

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

**Project Information**

**Project Name:** Trumbull

**HEROS Number:** 900000010467350

**Start Date:** 04/28/2025

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

**RE Preparer:** Kim Siegel

**State / Local Identifier:** Detroit, Michigan

**Certifying Officer:** Julie Schneider, Director

**Grant Recipient (if different than Responsible Entity):**

**Point of Contact:**

**Consultant (if applicable):** SES Environmental

**Point of Contact:** Mary Place

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

- ✓ By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

**Project Location:** 1501 Bagley St, Detroit, MI 48216

**Additional Location Information:**

Parcel D- Trumbull is identified as 1501 Bagley Street and is located along the south side of Bagley Street and the west side of Trumbull Road. Parcel D contains approximately 1.407 acres of a larger parcel of land identified as Parcel No. 08000246-346. CKG Trumbull 2023 is the proposed purchaser of the property. CKG Trumbull 2023 does not currently have ownership of the property. Maps depicting the project location, the boundaries of Parcel D, and the locations of the proposed buildings are attached. The Trumbull - Parcel D project also includes the following addresses 1511 Bagley St. Detroit, MI 48216 1515 Bagley St. Detroit, MI 48216 1517 Bagley St. Detroit, MI 48216 1519 Bagley St. Detroit, MI 48216 1521 Bagley St. Detroit, MI 48216 1523 Bagley St. Detroit, MI 48216 1525 Bagley St. Detroit, MI 48216 1527 Bagley St. Detroit, MI 48216

**Direct Comments to:** Penny Dwoinen, Environmental Review Officer, City of Detroit  
Housing and Revitalization Department  
E-mail: [dwoinenp@detroitmi.gov](mailto:dwoinenp@detroitmi.gov)

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

Trumbull (aka Parcel D) located at 1501 Bagley contains approximately 1.407 acres of land. Parcel D, the subject of this EA, is currently developed with 2 two-story, multi-family residential apartment buildings. CKG Trumbull 4 2023 Limited Dividend Housing Association L.L.C. ("CKG Trumbull 2023") will be redeveloping the subject property for multi-family residential usage by demolishing the existing buildings and constructing a multi-family residential building to contain 72,841 square feet. Exterior portions of the site will be paved for drive, parking areas, or walkways, other areas include green space areas or landscaping. The building will include 88 units, consisting of 23 studios apartments (420 square feet each), 51 one-bedroom apartments (575 square feet each), and 14 two-bedroom apartments (1,075 square feet each). Additional amenities will include a community room, on-site management, in-unit W/D hookups, central A/C, garbage disposals, window coverings, dishwashers, rooftop terrace, and parking areas. This review is for \$1,269,052 in HOME 2022, \$1,370,563 in HOME 2023, \$3,303,312 CNI funding, and \$3,102,142 in CDBG-DR funding. This review is valid for five years.

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

The larger Clement Kern Garden Project is a 370-unit affordable residential property for families located in the Corktown neighborhood in the city of Detroit, Michigan.

The existing 87-unit complex was constructed in 1985. The property does have substantive capital needs anticipated in the coming years as a number of systems and components have now reached, surpassed, or are approaching the end of their expected useful service lives (EUL). The project will provide quality, modernized market rate and affordable rental housing options to target a wide range of household incomes. The proposed project will occur on a portion of approximately 8.925-acre parcel (Parcel No. 08000246-346) located in Detroit's Corktown neighborhood. The proposed project is part of a redevelopment through the HUD Choice Neighborhoods Initiative. As part of the HUD Initiative, the City of Detroit was awarded \$30 million from HUD to implement a Transformation Plan in partnership with American Community Developers, Inc. and others in 2021. When completed, the subject property is planned to include a mix of market rate and affordable rental housing options to target a wide range of household incomes. No other alternatives have been identified.

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

According to The State of Economic Equity (2021), the median income for Caucasians increased 60% but only 8% for African Americans. Only 5% of Detroit residents live in a middle-class neighborhood, while 59% of Michigan residents as a whole live in these neighborhoods. Approximately 62% of Detroit renters are housing cost-burdened. Middle-class neighborhoods are defined as census tracts where more than half of households are middle or upper middle class. Middle and upper middle-class households range in income from 80% to 300% of the national median income, which is \$52,500 to \$197,000. In Detroit, only 5% of residents reside in middleclass neighborhoods. Currently, there are only 11 census tracts that meet this definition, down from 22 in 2010 (The State of Economic Equity (2021)). The project is located in a mixed residential and commercial area in the Corktown neighborhood. The current real estate vacancy rate in Corktown is 24.1%. This is higher than the rate of vacancies in 91.1% of all U.S. neighborhoods. In addition, most vacant housing here is vacant year round. If the development does not proceed, fewer modernized, mix of market rate and affordable rental housing options to target a wide range of household incomes.

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

[Fig 2B - Trumble Proposed Dev with Historical.pdf](#)

[Fig 1 - Site Location Map \(rev 3jun24\).pdf](#)

[Fig 2A - Trumble Current Dev with Historical.pdf](#)

[\(A4\) CKG Phase I \(ASTI\) Reduced.pdf](#)

**Determination:**

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
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	Finding of Significant Impact
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**Approval Documents:**[Signature Page - Trumbull.pdf](#)

**7015.15 certified by Certifying Officer  
on:**

**7015.16 certified by Authorizing Officer  
on:**

**Funding Information**

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B21MF260002	Community Planning and Development (CPD)	Community Development Block Grants (Disaster Recovery Assistance)	\$3,102,142.00
M22MC260202	Community Planning and Development (CPD)	HOME Program	\$1,269,052.00
M23MC260202	Community Planning and Development (CPD)	HOME Program	\$1,370,563.00
MI5F536CNG120	Public Housing	Choice Neighborhoods	\$3,303,312.00

**Estimated Total HUD Funded,                      \$9,045,069.00  
Assisted or Insured Amount:**

**Estimated Total Project Cost [24 CFR 58.2 (a)            \$38,867,442.00  
(5)]:**

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

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		



<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Cole A. Young Airport is located approximately 6.12 miles to the northeast, Windsor Airport located approximately 6.44 miles to the southeast, and Detroit Metropolitan is located approximately 15 miles to the southwest. The Project is located approximately 6.12 miles from the nearest civil or commercial service airport. The property is not located in a FAA-designated Airport Runway Clear Zone.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Review of the US Fish and Wildlife Service Coastal Barrier Resources System Mapper documents the Project is not located within a designated Coastal Zone Management area or Coastal Barrier.
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. According to a Federal Emergency Management Agency (FEMA) floodplain map, dated February 2, 2012 (map number 26163C0280E), the subject property is located in an area of minimal flood hazard. Zone X is the area determined to be outside the 500 year flood and protected by levee from 100 year flood.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b>		
<b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county or air quality management district is in maintenance/attainment for ozone and non-attainment for Sulfur dioxide. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s)

		<p>identified above. The project is in compliance with the Clean Air Act. The proposed project will not produce significant emissions beyond de minimis levels and, therefore, meets the definition of an activity classified under air permit exemptions (R 336.1291, Rule 291). Anticipated air emissions from the project are between 1 and 2 tpy criteria pollutant and less than 0.001 tpy lead, fluoride, and mercury. The project is in compliance. A Conformity Letter prepared by Breanna Bukowski, Environmental Quality Analyst for the EGLE Air Quality Division, dated April 29, 2025, indicates the size, scope, and duration of the Trumbull project is similar in scale to a documented project in Orange, California, and the proposed project should not exceed de minimis levels included in the federal general conformity requirements. A detailed conformity analysis was not required. Fugitive Dust Measures to control fugitive dust will be utilized to ensure that construction projects do not result in erosion and formation of dust. The Best Management Practices (BMPs) employed will comply with the City's site plan approval process and will be effective in controlling construction-related fugitive dust.</p>
<b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.</p>
<b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) & 58.5(i)(2)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>A list of previous reports is provided in attachments. CONTAMINATION: Historical activities conducted at the property and nearby properties and deposition of fill material have resulted in soil impact at the property. Metals, PNAs, and VOCs were detected at concentrations exceeding the GRCC for DWP, GSIP, SVIAI, VSIC, and/or DC in the</p>

		<p>soil samples. On March 17, 2025, EGLE approved the ResAP for the Project. At least four feet of soil will be removed from the entire subject property. The soil will be disposed off-site at a licensed Type 2 landfill. All soils beneath the future building slab will be excavated to remove all urban fill materials from within the building foundation or a minimum of 4 feet bgs. In addition, all former utilities beneath each building will be removed to at least five feet from the building foundation. As part of the excavation activities, the berm area on the southern border of the subject property will be excavated and disposed off-site. The excavation and disposal will be conducted in compliance with the applicable local, State, and Federal regulations. A former alley runs east to west across the subject property at the center of the parent parcel. During the redevelopment of the subject property there is the potential for unanticipated conditions such as orphan USTs or abandoned utilities to be encountered within the form alley right-of-way. Should an unanticipated condition be encountered within the right-of-way or the subject property at large, the encountered condition(s) will be handled appropriately in compliance with all applicable local, state, and federal regulations. In addition, EGLE, MSHDA, and the City of Detroit personnel will be notified of the unanticipated condition(s) and consulted regarding the selected assessment and/or remedy(s).</p> <p>ASBESTOS: Please see the April 2023 report prepared by ASTI. The report indicates an asbestos survey was conducted for all 12 buildings located on the 8.8-acre parcel, which includes Parcel D. Basement wall texture in each</p>
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		<p>building and 40 sets of fire doors and frame sets were confirmed or presumed asbestos containing. According to the classification guidelines, the wall texture was classified as a Category II non-friable ACM. No renovations have been conducted since April 2023. As such, the 2023 asbestos survey is considered valid (as these reports have no expiration dates). HAZARDOUS MATERIALS/PRE DEMOLITION SURVEY: Lead-based paint is not anticipated to be present. Universal Waste and other identified potential hazardous that are present at the subject property will be handled, removed, transported, and disposed of in accordance with applicable local, state, and federal requirements. During an asbestos containing materials inspection conducted by ASTI on March 27, 2023, ACMs were identified on the subject property. Basement wall texture (white) within the existing building. In addition, the fire doors and frames within the building were presumed to be ACMs. These ACMs should be removed by a licensed contractor in accordance with the NESHAP.</p>
<b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>The U.S. Fish and Wildlife Service Information for Planning and Consultation (iPac) tool was referenced. A list of protected species obtained identified the Indiana bat (Endangered), the Rufa Red Knot (Threatened); The Eastern Massasauga (Threatened); The Monarch Butterfly (Proposed Threatened); and the Eastern Prairie Fringed Orchid (Threatened). The Indiana bat hibernate in caves, mines, or similar structures during the winter. During the summer, they prefer forested/wooded habitats where the roost forage and travel to some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields.</p>

		<p>Small numbers of rufa red knots sometimes use manmade freshwater habitats along inland migration routes. Rufa red knots generally nest in dry, slightly elevated tundra locations, often on windswept slopes with little vegetation. The Eastern Massasauga maybe found in variety of wetland habitats, particularly prairie fens, and lowland coniferous forested, such as cedar swamps. Monarch butterflies live mainly in prairies, meadows, grasslands and along roadsides, across most of North America. The Eastern Prairie Fringed Orchid prefers wet habitats in full sun, like prairies and sedge meadows. No critical habitats were identified at the Site location. No wetland areas are present on the subject property. The subject property is located in an urban area which has been developed since at least 1884. Based on this information, the identified endangered species are not likely present on the subject property. Furthermore, the species identified above have never been observed at the project location, and no suitable habitats are located at the property.</p>
<b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>In accordance with HUD's Guidebook entitled "Siting of HUD-Assisted Projects Near Hazardous Facilities"(hereafter "Guidebook"), SES searched a 1-mile radius around the Project for above ground storage tanks (ASTs) containing flammable materials based on review of a 2022 regulatory database report. Review of the regulatory database documented 12 active AST sites within a one-mile radius of the subject property. Based on tank distances and the presence of numerous buildings between the properties and the subject property, the ASTs are not anticipated to have any impact on the proposed</p>

		developments associated with the project.
<b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
<b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.
<b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: Other. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106. 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: * The work is conducted in accordance with the specifications submitted to the Preservation Specialist on 7/18/2024, 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. * The archaeological monitoring plan, dated 9/16/24, is followed.
<b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A Noise Assessment was conducted. The noise level was acceptable: 58.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation. Calculations were entered into the HUD Exchange Day /Night Noise Level Calculator, available at <a href="https://www.hudexchange.info/environmental-review/dnl-calculator/">https://www.hudexchange.info/environmental-review/dnl-calculator/</a> Review of aerial photography and topographic maps conducted to determine the presence of railroads within 3,000 feet

		<p>of proposed development. Two railroads are located within 3,000 feet of the proposed development. The railroads are located approximately 1,640 feet to the southwest and 2,600 feet to the south. A Federal Railroad Administration Office of Safety Analysis Crossing Inventory sheet was reviewed for these railroads. Review of five railroad crossing inventory documents for Bagley Street and Rosa Parks Boulevard were reviewed for the Penn Central Railroad located to the southwest. No rail traffic operations were documented on each of the sheets for the railroad line to the southwest. Review of crossing inventory sheets for the rail line to the south documented the nearest crossing as Ambassador Bridge (2,440 feet from property), and 20 rail cars were documented. The DNL calculator was used to assess noise from railroad operations. The railroad DNL is 54 dB, which is below HUD's Acceptable (&lt;65 dB) range. The Project is located within 15 miles of three civil airports: Coleman A. Young Airport is located 6.12 miles to the northeast, Windsor Airport located approximately 6.44 miles to the southeast, and Detroit Metropolitan is located approximately 15 miles to the southwest. An Airport Noise Worksheet was used to calculate noise levels at the airports; and given an evaluation of aviation operations and per HUD guidelines (less than 9,000 air carriers per day, less than 18,000 air taxis per day, less than 18,000 military crafts per day, and less than 72,000 total operations per day), it can be assumed that the noise attributed to the airplanes will not extend beyond the boundaries of the airports. An Airport Master Record was obtained through the U.S. Department of Transportation Federal Aviation Administration. The</p>
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		<p>annual number of operations at both facilities does not exceed thresholds provided in the HUD Airport Noise Worksheet. Additionally, SES reviewed a 2011 Airport Noise Exposure Contours map, which documents noise levels not exceeding 55 dBs extend off the airport property to the east but more than 5 feet from the subject property. The Michigan Department of Transportation Traffic County Database System (TCDS) was reviewed to determine the presence of busy roadways within 1,000 feet of the subject property. The HUD (DNL) Calculator was utilized to obtain a DNL for the potential roadway noise sources. Using this data, SES performed calculations from the Project boundary to the potential noise source. Michigan Avenue is located 760 feet to the north, and data from 2015 documents traffic counts as exceeding 10,000. The calculation was completed for a projection for 2025, assuming a 1% traffic increase per year. SES used the "Major Arterial - Urbanized Area" values to determine the noise calculation, which assumed 92% automobiles, 4% medium trucks, and 4% heavy trucks. The DNL from the roadway source (Michigan Avenue) to the property boundary (920 feet) was calculated. The roadway DNL is 55 dB, which is below HUD's Acceptable (&lt;65 dB) range. As a precautionary measure, a 1% traffic increase was used to estimate traffic volumes through 2034. The DNL is 55 dB, which is below HUD's Acceptable (&lt;65 dB) range. The combined DNL for each noise source (based on the 2015 to 2025 traffic projections as well as the 2015 to 2034 projections) is 58 dB which is below HUD's Acceptable (&lt;65 dB) range. Based on the calculated DNL, noise mitigation is not required.</p>
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<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

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

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

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	This development is compatible with the City's goals for continued residential development and will have a positive impact on the area within which it exists. The proposed development activities are anticipated to help continue to revitalize the area immediately surrounding the Project. The project is not expected to contribute to urban sprawl due to its limited scope. According to the City of Detroit Zoning Map, the subject property parcels are zoned as	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		"PD" for "Planned Development District". This classification will remain the same following completion of the project.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Soils at the Project property are suitable for project activities. As part of the redevelopment of the subject property, at least four feet of soil will be removed from the entire subject property. The soil will be disposed off-site at a licensed Type 2 landfill. All soils beneath the future building slab will be excavated to remove all urban fill materials from within the building foundation or a minimum of 4 feet bgs. In addition, all former utilities beneath each building will be removed to at least five feet from the building foundation. Following completion of the excavations for the building foundation on the subject property, VSR samples will be collected from the excavation to determine if all impacted urban fill has been removed from beneath the building foundation. 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. The VSR sample results will be utilized to assess the building foundation areas for a dispersed vapor source. VSR sample results for the VOCs and volatile PNAs will be compared to the SSVIAC to confirm no source of vapors remains present beneath the building slabs. In addition, the samples will be utilized to evaluate for the removal of all urban fill materials from within the building footprints. As part of the excavation activities, the berm	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		area on the southern border of the subject property will be excavated and disposed off-site. The excavation and disposal will be conducted in compliance with the applicable local, State, and Federal regulations. A former alley runs east to west across the subject property at the center of the parent parcel. During the redevelopment of the subject property there is the potential for unanticipated conditions such as orphan USTs or abandoned utilities to be encountered within the form alley right-of-way. Should an unanticipated condition be encountered within the right-of-way or the subject property at large, the encountered condition(s) will be handled appropriately in compliance with all applicable local, state, and federal regulations. In addition, EGLE and MSHDA personnel will be notified of the unanticipated condition(s) and consulted regarding the selected assessment and/or remedy(s).	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	Noise intensive construction activities will be limited to the days and hours specified under the City's noise ordinance. These days and hours shall also apply to any servicing of equipment and to the delivery and removal of materials to and from the site. All construction equipment shall be equipped with mufflers and sound control devices (e.g., intake silencers and noise shrouds) no less effective than those provided on the original equipment and no equipment shall have an un-muffled exhaust. Stationary equipment shall be placed so as to maintain the greatest possible distance from sensitive uses. Road hazards will be addressed through installation and updating of crosswalk signs and control systems, which are under the city's control. Air Quality is not expected to be affected by the project though short term dust during construction is a potential concern and will be addressed by utilizing a best practices	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		approach with dust control measures in place during construction activities. Any emissions would be short-term and localized and would not result in any significant adverse effects on overall ambient air quality.	
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	2	The Project is not expected to alter the demographic nature or character of the community due to the slight increase in the local population. The Project will provide temporary construction jobs during the construction phase and continuing full and part-time employment for maintenance and management of the development. Future residents of this development will help to support existing and future commercial enterprises in the area.	
Demographic Character Changes / Displacement	2	The proposed project would not result in physical barriers or reduced access that would isolate a particular neighborhood or population group. The proposed project would not induce a substantial amount of unplanned growth. Construction would result in temporary construction job growth at the project site. It is anticipated that construction employees not already living in Detroit would commute from elsewhere in the Detroit area rather than relocating to the neighborhood for a temporary construction assignment. Thus, construction is not anticipated to generate a substantial, unplanned population increase. A robust Relocation Plan was developed to assist residents during redevelopment of the site and to prevent displacement. All residents will be given the right to return to the site upon completion.	
Environmental Justice EA Factor	2	No superfund or hazardous waste treatment, storage, and disposal sites are located within 1 mile of the Subject Property. The levels of pollution within 1 mile exceed the state average except for superfund. The population within 7 miles surrounding the Subject Property consists of 86 percent are persons of	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		color, 62 percent are low income earners, 1 percent are linguistically isolated, 15 percent hold less than a high school education, 7 percent are under the age of 5 years, and 14 percent are over the age of 64 years. The project entails redeveloping the subject property for multi-family residential usage by demolishing the existing building and constructing four new multi-family residential buildings. Exterior portions will be paved for drive, parking areas, or walkways, green space areas, or will be landscaped. When completed, the subject property is planned to include a mix of market rate and affordable rental housing options to target a wide range of household incomes. The project will not have a disproportionately high adverse effect on human health or environment of minority populations and/or low-income populations. An EJ Screen Report is provided as an attachment (Please note, the EJ Screen Tool was down at the time of EA preparation, so documentation for a property approximately 6 miles to the east is referenced).	
<b>COMMUNITY FACILITIES AND SERVICES</b>			
Educational and Cultural Facilities (Access and Capacity)	2	This housing development will have no immediate effect to any educational facilities. Public education is offered in the area by Detroit Public Schools. Several preschools, elementary, middle and high schools are located within three miles of the Project.	
Commercial Facilities (Access and Proximity)	2	The project will add to the current residential base and is not expected to negatively impact existing commercial facilities that are located around the project site. The project is expected to bring in new residents, which will benefit the neighboring commercial establishments. Commercial businesses and retail establishments are available along Trumbull Street to the east, Bagley Street to the north, and Labrosse Street to the south.	

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
Health Care / Social Services (Access and Capacity)	2	No health care facility will be negatively impacted by this Project. A sufficient number of hospitals are located in and around Detroit to accommodate new residents of the Property. The location is highly convenient for medical services. Henry Ford Hospital, main hospital, the largest medical hospital in the region, is just 2 3/4 miles away at 2799 West Grand Boulevard. Additionally, no social services will be negatively impacted by the Project activities. There will be no increase in the demand for social services as a result of the project activities. Affordable housing options for those in need could potentially reduce the number of people requiring social services. There is adequate access to social services including health care, family services, etc. within five miles of the Project. No health care services will be provided onsite.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The Project area is not anticipated to have any impact on solid waste management facilities and services since there will be no increase in occupancy. Solid wastes generated during construction activities will be removed by a private contractor. Solid wastes generated by future residents of the development will be removed by the municipal waste hauler. No contracts for waste removal are in place at this time.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	A minor increase in wastewater flows is expected. The existing municipal wastewater system will meet the increased demand. Additionally, the Project activities are not expected to increase pollutant loads in storm water. Catch basins in roadways will capture storm water, which will be discharged to the City of Detroit storm water system.	
Water Supply (Feasibility and Capacity)	2	The additional housing units will not impact the current capacity of this system. There is sufficient water capacity for the Project, as well as additional development in the area.	

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
Public Safety - Police, Fire and Emergency Medical	2	The Project will have no adverse effect in the need for police services due to the additional inhabitants. Dialing 911 accesses police and emergency services and they are adequate to serve the development. The City of Detroit Police Department is located within 1/4 mile of the project. The Project will have no adverse effect in the need for fire services due to the additional inhabitants. There is nothing in the proposed Project use that would indicate a disproportionate need for EMS services.	
Parks, Open Space and Recreation (Access and Capacity)	2	This Project is not expected to have any impact on open space. Roosevelt Park is located approximately 1/2 mile to the northwest, and the Detroit Riverwalk is located 1 3/4 miles to the southeast. Both properties can be reached via public transportation. Based on the small increase in population, the proposed project will not cause any overloading of these facilities.	
Transportation and Accessibility (Access and Capacity)	2	The project activities will have no negative impact on public transportation. There are likely to be short-term impacts to traffic in the area of the Project due to the construction at the Project. Temporary lane closures and/or associated detours may be expected. There will be sufficient onsite parking available for the tenants. The Detroit bus system operates seven days a week and provides services throughout the Detroit area. The nearest public bus stop is located at the intersection of Bagley Street and Trumbull Street. The buses have connection points to recreational, medical, and educational facilities throughout Detroit.	
<b>NATURAL FEATURES</b>			
Unique Natural Features /Water Resources	2	Project activities will not pose a threat to any of the unique natural features within Detroit. Construction/redevelopment activities will be limited to the Project area and none of the surrounding properties will be affected by the Project. Additionally, there are no unique	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		natural features known to pose any safety hazards to any Project activities.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The Project has been developed for commercial and residential purposes since at least 1884. Therefore, vegetation and wildlife in the area of the Project will not be negatively impacted by the construction/redevelopment activities at the Project. The Project is not anticipated to impact unique natural habitats, ecosystems or any threatened and endangered wildlife.	
Other Factors 1			
Other Factors 2			
<b>CLIMATE AND ENERGY</b>			
Climate Change	2	The project activities will not influence the environment in such a way that it will impact the carbon cycle through long-term ongoing greenhouse gas emissions. The project activities consists of a building addition for housing units and may use electrical, diesel or gasoline powered equipment during construction activities. Additionally, the project is located in a historically urban area, therefore no habitat fragmentation will be caused by the project activities. Review of a climate impact map indicates the City of Detroit has consistently maintained an average temperature, in warmer months, of 70 degrees F from 1986 through 2005; however, temperature predictions from 2020 through 2039 project a 2-degree temperature increase. As such, warming trends are anticipated; however, given the limited scope of the project (2-year construction period with limited air emissions), the project is not expected to have an adverse climate effect. In addition, proposed development will employ new construction in accordance with current building regulations, and no retrofitting of existing materials is expected.	
Energy Efficiency	2	The project will meet current State and local codes concerning energy consumption. Other	



Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		than natural gas and coal used to generate the electricity for the project it is not anticipated to have a substantial effect on the use, extraction, or depletion of a natural resource. Energy utilization during construction is expected to be consistent with typical construction equipment. The location is served by local utility providers. The addition will be constructed utilizing energy savings measures such as hot water tank, furnace, and appliance replacements/upgrades.	

**Supporting documentation**[EA Factors Map - climate prediction map.pdf](#)[EA Factors Maps - Showing Social Cultural and Government Properties.pdf](#)[EA Factors Map - Showing Commercial and Government Properties in the Project Area Reviewed.pdf](#)[EA Factors Map - Transit Map with Hospital Locations.pdf](#)**Additional Studies Performed:**

Phase I Environmental Site Assessment, Clement Kern Apartments, prepared by CTI and Associates, Inc., dated June 12, 2003 and revised June 9, 2003 \* Phase II Environmental Site Assessment, Clement Kern Apartments, prepared by CTI and Associates, Inc., dated July 7, 2003 \* Phase I Environmental Site Assessment, Clement Kern Gardens (East Portion), prepared by ASTI Environmental, dated September 30, 2022 Asbestos-Containing Material Inspection, Clement Kern Gardens, prepared by ASTI Environmental, dated April 10, 2023 \* Limited Phase II Environmental Site Assessment, Clement Kern Gardens, prepared by ASTI Environmental, dated October 4, 2023 \* Response Activity Plan -Evaluation Plan and Remedial Action Plan, Parcel D, prepared by SES Environmental, dated February 14, 2025 \* EGLE Correspondence, March 17, 2025, Hazardous Materials Survey

**Field Inspection [Optional]:** Date and completed

by:

Laura Gray

3/23/2022 12:00:00 AM

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

1. Attainment Status for the National Ambient Air Quality Standards 2. Coastal Barrier Resources System Mapper 3. Phase I Environmental Site Assessment, Clement Kern Apartments, prepared by CTI and Associates, Inc., dated June 12, 2003 and revised June 9, 2003 4. Phase II Environmental Site Assessment, Clement Kern Apartments, prepared by CTI and Associates, Inc., dated July 7, 2003 5. Phase I Environmental Site Assessment, Clement Kern Gardens (East Portion), prepared by ASTI Environmental, dated September 30, 2022 6. Limited Phase II Environmental Site Assessment, Clement Kern Gardens, prepared by ASTI Environmental, dated October 4, 2023 7. Response Activity Plan -Evaluation Plan and Remedial Action Plan, Parcel D, prepared by SES Environmental, dated March 17, 2025 8. EGLE Correspondence, March 17, 2025 9. U.S. FWS Federally Listed Threatened, Endangered, Proposed, and Candidate Species List 10. Acceptable Separation Distance map; Phase I ESA regulatory database report dated 2022 11. Custom Soil Resource Report for Wayne County, Michigan, USDA 12. Federal Emergency Management Agency (FEMA) floodplain map, dated February 2, 2012 (Map No. 26163C0280E) 13. Section 106 Application submitted July 10, 2023; SHPO response letters dated July 21, 2023 and December 4, 2023; Archeological Survey dated October 2023; National Register of Historic Places Map; City of Detroit Historic Districts Map 14. Railroad crossing inventories; Michigan DOT TCDS; maps of nearest airports; airport noise contour map; HUD Exchange DNL Calculator 15. Sole Source Aquifer Map 16. National Wetlands Inventory Map 17. National Wild and Scenic Rivers System Map 18. EJ Screen Report Asbestos-Containing Material Inspection, Clement Kern Gardens, prepared by ASTI Environmental, dated April 10, 2023 Hazardous Materials Survey

**List of Permits Obtained:****Public Outreach [24 CFR 58.43]:**

Beginning in 2019, the developer started holding information sessions with the tenants for their input on the redevelopment plans. Ongoing resident engagement continues on a monthly basis. The City of Detroit will post the publication and a copy of this Environmental Assessment on their website during the public comment period.

**Cumulative Impact Analysis [24 CFR 58.32]:**

The cumulative impacts anticipated for this project are primarily associated with providing additional housing units for persons of various incomes in the area. The project is consistent with the City's plan and anticipated growth of the immediate and surrounding neighborhoods and therefore not considered detrimental. There is no

negative cumulative impact on the environment that would result from proposed site development activities.

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

No alternative locations were considered for the Project since the Project consists of redevelopment of an existing residential complex. No variations of site development were proposed, and no scopes or size of the project were changed.

**No Action Alternative [24 CFR 58.40(e)]**

No action could possibly discourage other development near the Project, thereby, negatively affecting the City of Detroit and its revenues. No action does not provide needed housing for low income residents. The existing buildings would continue to deteriorate without proposed development.

**Summary of Findings and Conclusions:**

When completed, the subject property is planned to include a mix of market rate and affordable rental housing options to target a wide range of household incomes. The existing 87-unit complex was constructed in 1985. The property does have substantive capital needs anticipated in the coming years as a number of systems and components have now reached, surpassed, or are approaching the end of their expected useful service lives (EUL). The project will provide quality, modernized market rate and affordable rental housing options to target a wide range of household incomes. The project will provide several benefits to the region and no adverse impacts have been identified.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Historic Preservation	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	N/A	During government-to-government tribal consultation (54 U.S.C. 302706 (b)),	

	<p>monitoring of the site; due to the prevalence of Potawatomi villages and fisheries 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 &amp; 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>		<p>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 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 &amp; 10th Street Flats, West of 10th, and Trumbull Developments) in order to address the</p>	
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			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.	
Contamination and Toxic Substances	<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 of 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.</p> <p>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</p>	N/A	See attached documents and plans.	

	<p>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 soil imported to the subject property as part of the redevelopment will be sampled 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.</p> <p>Following the completion of site grading and hardscape installation, the subject property will be surveyed to confirm that a minimum of four feet of clean fill is present above any potential remaining fill materials.</p>			
Asbestos	Asbestos Mitigation Basement wall texture in each building and fire doors and frame sets were confirmed or presumed asbestos containing. According to the classification guidelines, the wall texture was classified as a Category II non-friable ACM. Prior to demolition of	N/A	Asbestos Abatement Plan and Asbestos Abatement Closeout Report	

	the buildings, an asbestos abatement plan will be completed. These ACMs will be removed by a licensed contractor in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP).			
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**Project Mitigation Plan**

The developer is responsible for implementing the mitigation plan as described during the redevelopment of the property. Following completion of the mitigation plan, the developer or their consultant will create a Documentation of Due Care Compliance that document the activities conducted as part of the mitigation plan and demonstrate that the property is in compliance with Michigan environmental regulations. Once the Documentation of Due Care Compliance is completed, it will be reviewed by the City of Detroit, the Michigan State Housing Development Authority, and finally the Michigan department of Environment, Great Lakes, and Energy (EGLE). Once EGLE is comfortable they will approve the plan concurring that the property is in compliance with the applicable State of Michigan Environmental regulations. Approval of the Documentation of Due Care Compliance is expected to be completed prior to the completion of building construction.

[ResAP - RAP Approval Letter Trumbull Detroit\(1\).pdf](#)

[HRD Model Mitigation Plan - Updated 4-29-2025.pdf](#)

**Supporting documentation on completed measures**

**APPENDIX A: Related Federal Laws and Authorities****Airport Hazards**

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

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No

✓ Yes

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

Yes, project is in an APZ

Yes, project is an RPZ/CZ

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

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

**Screen Summary****Compliance Determination**

Cole A. Young Airport is located approximately 6.12 miles to the northeast, Windsor Airport located approximately 6.44 miles to the southeast, and Detroit Metropolitan is located approximately 15 miles to the southwest. The Project is located approximately 6.12 miles from the nearest civil or commercial service airport. The property is not located in a FAA-designated Airport Runway Clear Zone.



**Supporting documentation**

[Attachment 14 - Noise Documentation for airports revised.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Coastal Barrier Resources**

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

**1. Is the project located in a CBRS Unit?**

✓ No

Document and upload map and documentation below.

Yes

**Compliance Determination**

Review of the US Fish and Wildlife Service Coastal Barrier Resources System Mapper documents the Project is not located within a designated Coastal Zone Management area or Coastal Barrier.

**Supporting documentation**

[Attachment 2 CBRS map revised.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Flood Insurance**

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

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

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

**2. Upload a FEMA/FIRM map showing the site here:**

[Attachment 12 - Flood map.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

**Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?**

✓ No

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

Yes

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

Yes

✓ No

**Screen Summary****Compliance Determination**

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. According to a Federal Emergency Management Agency (FEMA) floodplain map, dated February 2, 2012 (map number 26163C0280E), the subject property is located in an area of minimal flood hazard. Zone X is the area determined to be outside the 500 year flood and protected by levee from 100 year flood.

**Supporting documentation****Are formal compliance steps or mitigation required?**

Yes

✓ No

## Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

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

☒ Yes

☐ No

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

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

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

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

☐ Carbon Monoxide

☐ Lead

☐ Nitrogen dioxide

☒ Sulfur dioxide

- ✓ Ozone
- Particulate Matter, <2.5 microns
- Particulate Matter, <10 microns

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

Sulfur dioxide	75.00	ppb (parts per billion)
Ozone	0.07	ppb (parts per million)

**Provide your source used to determine levels here:**

Review of the EPA de minimis emission levels table available at <https://www.epa.gov/general-conformity/de-minimis-tables> indicates levels for ozone in maintenance areas is 100 tons/year and sulfur dioxide is 100 tons/year.

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

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

**Enter the estimate emission levels:**

Sulfur dioxide	0.00	ppb (parts per billion)
Ozone	0.00	ppb (parts per million)

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

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

**Screen Summary**

**Compliance Determination**

The project's county or air quality management district is in maintenance/attainment for ozone and non-attainment for Sulfur dioxide. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality

management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act. The proposed project will not produce significant emissions beyond de minimis levels and, therefore, meets the definition of an activity classified under air permit exemptions (R 336.1291, Rule 291). Anticipated air emissions from the project are between 1 and 2 tpy criteria pollutant and less than 0.001 tpy lead, fluoride, and mercury. The project is in compliance. A Conformity Letter prepared by Breanna Bukowski, Environmental Quality Analyst for the EGLE Air Quality Division, dated April 29, 2025, indicates the size, scope, and duration of the Trumbull project is similar in scale to a documented project in Orange, California, and the proposed project should not exceed de minimis levels included in the federal general conformity requirements. A detailed conformity analysis was not required. Fugitive Dust Measures to control fugitive dust will be utilized to ensure that construction projects do not result in erosion and formation of dust. The Best Management Practices (BMPs) employed will comply with the City's site plan approval process and will be effective in controlling construction-related fugitive dust.

**Supporting documentation**

[Attachment 1B- Gen Conformity Letter Trumbull Project.pdf](#)

[Attachment 1s -Sulfur Dioxide non-Attainment.pdf](#)

[Attachment 1 - Attainment Status for the National Ambient Air Quality Standards.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Coastal Zone Management Act**

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

**1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?**

Yes

☒ No

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

**Screen Summary****Compliance Determination**

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

**Supporting documentation**

[Attachment 2 a - Coastal Zone Management Map.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

☒ No



**Contamination and Toxic Substances**

General Requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
<a href="https://www.onecpd.info/environmental-review/site-contamination">https://www.onecpd.info/environmental-review/site-contamination</a>		

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

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

\* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

**2. Were any on-site or nearby toxic, hazardous, or radioactive substances\* (excluding radon) found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)**

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

No

Explain:

✓ Yes

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

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

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

Yes

Explain:

✓ No

\* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

**4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?**

✓ Yes

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

No

## 8. Mitigation

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

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

### Can all adverse environmental impacts be mitigated?

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

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

\* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

\*\* Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

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

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 of 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. Clean soil will be imported to the subject property to return the subject property to near the current grade. Any soil imported to the subject property as part of the redevelopment will be sampled 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 the completion of site grading and hardscape installation, the subject property will be surveyed to confirm that a minimum of four feet of clean fill is present above any potential remaining fill materials.

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

Complete removal

Risk-based corrective action (RBCA)

Other

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

\*\* Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

**Screen Summary****Compliance Determination**

A list of previous reports is provided in attachments. CONTAMINATION: Historical activities conducted at the property and nearby properties and deposition of fill material have resulted in soil impact at the property. Metals, PNAs, and VOCs were detected at concentrations exceeding the GRCC for DWP, GSIP, SVIAI, VSIC, and/or DC in the soil samples. On March 17, 2025, EGLE approved the ResAP for the Project. At least four feet of soil will be removed from the entire subject property. The soil will be disposed off-site at a licensed Type 2 landfill. All soils beneath the future building slab will be excavated to remove all urban fill materials from within the building foundation or a minimum of 4 feet bgs. In addition, all former utilities beneath each building will be removed to at least five feet from the building foundation. As part of the excavation activities, the berm area on the southern border of the subject property will be excavated and disposed off-site. The excavation and disposal will be conducted in compliance with the applicable local, State, and Federal regulations. A former alley runs east to west across the subject property at the center of the parent parcel. During the redevelopment of the subject property there is the potential for unanticipated conditions such as orphan USTs or abandoned utilities to be encountered within the form alley right-of-way. Should an unanticipated condition be encountered within the right-of-way or the subject property at large, the encountered condition(s) will be handled appropriately in compliance with all applicable local, state, and federal regulations. In addition, EGLE, MSHDA, and the City of Detroit personnel will be notified of the unanticipated condition(s) and consulted regarding the selected assessment and/or remedy(s). ASBESTOS: Please see the April 2023 report prepared by ASTI. The report indicates an asbestos survey was conducted for all 12 buildings located on the 8.8-acre parcel, which includes Parcel D. Basement wall texture in each building and 40 sets of fire doors and frame sets were confirmed or presumed asbestos containing. According to the classification guidelines, the wall texture was classified as a Category II non-friable ACM. No renovations have been conducted since April 2023. As such, the 2023 asbestos survey is considered valid (as these reports have no expiration dates). HAZARDOUS MATERIALS/PRE DEMOLITION SURVEY: Lead-based paint is not anticipated to be present. Universal Waste and other identified potential hazardous that are present at the subject property will be handled, removed, transported, and disposed of in accordance with applicable local, state, and federal requirements. During an asbestos containing materials inspection conducted by ASTI on March 27, 2023, ACMs were identified on the subject property. Basement wall texture (white) within the existing building. In addition, the fire doors and frames within the building were presumed to be ACMs. These ACMs should be removed by a licensed contractor in accordance with the NESHAP.

**Supporting documentation**

[Attachment 3b Hazardous Materials Survey.pdf](#)

[Attachment 3 -\(A5\) CKG Phase II ESA 10-4-23.pdf](#)  
[Attachment 3 - List of Reports and Documents for the Property supplemental.pdf](#)  
[Attachment 3 - Response Activity Plan Parcel D - FINAL.pdf](#)  
[Attachment 3 - ResAP - RAP Approval Letter Trumbull Detroit.pdf](#)  
[Attachment 3 -\(A4\) CKG Phase I \(ASTI\) Reduced.pdf](#)  
[Attachment 3 -\(A1\) CKG Phase I Environmental 6-12-03 \(Protons\).pdf](#)  
[Attachment 3 - \(A3\) CKG Phase I \(ASTI\) 9-30-22.pdf](#)  
[Attachment 3 - \(A2\) CKG Phase II 7-7-03.pdf](#)  
[attachment 3 CKG ACM Report 4-26-23.pdf](#)  
[Attachment 3 b summary of previous reports and surveys.pdf](#)

**Are formal compliance steps or mitigation required?**

✓ Yes

No

**Endangered Species**

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service ("FWS" and "NMFS" or "the Services").	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i> ); particularly section 7 (16 USC 1536).	50 CFR Part 402

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

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

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

- ✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

**2. Are federally listed species or designated critical habitats present in the action area?**

- ✓ No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

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

Documentation may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.

Yes, there are federally listed species or designated critical habitats present in the action area.

**Screen Summary****Compliance Determination**

The U.S. Fish and Wildlife Service Information for Planning and Consultation (iPac) tool was referenced. A list of protected species obtained identified the Indiana bat (Endangered), the Rufa Red Knot (Threatened); The Eastern Massasauga (Threatened); The Monarch Butterfly (Proposed Threatened); and the Eastern Prairie Fringed Orchid (Threatened). The Indiana bat hibernate in caves, mines, or similar structures during the winter. During the summer, they prefer forested/wooded habitats where the roost forage and travel to some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields. Small numbers of rufa red knots sometimes use manmade freshwater habitats along inland migration routes. Rufa red knots generally nest in dry, slightly elevated tundra locations, often on windswept slopes with little vegetation. The Eastern Massasauga maybe found in variety of wetland habitats, particularly prairie fens, and lowland coniferous forested, such as cedar swamps. Monarch butterflies live mainly in prairies, meadows, grasslands and along roadsides, across most of North America. The Eastern Prairie Fringed Orchid prefers wet habitats in full sun, like prairies and sedge meadows. No critical habitats were identified at the Site location. No wetland areas are present on the subject property. The subject property is located in an urban area which has been developed since at least 1884. Based on this information, the identified endangered species are not likely present on the subject property. Furthermore, the species identified above have never been observed at the project location, and no suitable habitats are located at the property.

**Supporting documentation**

[Attachment 9 - IPAC.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No



**Explosive and Flammable Hazards**

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

**1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?**

☒ No

☐ Yes

**2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?**

☐ No

☒ Yes

**3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:**

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

☐ No

☒ Yes

**4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?**

✓ Yes

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

No

**Screen Summary**

**Compliance Determination**

In accordance with HUD's Guidebook entitled "Siting of HUD-Assisted Projects Near Hazardous Facilities"(hereafter "Guidebook"), SES searched a 1-mile radius around the Project for above ground storage tanks (ASTs) containing flammable materials based on review of a 2022 regulatory database report. Review of the regulatory database documented 12 active AST sites within a one-mile radius of the subject property. Based on tank distances and the presence of numerous buildings between the properties and the subject property, the ASTs are not anticipated to have any impact on the proposed developments associated with the project.

**Supporting documentation**

[Attachment 10-11 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10-10 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10-9 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10-7 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10-8 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10-6 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10-5 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10-12 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10-3 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10-2 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10 - 1 Acceptable Separation Distance \(ASD\) Electronic Assessment Tool - HUD Exchange.pdf](#)

[Attachment 10 - blast map.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Farmlands Protection**

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

**1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?**

Yes

✓ No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

The property currently consists of developed land.

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

**Screen Summary****Compliance Determination**

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

**Supporting documentation**

[Attachment 11 - Farmland Classification.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No



**Floodplain Management**

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

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

Yes

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

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

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

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

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

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

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

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

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

or other HUD assistance.

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

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

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

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

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

Describe:

✓ No

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

Yes

Describe:

✓ No

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

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information<sup>1</sup> to determine flood elevation. Include documentation and an explanation of why this is the best available information<sup>2</sup> for the site. Note that newly constructed and substantially improved<sup>3</sup> structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

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

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

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

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

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

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



5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

**Screen Summary**

**Compliance Determination**

This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.

**Supporting documentation**

[Attachment 12 - Flood map\(1\).pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Historic Preservation

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

### Threshold

#### Is Section 106 review required for your project?

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA ). (See the PA Database to find applicable PAs.)

No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

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

### Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Office (SHPO) Completed

- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

- ✓ Bay Mills Indian Community Completed
- ✓ Forest County Potawatomi Community Completed  
of Wisconsin

✓ Grand Traverse Band of Ottawa & Chippewa Indians	Completed
✓ Hannahville Indian Community	Completed
✓ Ketegitigaaning Ojibwe Nation	Completed
✓ Keweenaw Bay Indian Community	Completed
✓ Lac du Flambeau Band of Lake	Completed
✓ Little River Band of Ottawa Indians	Completed
✓ Little Traverse Bay Bands of Odawa Indians	Completed
✓ Match-E-Be-Nash-She-Wish	Completed
✓ Menominee Indian Tribe of Wisconsin	Completed
✓ Miami Tribe of Oklahoma	Completed
✓ Michigan Anishinaabek Cultural	Completed
✓ Nottawaseppi Huron Band	Completed
✓ Pokagon Band of Potawatomi Indians	Completed
✓ Saginaw Chippewa Indian Tribe of Michigan	Completed
✓ Sault Ste. Marie Tribe of Chippewa	Completed
✓ Seneca Cayuga Nation	Completed

#### Other Consulting Parties

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

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.

Document and upload all correspondence, notices and notes (including comments and objections received below).

#### Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

Yes  
No

#### *Step 2 – Identify and Evaluate Historic Properties*

1. Define the Area of Potential Effect (APE), either by entering the address(es) or

**uploading a map depicting the APE below:**

The direct APE consists solely of the site located at 1511-1795 Bagley Street, Parcel ID: 08000246-346, Detroit, Michigan 48216

**In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.**

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
Corktown Local Historic District	Listed	Yes	✓ Not Sensitive

**Additional Notes:**

Upon site plan review, the City of Detroit Preservation Specialist has determined that the new construction will not adversely affect the Corktown Historic District. The proposed new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old. The new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

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

✓ Yes

Document and upload surveys and report(s) below.

For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

**Additional Notes:**

Upon site plan review, the City of Detroit Preservation Specialist has determined that the new construction will not adversely affect the Corktown Historic District. The proposed new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old. The new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

No

***Step 3 –Assess Effects of the Project on Historic Properties***

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

**Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.**

No Historic Properties Affected

✓ No Adverse Effect

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

**Document reason for finding:**

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 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.

**Does the No Adverse Effect finding contain conditions?**

✓ Yes (check all that apply)

Avoidance

Modification of project

✓ Other

Describe conditions here:

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 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.

No

Adverse Effect

**Screen Summary****Compliance Determination**

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: Other. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106. 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 at the following conditions are met: \* The work is conducted in accordance with the specifications submitted to the Preservation Specialist on 7/18/2024, 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. \* The archaeological monitoring plan, dated 9/16/24, is followed.

**Supporting documentation**

[Attachment 13 - Heartsong\\_Proposed\\_Archaeological\\_Monitoring\\_Plan 3-19-25.pdf](#)  
[Attachment 13 - CK\\_Trumbull\\_Parcel D\\_CNAE Section 106 Letter 5-27-25.pdf](#)  
[Attachment 13- SECTION 106 REVIEW CERTIFICATE OF COMPLETION March 2024.pdf](#)  
[Attachment 13- RE\\_City of Detroit Tribal Consultation - Clement Kern Gardens- Phase I-Bagley Townhomes and Flats on 10th-Monitoring.pdf](#)  
[Attachment 13- City of Detroit Clement Kern Gardens\\_MBPI Response 010424.pdf](#)  
[Attachment 13- ArchSummaryMemo\\_Trumbull Parcel D.pdf](#)  
[Attachment 13- Forest County Potawatomi RE\\_City of Detroit Tribal Consultation - Clement Kern Gardens.pdf](#)  
[Attachment 13 - Tribes Consulted - Full Names.pdf](#)  
[Attachment 13-CKG SHPO Response 7-21-23.pdf](#)  
[Attachment 13- CKG SHPO Response Letter \(ER96-1\\_23\\_1811-1795Bagley\) 12-4-23.pdf](#)  
[Attachment 13 - National Register of Historic Places map.pdf](#)  
[Attachment 13- Historic District for Detroit for north and east adjoining properties.pdf](#)  
[Attachment 13 - CKG Sec 106 Application 71023\\_redacted.pdf](#)  
[Attachment 13 - City of Detroit Historic District map.pdf](#)

**Are formal compliance steps or mitigation required?**

✓ Yes

No

**Noise Abatement and Control**

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

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

- ✓ New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

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

An interstate land sales registration

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

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

**Indicate the findings of the Preliminary Screening below:**

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



- ✓ Noise generators were found within the threshold distances.

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

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

Indicate noise level here: 58

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

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Unacceptable: (Above 75 decibels)

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

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

Indicate noise level here: 58

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

### **Screen Summary**

#### **Compliance Determination**

A Noise Assessment was conducted. The noise level was acceptable: 58.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation. Calculations were entered into the HUD Exchange Day /Night Noise Level Calculator, available at <https://www.hudexchange.info/environmental-review/dnl-calculator/> Review of aerial photography and topographic maps conducted to determine the presence of railroads within 3,000 feet of proposed development. Two railroads are located within 3,000 feet of the proposed development. The railroads are located approximately

1,640 feet to the southwest and 2,600 feet to the south. A Federal Railroad Administration Office of Safety Analysis Crossing Inventory sheet was reviewed for these railroads. Review of five railroad crossing inventory documents for Bagley Street and Rosa Parks Boulevard were reviewed for the Penn Central Railroad located to the southwest. No rail traffic operations were documented on each of the sheets for the railroad line to the southwest. Review of crossing inventory sheets for the rail line to the south documented the nearest crossing as Ambassador Bridge (2,440 feet from property), and 20 rail cars were documented. The DNL calculator was used to assess noise from railroad operations. The railroad DNL is 54 dB, which is below HUD's Acceptable (<65 dB) range. The Project is located within 15 miles of three civil airports: Coleman A. Young Airport is located 6.12 miles to the northeast, Windsor Airport located approximately 6.44 miles to the southeast, and Detroit Metropolitan is located approximately 15 miles to the southwest. An Airport Noise Worksheet was used to calculate noise levels at the airports; and given an evaluation of aviation operations and per HUD guidelines (less than 9,000 air carriers per day, less than 18,000 air taxis per day, less than 18,000 military crafts per day, and less than 72,000 total operations per day), it can be assumed that the noise attributed to the airplanes will not extend beyond the boundaries of the airports. An Airport Master Record was obtained through the U.S. Department of Transportation Federal Aviation Administration. The annual number of operations at both facilities does not exceed thresholds provided in the HUD Airport Noise Worksheet. Additionally, SES reviewed a 2011 Airport Noise Exposure Contours map, which documents noise levels not exceeding 55 dBs extend off the airport property to the east but more than 5 feet from the subject property. The Michigan Department of Transportation Traffic County Database System (TCDS) was reviewed to determine the presence of busy roadways within 1,000 feet of the subject property. The HUD (DNL) Calculator was utilized to obtain a DNL for the potential roadway noise sources. Using this data, SES performed calculations from the Project boundary to the potential noise source. Michigan Avenue is located 760 feet to the north, and data from 2015 documents traffic counts as exceeding 10,000. The calculation was completed for a projection for 2025, assuming a 1% traffic increase per year. SES used the "Major Arterial - Urbanized Area" values to determine the noise calculation, which assumed 92% automobiles, 4% medium trucks, and 4% heavy trucks. The DNL from the roadway source (Michigan Avenue) to the property boundary (920 feet) was calculated. The roadway DNL is 55 dB, which is below HUD's Acceptable (<65 dB) range. As a precautionary measure, a 1% traffic increase was used to estimate traffic volumes through 2034. The DNL is 55 dB, which is below HUD's Acceptable (<65 dB) range. The combined DNL for each noise source (based on the 2015 to 2025 traffic projections as well as the 2015 to 2034 projections) is 58 dB which is below HUD's Acceptable (<65 dB) range. Based on the calculated DNL, noise mitigation is not required.

#### **Supporting documentation**

[Attachment 14 - Day\\_Night Noise Level \(DNL\) Calculator - HUD Exchange Parcel D.pdf](#)

[Attachment 14- Noise Contours for Detroit Metro.pdf](#)

[Attachment 14 - Noise Documentation for airports revised\(1\).pdf](#)

[Attachment 14- Airport 5010 Detroit metro.pdf](#)

[Attachment 14 - Roadway Noise projections revised.pdf](#)

[Attachment 14 - Railroad noise SW\(3\).pdf](#)

[Attachment 14 - Railroad noise SW thrid.pdf](#)

[Attachment 14 - Railroad noise SW second option.pdf](#)

[Attachment 14 - Railroad noise SW fourth to west.pdf](#)

[Attachment 14 - Railroad noise Bagley Street intersection.pdf](#)

[Attachment 14 - Railroad noise Ambassador Bridge.pdf](#)

[Attachment 14 - Map distance from Parcel D to Michigan Avenue and RR.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Sole Source Aquifers**

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

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

✓ No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

**Screen Summary****Compliance Determination**

The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.

**Supporting documentation**

[Attachment 15 - Sole Source Aquifer Map.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Wetlands Protection**

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

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

No

✓ Yes

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

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

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

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

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

**Screen Summary****Compliance Determination**

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[Attachment 16 - Wetlands Map.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Wild and Scenic Rivers Act**

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

**1. Is your project within proximity of a NWSRS river?**

✓ No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

**Screen Summary****Compliance Determination**

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

**Supporting documentation**

[Attachment 17 - Wild and Scenic Rivers Map.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No



**Environmental Justice**

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?

Yes

✓ No

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

**Screen Summary****Compliance Determination**

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

**Supporting documentation**

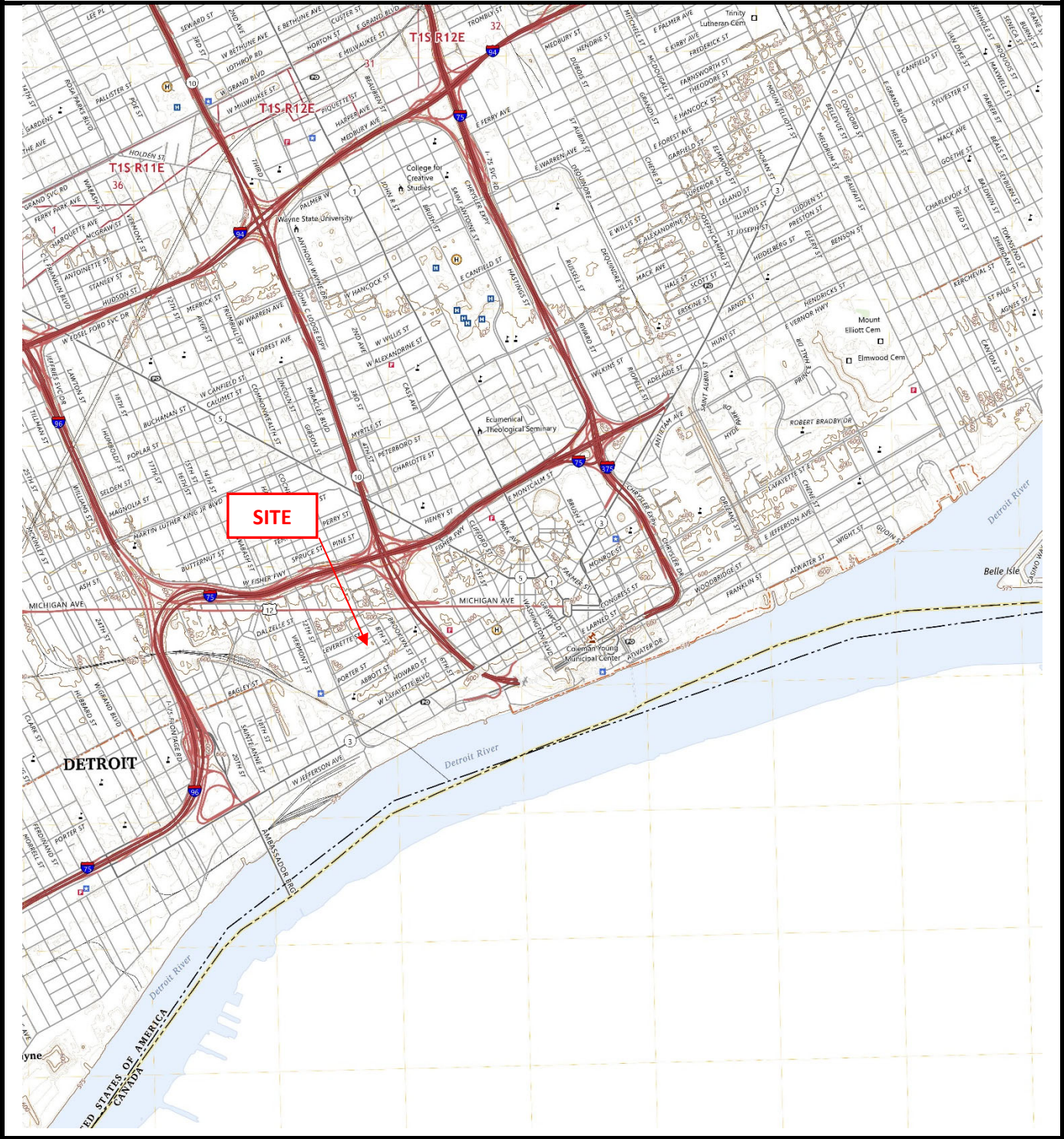
[Attachment 18- EJScreen Community Report.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

**Detroit, Michigan 7.5 Minute Quadrangle Map**  
**(Published 2023)**



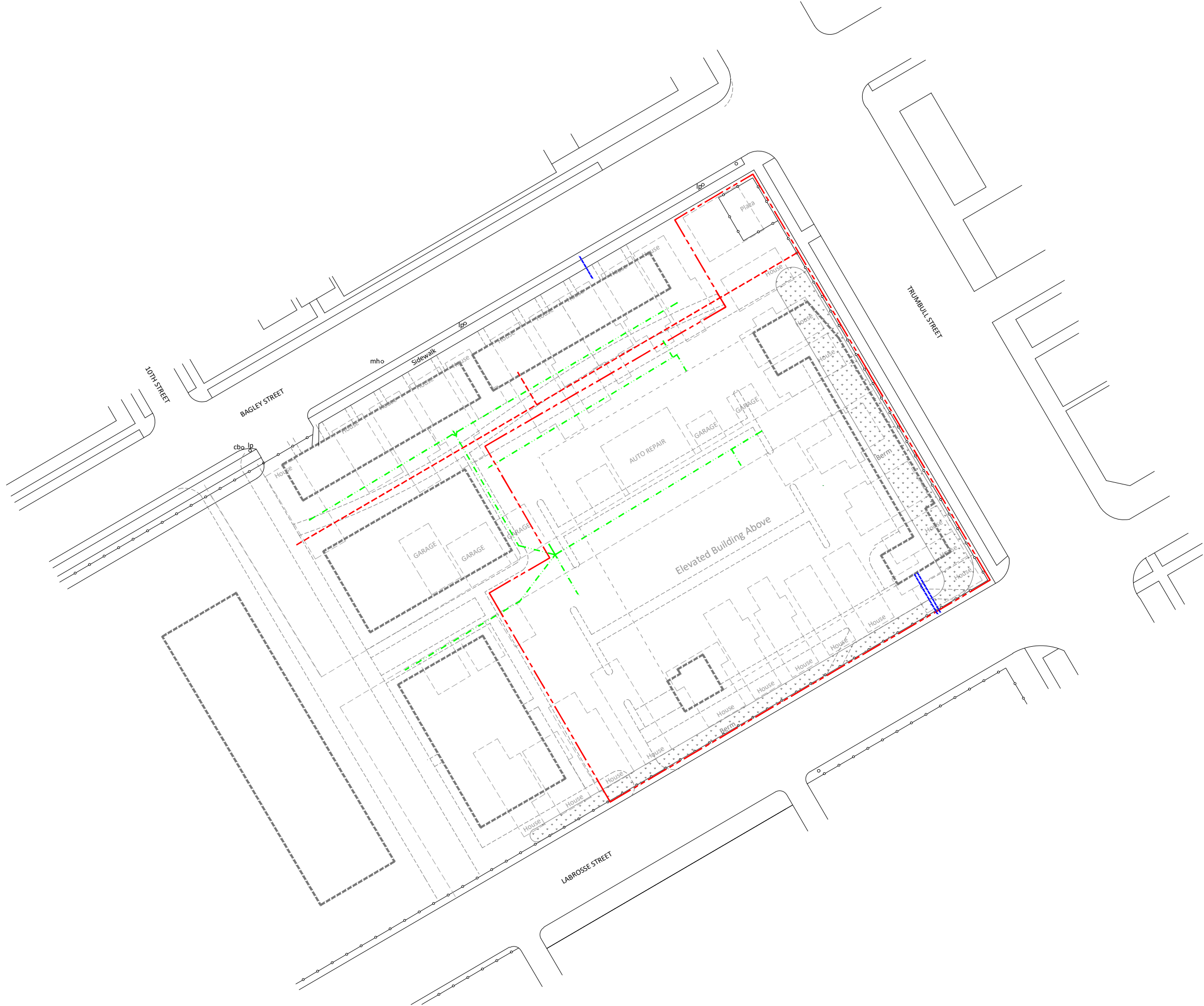
CONTOUR INTERVAL 10 FEET  
Site Boundaries Shown are Approximate

**SITE LOCATION MAP**

Trumble (Parcel D)  
1601 Bagley Street  
Detroit, Wayne County, Michigan  
SES Project No.: 2024219

**Figure 1**





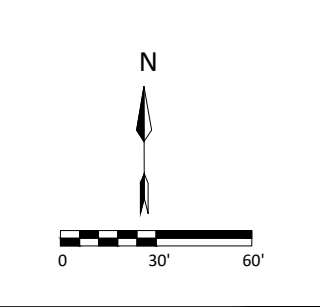
Location  
**ACD**  
American Community Developers  
1601 Bagley Avenue  
Detroit, Michigan 48216

Title  
**TRUMBLE (PARCEL D)  
PROPOSED DEVELOPMENT  
WITH HISTORICAL FEATURES**

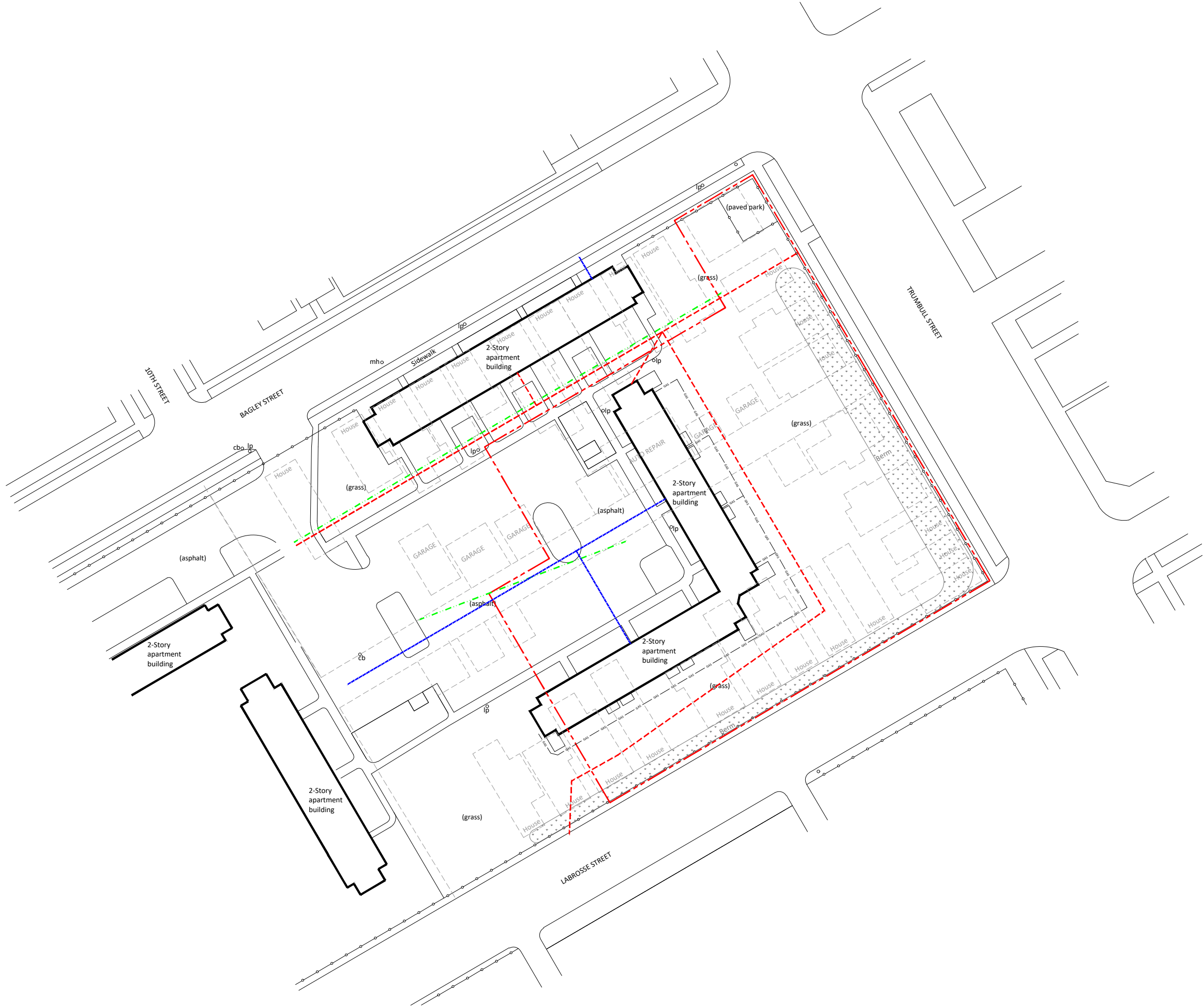
- Legend
- PROPERTY BOUNDARY
  - FENCE LINE
  - PROPOSED PAVEMENT
  - SEWER LINE
  - ELECTRIC
  - WATER
  - NATURAL GAS LINE
- cb CATCH BASIN  
pp POWER POLE  
mh MANHOLE  
lp LIGHT POLE  
PROPOSED BUILDING  
FORMER BUILDINGS (Sanborn mapping, 1961)

- Notes
- Base map from Google Earth Imagery, May 2023
  - Sample grid on 30' spacing

Project	2024219	Scale	1" = 60'
Date	1/29/25	Checked	be
Drawn	dn	Figure	2B
File	2024219		







Location  
**ACD**  
American Community Developers  
1601 Bagley Avenue  
Detroit, Michigan 48216

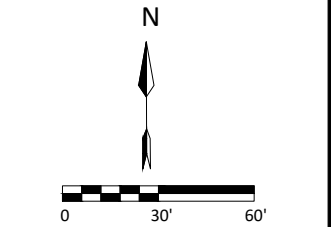
Title  
**TRUMBLE (PARCEL D)  
CURRENT DEVELOPMENT  
WITH HISTORICAL FEATURES**

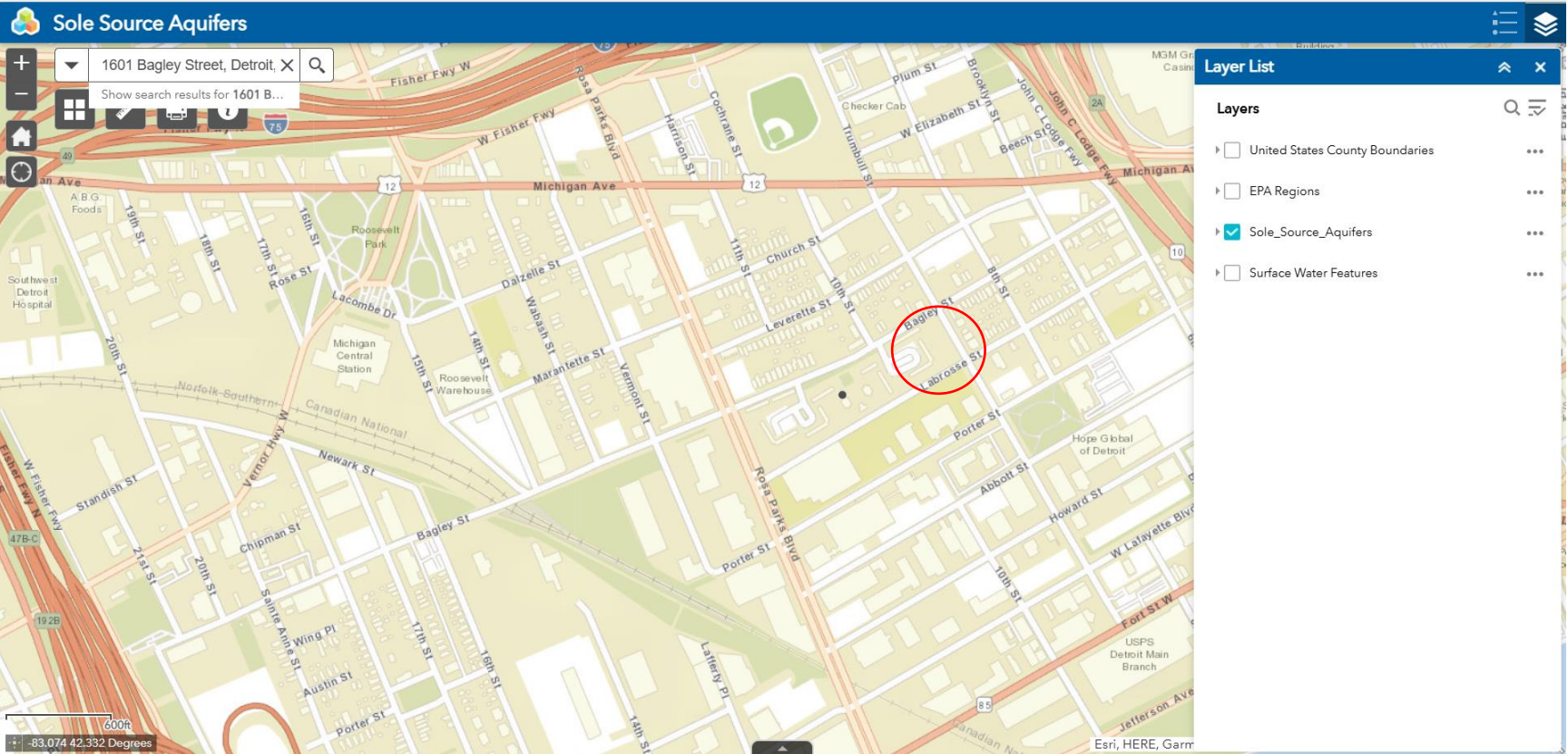
- Legend
- PROPERTY BOUNDARY
  - FENCE LINE
  - SEWER LINE
  - ELECTRIC
  - WATER
  - NATURAL GAS LINE
- 
- cb CATCH BASIN
  - pp POWER POLE
  - mh MANHOLE
  - lp LIGHT POLE
- 
- CURRENT BUILDING
  - FORMER BUILDINGS (Sanborn mapping, 1961)

Notes

- Base map from Google Earth Imagery, May 2023
- Sample grid on 30' spacing

Project	2024219	Scale	1" = 60'
Date	1/29/25	Checked	be
Drawn	dn	Figure	2A
File	2024219		





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# Day/Night Noise Level (DNL) 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 \(/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/\)](#).

## 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

<b>Site ID</b>	Parcel D
<b>Record Date</b>	04/29/2025
<b>User's Name</b>	SES Environmental

<b>Road # 1 Name:</b>	Michigan Avenue
-----------------------	-----------------

**Road #1**

<b>Vehicle Type</b>	<b>Cars</b> <input checked="" type="checkbox"/>	<b>Medium Trucks</b> <input checked="" type="checkbox"/>	<b>Heavy Trucks</b> <input checked="" type="checkbox"/>
Effective Distance	760	760	760
Distance to Stop Sign			
Average Speed	35	35	35
Average Daily Trips (ADT)	12494	543	543
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNI	47	43	54

Vehicle DNL	77	78	79
Calculate Road #1 DNL	55	Reset	
<b>Railroad #1 Track Identifier:</b> Penn and Wester			
<b>Rail # 1</b>			
<b>Train Type</b>	<b>Electric</b> <input type="checkbox"/>	<b>Diesel</b> <input checked="" type="checkbox"/>	
Effective Distance		2440	
Average Train Speed		10	
Engines per Train		2	
Railway cars per Train		50	
Average Train Operations (ATO)		20	
Night Fraction of ATO		50	
Railway whistles or horns?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	
Bolted Tracks?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	
<b>Train DNL</b>	0	54	
Calculate Rail #1 DNI	54	Reset	



Calculate Road / Rail DNL	51	Reset
Add Road Source	Add Rail Source	
Airport Noise Level		
Loud Impulse Sounds?	<input type="radio"/> Yes <input type="radio"/> No	
Combined DNL for all Road and Rail sources	58	
Combined DNL including Airport	N/A	
Site DNL with Loud Impulse Sound		
Calculate	Reset	

## 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** (</programs/environmental-review/hud-environmental-staff-contacts/>)
  - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
  - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
  - Incorporate natural or man-made barriers. See *The Noise Guidebook* (</resource/313/hud-noise-guidebook/>)
  - Construct noise barrier. See the **Barrier Performance Module** (</programs/environmental-review/bpm-calculator/>)

## Tools and Guidance

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

Day/Night Noise Level Assessment Tool Flowcharts (</resource/3823/day-night-noise-level-assessment-tool-flowcharts/>)

## **Proposed Archaeological Monitoring Plan**

Monte Lawton, RPA

A preliminary review of the Direct APE found that the entire property surface is landscaped with fill material, and therefore traditional archaeological methods such as pedestrian survey or shovel testing are not viable methods of Phase I assessment of the property prior to construction work. Historic and modern environmental data as well as archival documentation informed the archaeological sensitivity analysis. Archival research permitted the emphasis of areas which are indicated to have hosted structures in the past or which have previously documented sites and the high possibility of buried intact archaeological features which predated the paving and possibly even the nearby structures. The potential locations of foundations have been mapped using Sanborn Fire Insurance maps and the locations of the buildings have also been noted so as to indicate those locations which are most likely to contain intact deposits between the formerly present structures. The search for intact archaeological resources can be best achieved by the application of an archaeological monitoring plan. Therefore, **Heartsong Archaeology recommends monitoring** of all ground disturbing construction work in order to identify, document, and evaluate any buried archaeological deposits. The archaeologist will have the authority to stop all ground disturbing work when cultural resources or human remains are identified during monitoring. All work must stop immediately within 100 feet of any inadvertently discovered human remains. It is a crime to ignore the presence of human remains during ground disturbing work and/or to desecrate a burial (Michigan Attorney General Opinion #6585). If cultural materials not associated with human remains are identified, a buffer of at least 50 feet or a distance determined by the archaeologist will be placed around the identified cultural resources and no work will take place within that buffer until the archaeologist has been able to assess the feature and has authorized it. If the previous construction activity has previously disturbed all possible archaeological contexts, archaeological monitoring will be able to determine this and monitoring will conclude at the discretion of the archaeologist in charge, who will first confer with the State Historic Preservation Office Archaeology Team before ending monitoring at the location.

Monitoring shall be conducted by a United States Secretary of the Interior (SOI) qualified professional archaeologist (Appendix A to 36 CFR Part 61). Selection of an archaeologist with relevant specialization (precontact or historic) for monitoring is based upon the type of deposits anticipated. In this case, due to the multiple known historic structures previously present on the Direct APE, an archaeologist with experience in historic archaeology is preferred. This qualified archaeologist should be present for all ground disturbing activities that take place as a part of the project, per the project description. At the discretion of the monitoring archaeologist, excavation or other ground disturbing activities must be halted any time a suspected archaeological feature or deposit is encountered. Excavations in the area of the discovery must remain halted until the archaeologist can determine the nature, extent, and age of the archaeological deposit. If initial examination determines that the deposit may have sufficient integrity and content to be considered

potentially eligible for nomination to the NRHP, all further excavations in the vicinity of the deposit (a minimum of 15 feet) must be halted until a complete eligibility determination can be made. In this case, excavations outside of the find location may proceed with continued monitoring.

Reporting subsequent to the construction work will include a map showing the location of all excavations, surface structures, topography, and identified archaeological deposits within the project area where monitoring occurred. Representative profiles of all excavations will be recorded in the field with both photographs and illustrations. Circumstances that limit or prevent visual examination of project excavations will be described in the report, and the unexamined or minimally examined areas delineated on a project map.

If archaeological deposits are encountered, the boundaries of the deposit or site will be delineated both horizontally and vertically. If a site is identified during stripping, slab removal, or other surface exposure, delineation via shovel testing may be appropriate to determine the limits. If a site is identified within a mechanically excavated trench and shovel testing is not practical, cores or augers may be used to define site limits and avoid substantial impact to the site. If further mechanical excavation is necessary, it should be limited to the minimum number of trenches necessary to provide approximate site limits. The locations of cultural materials more than 50 years old but that do not otherwise meet the qualifications to be recorded as a site may be recorded as an isolated find and will be included in the report on monitoring investigations. A site form (or site update form, as appropriate) will be filed for every site identified during the course of monitoring work. Additionally, sites located during monitoring will be evaluated for NRHP eligibility, and this documentation will be included as part of the report. All documented isolated finds, features, and site boundaries will be recorded with a 1 cm accuracy capable Trimble DA2 GPS unit using RTK correction.

The Urban Land complexes which comprise the soils of the Direct APE are associated with varying levels of human transported fill material. These fill layers will be carefully assessed to prevent an otherwise natural or historical deposition layer from being mistaken to be a layer of secondary deposition or fill material. The types of artifacts observed within the layers of fill will be recorded along with the strata's color, texture, structure, and position.

The majority of features are anticipated to consist of historic structural and foundations, footings, rubble piles, and abandoned utility infrastructure like buried pipes. Foundations and footings will be exposed and further cleaned by hand excavation, given a datum-based location, and photographed. Aspects noted will be restricted to construction type, material, wall orientation, and dimension. Rubble piles will be described by their contents and estimated sizes. Utility features will also be noted with their material and sizes. Utility features and rubble piles will also be given a datum-based location and photographed. Spoil piles from trenching and grading will be examined for diagnostic artifacts and strong densities of artifacts. All diagnostic in situ historical artifacts will be collected

and all precontact artifacts will be collected. Non-diagnostic historical artifacts as well as architectural debris will be recorded with estimated counts and a select number photographed at the monitor's discretion. If the large volume of non-diagnostic material makes this impractical, quantities may be estimated by counting the artifacts within a sample area. All recovered materials will be placed in bags or containers with labels that list the project and provenience information.

All field forms, photographs, and documentation will be retained. Bagged and labeled materials will be returned to the laboratory for processing, analysis, and pre-curation treatment, after which the artifacts will be handed over to the landowner(s) or a designated curation facility. Artifacts will be submitted to the Gordon L. Grosscup Museum of Anthropology for curation for those items recovered in the City of Detroit. The disposition of human remains, if any are identified, will follow the guidelines set out by the Native American Graves Protection and Repatriation Act (NAGPRA) if applicable, as well as the City of Detroit Unanticipated Discoveries Plan (Appendix A).

### **Site Delineation and Eligibility Determination Procedures**

Those historic sites which date to a time after the subdivision of the lots will be defined by lot boundaries. This is premised upon the concept that features and artifacts within a lot will have a primary association with the former residents of the lot. In instances where artifact densities and features cross the boundaries of lots, association will be considered on an individual basis. Artifacts will be analyzed so as to make determinations of National Register of Historic Places (NRHP) eligibility though it is not proposed that Heartsong Archaeology conduct analysis of the technological or manufacturing characteristics of artifacts. If properties are considered to;

- A. be associated with events that have contributed to the broad patterns of history; or,
- B. be associated with the lives of persons significant in our past; or,
- C. embody the distinctive characteristics of type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant or distinguishable entity whose components may lack individual distinction; or,
- D. have yielded, or may be likely to yield, information important in prehistory or history

they may be eligible for listing on the NRHP. At least one of the above criteria must be met for this listing, additionally the site must contain integrity. Integrity is considered the authenticity of a property's historic identity demonstrated in the survival of physical components that existed during the historic or precontact period usage of the property. Historic integrity will always involve several if not all of the seven necessary aspects; location, design, setting, materials, workmanship, feeling, and association.

Archaeological sites are usually evaluated with regard to Criterion D, however all of these criteria can be applied to archaeological properties. Archaeological integrity is determined by the site's

potential to offer data that can be addressed by significant research questions. Very important for archaeological integrity is the vertical stratification of deposits from different periods. This stratification or separation of older and more recent deposits permits archaeologists to examine associated materials and activity patterns within each segregated layer in a manner which would be impossible if these layers had become mixed by a destructive activity. This integrity can be gleaned from the careful assessment of soil/sediment horizons during excavation and the degree of fragmentation of materials identified within each horizon.

The visibility and focus of archaeological sites is often considered during the NRHP evaluation process. Visibility is defined by Hardesty and Little (Hardesty and Little 2000:46) as, “the relative abundance of material remains. It is the extent to which the physical remains of a historic property have survived and are observable today.” Focus is described by Hardesty and Little as, “the degree to which the physical remains are readable or interpretable and can be linked to the historic property (Hardesty and Little 2000:46).” Low artifact densities and poor artifact class diversity can be considered aspects which make a site low in visibility. Sites which contain secondary deposits or multiple occupations which have been mixed by disturbance or plowing are considered to lack focus. Archaeological sites are more affected by focus than visibility in the determination of eligibility for Criterion D (Hardesty and Little 2000:46).

### **Summary of Recommendations**

The Direct APE located at 1181-1175 Bagley St in Detroit, Wayne County MI, is presently a series of parcels associated with the . It is therefore not amenable to traditional archaeological methods like shovel testing or pedestrian survey prior to construction work. The area once hosted a nineteenth century historical period neighborhood including several yards and dwellings and is also located proximal to a previous iteration of the Detroit river. These factors make the Direct APE an area of high archaeological sensitivity, and the likelihood of encountering buried archaeological resources in this area is high. Detroit’s archaeological and cultural history consists of both Native American or indigenous (precontact) components as well as post-Euro-American settlement (historic) components. There is a buried horizon of sandy loam which could be associated with a former land surface, one that remains largely intact despite all of the surrounding construction and surficial landscaping. Previous archaeological investigation has found that both precontact and historical categories of archaeological resources are present within the vicinity of the Direct APE (see Lawrence and Parker 2023). The monitoring company’s involvement will not address specific research questions and will be primarily aimed at identifying buried archaeological deposits for documentation and evaluation during the course of planned construction work.

**Heartsong Archaeology recommends monitoring** of all ground disturbing construction activities that take place within the Direct APE as part of this project. Monitoring will be conducted by a SOI qualified professional archaeologist, who should be present for all ground disturbing activities that

take place as a part of the project, per the project description. At the discretion of the monitoring archaeologist, excavation or other ground disturbing activities must be halted any time a suspected archaeological feature or deposit is encountered. Excavations in the area of the discovery must remain halted until the archaeologist can determine the nature, extent, and age of the archaeological deposit. If initial examination determines that the deposit may have sufficient integrity and content to be considered potentially eligible for nomination to the NRHP, all further excavations in the vicinity of the deposit must be halted until a complete eligibility determination can be made. In this case, excavations outside of a 50 feet buffer (or a distance determined appropriate by the archaeologist) the find location may proceed with continued monitoring. If human remains are identified, work must stop immediately for a buffer of at least 100 feet around the inadvertent discovery.

If archaeological deposits are encountered, the boundaries of the deposit or site will be delineated both horizontally and vertically. Shovel testing or cores/augers may be used to determine the limits of identified sites as appropriate. Identified sites and isolated finds will be documented as appropriate and this information will be submitted as part of the report, along with NRHP evaluation of any newly identified sites. All documented archaeological resources will be recorded with a 1 cm accuracy capable Trimble DA2 GPS unit with RTK correction. Heartsong Archaeology is not proposing to conduct Tribal consultation or public outreach, which are the agency or responsible entity's duties. The disposition of human remains, if any are identified, will follow the guidelines set out by the Native American Graves Protection and Repatriation Act (NAGPRA) if applicable, as well as the City of Detroit Unanticipated Discoveries Plan (Appendix A). An archaeological report will be prepared and submitted to the client and the City of Detroit which meets the standards of the Michigan SHPO.

## **APPENDIX A**

### **Detroit Unanticipated Discoveries Plan**

#### **Purpose**

This document outlines the procedures to prepare for and address the unanticipated discovery of historic properties or human remains for the 1181-1175 Bagley Detroit Project. It provides direction to personnel and their consultants regarding the proper procedures to follow in the event that unanticipated historic properties or human remains are encountered during construction. An unanticipated discovery can result when previously undocumented or unknown historic properties are discovered during the course of construction, demolition, or other work undertaken for remodeling projects. Work should be conducted in accordance with the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation.

**Historic structures** or buildings can be districts, sites, buildings, structures, or objects significant in American history, architecture, engineering, archaeology, or culture at the national, State, or local level. Sometimes elements of historic buildings or structures may be hidden by recent additions or alterations. For example, siding may obscure the historic character of a historic home or log cabin.

**Cultural materials** include man-made objects (prehistoric and historic period items) and features (e.g., walls constructed of natural materials such as cobbles; surfaces paved by cobbles, brick, or other material; or other remnants of cultural activity).

Examples of cultural materials include:

Accumulation of shell, burned rocks, or other food related materials, Bones or small pieces of bone, An area of charcoal or very dark stained soil with artifacts, Stone tools or waste flakes (i.e., an arrowhead, or stone chips), Clusters of tin cans or bottles, Logging or agricultural equipment that appears to be older than 50 years, Buried railroad tracks, decking, or other industrial materials.

**Human remains** are physical remains of a human person or persons, including, but not limited to, bones, teeth, hair, ashes, and preserved soft tissues (mummified or otherwise preserved) of an individual. Remains may be articulated or disarticulated bones or teeth. Any human remains, regardless of antiquity or ethnic origin, will at all times be treated with dignity and respect.

#### **A. PROCEDURES FOR UNANTICIPATED DISCOVERY OF HISTORIC BUILDINGS OR STRUCTURES OR CULTURAL MATERIALS**

**STOP WORK.** If any professional employee, contractor, or subcontractor believes that they have uncovered a historic property, object, or human remains at any point in the project, all work within 100 feet of the discovery must stop. The discovery location should be secured and monitored at all times to prevent looting. Minimize movement of vehicles and equipment in area immediately



surrounding the discovery. For the unanticipated discovery of human remains, Native American funerary objects, sacred objects, items of cultural patrimony, or burial features, see procedures in Section B.

1) The monitor or construction manager will notify the Preservation Specialist (PS). The PS will make all calls and notifications to SHPO and Tribal Liaisons.

a. SHPO and identified Tribal representatives will be invited to observe the implementation of any proposed work.

2) Within 24 hours, if possible, a professional archaeologist will examine the location of the discovery.

a. If the archaeologist determines that the discovery is not a historic resource, the archaeologist will immediately advise the PS. The archaeologist will submit a report including photographs of the discovery site to the City of Detroit for distribution to Tribal Liaisons and SHPO with a request for expedited review.

b. If the archaeologist determines that the discovery is a historic or cultural resource, the archaeologist will immediately advise the PS. The PS will notify the SHPO and Tribal Liaisons by telephone and e-mail. The SHPO will assign an Archaeological Site Number to the discovery.

i. If the resource is determined to hold Tribal associations, the PS, archaeologist, SHPO, and Tribal Liaisons will coordinate to determine appropriate preservation, excavation, and disposition of the discovery.

1. If any photographs or sketches are collected of Native American human remains or funerary objects, disposition of all images, including electronic and physical copies, will be subject to consultation with Tribes and any digital files will be destroyed.

ii. If the resource is believed to represent National Register of Historic Places significance, the archaeologist will prepare a proposal for data recovery and will request SHPO and Tribal Liaison approval to immediately implement the work scope.

iii. If the resource is determined ineligible for inclusion on the NRHP, the archaeologist will document the discovery in a report (including photographs of the discovery site). The report must also include a completed site form for the discovery and an explanation of why they believe the resource is not significant. The archaeologist will formally request permission from SHPO, and participating Tribal Liaisons, for construction to recommence.

3) When the evaluation of the cultural resources is complete The City of Detroit will notify SHPO, and participating Tribal Liaisons, by telephone and discuss the project archaeologist's opinion concerning the potential significance of the resource and next steps if mitigation is required.

4) A final report on the findings will be provided to the PS, participating Tribal Liaisons, and SHPO upon completion.



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

Phone: 313.224.6380  
Fax: 313.224.1629  
[www.detroitmi.gov](http://www.detroitmi.gov)

May 27, 2025

Mike Essian  
American Community Developers  
20250 Harper Ave.  
Detroit, MI 48225

**RE: Section 106 Review of a CNI Funded Clement Kern Gardens (Trumbull Parcel D)  
Project Located at 1511–1795 Bagley Street in the City of Detroit, Wayne County,  
Michigan**

Dear Mr. Essian,

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 demolish an extant 87-unit apartment complex and construct a new 370-unit apartment complex with a mix of unit types through multiple phases of construction. The proposed project is to occur across 9-acres where the existing Clement Kern Gardens located at 1601 Bagley Street, Detroit, Wayne County, Michigan 48216 (Subject Property) and is located in Detroit’s Corktown neighborhood.

The direct APE consists solely of the site located at 1511–1795 Bagley Street, Parcel ID: 08000246-346, Detroit, Michigan 48216. The National Register of Historic Places Listed Corktown Local Historic District is located in the indirect area of potential effect. Upon site plan review, I have determined that the new construction will not adversely affect the Corktown Historic District. The proposed new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old. The new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Per Stipulation VI of Programmatic Agreement (PA), the proposed undertaking qualified for review by SHPO’s archaeologist. Archaeological resources review for the proposed project was compiled by Commonwealth Heritage Group in June 2023 (Burns 2023). As a result of their research, Commonwealth recommended Phase I survey within the Project Area. The survey focused on areas where ground disturbing activity may potentially occur in existing open green spaces or paved parking lots identified by Burns (2023). The archaeological resource APE encompassed approximately 3.4-acres of the entire 9-acre site.

Commonwealth completed a Phase I archaeological survey of the APE on August 8 and 18, 2023. A total of 43 STPs were excavated across 15 transects. Extensive disturbance was noted in all

STPs. During the survey, non-diagnostic historic period artifacts were observed mixed with modern items (plastic and concrete) in STPs excavated across the APE. No subsurface evidence of intact structural remnants or other cultural features were observed in the APE during the survey. No new archaeological sites were identified as a result of the Phase I survey.

It was the opinion of Commonwealth that the project, if restricted to the designated APE as planned, will have no effect on archaeological resources listed in or eligible for listing in the NRHP. Commonwealth recommended no further archaeological investigation in the APE if the Project's ground disturbing activity stays within the planned APE boundaries. In a letter dated, 12/4/2023, SHPO's archaeologist concurred with the recommendation of "No Historic Properties Affected" for archaeological resources.

Per Stipulation VI of Programmatic Agreement (PA), the proposed undertaking requires consultation with Tribes. On 11/1/2023, a request for Tribal Consultation was submitted to the following Tribes:

- Bay Mills Indian Community
- Forest County Potawatomi Community of Wisconsin
- Grand Traverse Band of Ottawa & Chippewa Indians
- Hannahville Indian Community
- Ketegitigaaning Ojibwe Nation/Lac Vieux Desert Band of Lake Superior Chippewa Indians
- Keweenaw Bay Indian Community of the Lake Superior Band of Chippewa Indians
- Lac du Flambeau Band of Lake Superior Chippewa Indians
- Little River Band of Ottawa Indians
- Little Traverse Bay Bands of Odawa Indians
- Menominee Indian Tribe of Wisconsin
- 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

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 along the Detroit River and the depth of excavation proposed. They raised concerns that this undertaking could disturb previously undisturbed sub-surface resources.

In order to understand the scope of monitoring appropriate for the site and continue consultation surrounding monitoring requirements, HRD's staff Archaeologist, Samel Burns, reviewed and

reevaluated the archaeological reports in conjunction with the additional new data available in the Phase II Environmental Site Assessment conducted for the Project (Arnold and Earl 2023).

Based on the following considerations, we believe that there is still potential for the Project Area to harbor buried Precontact period or historic period archaeological resources:

- The project is located in a historically and archaeologically sensitive area of Detroit.
- Shovel test pits excavated in the Project Area were only excavated to a depth of 20 inches below ground surface and terminated in a layer of yellow clay, which nearby investigations suggest may cap intact historic period archaeological resources.
- Soil borings conducted in the Project Area as part of a Phase II ESA indicate the presence of a potentially undisturbed soil surface, which may harbor Precontact period archaeological resources, buried by up to 6.5 feet of contaminated fill.
- The removal of contaminated fill would adversely affect any Precontact period or historic period archaeological resources present.

A letter report with the results of this re-evaluation was provided to SHPO for review on July 24, 2024. On 7/29/24, SHPO archaeologist Amy Krull concurred with the results of the reevaluation.

We are recommending 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.

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:

- The work is conducted in accordance with the specifications submitted to the Preservation Specialist on 7/18/2024, 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.
- An archaeological monitoring plan should be provided by the developer for each phase of development. The monitoring plan will be subject to SHPO and tribal consultation, which comes with a mandated 30-day comment period.
  - Additional data surrounding the extent of ground disturbance related to contamination mitigation (Response Activity Plans, etc.) may be considered to make appropriate changes to the monitoring plan for each phase of the Clement Kern Gardens development.

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 [Ciavatto.net@detroitmi.gov](mailto:Ciavatto.net@detroitmi.gov).

Sincerely,



**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](http://www.detroitmi.gov)

Tiffany Ciavattone  
Preservation Specialist  
City of Detroit  
Housing & Revitalization Department



# Archaeology Summary Memo

CKG I – Bagley Townhomes and Flats on 10th

## Project Description

Clement Kern Gardens (“CKG”), constructed in 1985, is a multi-family public housing complex in Detroit’s Corktown neighborhood, which secured a FY2020 Choice Neighborhoods Initiative Grant of \$30 million to contribute towards a Transformation Plan. American Community Developers (ACD), Inc. is the developer of a proposed redevelopment project for CKG, which is divided into three phases:

- Bagley Townhomes and Flats on 10<sup>th</sup> (CKG I)
- Flats West of 10<sup>th</sup> (CKG II)
- Trumbull (CKG III)

ACD is proposing demolishing the existing buildings and replacing them with new construction of townhomes and apartments. Each project phase is undergoing a separate environmental review, but the archaeological investigations considered the entire CKG redevelopment project.

The Project Area has been part of the urban Corktown neighborhood since as early as 1860 and was occupied by densely built residential and light industrial structures from the 1860s to the late 1950s or early 1960s. This original residential neighborhood was cleared during midcentury urban renewal efforts and was left as open space from the 1960s through 1985. The Clement Kern Gardens housing complex was constructed on the site in 1985.

The proposed project is subject to the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (P.L. 89-665), and its implementing regulations at 36 C.F.R. § 800. Under the terms of the “Programmatic Agreement between the Michigan State Historic Preservation Office and the City of Detroit, Michigan...,” dated December 21, 2022 (“PA”), the project is being reviewed by the City of Detroit’s Housing & Revitalization Department (“HRD”). Per Stipulation VI of the PA, the proposed undertaking requires archaeological consultation with the Michigan State Historic Preservation Office (SHPO). Per Stipulation VI of the PA, the proposed undertaking also requires consultation with Tribes.

Summary prepared by:	Samuel Burns
Date prepared:	March 10, 2025
Does project trigger Archaeological Consultation?	Yes
Does Project require Study Plan review?	Yes

## Section 106 Review Summary

In June 2023, Commonwealth Heritage Group (Commonwealth) completed a desktop review of the Project Area as part of the initial application for Section 106 review, which was submitted to the City of Detroit Housing and Revitalization Department (HRD). Due to the Project's location in the historically and archaeologically sensitive Corktown neighborhood, Commonwealth recommended an archaeological survey be conducted in the Project Area prior to the initiation of ground disturbing activities (Burns 2023).

On August 8 and August 18, 2023, Commonwealth conducted a phase I archeological survey of the Project Area to determine whether intact archaeological deposits are present in the Project Area. A total of 43 shovel test pits were excavated into near-surface soils across 15 transects (Lawrence and Parker 2023). No new archaeological sites were recorded during the survey, but fragmentary artifacts were observed across the Project Area. Due to a lack of identified intact archaeological deposits and the fragmentary nature of artifacts observed in the near-surface soils, Commonwealth recommended a determination of No Historic Properties Affected (36 C.F.R. § 800.4[d][1]). Following review of the survey report, the Michigan State Historic Preservation Office (SHPO) concurred with Commonwealth's recommended determination in a letter dated December 4, 2023 (Krull 2023).

On November 11, 2023, HRD sent a request for government-to-government tribal consultation (54 U.S.C. 302706 [b]) to the following Tribes:

- Bay Mills Indian Community
- Forest County Potawatomi Community of Wisconsin
- Grand Traverse Band of Ottawa & Chippewa Indians
- Hannahville Indian Community
- Ketegitigaaning Ojibwe Nation/Lac Vieux Desert Band of Lake Superior Chippewa Indians
- Keweenaw Bay Indian Community of the Lake Superior Band of Chippewa Indians
- Lac du Flambeau Band of Lake Superior Chippewa Indians
- Little River Band of Ottawa Indians
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- Match-E-Be-Nash-She-Wish (Gun Lake) Band of Pottawatomi Indians
- Miami Tribe of Oklahoma
- Michigan Anishinaabek Cultural Preservation and Repatriation Alliance
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- Saginaw Chippewa Indian Tribe of Michigan
- Sault Ste. Marie Tribe of Chippewa Indians
- Seneca Cayuga Nation



In response to the request for consultation, 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 along the Detroit River and the depth of excavation proposed (Rhodd 2023). They raised concerns that this undertaking could disturb previously undisturbed sub-surface resources.

In order to understand the scope of monitoring appropriate for the site and continue consultation surrounding monitoring requirements, HRD's Archaeological Compliance Specialist, Samuel Burns, reviewed and reevaluated the archaeological reports in conjunction with the additional new data available in the Phase II Environmental Site Assessment conducted for the Project (Arnold and Earl 2023). Due to the following considerations, HRD determined that there is still potential for the Project Area to harbor buried Precontact period or historic period archaeological resources:

- The project is in a historically and archaeologically sensitive area of Detroit.
- Shovel test pits excavated in the Project Area were only excavated to a depth of 20 inches below ground surface and terminated in a layer of yellow clay, which nearby investigations suggest may cap intact historic period archaeological resources.
- Soil borings conducted in the Project Area as part of a Phase II ESA indicate the presence of a potentially undisturbed soil surface, which may harbor Precontact period archaeological resources, buried by up to 6.5 feet of contaminated fill.
- The removal of contaminated fill would adversely affect any Precontact period or historic period archaeological resources present.

To address the concerns of the Forest County Potawatomi and avoid adverse effects to potential precontact and historic period archaeological resources, HRD recommended development of an archaeological monitoring plan for ground disturbing activities across the Clement Kern Development site (Bagley Townhomes & 10th Street Flats, West of 10th, and Trumbull Developments). SHPO Archaeologist Amy Krull concurred with HRD's recommendation on July 29, 2024. On November 19, 2024, Commonwealth provided a proposed monitoring plan for SHPO, HRD, and Tribal concurrence (Epstein 2024). The plan calls for a qualified archaeologist (48 FR 44738-9) to be on-site for the Project's ground disturbing activities to observe, document, and evaluate archaeological materials, should any be encountered.

In a letter dated October 17, 2024, SHPO issued the project a determination of No Adverse Effect (36 C.F.R. § 800.5[b]), conditioned upon implementation of the monitoring plan and an Inadvertent Discoveries Plan (Schumaker 2024).

## **Exempt Archaeological Files Summary**

The Michigan Freedom of Information Act (MCL 15.243 § 13.1[o]) exempts "information that would reveal the exact location of archaeological sites" from public disclosure. The following archaeological files associated with this Project are exempt from disclosure and are securely held by the HRD Archaeologist.



**Table 8–Exempt Archaeological Files**

<b>Title</b>	<b>Citation</b>	<b>File Type</b>
1511–1795 Bagley Street Development Project—Archaeological Resources Review, Wayne County, Michigan	(Burns 2023)	Report (Consultant)
Phase I Archaeological Survey for the 1511–1795 Bagley Street Development Project, City of Detroit, Wayne County, Michigan	(Lawrence and Parker 2023)	Report (Consultant)

## Bibliography

Arnold, Aaron, and Brian J. Earl

2023 *Limited Phase II Environmental Site Assessment: Clement Kern Gardens, 1601 Bagley Street, Detroit, Michigan*. ASTI Environmental, Brighton, Michigan.

Burns, Samuel R.

2023 *1511–1795 Bagley Street Development Project—Archaeological Resources Review, Wayne County, Michigan*. Clement Kern Gardens (ER96-1.23.1811-1795 Bagley). Commonwealth Heritage Group, Dexter, Michigan.

Epstein, Ethan A.

2024 *Proposal – Archaeological Monitoring of the Clement Kerns Gardens Development Project, Wayne County, Michigan*. Commonwealth Heritage Group, Dexter, Michigan.

Krull, Amy

2023 RE: ER96-1.23.1811-1795 Bagley, Detroit PA Review, Development Project, 1181-175 Bagley Street, Detroit, Wayne County (HUD). Clement Kern Gardens (ER96-1.23.1811-1795 Bagley). Michigan State Historic Preservation Office, Lansing, Michigan.

Lawrence, Rachel V., and James G. Parker

2023 *Phase I Archaeological Survey for the 1511–1795 Bagley Street Development Project, City of Detroit, Wayne County, Michigan*. Clement Kern Gardens (ER96-1.23.1811-1795 Bagley). Commonwealth Heritage Group, Dexter, Michigan.

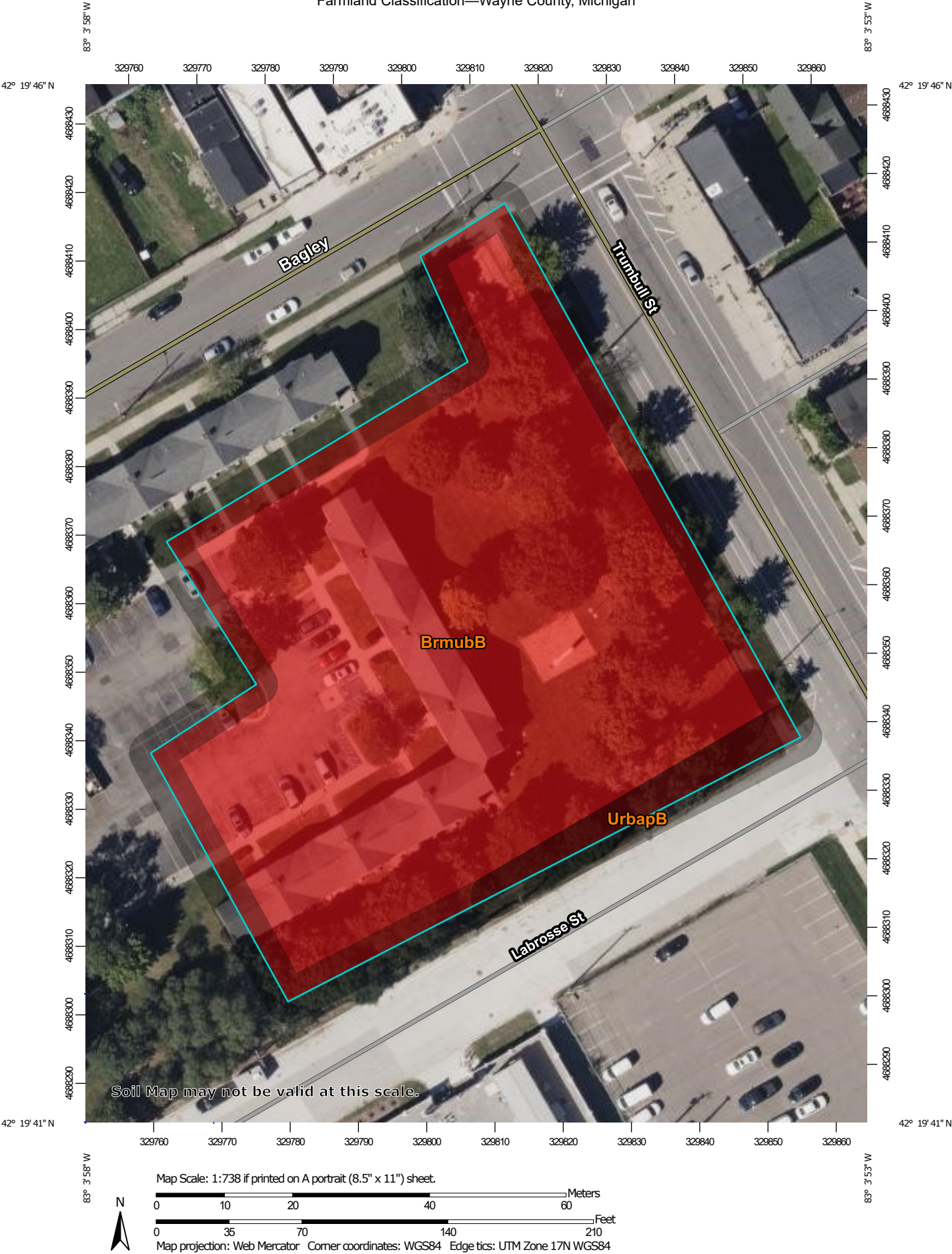
Rhodd, Ben

2023 RE: City of Detroit Tribal Consultation – Clement Kern Gardens. Email dated November 1, 2023 to Mallory Bower, Detroit HRD. Forest County Potawatomi, Crandon, Wisconsin.

Schumaker, Ryan M.


2024 RE: ER24-986 Proposed “Bagley Townhouses and Flats on 10th Street”, Clement Kern Gardens, 1661 Bagley Street, Detroit, Wayne County (HUD). Michigan State Historic Preservation Office, Lansing, Michigan.

Farmland Classification—Wayne County, Michigan











## MAP LEGEND








### Area of Interest (AOI)






 Area of Interest (AOI)








### Soils



#### Soil Rating Polygons

-  Not prime farmland
-  All areas are prime farmland
-  Prime farmland if drained
-  Prime farmland if protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated
-  Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated and drained
-  Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season









-  Prime farmland if subsoiled, completely removing the root inhibiting soil layer
-  Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
-  Prime farmland if irrigated and reclaimed of excess salts and sodium
-  Farmland of statewide importance
-  Farmland of statewide importance, if drained
-  Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if irrigated

-  Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if irrigated and drained
-  Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer
-  Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60

-  Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium
-  Farmland of statewide importance, if drained or either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if warm enough
-  Farmland of statewide importance, if thawed
-  Farmland of local importance
-  Farmland of local importance, if irrigated

-  Farmland of unique importance
-  Not rated or not available

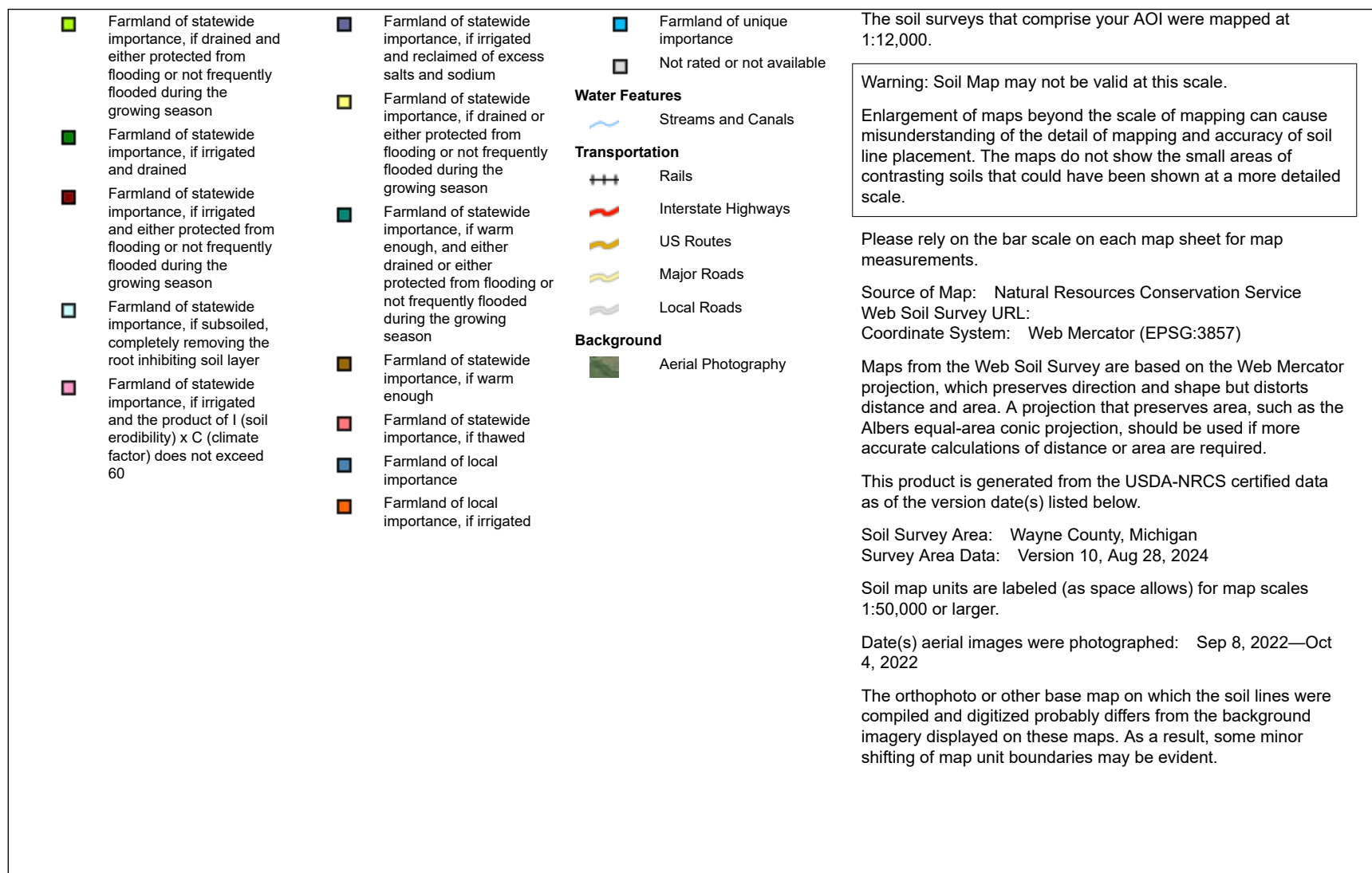
### Soil Rating Lines

-  Not prime farmland
-  All areas are prime farmland
-  Prime farmland if drained
-  Prime farmland if protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated
-  Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated and drained
-  Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season

# Farmland Classification—Wayne County, Michigan

	Prime farmland if subsoiled, completely removing the root inhibiting soil layer		Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium		Farmland of unique importance		Prime farmland if subsoiled, completely removing the root inhibiting soil layer
	Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60		Farmland of statewide importance, if irrigated and drained		Farmland of statewide importance, if drained or either protected from flooding or not frequently flooded during the growing season	<b>Soil Rating Points</b>			Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
	Prime farmland if irrigated and reclaimed of excess salts and sodium		Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season		Not prime farmland		Prime farmland if irrigated and reclaimed of excess salts and sodium
	Farmland of statewide importance		Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer		Farmland of statewide importance, if thawed		Prime farmland if protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance
	Farmland of statewide importance, if drained		Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60		Farmland of local importance		Prime farmland if irrigated		Farmland of statewide importance, if drained
	Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season				Farmland of local importance, if irrigated		Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season
	Farmland of statewide importance, if irrigated						Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if irrigated

# Farmland Classification—Wayne County, Michigan





## Farmland Classification

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
BrmubB	Brems-Urban land complex, dense substratum, 0 to 4 percent slopes	Not prime farmland	1.4	98.8%
UrbapB	Urban land-Fortress family complex, dense substratum, 0 to 4 percent slopes	Not prime farmland	0.0	1.2%
<b>Totals for Area of Interest</b>			<b>1.4</b>	<b>100.0%</b>

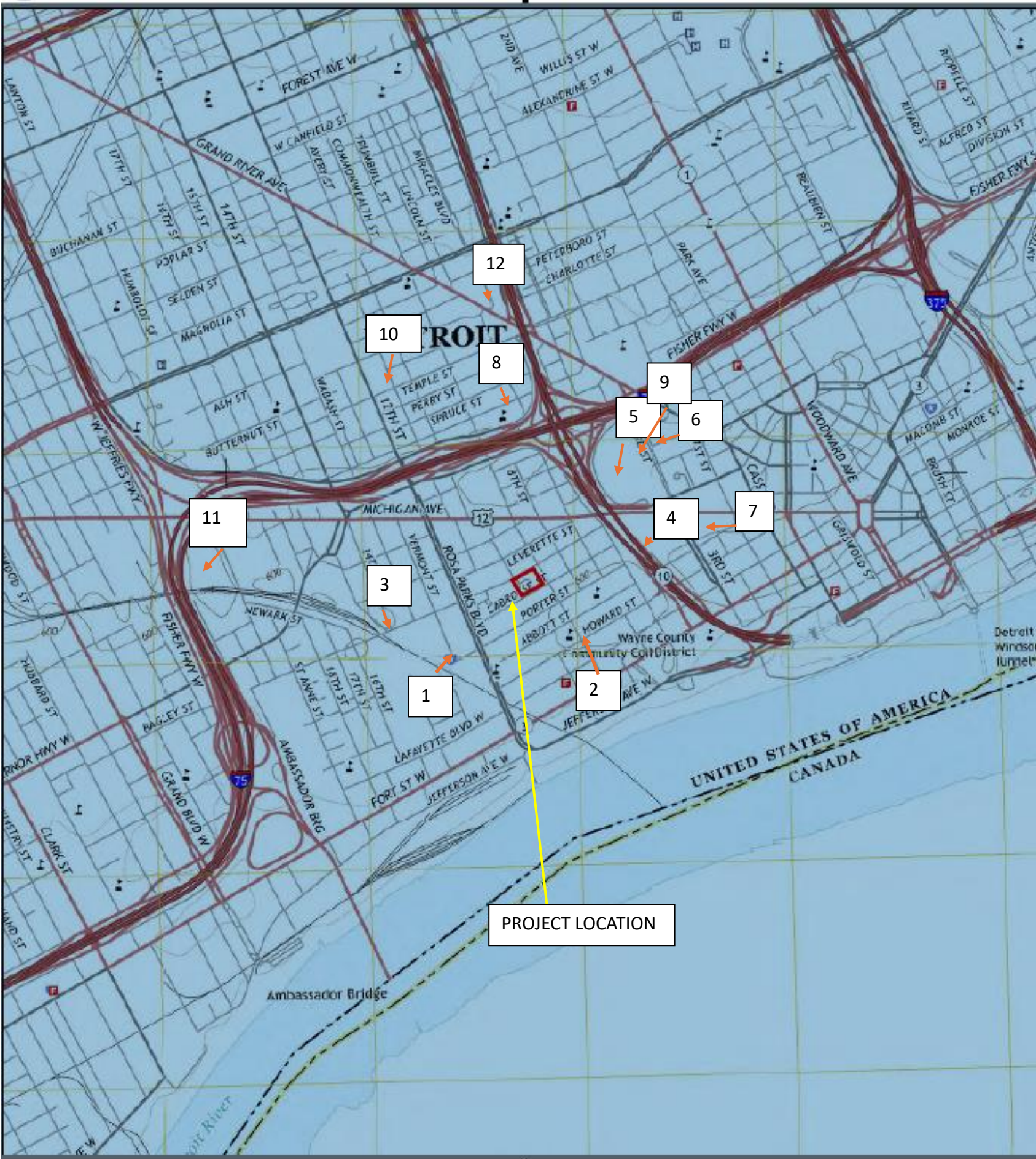
## Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

## Rating Options

*Aggregation Method:* No Aggregation Necessary

*Tie-break Rule:* Lower



ID	Property Name	Address	Size (gal)	Contents	Distance (ft)	ASD (ft)
1	Level 3 Communications	1965 Porter	8,000	Diesel	675	657
2	Windstream PAETEC Pop-LC	1686 Howard	2,100	Diesel	750	376
3	US Postal Service	1770 14 <sup>th</sup> Street	10,000	Diesel	1,050	721
4	Detroit Public Safety Headquarters	1300 John C Lodge	N/A	FL/CL	1,800	N/A
5	MGM Grand Detroit Casino and Hotel	1777 3rd	Two 6,500	Diesel	2,400	603
6	DTE HQ- Executive Garage	1 Energy	6,000	Diesel	2,475	583
7	Sprint Detroit Switch	1320 3rd	7,000	Diesel	2,400	622
8	Brinks	1351 Spruce	8,000	Diesel	2,500	657
9	DTE Energy Headquarters	2000 2nd	Four 1,650	Deisel	2,800	340
10	Total Armored Car Service	2950 Rosa Parks	1,000	FL/CL	3,750	276
11	United Community Hospital	2401 20th	4,000	Diesel	3,750	492
12	Noble Street Complex- MICHCON	3200 Hobson	13,500	Other	4,500	817



# IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

## Location

Wayne County, Michigan





# Local office

Michigan Ecological Services Field Office

☎ (517) 351-2555

📅 (517) 351-1443

2651 Coolidge Road Suite 101

East Lansing, MI 48823-6360

# Endangered species

**This resource list is for informational purposes only and does not constitute an analysis of project level impacts.**

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species<sup>1</sup> and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries<sup>2</sup>).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

## Mammals

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> Wherever found There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a>	Endangered

## Birds

NAME	STATUS
Rufa Red Knot <i>Calidris canutus rufa</i> Wherever found This species only needs to be considered if the following condition applies: <ul style="list-style-type: none"><li>• Only actions that occur along coastal areas during the Red Knot migratory window of MAY 1 - SEPTEMBER 30.</li></ul> There is <b>proposed</b> critical habitat for this species. Your location does not overlap the critical habitat. <a href="https://ecos.fws.gov/ecp/species/1864">https://ecos.fws.gov/ecp/species/1864</a>	Threatened

## Reptiles

NAME	STATUS
------	--------

**Eastern Massasauga (=rattlesnake) Sistrurus catenatus****Threatened**

Wherever found

This species only needs to be considered if the following condition applies:

- For all Projects: Project is within EMR Range

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/2202>

## Insects

NAME

STATUS

**Monarch Butterfly Danaus plexippus****Proposed Threatened**

Wherever found

There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat.
<https://ecos.fws.gov/ecp/species/9743>

## Flowering Plants

NAME

STATUS

**Eastern Prairie Fringed Orchid Platanthera leucophaea****Threatened**

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/601>

## Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

## Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act <sup>2</sup> and the Migratory Bird Treaty Act (MBTA) <sup>1</sup>. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their nests, should follow appropriate regulations and implement required avoidance and minimization measures, as described in the various links on this page.

The [data](#) in this location indicates that no eagles have been observed in this area. This does not mean eagles are not present in your project area, especially if the area is difficult to survey. Please review the 'Steps to Take When No Results Are Returned' section of the [Supplemental Information on Migratory Birds and Eagles document](#) to determine if your project is in a poorly surveyed area. If it is, you may need to rely on other resources to determine if eagles may be present (e.g. your local FWS field office, state surveys, your own surveys).

Additional information can be found using the following links:

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

Bald and Golden Eagle information is not available at this time

## Bald & Golden Eagles FAQs

## What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle ([Bald and Golden Eagle Protection Act](#) requirements may apply).

## Proper interpretation and use of your eagle report

On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

## How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the [RAIL Tool](#) and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

## Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

### ***How is the probability of presence score calculated? The calculation is done in three steps:***

The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

**Breeding Season ()**

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

**Survey Effort ()**

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

**No Data ()**

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

**Survey Timeframe**

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

## Migratory birds

The Migratory Bird Treaty Act (MBTA) <sup>1</sup> prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior [authorization](#) by the Department of Interior U.S. Fish and Wildlife Service (FWS). The incidental take of migratory birds is the injury or death of birds that results from, but is not the purpose, of an activity. The FWS interprets the MBTA to prohibit incidental take.

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds

- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

Migratory bird information is not available at this time

## Migratory Bird FAQs

**Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Avoidance & Minimization Measures for Birds](#) describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?**

The Migratory Bird Resource List is comprised of [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the [Bald and Golden Eagle Protection Act](#) and those species marked as “Vulnerable”. See the FAQ “What are the levels of concern for migratory birds?” for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle ([Bald and Golden Eagle Protection Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

**Why are subspecies showing up on my list?**



Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

### **What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

### **How do I know if a bird is breeding, wintering, or migrating in my area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the [RAIL Tool](#) and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### **What are the levels of concern for migratory birds?**

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Bald and Golden Eagle Protection Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ "Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

### **Details about birds that are potentially affected by offshore projects**

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

### **Proper interpretation and use of your migratory bird report**

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

### **Interpreting the Probability of Presence Graphs**

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

#### ***How is the probability of presence score calculated? The calculation is done in three steps:***

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**Survey Effort ()**

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

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**Survey Timeframe**

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## Facilities

### National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

### Fish hatcheries

There are no fish hatcheries at this location.

# Wetlands in the National Wetlands Inventory (NWI)

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

This location did not intersect any wetlands mapped by NWI.

**NOTE:** This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

## Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

## Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

## Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
REMEDATION AND REDEVELOPMENT DIVISION



PHILLIP D. ROOS  
DIRECTOR

March 17, 2025

VIA EMAIL

Michael D. Essian II  
CKG Trumbull 4 2023 Limited Dividend Housing Association L.L.C.  
20250 Harper Avenue  
Detroit, Michigan 48226

Dear Michael Essian:

SUBJECT: Notice of Approval of the Response Activity Plan  
Proposed Trumbull Development  
1601 Bagley Street, Detroit, Wayne County, Michigan  
Parcel ID Number: 1.44-acre portion of Parcel #08000246-346  
Facility ID Number: Part of 82009112

The Department of Environment, Great Lakes, and Energy (EGLE) Remediation and Redevelopment Division (RRD) has reviewed the Response Activity Plan (ResAP) containing a Remedial Action Plan for response activities to be undertaken at a 1.44- acre portion of the property currently known as Clement Kern Gardens, proposed to become Trumbull, located at the above-referenced address. The ResAP was submitted on your behalf pursuant to Section 20114b of Part 201 Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) on January 16, 2025, by Brian Earl of SES Environmental, and the final revised version was received by EGLE on March 17, 2025.

Based upon the representations and information contained in the submittal, the ResAP is approved. EGLE agrees with the pathway evaluation that is documented in the submittal and it appears consistent with our understanding of the reporting and/or environmental review requirements established by the Michigan State Housing Development Authority (MSHDA), the city of Detroit Housing and Revitalization Department (HRD), and the U.S. Department of Housing and Urban Development (HUD) for the portion of parcel number 08000246-346 that is proposed to become Trumbull.

EGLE expresses no opinion on the adequacy of the proposed response activities to address conditions that are not represented, described, or contained within the submittal. If environmental contamination is found to exist that is not addressed by the ResAP and you are otherwise liable for the contamination, additional response activities, possibly including a post-closure agreement and/or establishing a financial assurance mechanism, may be necessary. Further, since the ResAP does not consider all complete or relevant exposure pathways (as applicable) for the remainder of parcel number 08000246-346 (currently known as Clement Kern Gardens), EGLE cannot

confirm that the portions of the parcel not included within this submittal are or will be safe for residential use.

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

This approval is pursuant to the applicable requirements of the NREPA. MSHDA, the city of Detroit HRD, or HUD may have additional site selection requirements beyond the NREPA statutory obligations for site characterization and remedial actions or response activities necessary to prevent, minimize, or mitigate injury to public health, safety, or welfare, or to the environment.

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

Sincerely,

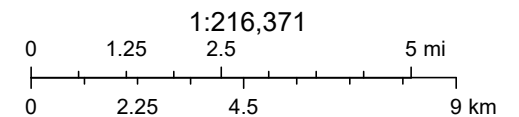
A handwritten signature in black ink, appearing to read "Carrie A. Geyer". The signature is fluid and cursive, with a large initial "C" and a stylized "G" at the end.

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

cc: Brian Earl, SES Environmental  
Paul Owens, EGLE  
Martha Thompson, EGLE  
Jarrett McFeters, EGLE  
Devon Nagengast, EGLE

Map of Detroit showing lead levels at 100 locations. The map is color-coded: green for 0-1.9 pCi/L, blue for 2-4 pCi/L, and red for >4 pCi/L. Major roads like I-75, I-94, and I-10 are shown. The map shows a high concentration of green locations, with a few blue and red locations scattered throughout.

4/18/2024



The City of Detroit Housing and Revitalization Department (HRD) collects radon data from some HUD funded programs. This data is shown on the HRD Indoor Radon Map. The number of lab tests collected is 59 and the average level of radon detected is 0.74pCi/L. This is below the recommended mitigation level of 4pCi/L. The map is updated approximately every 6 months since testing began in November of 2023.



gis-michigan.opendata.arcgis.com/datasets/egle:coastal-zone-management-areas/explore?location=42.327132%2C-83.064188%2C15.93

GIS Open Data

< Info I want to...

Records: 42

1601 Bagley St, Detroit, MI, 48216, ...

Create a Map  
Start a map with this data

[ArcGIS Map Viewer](#)  
Advanced mapping in the modernized editor

[ArcGIS Map Viewer Classic](#)  
Advanced mapping in the legacy editor

Create a Story  
Open in ArcGIS StoryMaps

View API Resources  
Try out the API Explorer

View Data Source  
Select to open in a new tab

Search result

1601 Bagley St, Detroit, Michigan, 48216

Esri, HERE, Garmin, INCREMENT P, Intermap, NGA, USGS, NRC, and Michigan Coastal Management Program, Office of the Great Lakes Department. Powered by Esri

gis-michigan.opendata.arcgis.com/datasets/34621ad5b814405fb8c447d9872dc864\_13/explore?location=42.3226809%2C-83.066407%2C14.08

**GIS Open Data**

### Primary Sulfur Dioxide National Ambient Air Quality Standard Nonattainment Areas - 2010

✓ Authoritative

**EGLE** Egle Admin  
Michigan Dept. of Environment, Great Lakes, and Energy

#### Summary

The data contained in this layer file outlines the statewide nonattainment areas for the 2010 Primary Sulfur Dioxide NAAQS as designated by the USEPA.

[View Full Details](#)

[Download](#)

#### Details

**Dataset**  
Feature Layer

**September 15, 2023**  
Info Updated

October 15, 2023

I want to use this

Records: 2

1601 Bagley St, Detroit, MI, 48216, ...

**Project Location**

**Search result**

Zoom to

1601 Bagley St, Detroit, Michigan, 48216

Eri, HERE, Garmin, INCREMENT P, NOAA, USGS, NRCan

Powered by Eri



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
AIR QUALITY DIVISION



PHILLIP D. ROOS  
DIRECTOR

April 29, 2025

Mike Essian  
CKG East 2021 Limited Dividend Housing Association LLC  
20250 Harper Avenue  
Detroit, Michigan 48226

**Via Email Only**

Dear Mike Essian:

Subject: Trumbull Project – Detroit, Michigan

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

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

EGLE has reviewed the Trumbull Project proposed to be completed with federal grant monies, including construction of an approximately 72,841 square foot building with multiple residential apartment types. When finished the building will include 23 studio units with an average size of 420 square feet, 51 one-bedroom units with an average size of 575 square feet, and 14 two-bedroom units approximately 1,075 square feet in size. Building amenities will consist of a community room, on-site management, in-unit washer/dryer hookups, central air conditioning, garbage disposals, window coverings, dishwashers, rooftop terrace and parking areas. This 1.44 acre parcel (Parcel D) is part of a multi-phased redevelopment located in Detroit's Corktown neighborhood. The proposed project is part of a redevelopment through the Housing and Urban Development (HUD) Choice Neighborhoods Initiative. The redevelopment is anticipated to occur in phases over 4 to 6 years beginning with the eastern portion (Parcel C) and continuing across the western boundary. When completed, the property will include a mix of market rate and affordable rental housing options to target a wide range of household incomes. The initial phase of the project is anticipated to begin in summer 2025. Construction on Parcel D will begin following the completion of the first project phase (Parcel C).

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

The size, scope and duration of the Trumbull Project proposed for completion in Wayne County Michigan is similar in scale to the Uptown Orange Apartments project described above and should not exceed the de minimis levels included in the federal general conformity requirements. Therefore, it does not require a detailed conformity analysis.

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

Sincerely,



Breanna Bukowski  
Environmental Quality Analyst  
Air Quality Division

cc: Michael Leslie, USEPA Region 5  
Kim Siegel, City of Detroit  
Mary Place, SES Environmental

# Attainment Status for the National Ambient Air Quality Standards

The National Ambient Air Quality Standards (NAAQS) are health-based pollution standards set by EPA.

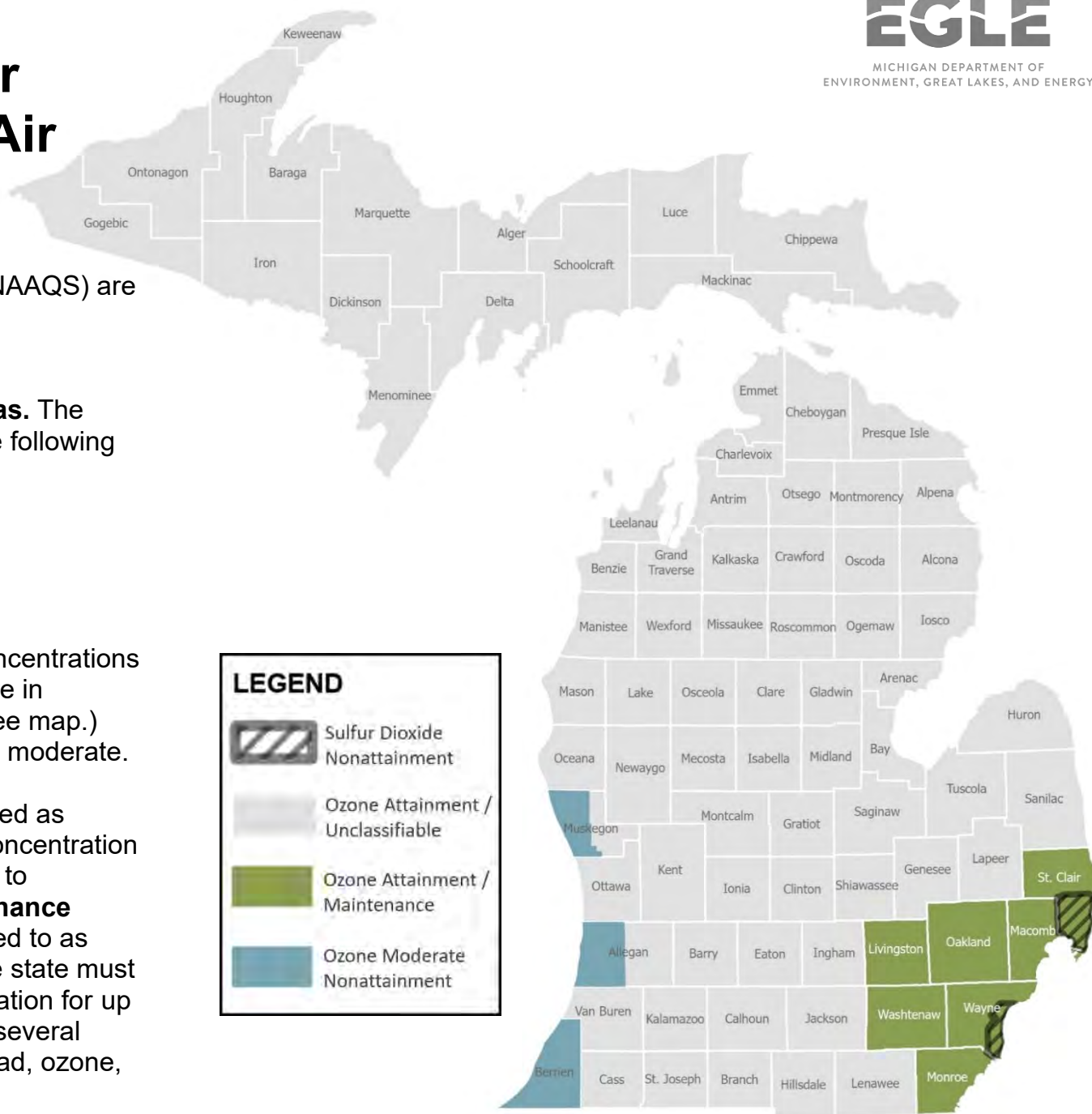
Areas of the state that are below the NAAQS concentration level are called **attainment areas**. The entire state of Michigan is in attainment for the following pollutants:

- Carbon Monoxide (CO)
- Lead (Pb)
- Nitrogen Dioxide (NO<sub>2</sub>)
- Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>)

**Nonattainment areas** are those that have concentrations over the NAAQS level. Portions of the state are in nonattainment for sulfur dioxide and ozone (see map.) The ozone nonattainment area is classified as moderate.

Areas of the state that were previously classified as nonattainment but have since reduced their concentration levels below the NAAQS can be redesignated to attainment and are called **attainment/maintenance areas**. These areas are also commonly referred to as “attainment” after reclassification, however the state must continue monitoring and submitting documentation for up to 20 years after the redesignated. There are several maintenance areas throughout the state for lead, ozone, and particulate matter.

*\*For readability purposes the map only includes the most recently reclassified ozone maintenance area in southeast Michigan. For more information, please consult the [Michigan.gov/AIR](https://www.michigan.gov/AIR) webpage or contact the division directly.*



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



# Close-Up Maps of Partial County Nonattainment Areas

## Sulfur Dioxide Nonattainment Areas

*St. Clair County*



*Wayne County*



## Ozone Moderate Nonattainment Areas

*Allegan County*



*Muskegon County*

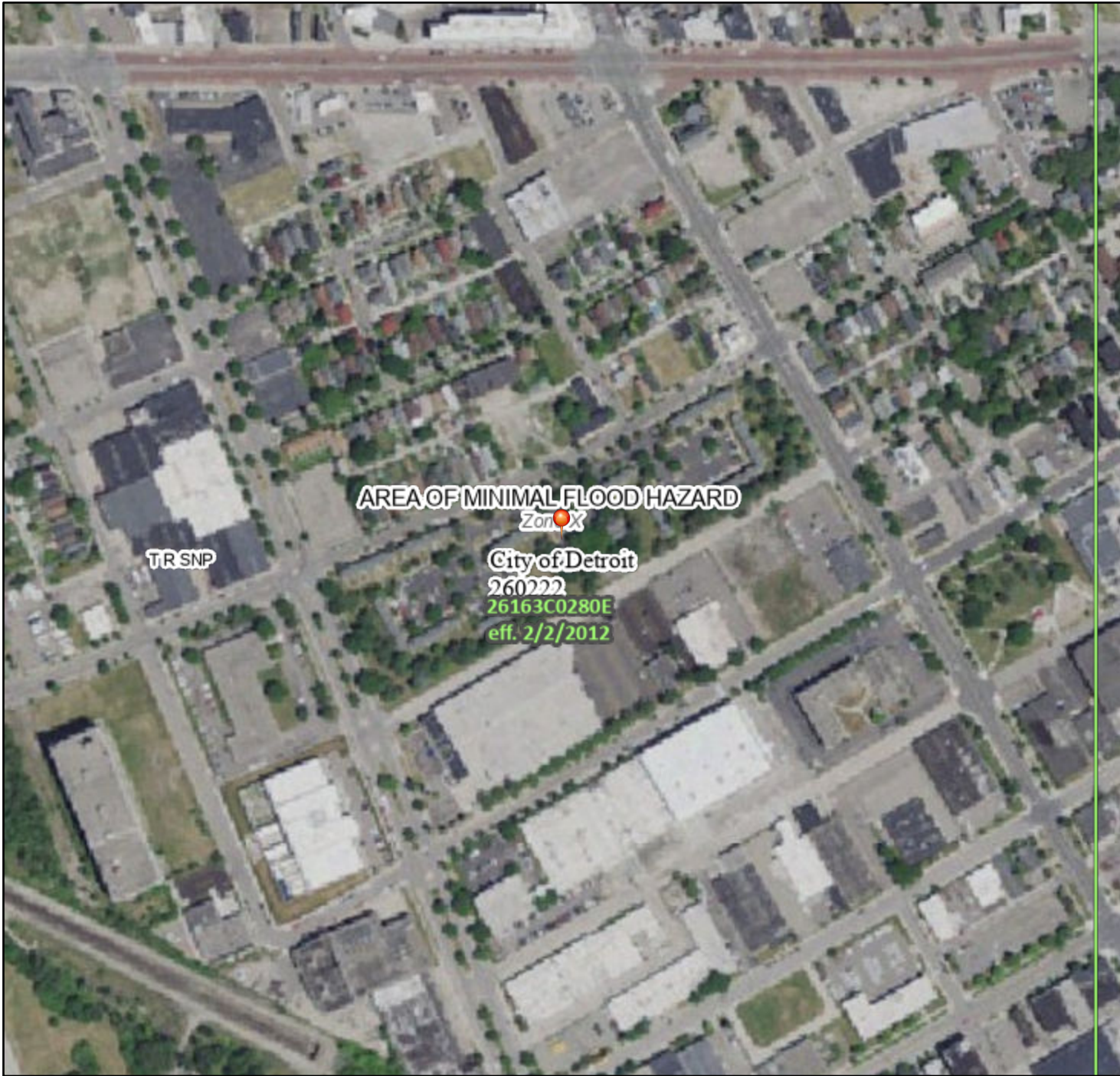




# National Flood Hazard Layer FIRMMette



83°4'22"W 42°19'55"N



83°3'44"W 42°19'28"N

Basemap Imagery Source: USGS National Map 2023

## 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, A99
		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
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
OTHER FEATURES		Levee, Dike, or Floodwall
		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
OTHER FEATURES		17.5 Coastal Transect
		Base Flood Elevation Line (BFE)
OTHER FEATURES		Limit of Study
		Jurisdiction Boundary
OTHER FEATURES		Coastal Transect Baseline
		Profile Baseline
OTHER FEATURES		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 **2/7/2025 at 10:31 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.

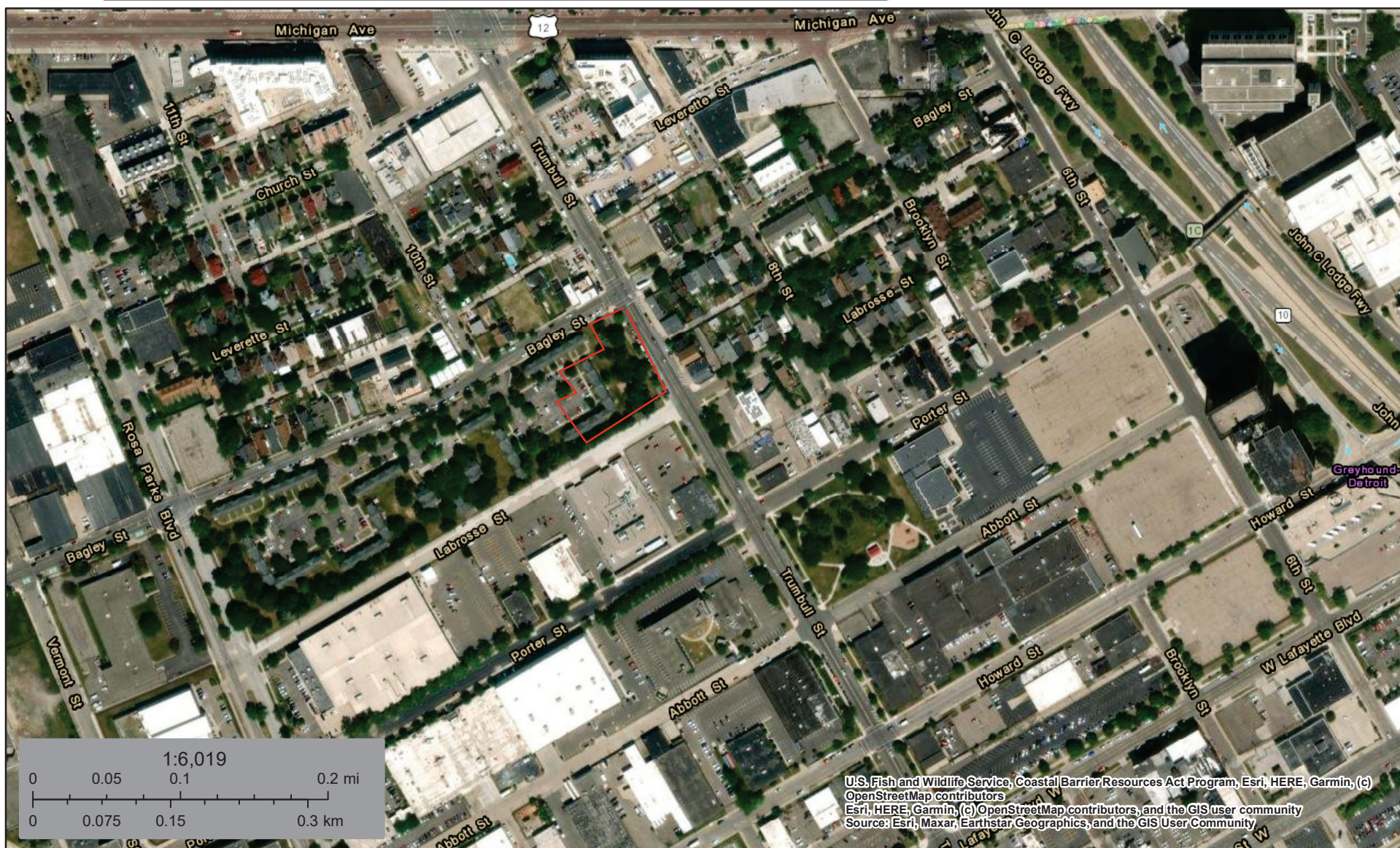
This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory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





# U.S. Fish and Wildlife Service Coastal Barrier Resources System



## CBRS Mapper



February 6, 2025

 CBRS Buffer Zone

### CBRS Units

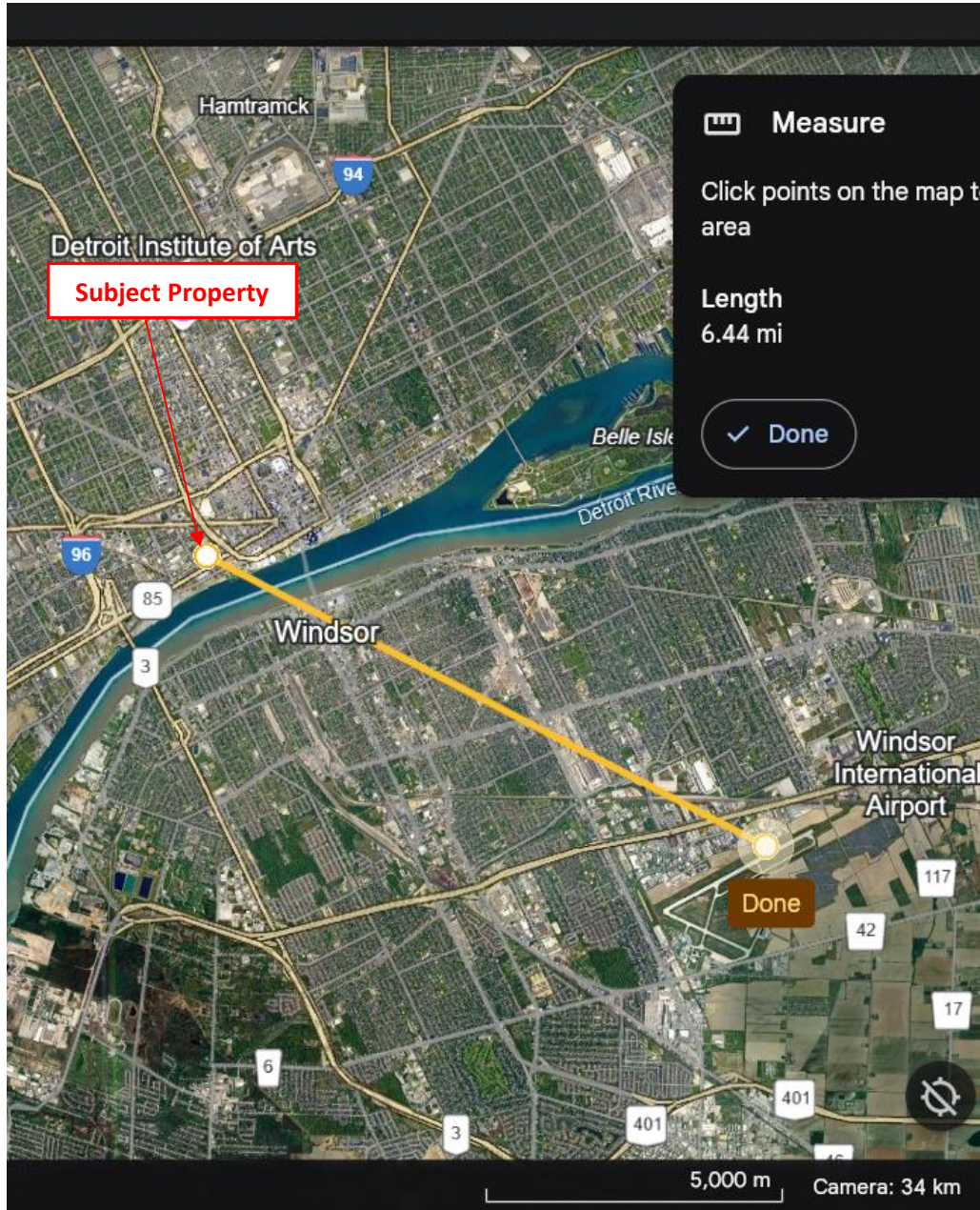
 Otherwise Protected Area  
 System Unit

This map is for general reference only. The Coastal Barrier Resources System (CBRS) boundaries depicted on this map are representations of the controlling CBRS boundaries, which are shown on the official maps, accessible at <https://www.fws.gov/library/collections/official-coastal-barrier-resources-system-maps>. All CBRS related data should be used in accordance with the layer metadata found on the CBRS Mapper website.

The CBRS Buffer Zone represents the area immediately adjacent to the CBRS boundary where users are advised to contact the Service for an official determination (<https://www.fws.gov/service/coastal-barrier-resources-system-property-documentation>) as to whether the property or project site is located "in" or "out" of the CBRS.

CBRS Units normally extend seaward out to the 20- or 30-foot bathymetric contour (depending on the location of the unit). The true seaward





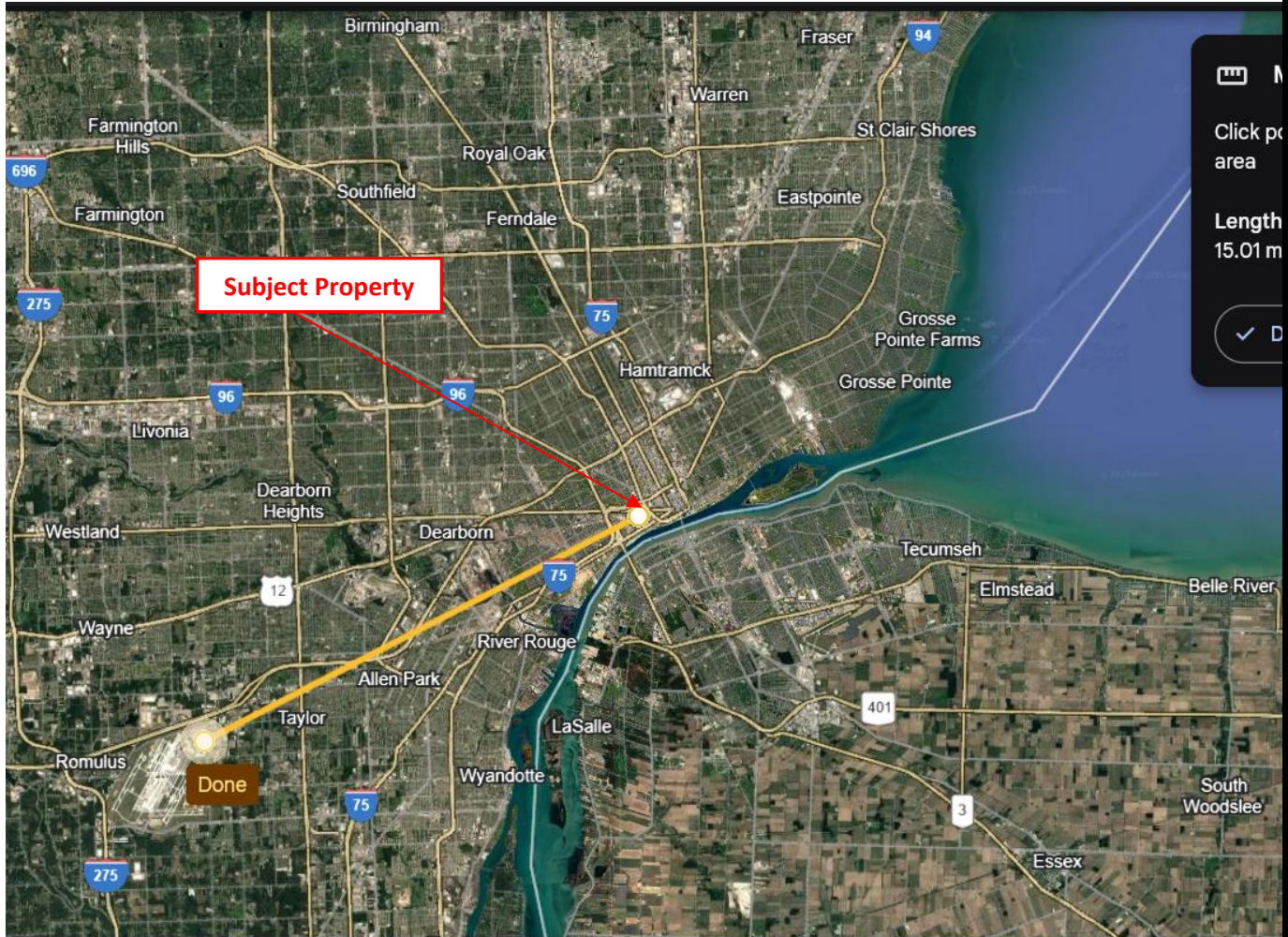
### Airport Map

Trumbull – Parce D  
1601 Bagley Street  
Detroit, Wayne County, Michigan 48216  
SES Project No.: 2025-0140

Windsor – 6.44 miles to southeast







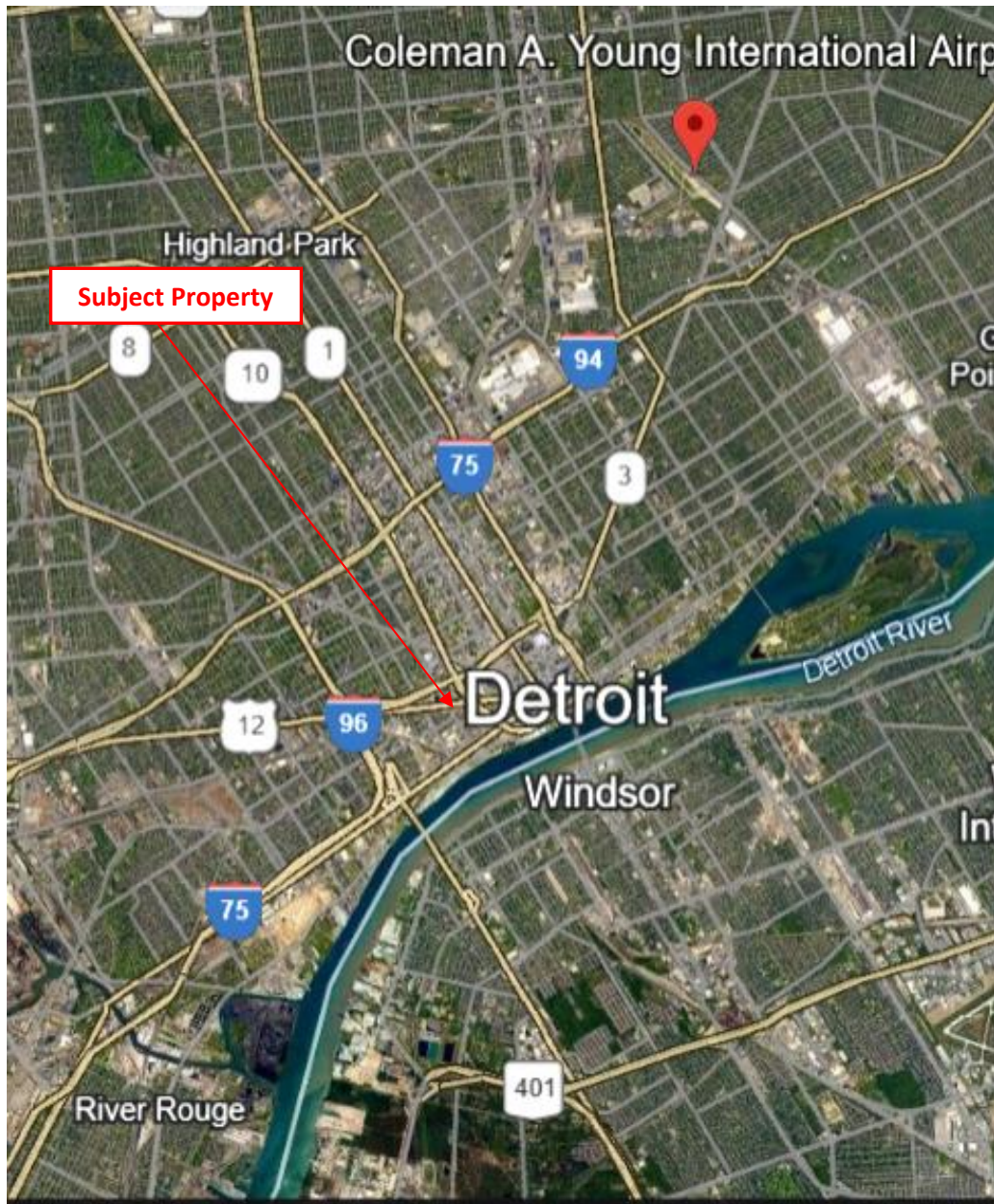
### Airport Map

Trumbull – Parce D  
1601 Bagley Street  
Detroit, Wayne County, Michigan 48216  
SES Project No.: 2025-0140

Detroit Metro – 15 miles to southwest







#### Airport Map

Trumbull – Parce D  
1601 Bagley Street  
Detroit, Wayne County, Michigan 48216  
SES Project No.: 2025-0140

Coleman Young Airport – 6.12 miles to northeast







# EJScreen Community Report

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

## Detroit, MI

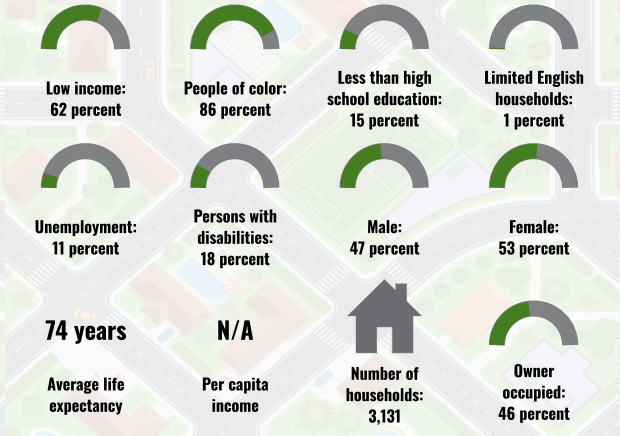
1 mile Ring Centered at 42.375175,-82.957935  
Population: 7,662  
Area in square miles: 3.14

Dynamic map initially showing the user-selected area

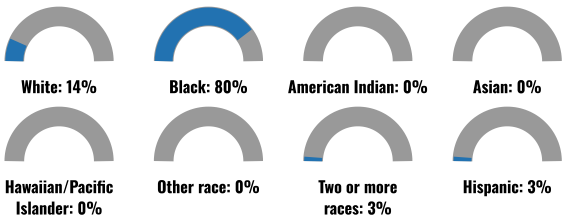
### COMMUNITY INFORMATION

#### LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	98%
Spanish	1%
Total Non-English	2%



#### BREAKDOWN BY RACE



#### BREAKDOWN BY AGE



#### LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2018-2022. Life expectancy data comes from the Centers for Disease Control.

Report for 1 mile Ring Centered at 42.375175,-82.957935  
Report produced December 20, 2024 using EJScreen Version 2.3

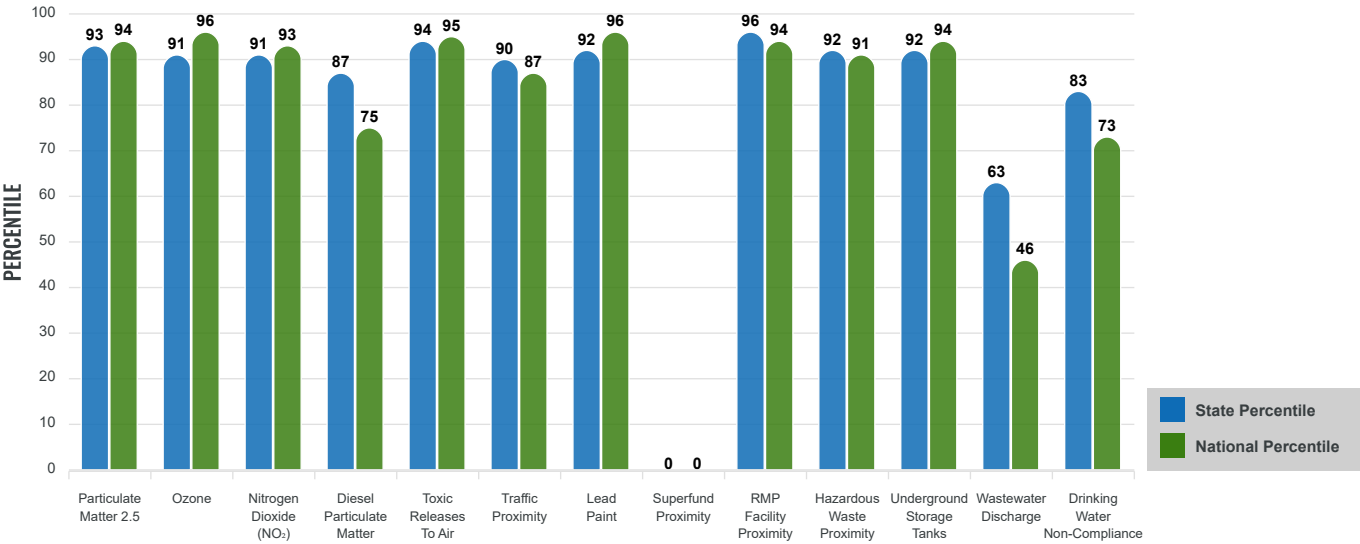
# Environmental Justice & Supplemental Indexes

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

## EJ INDEXES

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

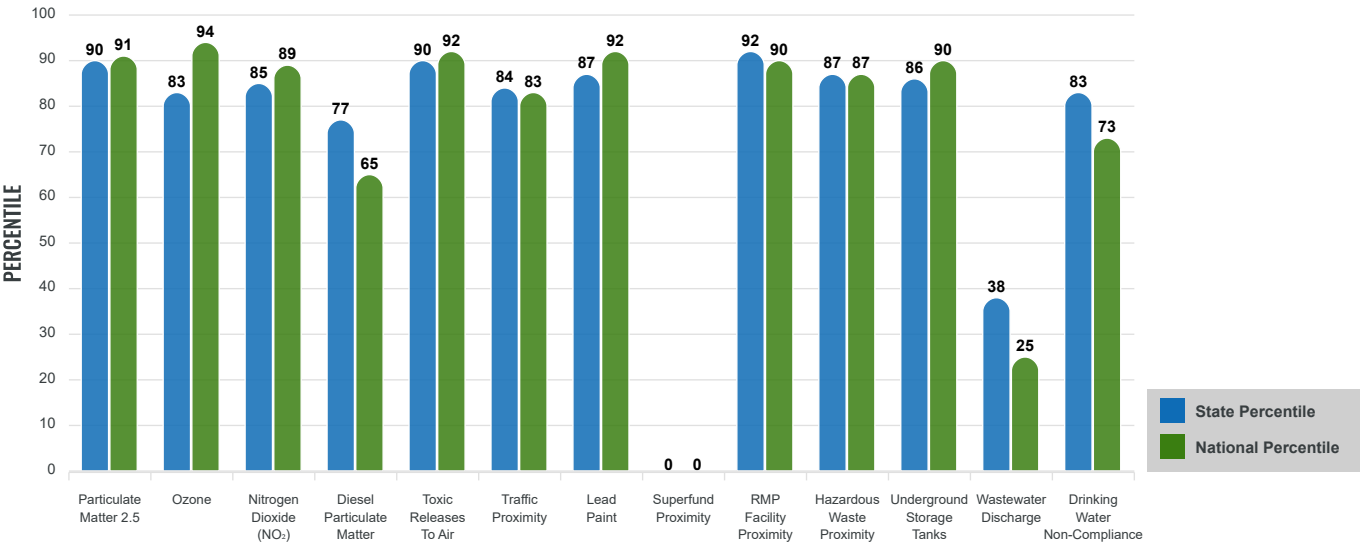
### EJ INDEXES FOR THE SELECTED LOCATION



## SUPPLEMENTAL INDEXES

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

### SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



Report for 1 mile Ring Centered at 42.375175,-82.957935  
Report produced December 20, 2024 using EJScreen Version 2.3

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
ENVIRONMENTAL BURDEN INDICATORS					
Particulate Matter 2.5 (µg/m³)	9.01	7.84	78	8.45	75
Ozone (ppb)	68.8	67.3	58	61.8	82
Nitrogen Dioxide (NO₂) (ppbv)	10	7.7	70	7.8	75
Diesel Particulate Matter (µg/m³)	0.128	0.116	56	0.191	39
Toxic Releases to Air (toxicity-weighted concentration)	3,100	2,500	82	4,600	79
Traffic Proximity (daily traffic count/distance to road)	1,200,000	910,000	69	1,700,000	59
Lead Paint (% Pre-1960 Housing)	0.63	0.38	75	0.3	82
Superfund Proximity (site count/km distance)	0	0.28	0	0.39	0
RMP Facility Proximity (facility count/km distance)	0.97	0.38	86	0.57	80
Hazardous Waste Proximity (facility count/km distance)	3.1	2	72	3.5	68
Underground Storage Tanks (count/km²)	21	7.6	88	3.6	96
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.11	880	21	700000	15
Drinking Water Non-Compliance (points)	0.65	0.39	87	2.2	76
SOCIOECONOMIC INDICATORS					
Demographic Index USA	2.82	N/A	N/A	1.34	93
Supplemental Demographic Index USA	2.33	N/A	N/A	1.64	85
Demographic Index State	2.98	1.18	94	N/A	N/A
Supplemental Demographic Index State	2.25	1.5	86	N/A	N/A
People of Color	86%	26%	92	40%	86
Low Income	62%	31%	89	30%	90
Unemployment Rate	11%	6%	83	6%	85
Limited English Speaking Households	0%	2%	73	5%	57
Less Than High School Education	15%	9%	83	11%	73
Under Age 5	7%	5%	73	5%	69
Over Age 64	14%	18%	37	18%	42

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

Sites reporting to EPA within defined area:

Superfund .....	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities .....	2
Water Dischargers .....	1
Air Pollution .....	8
Brownfields .....	15
Toxic Release Inventory .....	8

Other community features within defined area:

Schools .....	6
Hospitals .....	0
Places of Worship .....	13

Other environmental data:

Air Non-attainment .....	Yes
Impaired Waters .....	Yes

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

Report for 1 mile Ring Centered at 42.375175,-82.957935  
Report produced December 20, 2024 using EJScreen Version 2.3

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	24%	20%	85	20%	88
Heart Disease	8	6.3	86	5.8	88
Asthma	14.7	11.4	93	10.3	99
Cancer	5.9	7	21	6.4	36
Persons with Disabilities	18.4%	14.9%	75	13.7%	79

CLIMATE INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	46%	7%	98	12%	95
Wildfire Risk	0%	0%	0	14%	0

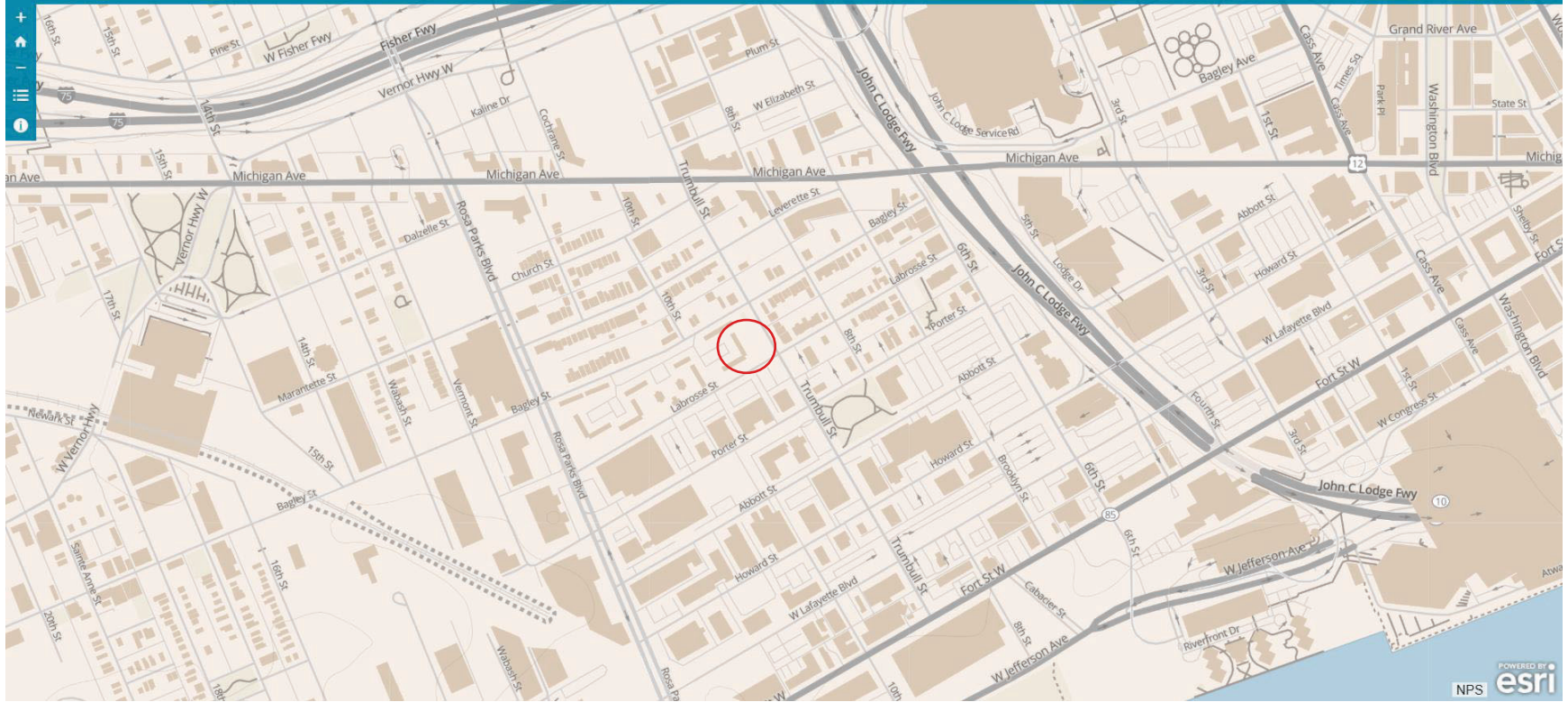
CRITICAL SERVICE GAPS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	15%	13%	67	13%	67
Lack of Health Insurance	6%	5%	60	9%	41
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access Burden	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Report for 1 mile Ring Centered at 42.375175,-82.957935  
Report produced December 20, 2024 using EJScreen Version 2.3

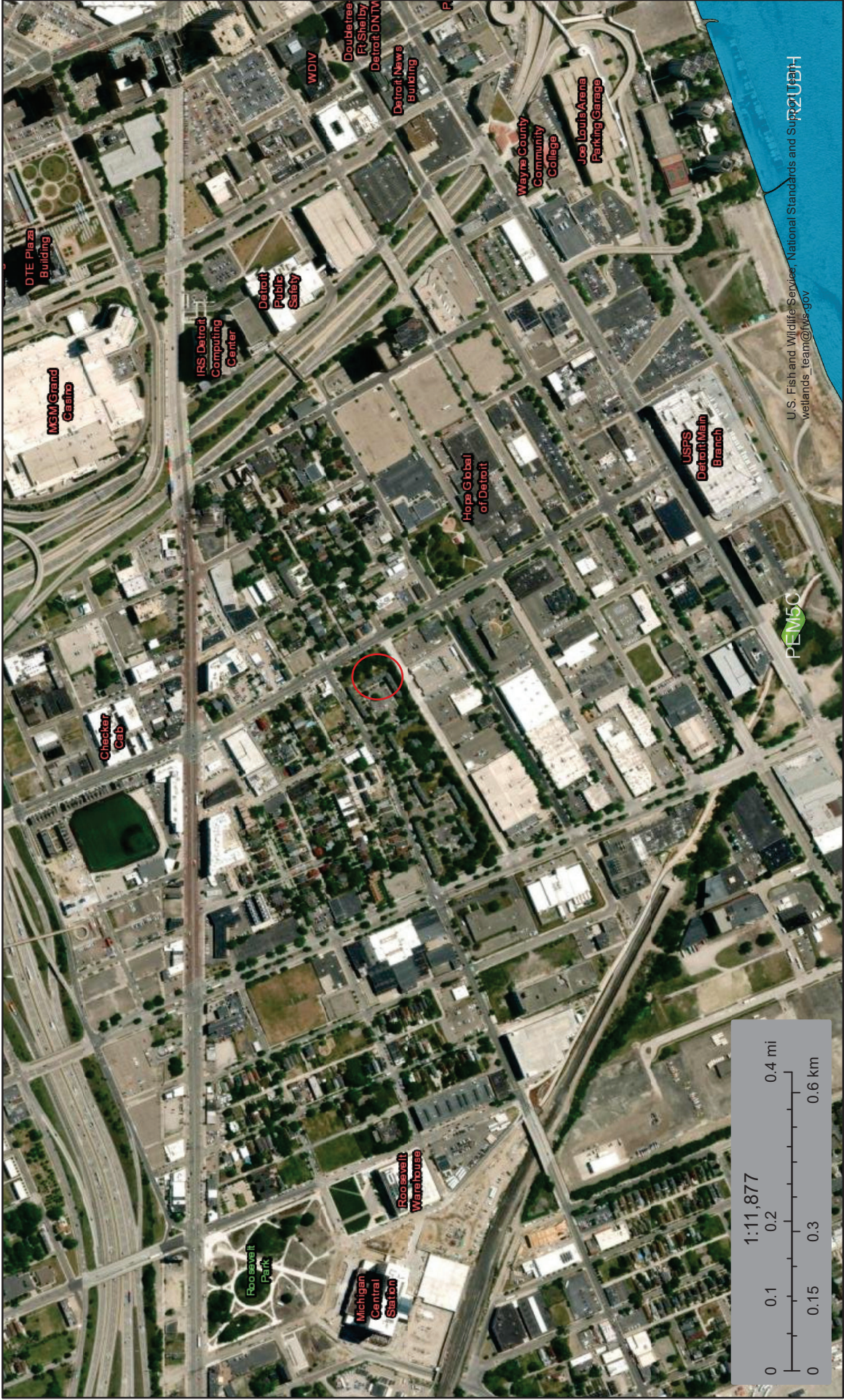


Wild & Scenic Rivers

▼ 1601 Bagley Street, Detroit, Mich







February 7, 2025

Wetlands

- Estuarine and Marine Deepwater

Estuarine and Marine Wetland

Freshwater Emergent Wetland

Freshwater Forested/Shrub Wetland

Freshwater Pond

Lake

Other

Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



Show me Average Jun/Jul/Aug Temps - under Moderate emissions (SSP2-4.5) - with a Median - probability

Historical 1986-2005

Next 20 Years 2020-2039

Mid-Century 2040-2059

End of Century 2080-2099

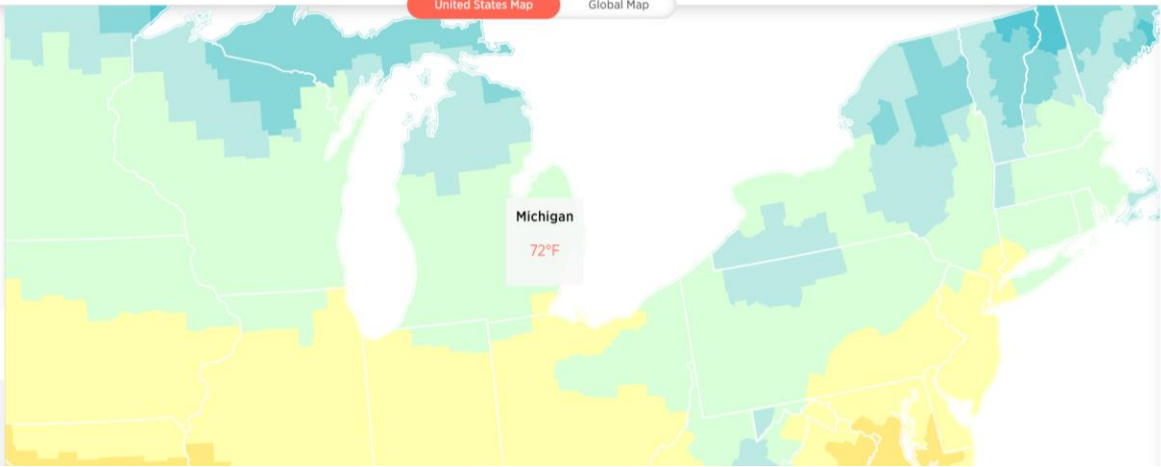
United States Map

Global Map

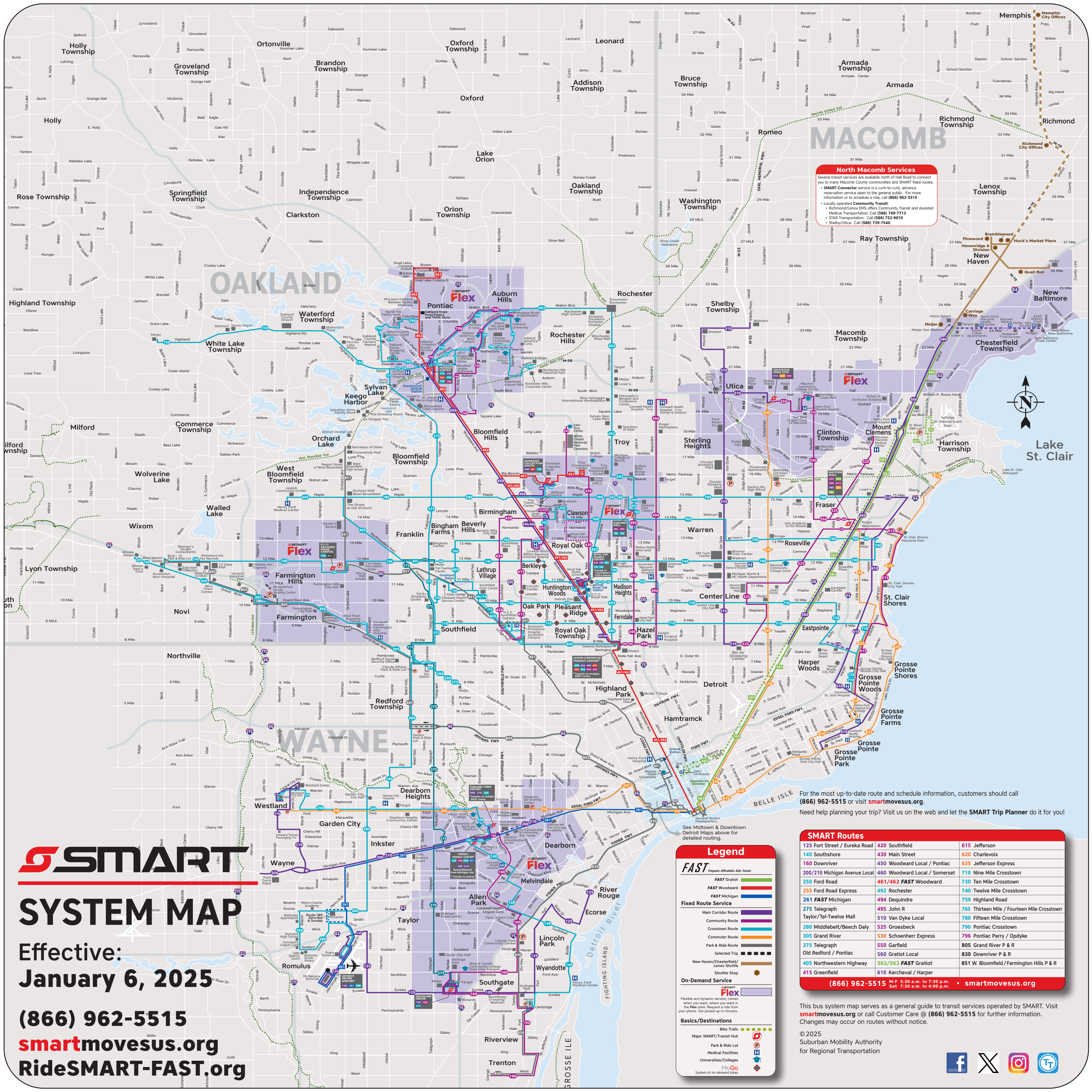


Temperature

°F °C







**North Macomb Services**  
Several transit services are available north of Hal Road to connect you to many Macomb County communities and SMART fixed routes.  
• **SMART Connector** service is a curb-to-curb, advance reservation service open to the general public. For more information or to schedule a ride, call (866) 962-5515  
• Locally operated **Community Transit**  
• Richmond/Lenox EMS offers Community Transit and Assisted Medical Transportation: Call (586) 749-7713  
• STAR Transportation: Call (586) 732-9010  
• Shelby/Utica: Call (586) 739-7540

For the most up-to-date route and schedule information, customers should call (866) 962-5515 or visit [smartmovesus.org](http://smartmovesus.org).  
Need help planning your trip? Visit us on the web and let the SMART Trip Planner do it for you!

SMART Routes			
125 Fort Street / Eureka Road	420 Southfield	615 Jefferson	
140 Southshore	430 Main Street	620 Charlevoix	
160 Downriver	450 Woodward Local / Pontiac	635 Jefferson Express	
200/210 Michigan Avenue Local	460 Woodward Local / Somerset	710 Nine Mile Crosstown	
250 Ford Road	461/462 FAST Woodward	730 Ten Mile Crosstown	
255 Ford Road Express	492 Rochester	740 Twelve Mile Crosstown	
261 FAST Michigan	494 Dequindre	759 Highland Road	
275 Telegraph	495 John R	760 Thirteen Mile / Fourteen Mile Crosstown	
Taylor/Tel-Twelve Mall	510 Van Dyke Local	780 Fifteen Mile Crosstown	
280 Middlebelt/Beech Daly	525 Groesbeck	790 Pontiac Crosstown	
305 Grand River	530 Schoenherr Express	796 Pontiac Perry / Opdyke	
375 Telegraph	550 Garfield	805 Grand River P & R	
Old Redford / Pontiac	560 Gratiot Local	830 Downriver P & R	
405 Northwestern Highway	562/563 FAST Gratiot	851 W. Bloomfield / Farmington Hills P & R	
415 Greenfield	610 Kercheval / Harper		

This bus system map serves as a general guide to transit services operated by SMART. Visit [smartmovesus.org](http://smartmovesus.org) or call Customer Care @ (866) 962-5515 for further information. Changes may occur on routes without notice.

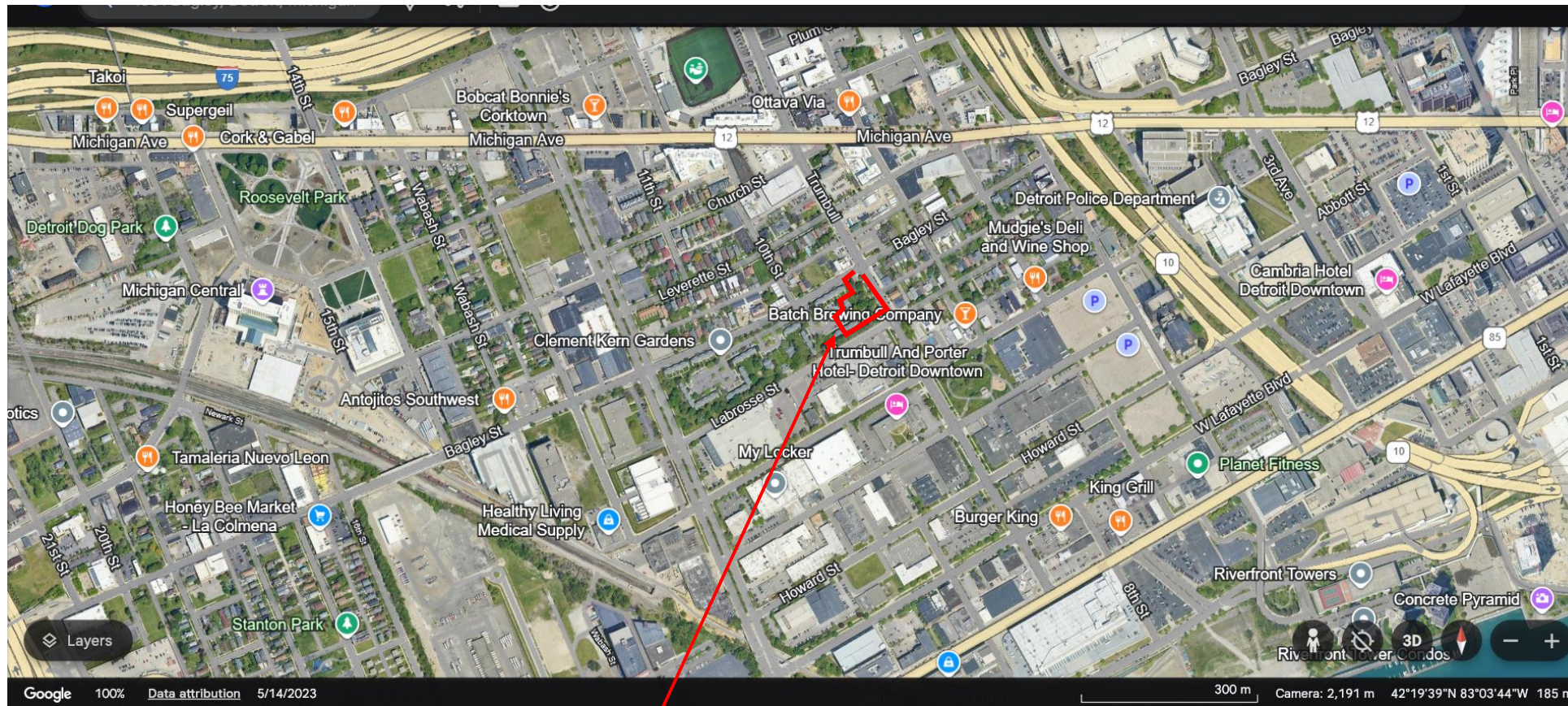
© 2025  
Suburban Mobility Authority  
for Regional Transportation



**SMART**  
**SYSTEM MAP**  
Effective:  
**January 6, 2025**  
**(866) 962-5515**  
**smartmovesus.org**  
**RideSMART-FAST.org**



Map Depicting Project Location and Nearby Commercial Properties



Project Location

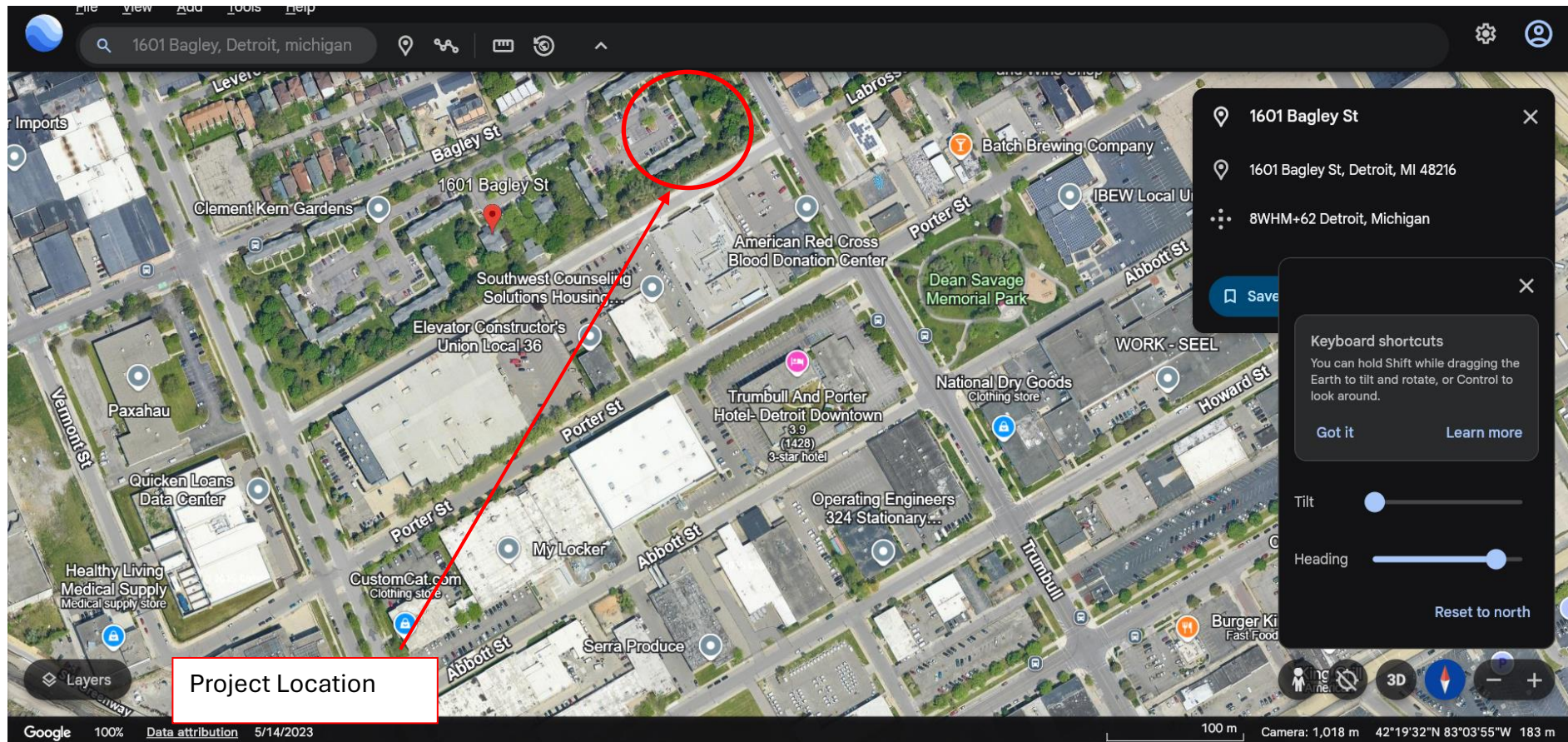


## Commercial Properties Surrounding Project Location



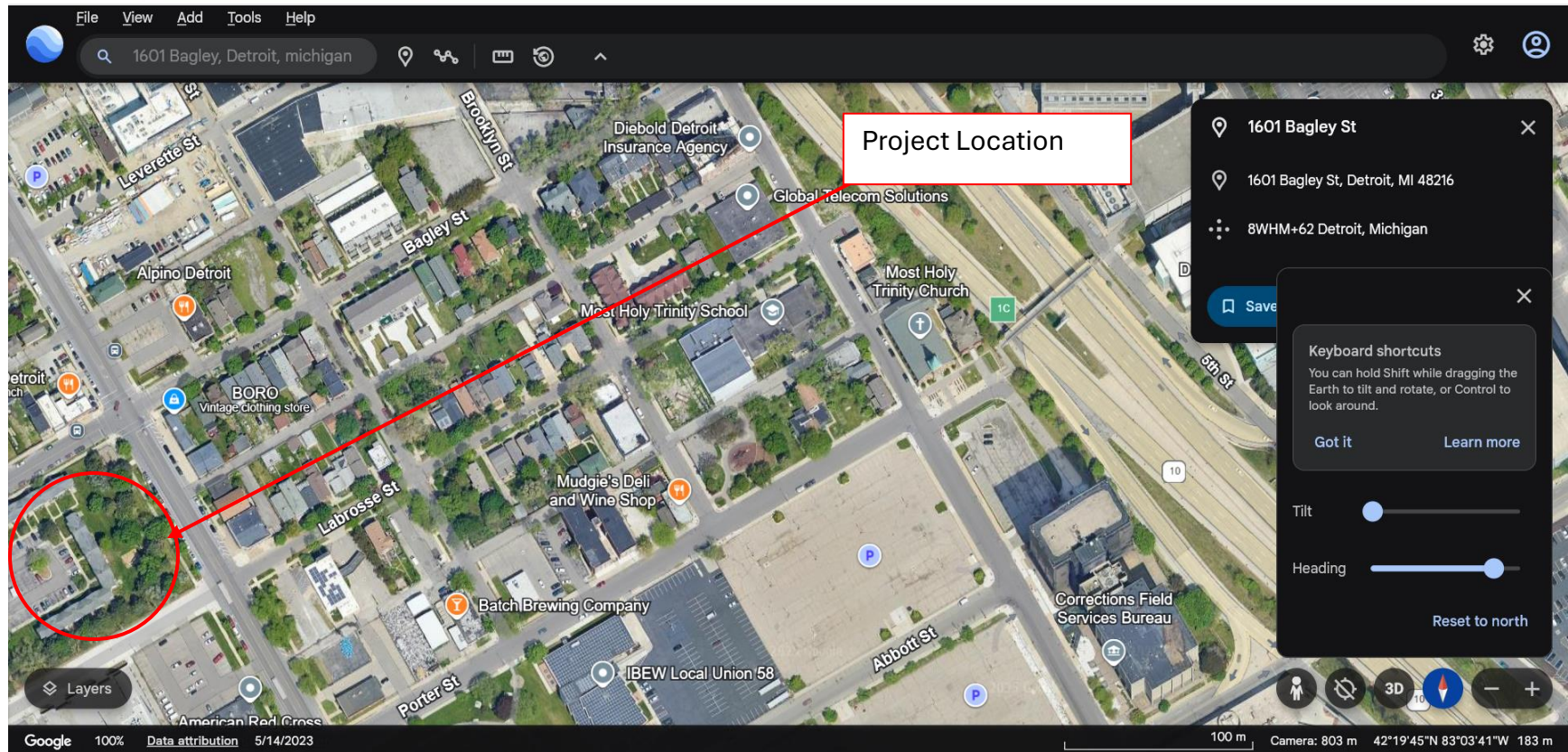


## Commercial Properties to South



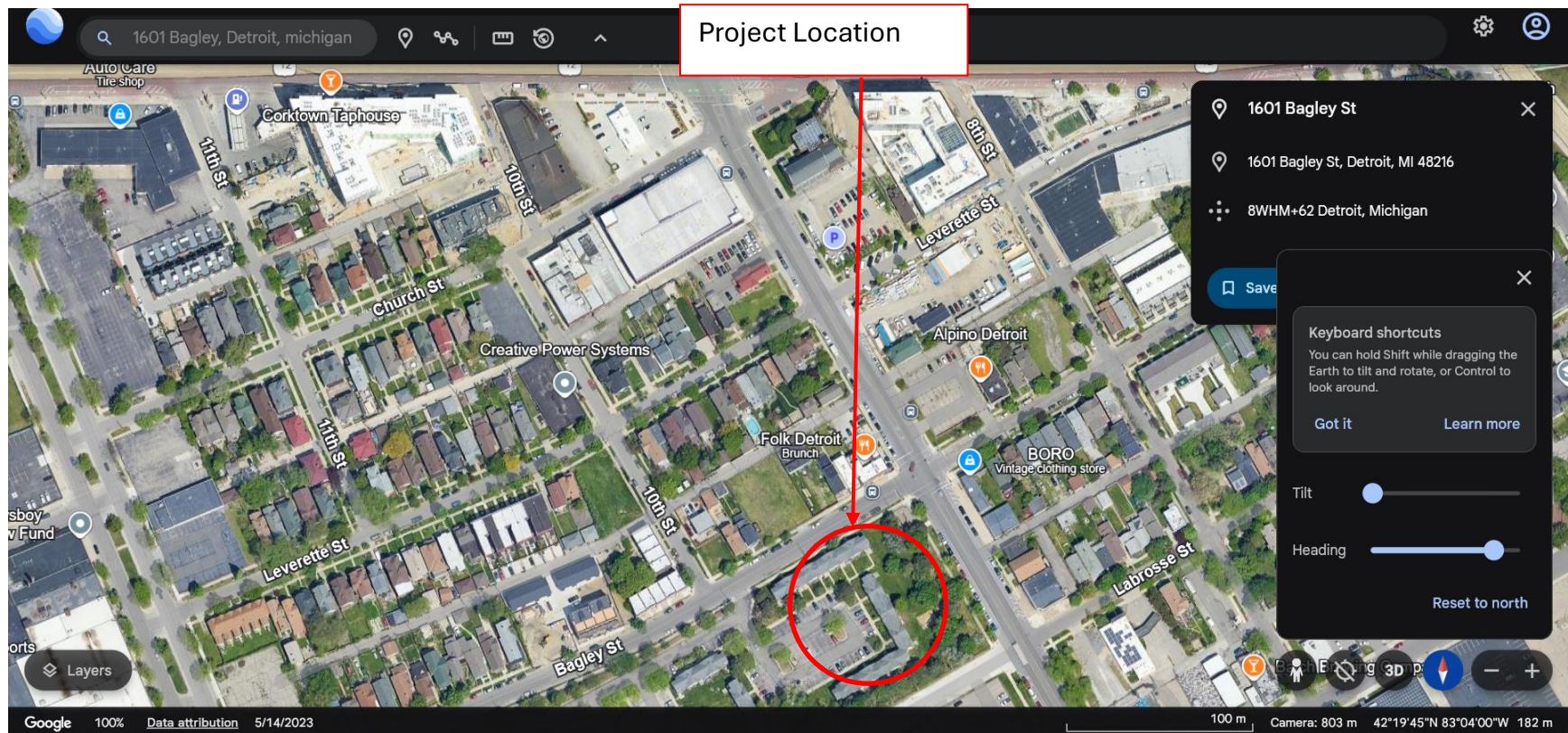


## Commercial Properties to East





## Commercial Properties to North





## Commercial Properties to West

