

**Mitigation Plan
Brewster Wheeler I, II, III
NEPA EA April 2025**

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	<p>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 ResAPs (approved January 2025).</p> <ul style="list-style-type: none"> Excavation will performed for geotechnical reasons to depths estimated at 2 to 7 feet. Excavated soil will be transported to a licensed landfill for disposal. Hardscapes will consist of buildings, new asphalt or concrete. Engineered soil barriers will consist of a minimum of 12 inches of vertical thickness. Daily reports, a photo log, and all other documentation (e.g., survey data, truck tickets, etc.) will be completed during the construction of the Engineered Soil Barrier areas. 	Contractor	During Construction	<p>Phase I \$411,600</p> <p>Phase II \$413,000</p> <p>Phase III \$469,700</p>	Include results in DDCC report.
ResAP – Clean Fill	<p>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.</p>	Contractor	During Construction	<p>Phase I \$61,400</p> <p>Phase II \$60,640</p> <p>Phase III \$61,400</p>	Include results in DDCC report.

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Documentation of Due Care Compliance	A. Complete a DDCC report and submit to EGLE. Engineering controls will require an Operations and Maintenance plan. B. Additional requirements such as a Restrictive Covenants and/or a recorded Notice to Title may be requested depending on site conditions.	Consultant	Post Construction	\$6,500 (per Phase)	Provide report to City.
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. Wall construction components include 4" face brick; exterior Siding - 2" insulation board + sheathing - 2x6 wood studs @ 16" o.c., fiberglass insulation 5-1/2", 5/8" gyp. bd. screwed to stud. Window construction includes vinyl windows.	Architect, Construction, Crew, Foremen, Developer,	During Construction	NA	Building specs
Section 106 – Adverse Effect Requirements	The City has determined that the Undertaking may have an adverse effect on the Brewster Wheeler Archaeology District (BWAD). The City, MSHDA, DCH SHPO and MHT (signatories) and the ACHP agree that the Undertaking shall be implemented in accordance with the following stipulations over a period of up to seven (7) years: I. Phase III Archaeological Data Recovery, conducted in accordance with the Archaeology Data Recovery Plan. II. Oral History Documentation will be compiled III. A Final Technical Report will be provided at the end of mitigation activities IV. Public Education Material will be created to reach the broader public.	General Contractor	Prior to/during Construction	Phase I \$473,400 Phase II \$362,000 Phase III \$476,800	Include findings in Archaeological Data Recovery report.
Section 106 – Unanticipated Discoveries Plan	During the Undertaking, the SHPO approved Unanticipated Discoveries Plan shall be followed for the duration of the project.	Construction Crew, Foremen, Developer	During Construction	NA	Unanticipated Discoveries Plan included in MOA