall Statistics	
Stat	Value
Area:	0 ft²
Wall STC:	0

Aperture Statistics			
Aperture	Count	Area	% of wall
Windows:	0	0 ft²	0%
Doors:	0	0 ft²	0%

Evaluation Criteria	
Criteria	Value
Noise source sound level(dB):	0
Combined attenuation for wall component:	0 dB
Required attenuation:	0
Do Wall components meet requirements?	Yes

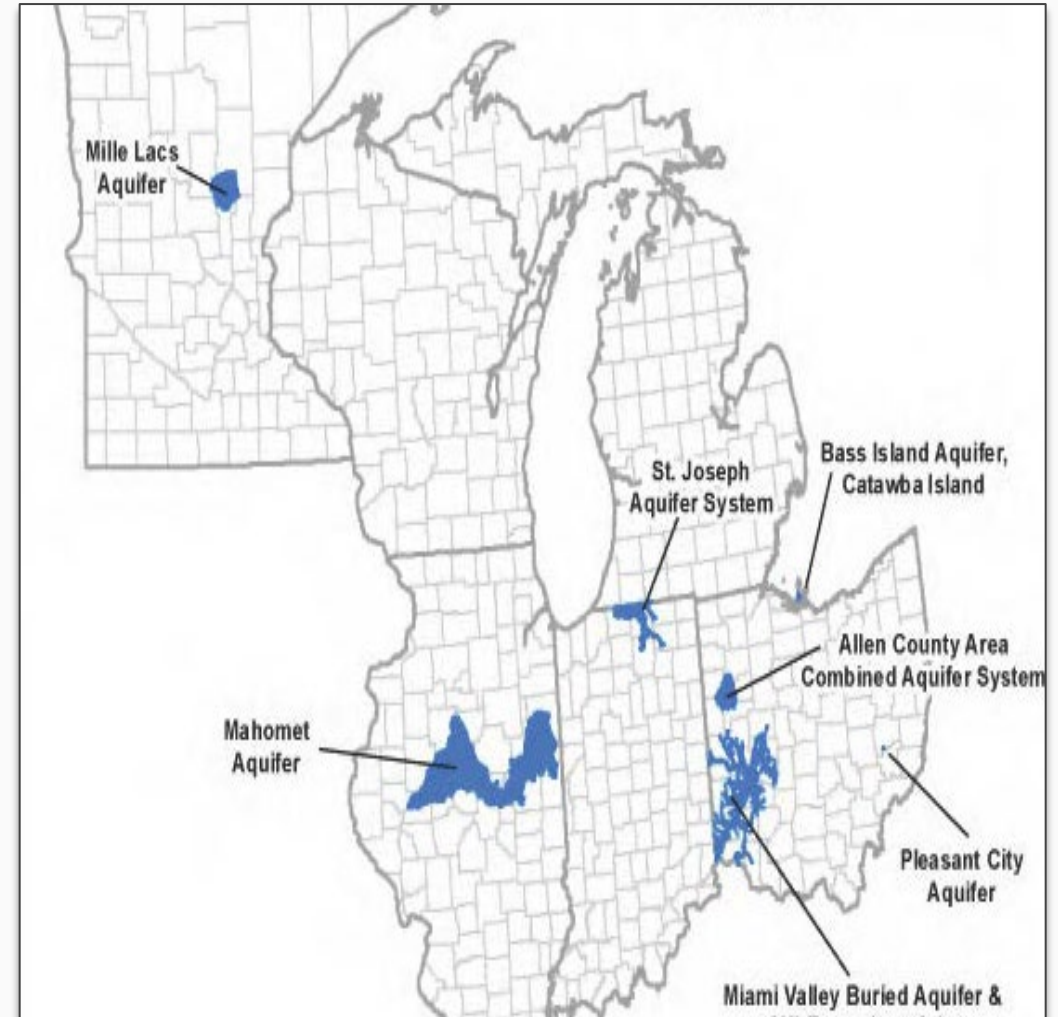
Print

Noise Abatement and Control

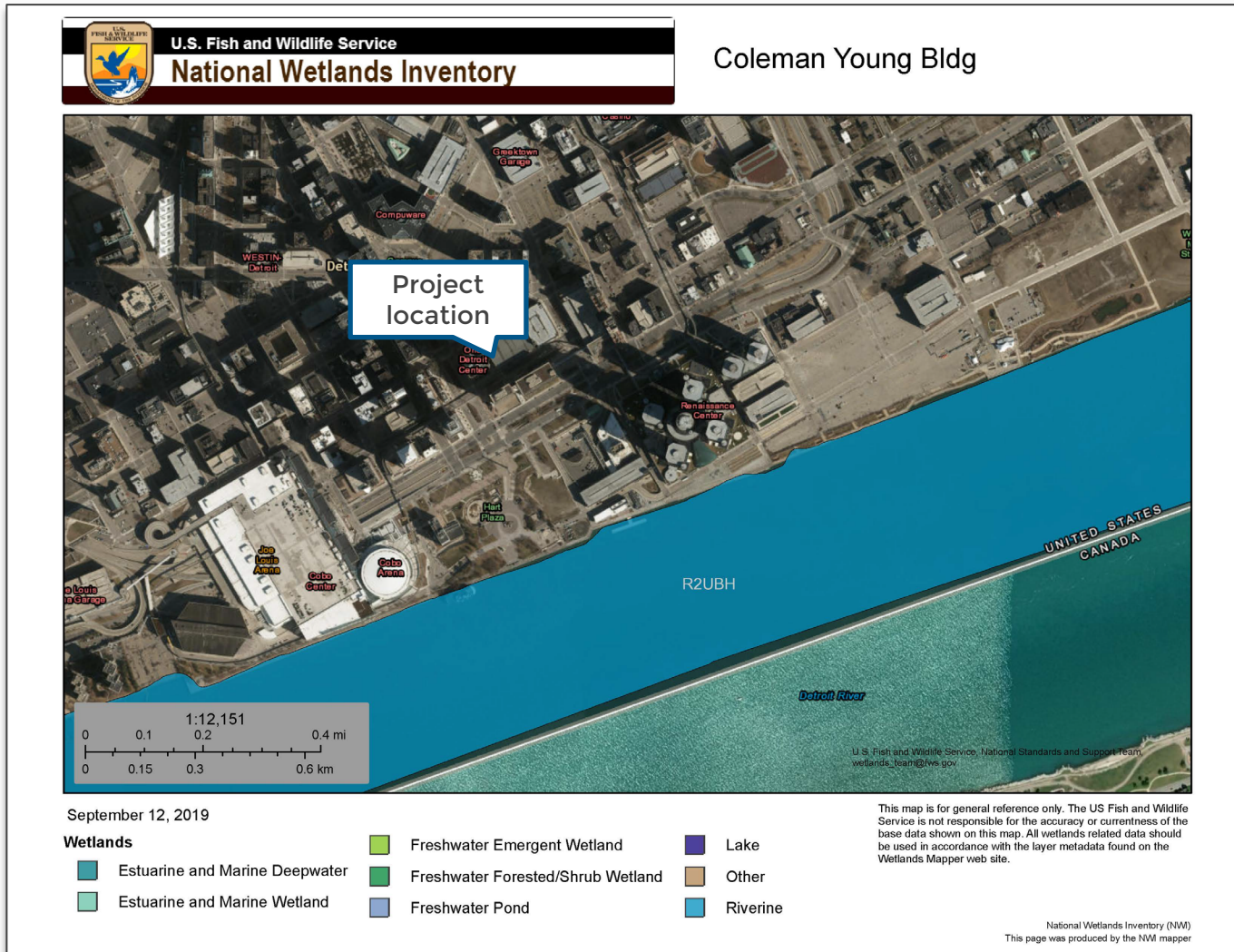
- If the project has an “unacceptable” (76+ dB), the project will be elevated to an Environmental Impact Statement and attenuation requirements for new construction must be approved by the Assistance Secretary of CPD or the Certifying Officer
- Please contact the ER Team if the DNL is above 75 dB.
- For more information, here is the link to the Noise Abatement and Control page on the [HUD Exchange](#)

Sole Source Aquifers

- There are no sole source aquifers in Detroit
- Either use this [link](#) to obtain map or create a map from EPA using this [link](#) and attach in HEROS
- For more information, here is the link to the Sole Source Aquifer page on the [HUD Exchange](#)

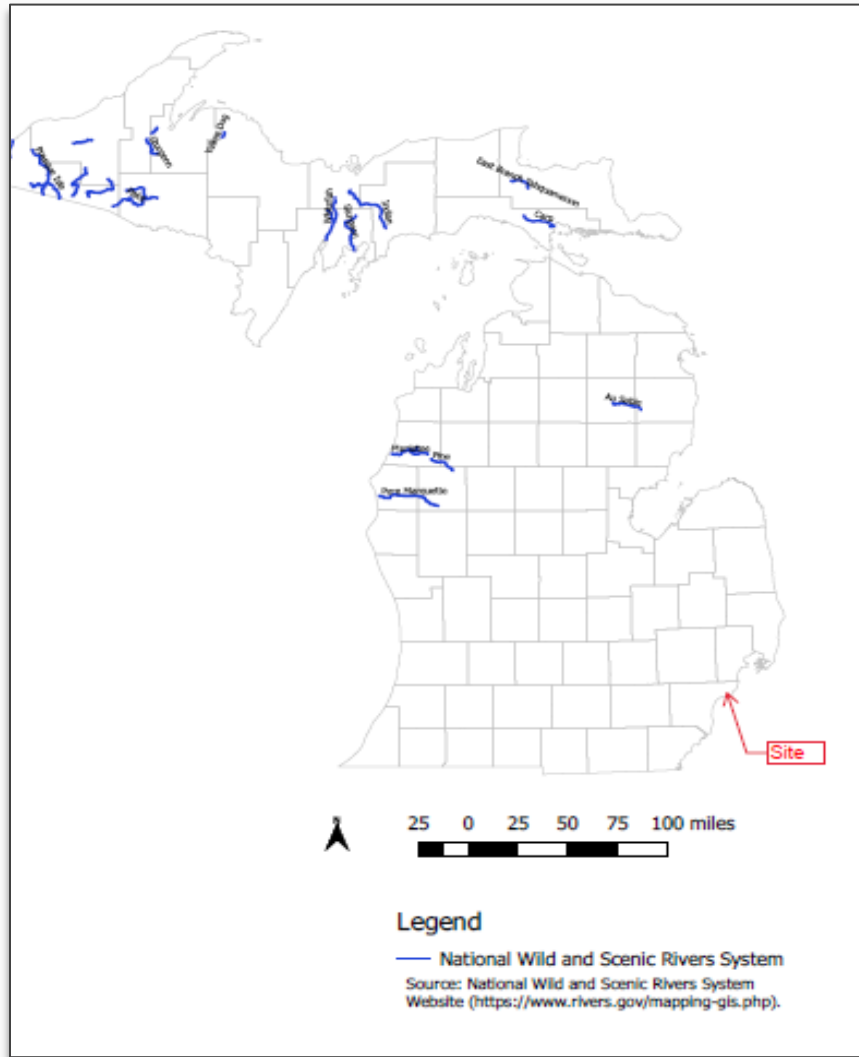


Wetland Protection



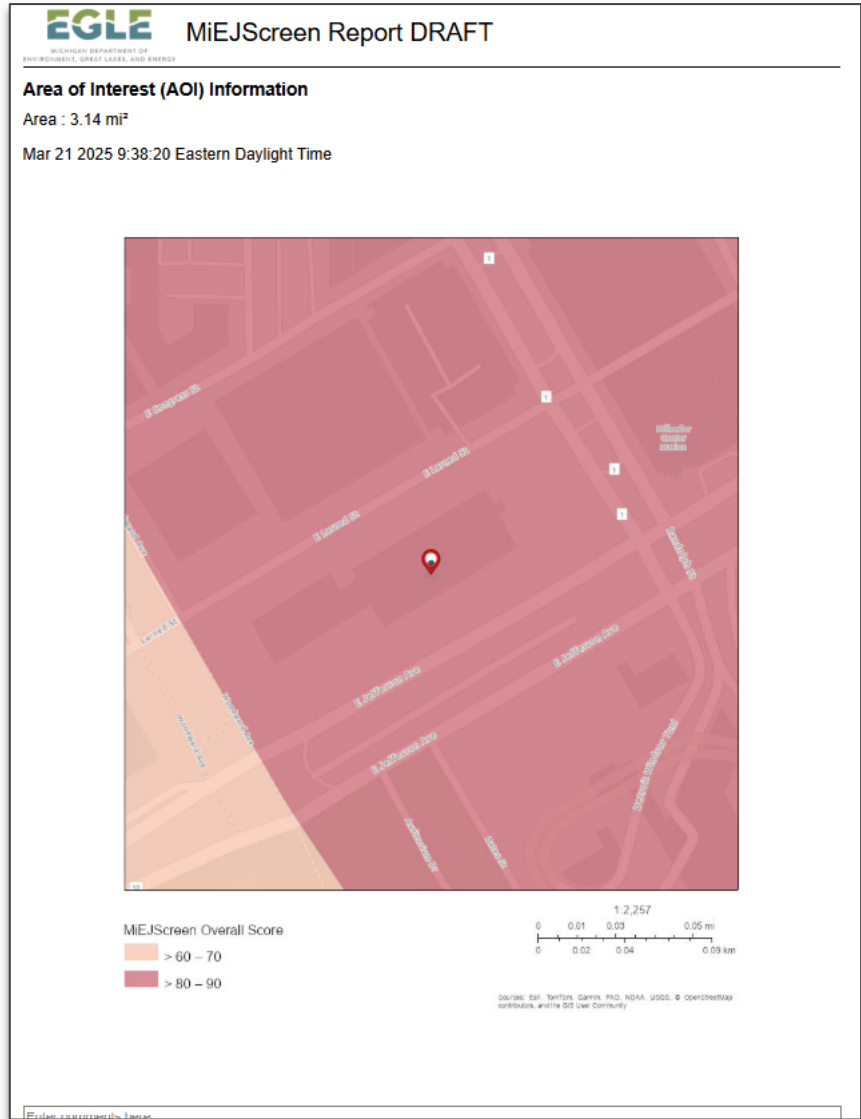
- Most projects will not be in a wetland
- Obtain map from US Fish and Wildlife Service using this [link](#) or from EGLE using this [link](#) and attach in the HEROS report
- **If the project impacts a wetland, the project needs to complete the eight-step process, up to and including wetland mitigation**
 - The consultant is responsible for completing the eight-step process on behalf of their client
- For more information, here is the link to the Wetlands Protection page on the [HUD Exchange](#)
- An overview of the eight-step process can be found [here](#)

Wild and Scenic Rivers



- There are no Wild & Scenic rivers in the City of Detroit
- Obtain map from the State using this [link](#) or the National Wild and Scenic Rivers System using this [link](#) and document in HEROS
- For more information, here is the link to the Wild and Scenic Rivers page on the [HUD Exchange](#)

Environmental Justice



- The EPA has removed their EJ Screen Report
- Obtain information from the State of Michigan EJScreen Screening tool using this [link](#) and document in HEROS
- The report should be for a one-mile radius around the site

Common Issues: Related Laws & Authorities

- Common issues that arise while reviewing consultant ER's include:
 - Missing supporting documentation
 - **Every law and authority must have source documentation (an attachment) to verify your determination**
 - Vague information in the summary section
 - Specifically, the air quality, contamination, noise and Section 106 portions
 - The summary should include more information and detail than HEROS automatically generates
 - I.E. distance from site to nearest airport, FIRM map number and date, dates of reports, dates letters are issued from government agencies, the information from the reports, etc.
 - The source documentation/exhibit map was not project-specific
 - Indicate the location of the project on the map
 - Detailed information about laws and authorities can be found on the [HUD Exchange](#)

Components of the HUD Part 58 Environmental Review

Environmental Assessment Factors

EA Factor and Impact Evaluation

Environmental Assessment Factor	Impact Evaluation
LAND DEVELOPMENT	
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	
Hazards and Nuisances including Site Safety and Noise	
Energy Consumption	
SOCIOECONOMIC	
Employment and Income Patterns	
Demographic Character Changes, Displacement	
COMMUNITY FACILITIES AND SERVICES	
Educational and Cultural Facilities	
Commercial Facilities	
Health Care and Social Services	
Solid Waste Disposal / Recycling	
Waste Water / Sanitary Sewers	
Water Supply	
Public Safety - Police, Fire and Emergency Medical	
Parks, Open Space and Recreation	
Transportation and Accessibility	
NATURAL FEATURES	
Unique Natural Features, Water Resources	
Vegetation, Wildlife	
Other Factors	

- HUD needs to know that the Site and surrounding area can support the new influx of people, and that the people have access to basic needs
- Must provide a detailed explanation about the impact of the project on each of the factors
 - I.E. The Detroit Police Department covers the city with the Eighth Precinct covering the project location. The precinct offices are located at 21555 West McNichols Road, is 1,819 feet away from the property. No police services will be negatively impacted by the proposed project.
- Must include maps for the community facility & services section and other relevant factors

Environmental Assessment Impact Codes

- Minor Beneficial Impact- An outcome of the project is positive in some way, but the community improvement is limited. (An example might be a new mixed-use project whose new parking is available to the neighborhood after the commercial component closes)
- No Impact Anticipated- The proposed project will have no negative effect on the community. (An example would be new residential units require additional potable water from the municipal supply, but the existing system has sufficient capacity to provide for the new residents)
- Minor Adverse Impact- Analysis of the proposal shows that some aspect of the project will negatively affect the community, both the challenge affects a relatively small number of people or is easily mitigated. (An example is a new apartment building that raises traffic volumes at a nearby intersection. Installing a traffic light, turning lane, or turning land signal as project mitigation could improve the intersection's performance)
- Significant or Potentially Significant Impact- If the project analysis finds a significant impact, the project should be modified to avoid the impact. A finding of a significant impact that remains in the preferred alternative requires an Environmental Impact Statement

EA Factor and Impact Evaluation

- **Land Development:**

- Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design

- How does the project support comprehensive City plans?
- Is it located in a specific planning area, community area or planning area that details existing and future planning initiatives for those areas?
- What is the current zoning of the classification and does the proposal require a zoning variance?
- How will the project alter the landform?
- Will the project alter the landform?
- Is the project a good fit for the surrounding area?

EA Factor and Impact Evaluation

- **Land Development:**

- Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff

- Is there evidence of ground subsidence, erosion or other unusual conditions on the site?
 - Is there any visible evidence of soil problems?
 - Is there evidence of erosion or sedimentation?
 - Is an erosion control included as part of the construction contract?
 - Will the project site significantly affect or be affected by erosion or sedimentation conditions?
 - If so, does the design plan include measures to overcome potential erosion problems?
 - Is the site on a slope? If so, is the slope slight, moderate, severe or very severe?
 - What will be done to address sites with a steeper slope?
 - Will drainage and stormwater conditions significantly affect or be affected by the project site? If so, does its design include measures to overcome potential runoff problems?

EA Factor and Impact Evaluation

- **Land Development:**

- Hazards and Nuisances including Site Safety and Noise

- Will the project be affected by natural hazards, air pollution generators, man-made site hazards, nuisances?
 - Is the project itself a noise-generating facility in a noise-sensitive area, such as a site in close proximity to schools and housing?
 - Are mitigation measures required to avoid or guard against various problems?

- For more information, here is the link to the Land Development page on the HUD Exchange

- Include attachments when relevant

EA Factor and Impact Evaluation

- **Socioeconomic**

- Employment and Income Patterns

- Will the project either increase or decrease employment opportunities?
 - Will it create conditions favorable or unfavorable to commercial, industrial or institutional development?
 - How many temporary and how many permanent jobs will the project create?

- Demographic Charter Changes/Displacement

- What is/are the identifiable community(ies) within the sphere of likely impact of the proposed project?
 - Does the proposed project contribute to reducing or significantly altering the racial, ethnic or income segregations of the area's housing?
 - Will the project directly displace individuals or families? How many people?
 - Will the project result in probable indirect displacement?

- Environmental Justice

- Were any adverse environmental impacts identified in the project's environmental review?
 - Is the proposed project located in a low income and/or minority community?
 - Will the project expose the community to disproportionate adverse environmental or human health conditions?

- For more information, here is the link to the Land Development page on the [HUD Exchange](#)
- Include attachments when relevant

EA Factor and Impact Evaluation

- **Community Facilities and Services**

- **Educational and Cultural Facilities**

- What is the projected increase in student population due to the project?
 - Will the additional school-aged children in the proposed project exceed the capacity of existing or planned school facilities?

- **Commercial Facilities**

- Is there adequate and convenient access to retail stores?
 - If not, can public transportation carry people to retail services within 30 minutes?

- **Health Care Services**

- Will a potential population rise increase the need for area health care services beyond current capacities?
 - Are non-emergency health care services located within reasonable proximity to the proposed project?
 - Are emergency health services available within five minutes?

EA Factor and Impact Evaluation

- Community Facilities and Services

- Social Services

- Are the social services located onsite or within a convenient and reasonable distance to the proposed project?
 - Will the proposed project overtax or negatively impact social services?

- Solid Waste Disposal and Recycling

- Will a solid waste disposal company or system handle construction debris?
 - What types of solid waste will the completed project generate?
 - What organization will handle garbage collection, composting and recycling?

- Wastewater and Sanitary Sewers

- Does the existing or proposed sewer system have the capacity to adequately service the proposed development?

- Water Supply

- Is the municipal water system adequate to serve the proposed project?
 - Will there be upgrades to the water pipes?
 - Provide existing pipe sizes

EA Factor and Impact Evaluation

- Community Facilities and Services

- Public Safety

- What police services are located within reasonable proximity to the proposed project? What is the approximate response time?
 - What firefighting protection is located within reasonable proximity to the proposed project? What is the approximate response time?
 - What emergency health care providers are located within reasonable proximity to the proposed project? What is the approximate response time?
 - Will the project create a significant burden on police, fire, or health care providers in terms of manpower and/or equipment?

- Parks, Open Space, Recreation

- Are open space and recreational and cultural facilities within reasonable walking distance to the project area, or is adequate public transportation available from the project to these facilities?
 - Will the proposed project cause any overloading of existing open space or recreational or cultural facilities?

EA Factor and Impact Evaluation

- Community Facilities and Services

- Transportation

- Do safe and adequate public transportation services serve the project?
 - Is the project safely accessible to vehicles? Is vehicle parking adequate, including parking for moving vans/trucks?
 - Does the project facilitate pedestrian movement (e.g., sidewalks, pavement markings, landscaping, pedestrian-activated signal lights, or pedestrian overpasses)?
 - Do bicycle lanes or trails serve the project area? Does the project provide covered, secure parking for bicycles, employees, and residents?
 - Overall, will the existing and reasonably foreseeable transportation facilities and services be adequate to meet the needs of the project?
 - Will the project itself cause a significant adverse impact on the local or regional transportation system (e.g., by reducing the level of service of roadways)?
- For more information, here is the link to the Community Facilities page on the [HUD Exchange](#)
- Include attachments when relevant

EA Factor and Impact Evaluation

- **Natural Features**

- **Unique Natural Features/Water Resources**

- Will the proposed project location, construction, or activities of project users adversely impact unique natural features on or near the site?
 - Will the project involve a substantial increase in impervious surface area? Does the design include runoff control measures or permeable surfaces?

- **Vegetation/Wildlife**

- Will the project create problems by introducing nuisance or non-indigenous species of vegetation that may be ecologically disruptive, be invasive, threaten the survival of indigenous plant habitats, or disrupt agricultural or silvicultural activities?
 - Will the project damage or destroy trees without replacement and landscaping?
 - Will the project create special hazards for animal life? What types and numbers of animals will the project affect and how?
 - Will the project impact migratory birds? Most birds protected by the federal Migratory Bird Treaty Act are not included in the Endangered Species Act yet are protected by similar protections against a “taking” of birds' nests or eggs. Consult with the U.S. Fish and Wildlife Service (USFWS). Construction activities should occur outside the migratory bird nesting season. Alternatively, survey the site for migratory bird nests prior to construction.
 - Will the project damage or destroy existing wildlife habitats (e.g., removal or blockage of wildlife corridors, such as a riparian buffer)?
 - Will excessive grading alter the groundwater level and thus cause the death of trees and ground cover which in turn diminish animal habitats?

- For more information, here is the link to the Natural Features page on the [HUD Exchange](#)
 - Include attachments when relevant

EA Factor and Impact Evaluation

- Climate and Energy

- Climate Change

- Is this project designed in a way that it will withstand, within the useful life of the project, the expected climate related changes projected for the area? Numerous resources, such as those listed later on this page, are available to help identify future climate threats. As a rule of thumb, the project's mortgage length (often 30-40 years) can be used as a minimum, though the useful life of a building is often much longer.
 - How will increasingly frequent or severe natural disasters affect the proposed project?
 - What specific climate change impacts have been identified for the project area? What measures will help mitigate those impacts? Will they shorten the project's lifespan?
 - The effect of existing or ongoing local infrastructure projects designed to mitigate the impact of climate change may be considered; however, such projects do not eliminate the need to include mitigation measures specific to the proposed project.
 - As you work through the other environmental assessment factors that focus on the natural environment (e.g., water resources, soil suitability, etc.), consider what the results of the analysis would be under moderate and severe future climate scenarios.
 - Do the results of any of these analyses change?
 - How will those likely future results affect the wellbeing of project residents and the natural environment?
 - For example, could heavier precipitation in the future cause stormwater runoff issues, despite the project site's currently sufficient drainage?

EA Factor and Impact Evaluation

- Climate and Energy

- Energy Efficiency

- Is the project planning to install Energy Star appliances, lighting fixtures, or heating, cooling, and hot water systems? Does the project include programmable thermostats, occupancy sensors in common areas, water filters, insulated hot water pipes, and/or point-of-use/tankless hot water heaters?
 - Does the project design meet the current version of the Energy Star Certified Homes performance standard for single-family and low-rise multifamily housing or the Energy Star Multifamily New Construction standard for multifamily buildings with four or more stories?
 - Is the project seeking a rating under a recognized green building standard such as the following, or other green standard or sustainability program?
 - For large developments, is the project considering LEED-Neighborhood Development (LEED-ND) certification?
 - What is the estimated energy consumption of the proposal and are the energy resources of the utility provider sufficient to support the proposal?
 - For more information, here is the link to the Natural Features page on the [HUD Exchange](#)
 - Include attachments when relevant

Common Issues Related to EA Factors

- Common issues that arise while reviewing consultant EA Factors include:
 - Minimal information in the summaries
 - Missing documentation for factors (such as maps)
 - Current pipe sizes for water/sewer not included
 - Site Development Plans
 - City Infrastructure Maps

Components of the HUD Part 58 Environmental Review

Environmental Assessment Analysis

Environmental Assessment - Analysis

- **Cumulative Impacts:** The impact on the environment that will result from the incremental impact of the project when added to other past, present, and reasonably foreseeable future actions.
- **Alternatives Analysis:** Discuss alternatives considered and why they were not selected
 - Alternatives considered are limited to the range of alternatives that meet the purpose and need. Those alternatives that do not meet the purpose and need can be dismissed without detailed study. This is an imaginative, creative, and communal process
- **No Action Alternative:** Describe the most likely conditions expected to exist in the future in the absence of the project
- **List of sources, agencies and persons consulted:** EGLE, EPA, etc.

Environmental Assessment - Analysis

- **Public Outreach:**
 - List other forms of public outreach, if applicable (i.e. public meetings)
- **Lists of Permits:** Provide a list of permits, reviews and approvals that are required for project construction
- **Summary of Findings and Conclusions:** Provide a detailed summary of finding and conclusions are the main points of analysis and include potential impacts, both beneficial and potentially adverse.
 - Can also discuss changes to proposal to avoid significant impacts, if any.

Common Issues Related to EA Analysis

- Common issues that arise while reviewing consultant EA Analysis include:
 - Minimal information in the summaries
 - No alternatives provided

Components of the HUD Part 58 Environmental Review

Mitigation Plan

Mitigation Plan

- Any project with outstanding mitigation or conditions must include a mitigation plan. The mitigation plan must
 - Explain how measures will be carried out and monitored
 - Clearly identify persons responsible for implementing and monitoring mitigation measures
 - Provide a timeframe in which they will be completed
 - Provide estimated cost for the measure
- All mitigation measures and conditions will be included in the plan
 - i.e. Contamination, Asbestos, lead, radon, Section 106 Conditional No Adverse Effect, Noise Attenuation, etc.
- The ER Team can send a mitigation plan outline for the consultant to use, though you are welcome to create your own
- The plan must be submitted to the City in the EA for review
- This plan will be included in the NEPA Compliance Commitment (NCC) Memo that will be utilized during construction

Mitigation Plan Example

Response Activity or Continuing Obligation	Required Activities	Party Responsible for Completing Activity	Timing of Activity	Cost	Required Follow-up or Reporting
ResAP – excavation and exposure barriers	Historic uses of the site were identified as RECs, with subsurface investigation confirming soil contamination at levels greater than their respective Generic Residential Cleanup Criteria. Groundwater was not encountered. Response activities to mitigate unacceptable exposures include excavation and exposure barriers (hardscape/engineered barriers). Mitigation measures to be implemented in accordance with the EGLE approved April 2024 ResAP.	Contractor	During Construction	\$376,528	Include results in DDCC report.
ResAP – Clean Fill	The fill material brought to the site will be documented as clean by analytical results from samples collected from the site of origin documenting that the material does not contain metals at concentrations above the applicable generic direct contact criteria.	Contractor	During Construction	\$125,000	Include results in DDCC report.
Documentation of Due Care Compliance	<p>A. Complete a DDCC report and submit to the City of Detroit Environmental Review Officer for review prior to submitting to EGLE. Engineering controls will require an Operations and Maintenance plan.</p> <p>B. Additional requirements such as a Restrictive Covenants and/or a recorded Notice to Title may be requested depending on site conditions.</p>	Consultant	Post Construction	\$6,500	Provide report to HRD's ER Team
Noise Analysis – Unacceptable Noise	Appropriate construction materials will be incorporated in the building to mitigate noise levels within the acceptable range. The HUD STraCAT electronic tool was used to conduct a site specific noise assessment. The assessment indicated the wall assemblies meet required attenuation. The project is in compliance with HUD's Noise regulation with mitigation.	Architect, Construction, Crew, Foremen, Developer,	During Construction	NA	Building specs

Common Issues Related to Mitigation Plans

- Common issues that arise while reviewing consultant Mitigation Plans include:
 - Not all mitigation measures/conditions added in the HEROS summary page
 - Not all mitigation steps included in this summary
 - The title in the Mitigation Plan is not updated with the project information
 - Plan does not include all ResAP required activities
 - Missing conditions in the plan (i.e. noise, Section 106 CNAE, etc.)

Components of the HUD Part 58 Environmental Review

**Finalizing Review, Construction, and Continuing
Obligations**

Completing the Environmental Review

- When the report is complete, the consultant will:
 - Download a copy of the ER from HEROS for their records
 - Assign the review to Kim Siegel in HEROS
 - E-mail Kim to confirm that the report has been assigned to her in HEROS and provide Kim with a copy of the HEROS ER and attachments separately (you can use Dropbox or a similar program)
- The Historic team (Tiffany and Sam) will review the Historic Preservation section; Kim will review the remainder of the EA
 - Most likely, revisions or additional documentation will be required. It could take several weeks to get through this process depending on how thorough the initial EA is

After Receiving AUGF

- **If unforeseen environmental conditions are observed during construction (i.e. tank discovered, potential archeological artifacts found, etc.), please contact Melissa immediately**
- When applicable, the consultant will provide any relevant reports to Melissa Owsiany (asbestos closeouts, etc.)
- Mitigation measures and final paperwork are reviewed; the ER Team will issue one of the two memos prior to final payout from the City of Detroit:
 - A Final Closeout Memo – no further action required
 - A Continuing Obligations memo - mitigation measures must continue beyond final construction closeout
 - Typical continuing obligations include:
 - Remedial action documentation including an EGLE approved Documentation of Due Care Compliance (DDCC) or No Further Action(NFA) Report
 - O&M Plans, inspection, and reporting requirements from the DDCC
 - Lead and Asbestos closeout reports and ongoing O&M Plans
 - The responsibility of following up on the CO's will transfer to the Asset Management division of HRD

Questions?



Today's Presenters

City of Detroit Housing & Revitalization Department

- Penny Dwoinen
- Kim Siegel
- Melissa Owsiany
- Tiffany Ciavattone
- Samuel Burns

Michigan Department of Environment, Great Lakes, and Energy

- Carrie Geyer
- Martha Thompson

Michigan State Housing Development Authority

- Daniel Lince
- Michael Vollick

Thank you!

A copy of the slide presentations will be available on the HRD website. A link will be sent to registrants when available to access.

Please direct any follow up questions to Kim Siegel at Kim.Siegel@detroitmi.gov



TAKE PART
Opportunity Rising

