

Bagley Townhomes and Flats on 10th – Parcel C
SES Environmental
6-5-2025

Response Activity or Continuing Obligation	Required Activities	Party Responsible for Completing Activity	Timing of Activity	Cost	Required Follow-up or Reporting
ResAP – Clean Fill	<p>As part of the redevelopment of the subject property, at least four feet of soil will be removed from the entire subject property. Excavation will occur to the property boundaries in all directions. The soil will be disposed off-site at a licensed Type 2 landfill. Copies of load tickets, bills of lading, and/or manifests for each shipment of soil transported off the subject property for disposal will be retained by the owner. Prior to the removal of the soil from the subject property will be surveyed to determine the current grade elevations. Following completion of excavation activities, the subject property will be re-surveyed to confirm a minimum of four feet of soils have been removed.</p> <p>Clean soil will be imported to the subject property to return the subject property to near the current grade. Any soils imported to the subject property as part of the development of the direct contact barrier will be sampled periodically to ensure they are not contaminated prior to being utilized for the barrier. At a minimum the imported soils will be sampled and analyzed VOCs by US EPA Method 8260, PNAs by US EPA Method 8270 and the metals arsenic, lead, and selenium by USEPA Methods 6020 and 7471. Additional analysis may be conducted as appropriate. Samples will be collected prior to the placement of the soil on to the property and analyzed at a rate of one sample per every 500 cubic yards of imported soil. Following completion of site grading and hardscape installation, the subject property will be surveyed to confirm that a minimum of four feet of clean fill are present above any potential remaining fill materials.</p>	Contractor	During Construction	\$1,000,000	Include results in DDCC report.

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	Current future use plans for the subject property include the redevelopment with four new multifamily residential buildings. Following completion of the excavations for each building foundation on the subject property, VSR samples will be collected from beneath the building foundations. The samples will be collected in accordance with the S3TM guidance document. The VSR samples will be analyzed for VOCs, PNAs, and the Michigan 10 metals. In addition, all excavation and disposal will be conducted in compliance with the applicable local, State, and Federal regulations. The vertical and horizontal locations of the samples and the depth(s) of the excavation will be documented. In addition, photographs documenting the removal of the urban fill will be collected during and after excavation.				
Documentation of Due Care Compliance	<ul style="list-style-type: none"> 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. B. Additional requirements such as a Restrictive Covenants and/or a recorded Notice to Title may be requested depending on site conditions. 	Consultant	During Construction	\$3,000	Provide report to HRD's ER Team
Section 106 – Conditional No Adverse Effect Requirements	<ul style="list-style-type: none"> A. Prior to the start of any work, building plans, specifications and photos must be submitted to the Preservation Specialist for review and Conditional Approval B. If there is a change in the scope of work, those changes will be required to undergo additional Section 106 Review prior to the execution of any work. C. During government-to-government tribal consultation (54 U.S.C. 302706 (b)), the Forest County Potawatomi Community Tribal Historic Preservation Officer made a request for archaeological monitoring of the site; due to the prevalence of Potawatomi villages and fisheries 	<p>General Contractor</p> <p>General Contractor</p>	<p>Prior to Construction</p> <p>At any time</p>	\$100	<p>Submit work to Preservation Specialist.</p> <p>Notify Preservation Specialist</p>

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	<p>along the Detroit River and the depth of excavation proposed. They raised concerns that this undertaking could disturb previously undisturbed sub-surface resources. The City of Detroit and SHPO have recommended monitoring across the Clement Kern Development site (Bagley Townhomes & 10th Street Flats, West of 10th, and Trumbull Developments) in order to address the concerns of the Forest County Potawatomi and avoid adverse effects to potential precontact and historic period archaeological resources. An archaeology monitoring plan was submitted for consideration and approved through consultation with SHPO and Tribes.</p>				
Asbestos Abatement	Follow all federal, local, and state guidelines for asbestos abatement for the demolition of buildings.	Contractor	Prior to and during demolition	TBD	Abatement documentation

If unanticipated tanks, evidence of contamination, tanks, artifacts or bones are discovered during ground disturbing activities, work will be halted, and the Melissa Owsiany will be contacted immediately for further guidance on how to proceed. You can reach her at melissa.owsiany@detroitmi.gov.