

MITIGATION PLAN
Preserve on Ash III (POA III)
GEI Consultants, Inc.
August 2025

Response Activity or Continuing Obligation	Required Activities	Party Responsible for Completing Activity	Timing of Activity	Estimated Cost	Required Follow-up or Reporting
ResAP – Clean Fill	<ul style="list-style-type: none"> The fill material brought to the site will be documented as clean by analytical results from samples collected from the site of origin documenting that the material does not contain volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), or metals at concentrations above the applicable generic direct contact criteria. 	Contractor	During Construction	\$30,000, for analytical testing	Include results in DDCC report.
Direct Contact Barrier	<ul style="list-style-type: none"> The site requires a direct contact barrier and a minimum of 12” of soil cover. 	Contractor	During Construction	\$40,000, for installation and oversight	Include documentation of barrier and cover installation in DDCC report
Documentation of Due Care Compliance	<ul style="list-style-type: none"> Complete a DDCC report and submit to the City of Detroit Environmental Review Officer for review prior to submitting to EGLE. Engineering controls will require an Operations and Maintenance plan. Additional requirements such as a Restrictive Covenants and/or a recorded Notice to Title may be requested depending on site conditions. 	Consultant	During Construction	\$20,000	Provide report to HRD’s ER Team

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Section 106 – No Adverse Effects Requirements	<ul style="list-style-type: none"> The objects collected during the trenching investigation will be donated to Wayne State University (WSU). 	Consultant	Prior to Construction	N/A	Submit objects to WSU. Notify Preservation Specialist
Section 106 – Unanticipated Discoveries Plan	<ul style="list-style-type: none"> Once construction has started, the City of Detroit's Unanticipated Discoveries Plan shall be followed for the duration of the project. 	Construction Crew, Foremen, Developer	During Construction	N/A	As required in the City of Detroit's Unanticipated Discoveries Plan, depending on the type of unanticipated discovery. Notify Preservation Specialist