U.S. Department of Housing and Urban Development 451 Seventh Street, SW Washington, DC 20410

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

Project Information

Project Name: VOA-Saint-Mary

HEROS Number: 900000010478583

Start Date: 06/23/2025

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

DETROIT MI, 48226

RE Preparer: Kim Siegel

State / Local Identifier: Michigan/Detroit

Certifying Officer: Julie Schneider

Grant Recipient (if different than Responsible Ent

ity):

Point of Contact:

Consultant (if applicable): ASTI Environmental

Point of Contact: Christopher Yelonek

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: 14751 Mansfield St, Detroit, MI 48227

Additional Location Information:

14751 Mansfield Street, Detroit, Wayne County, Michigan 48227

Direct Comments to: Penny Dwoinen, Environmental Review Officer, Housing and

Revitalization Department, City of Detroit

E-mail: dwoinenp@detroitmi.gov

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

The proposed project seeks to purchase, rehabilitate, and convert a former Catholic school building into permanent supportive housing, apartment building at 14751 Mansfield Street, Detroit, Wayne County, Michigan 48227 (Subject Property). The Subject Property is located in Detroit's Grand River-Saint Mary's Neighborhood. The Subject Property building is a former three-story, school building and is currently vacant. Through their purchase of the Subject Property, Volunteers of America: Michigan plans to split the Subject Property from the Saint Mary's of Redford Church property, which is currently part of the Saint Mary's Church parcel. The proposed rehabilitation and conversion are to develop 61 apartment units. The breakdown of apartment units is to be 12 studio apartments of approximately 550 square feet, 45 one-bedroom apartments of approximately 650 square feet, and 4 two-bedroom apartments of approximately 850 square feet. All 61 apartments are to be reserved as permanent supportive housing for the chronically homeless and persons from the top 10 percent of the Detroit Continuum of Care's (DCoC) priority list scoring households based on SPDAT. The supportive housing is to use the housing first approach with low barrier admissions practices and referrals from the DCoC. Additionally, the proposed project will accept referrals through Detroit's Coordinated Assessment Model (CAM), who focuses on homeless persons in Detroit, Highland Park, and Hamtramck. This review is for \$2,900,000.00 in HOME-ARP funds, \$163,566.57 in HOME 2024, \$199,984.96 in HOME 2023, \$386,448.47 in HOME 2022, and \$100,000 in CDBG-CV funds from the City of Detroit. This review is valid for five years.

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

Since the 1980s, homelessness has altered to include low-income persons experiencing economic hardships, persons in areas of housing burdens, persons displaced by medical costs, substance abusers, and persons struggling with mental health issues. Treatment first housing approaches usually fail to keep most homeless persons, particularly chronically homeless persons housed and to address the underlying issues that contribute to homelessness. As of 2021, the Homeless Action Network of Detroit (HAND) estimated that 5,687 Detroit residents were homeless

with an estimated 3,454 were single adults aged 25 years or older, of whom 1,120 persons were identified as chronically homeless. Additionally, the City of Detroit is actively seeking to increase affordable housing stock throughout the city to address housing burdens reported by numerous residents. The proposed project plans to help address chronic homelessness by converting a vacant school building into permanent supportive housing using the housing first approach to resolve homelessness. By using the housing first approach to resolve homelessness, there is a higher chance the persons experiencing chronic homelessness will be able to address underlying causes for homelessness, obtain stable employment, and remain housed. The proposed project is anticipated to help reduce overall public spending in healthcare, judicial services, and welfare costs, with public spending being reduced in a range from "\$900.00 to \$29,400.00 per person who enters into a housing first program" as stated by the National Low Income Housing Coalition.

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

The population in the area surrounding the Subject Property are largely employed in manufacturing and services industries, which are industries volatile to market downturns, as documented in the market study of the Subject Property (Tab Attachment 1). The other significant industry employing the population surrounding the Subject Property is the healthcare industry, which is a largely stable industry, regardless of economic conditions. In 2023, the unemployment in the Project Market Area (PMA) of the Subject Property is estimated to be at 4.1 percent, but employment growth increased 3.5 percent, with both statistics being slightly above the national averages. The overall population in the PMA and household sizes, have decreased from 2000 to 2023. The population decrease is predicted to decrease slightly into 2028. Rental properties surrounding the Subject Property hold vacancy rates ranging from zero to 21.7 percent with an average vacancy rate of 2.2 percent. The average market rate rental properties vacancy rate is 1.4 percent in the PMA. Overall, the demand for rental housing, particularly affordable housing, is high, which is a significant contributor of homelessness. As of 2021, HAND estimated that 5,687 Detroit residents were homeless with an estimated 3,454 were single adults aged 25 years or older, of whom 1,120 persons were identified as chronically homeless.

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

B5-103 Third Floor.pdf

B4-102 Second Floor.pdf

B3-101 First Floor.pdf

T1-VOA St Marys - MSHDA MS - 112023.pdf

B2-StMarysofRedford SITE PLAN.pdf

B1-VOA StMary Ex01 Project Narrative.pdf

A2-Site Features Map.pdf

A1-Site Location Map USGS Topographic Map.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					
	Finding of Significant Impact					

Approval Documents:

Signature Page - VOA St Mary.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
B20MW260006	Community Planning and Development (CPD)	Community Development Block Grant CARES Act (CDBG-CV)	\$100,000.00
M21MP260202	Community Planning and Development (CPD)	HOME American Rescue Plan (HOME-ARP)	\$2,900,000.00
M22MC260202	Community Planning and Development (CPD)	HOME Program	\$386,448.47
M23MC260202	Community Planning and Development (CPD)	HOME Program	\$199,984.96
M24MC260202	Community Planning and Development (CPD)	HOME Program	\$163,566.57

Estimated Total HUD Funded,
Assisted or Insured Amount:

\$3,750,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) \$31,523,216.00 **(5)]:**

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

Compliance Factors: 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)
STATUTES, EXECUTIVE ORE	DERS, AND REGULATIO	NS LISTED AT 24 CFR §50.4 & § 58.6
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	☐ Yes ☑ No	There are three airports within a 15-mile radius of the Subject Property. The Coleman A. Young International Airport is approximately 9.69 miles from, Detroit Metropolitan Wayne County Airport is approximately 12.98 miles from, and Windsor International Airport is approximately 14.75 miles from the Subject Property. The Subject Property is outside of all airport runway protection, clear, and accident potential zones. The Subject Property is not anticipated to be adversely impacted by airport hazards and is in compliance with this regulation. See Appendix P for an airport location map.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	□ Yes ☑ No	The Subject Property is located in Detroit, Wayne County, Michigan. Wayne County has one coastal barrier resource known as MI-04, along its southern coast. The Subject Property is located in the inland portion of western Detroit, of Wayne County's North-Central portion. The proposed project is not anticipated to have an adverse impact on coastal barrier resources and is in compliance with this statute. See Appendix Q for the John H. Chafee Coastal Barrier Resources System map of Michigan.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001- 4128 and 42 USC 5154a]	□ Yes ☑ No	The Subject Property is located in Zone X, the area of minimal flood hazard as seen in the FEMA flood map 26160C0100E, effective February 2, 2012. The Subject Property is not anticipated to be adversely impacted by flood hazards, flood insurance is not required for the proposed project, and the project is in compliance with this

		statute. See Appendix D for the FEMA			
STATUTES EXECUTIVE OF	SERS AND REGULATION	FIRMette map.			
·	STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5				
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	☐ Yes ☑ No	The Subject Property is located in Detroit, Wayne County, Michigan. Wayne County is in an ozone attainment/maintenance zone and has a sulfur dioxide nonattainment zone in its Southeast portion of the county. The Subject Property is located in the Northwest portion of the City of Detroit, outside of the Wayne County sulfur dioxide nonattainment. However, the Subject Property is located in the ozone attainment/maintenance zone. Construction on the proposed project is to begin in the third quarter of 2025 and last into the fourth quarter of 2026. Through their review of the proposed project, EGLE had determined that the size, scope, and duration of the proposed project is small enough in scale which is not anticipated to exceed de minimis levels for ozone standards. See Appendix J for more information on			
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☑ No	air quality standards. The Subject Property is located in Detroit, Wayne County, Michigan. The City of Detroit has coastline in the Eastern portion of the city. The Subject Property is located in an inland portion of Detroit. The proposed project is not anticipated to have an adverse impact on coastal zone management area and is in compliance with this statute. See Appendix F for the coastal zone management map of northern Wayne County.			
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☑ Yes □ No	Phase I ESA, 11/22/ 2023 ASTI Environmental was retained to conduct a Phase I ESA (Tab Attachment 2) of the Subject Property. REC: Saint Mary's Church at 14750 Saint Mary's, Detroit adjoins the Subject Property to the South, and it is listed in the Voluntary			

Cleanup Program database as a Part 201 site. Part 201 listings indicate some level of subsurface contamination and ASTI has been unable to determine the risk to the Subject Property. Additionally, verbal information had been received by former site personnel that indicates the REC is likely connected to a potential heating oil UST that may or may not have been removed from the south adjoining site. Limited Phase II ESA, 10/22/2024 ASTI was retained to conduct a Limited Phase II ESA (Tab Attachment 3) of the Subject Property. The GPR survey identified an anomaly indicating a potential UST on the south adjoining property. Another anomaly indicative of a subsurface utility corridor was identified on the Southwestern portion of the Subject Property. Naphthalene was detected, but at concentrations below the VIAP SL. Based on the results of the Limited Phase II ESA, the Subject Property has not been determined to be a "facility" as defined in Part 201. Sub-Slab Soil Gas Investigation, 02/11/2025 ASTI was retained to conduct a Sub-slab Soil Gas Investigation (Tab Attachment 4) at the Subject Property. Naphthalene was detected at a concentration that exceeded the residential VIAP SLs in soil gas sample VP-18. Soil Gas Investigation, 03/10/2025 ASTI was retained to conduct a Soil Gas Investigation (Tab Attachment 5) at the Subject Property. Based on the historical usage of the Subject Property, and results of the investigations conducted on and adjoining the Subject Property, the naphthalene detection is likely from a building material that is off-gassing low concentrations of naphthalene and not volatilization from the soil. EGLE's unrestricted residential VIAP SLs were derived with the

		assumption that a source of vapor is
		present in soil and/or groundwater.
		Volatilization to Indoor Air Pathway
		Evaluation, 06/05/2025 ASTI was
		retained to conduct a VIAP Evaluation
		(Tab Attachment 6) at the Subject
		Property. Based on the Tier II Evaluation
		results for naphthalene in the soil gas at
		the Subject Property and given that the
		GSIP pathway is not relevant for the
		Subject Property, no unacceptable
		exposures are present. Therefore, no
		response actions are required for the
		owner or operator to comply with their
		due care obligations under Part 20107a.
		Asbestos-Containing Materials
		Inspection, 09/26/2024 ASTI was
		retained to conduct an ACM inspection
		(Tab Attachment 7) of the Subject
		Property. Based on the inspection
		· · · ·
		conducted between June 17-19 and 24,
		2024, ACMs were identified. Lead-
		Based Paint Inspection and Risk
		Assessment, 09/10/2024 ASTI
		conducted a LBP Inspection and Risk
		Assessment (Tab Attachment 8) of the
		Subject Property on June 17-19, 2024.
		ASTI collected 813 measurements of
		painted surfaces. Of these
		measurements, 93 measurements were
		positive for LBP. During the evaluation,
		ASTI observed 92 areas with paint-lead
		hazards, including deteriorated LBP and
		LBP on impact, friction, or chewable
		•
		surfaces. No potential paint-lead
		hazards were identified. ASTI personnel
		collected 147 lead dust wipe samples
		including 6 media blanks. Each sample
		was submitted to an NLLAP-certified
		laboratory. Review of the lead dust wipe
		sample results revealed that 119 of the
		samples collected exceeded the State of
		Michigan clearance levels and HUD and
		EPA standards.
Endangered Species Act	☐ Yes ☑ No	The Indiana Bat, Northern Long-eared
Endangered Species Act of 1973,		Bat, Rufa Red Knot, Eastern Massasauga
Linualization appeared field 1373,	1	Day Mara Mea Milot, Lastern Massasauga

particularly section 7; 50 CFR Part 402		Rattlesnake, and the Eastern Prairie Fringed Orchid are all species listed on the Threatened and Endangered Species List known to have critical habitats in Wayne County. The Subject Property is a former school building, located in a highly urbanized area of the City of Detroit, where no critical habitats for animal species are known to be present. The proposed project is not anticipated to have an adverse impact on threatened and endangered species and is in compliance with this statute. See
		Appendix H for the Threatened and Endangered Species List for Michigan Species.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☑ No	Based on the EDR Radius Map Report of the Subject Property, dated October 4, 2023, reports no Above-ground Storage Tanks (ASTs) are reported to be within a one-mile radius of the Subject Property. However, in reviewing aerial photographs of Wayne County, there is one property with ASTs. At 15850 Glendale Street, there are two ASTs with an estimated capacity of 16,457 gallons, which has an Acceptable Separation Distance for Blast Over Pressure (ASDBOP) of 552.87 feet each, and Acceptable Separation Distance for Thermal Radiation for People (ASDPPU) of 888.24 feet each, and the ASTs are approximately 5,041 feet from the Subject Property. The Subject Property is located beyond the minimum acceptable separation distance for the two ASTs and is not anticipated to be adversely impacted by explosive and flammable hazards. The proposed project is in compliance with this regulation. See Appendix O for more information on explosive and flammable hazards.
Farmlands Protection Farmland Protection Policy Act of	☐ Yes ☑ No	The soil present on the Subject Property consists of Urban land-Riverfront complex which is classified as not prime

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	farmland. The proposed project is not anticipated to have an adverse impact on prime farmland and is in compliance with this statute. See Appendix K for the USDA soil survey of the Subject Property.
□ Yes ☑ No	The Subject Property is located in Zone X, the area of minimal flood hazard as seen in the FEMA flood map 26160C0100E, effective February 2, 2012. The Subject Property is not anticipated to be adversely impacted by flood hazards and the proposed project is in compliance with this executive order. See Appendix D for the FEMA FIRMette map.
✓ Yes □ No	The proposed project is a rehabilitation and conversion project of a former, vacant school building. Due to the age of the Subject Property building and the eligibility for listing on the National Register of Historic Places (NRHP) for the building on the adjoining property at 14751 Mansfield Street, the proposed project underwent a Section 106 review. Under the programmatic agreement with the State Historic Preservation Office (SHPO), the City of Detroit has determined that the proposed project will have no adverse effect on cultural resources nearby the Subject Property. However, the City of Detroit has stipulated that after the proposed project is completed, photographs of the completed work are to be provided to the City of Detroit to document that the completed work is in accordance with the specifications provided to the City's Preservation Specialist. See Appendix C for the Section 106 application and response letter.
☐ Yes ☑ No	ASTI conducted a noise assessment of the Subject Property, using one noise assessment location, which was found to be at 61 decibels and within the
	☑ Yes □ No

	1	T			
Act of 1978; 24 CFR Part 51 Subpart B		Acceptable noise range. The proposed project is not anticipated to be adversely impact by noise and is in compliance with this statute. See Appendix M for the noise assessment.			
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	□ Yes ☑ No	The Subject Property is located in Detroit, Wayne County, Michigan. There are no designated sole source aquifers in the State of Michigan. The proposed project is not anticipated to have an adverse impact on sole sources aquifers and is in compliance with this statute. See Appendix G for the Designated Sole Source Aquifers in Region 5 map.			
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	□ Yes ☑ No	The Subject Property is located in a highly urbanized area of the City of Detroit. Based on the U.S. Fish and Wildlife Service wetlands database, there are no wetlands on or near the Subject Property. The proposed project is not anticipated to have an adverse impact on wetlands and is in compliance with this executive order. See Appendix E for the wetland map of the Subject Property.			
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	□ Yes ☑ No	The Subject Property is located in Detroit, Wayne County, Michigan. Wayne County is in Michigan's Southeast Region. There are no designated Wild and Scenic Rivers in Southeast Michigan. There are no designated Inventory Rivers on or near the Subject Property. The proposed project is not anticipated to have an adverse impact on Wild and Scenic Rivers and the project is in compliance with this statute. See Appendix I for more information on Wild and Scenic Rivers.			
HUD HOUSING ENVIRONMENTAL STANDARDS					
ENVIRONMENTAL JUSTICE					
Environmental Justice Executive Order 12898	□ Yes ☑ No	The proposed project is a rehabilitation and conversion project of a former school building for affordable housing.			
		The pollution levels selected by the EPA			

surrounding the Subject Property are higher than the State of Michigan average, except for superfund proximity, hazardous waste proximity, RMP facility proximity, and wastewater discharge, which are below the state averages. The population surrounding the Subject Property consists of 97 percent are people of color, 53 percent are low-income, 19 percent are unemployed, 1 percent are members of limited English speaking households, 13 percent hold less than a high school education, 7 percent are under 5 years of age, 18 percent are over 64 years of age, 26 percent have a low life expectancy, 17.6 percent are persons with disabilities, 29 percent lack broadband internet access, 6 percent lack health insurance, and 59 percent of households are owner occupied. The per capita income of the population surrounding the Subject Property is \$21,517.00 annually and the average life expectancy is 72 years of age. Out of the limited English-speaking households, Spanish is the most spoken language at 1 percent. The Subject Property is currently vacant, and the proposed project is not anticipated to displace any persons. Nor is the proposed project expected to have an adverse impact on housing stock near the Subject Property. The proposed project is in compliance with this executive order. See Appendix L for the EPA's EJ Screen Report.

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	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code	·	
	·	LAND DEVELOPMENT	•
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The proposed project is a rehabilitation project to convert a former school building into apartments. The City of Detroit is actively seeking ways to increase affordable housing stock and to increase high quality rental opportunities in the city. Additionally, the City of Detroit is seeking ways to help preserve its historical character through reuse and adoptive reuse. The proposed project will help the City of Detroit achieve its goals by creating an increase in affordable housing stock, high quality rental properties in the city, and retaining a historic building through adoptive reuse. The Subject Property is zoned R5: Medium Density Residential District. The current zoning of the Subject Property is compatible with the proposed project and will not need to be altered. The Subject Property building will maintain its scale and urban design on its exterior. Only the interior of the Subject Property building is to be significantly altered as part of the proposed project. The proposed project is anticipated to help the City of Detroit achieve some of its housing and historic preservation goals, without significant altering the surrounding neighborhood. See Appendix R for the City of Detroit: zoning map section 67.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	The soil present on the Subject Property consists of Urban land-Riverfront complex with 0 to 4 percent slopes. The drainage class of the soil is rated as well drained and the runoff class of the soil is rated as low. Additionally, the soil is not known to have a frequency of flooding or ponding. The proposed project is a rehabilitation project of a former school building to be converted into apartments where erosion is not anticipated to have an adverse impact on	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code	·	
		the Subject Property, and the soil is	
		anticipated to continue to be suitable for	
		the project. See Appendix K for the USDA	
		soil survey of the Subject Property.	
Hazards and	2	The proposed project is a rehabilitation	
Nuisances including		project for residential use and is not	
Site Safety and Site-		anticipated to be a noise generator. The	
Generated Noise		proposed project plans to install intrusion	
		alarms for the below-grade and at-grade	
		apartment units. The proposed project is	
		not anticipated to create hazards and	
		nuisances to the surrounding neighborhood.	
		SOCIOECONOMIC	l
Employment and	1	The proposed project is anticipated to	
Income Patterns		create a temporary increase in construction	
		employment. The proposed project does	
		plan to create one permanent full-time job	
		for the administration, maintenance, and	
		operation of the new apartment building.	
		The proposed project is anticipated to	
		house at least 61 homeless persons, who	
		will have permanent supportive housing	
		services. Through holding a permanent	
		home, homeless persons are able to seek	
		permanent employment. The proposed	
		project may increase incomes overall for the	
		target population of the project.	
Demographic	2	The Subject Property consists of a former,	
Character Changes /		vacant school building that is to be	
Displacement		rehabilitated and converted into	
		apartments. The proposed project is a	
		supportive housing project; hence, the	
		project is not anticipated to displace any	
		persons. The proposed project is focused on	
		homeless residents of Detroit, Highland	
		Park, and Hamtramck, which may lead to	
		small demographic alterations in the Grand	
		River-Saint Mary's Neighborhood.	
		Additionally, the proposed project is	
		anticipated to increase urban density in the	
		Grand River-Saint Mary's Neighborhood.	
Environmental	2	The proposed project is a rehabilitation and	
Justice EA Factor	_	conversion project of a former school	
7.5.5.6.6. E. 1.1 doloi		building for affordable housing. The	
	<u> </u>	building for affordable flousing. The	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code	impact Evaluation	i i i i i i i i i i i i i i i i i i i
		pollution levels selected by the EPA	
		surrounding the Subject Property are higher	
		than the State of Michigan average, except	
		for superfund proximity, hazardous waste	
		proximity, RMP facility proximity, and	
		wastewater discharge, which are below the	
		state averages. The population	
		surrounding the Subject Property consists of	
		97 percent are people of color, 53 percent	
		are low-income, 19 percent are	
		unemployed, 1 percent are members of	
		limited English speaking households, 13	
		percent hold less than a high school	
		education, 7 percent are under 5 years of	
		age, 18 percent are over 64 years of age, 26	
		percent have a low life expectancy, 17.6	
		percent are persons with disabilities, 29	
		percent lack broadband internet access, 6	
		percent lack health insurance, and 59	
		percent of households are owner occupied.	
		The per capita income of the population	
		surrounding the Subject Property is	
		\$21,517.00 annually and the average life	
		expectancy is 72 years of age. Out of the	
		limited English-speaking households,	
		Spanish is the most spoken language at 1	
		percent. The Subject Property is currently	
		vacant, and the proposed project is not	
		anticipated to displace any persons. Nor is	
		the proposed project expected to have an	
		adverse impact on housing stock near the	
		Subject Property. The proposed project is in	
		compliance with this executive order. See	
	CONANAI	Appendix L for the EPA's EJ Screen Report.	
Educational and		JNITY FACILITIES AND SERVICES	T
Educational and Cultural Facilities	2	Education services for Kindergarten to the	
(Access and Capacity)		Twelfth Grade are provided by the Detroit	
(Access and Capacity)		Public Schools Community District. The nearest schools to the Subject Property are:	
		* Edison Elementary School at 17045 Grand	
		River Avenue provides education services	
		for students in Kindergarten to the Fifth	
		Grade and is approximately 1,877 feet from	
		the Subject Property. * Alternatively,	
		and subject i toperty. Atternatively,	l

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code		
		students can attend Burns Elementary-	
		Middle School at 14350 Terry Street, which	
		offers education services to students in	
		Kindergarten to the Eighth Grade and is	
		approximately 3,911 feet from the Subject	
		Property. * Cody High School at 18445	
		Cathedral Street provides educational	
		services for students in the Nineth to	
		Twelfth Grades and is approximately 2.55	
		miles from the Subject Property. Students	
		of the Detroit Public Community District	
		who live at least 3/4 mile from their	
		neighborhood school are offered free bus	
		transit for school children kindergarten to	
		eighth grade and offers free Detroit	
		Department of Transportation (DDOT) bus	
		passes for students in the ninth to twelfth	
		grade. Students can pursue post-secondary	
		education through Wayne County	
		Community College: Northwest Campus at	
		8200 Outer Drive West, which is	
		approximately 1.76 miles from the Subject	
		Property. Based on current estimates of	
		homelessness in the City of Detroit, most	
		homeless persons are single adults. The	
		proposed project is a residential project but	
		is not anticipated to have an adverse impact	
		on local education facilities. See Appendix R	
		for the education facilities EA Factors map.	
		There are several opportunities for	
		potential future residents to seek cultural	
		engagement near the Subject Property. *	
		The Detroit Public Library: Chaney Branch at	
		16101 Grand River Avenue is approximately	
		557 feet from the Subject Property. * The	
		876 Exclusive Cultural Community Center at	
		15743 James Couzens Freeway is	
		approximately 2.24 miles from the Subject	
		Property. * The Redford Theatre at 17360 Lahser Road is approximately 2.92 miles	
		from the Subject Property. * The	
		Northwest Activities Center at 18100	
		Meyers Road, is approximately 2.53 miles	
		from the Subject Property. * The 8 Mile	
		moin the subject Froperty. The o wille	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code	•	
		Road Old Timers Club performing arts group	
		at 20402 Santa Barbara Street is	
		approximately 4.28 miles from the Subject	
		Property. The proposed project is not	
		anticipated to have an adverse impact on	
		cultural facilities. See Appendix R for the	
		cultural facilities EA Factors map.	
Commercial Facilities	1	The Subject Property is located between	
(Access and		two commercial corridors on Grand River	
Proximity)		Avenue in the Grand River Saint Mary's	
,,		neighborhood. The nearest commercial	
		corridor to the Subject Property is the	
		Grand River Avenue/Greenfield Road	
		commercial corridor, which is	
		approximately 1,769 feet away. The Grand	
		River Avenue/Greenfield Road commercial	
		corridor stretches from Winthrop Street in	
		the West to Whitcomb in the East and	
		Lyndon Street in the North to Birch Street in	
		the South. The Grand River	
		Avenue/Greenfield Road commercial	
		corridor features Food Giant grocery store,	
		retail, an event venue, and a restaurant.	
		The next nearest commercial corridor to the	
		Subject Property is the Grand River	
		Avenue/Fenkell Avenue commercial	
		corridor, which is approximately 2,497 feet	
		away. The Grand River Avenue/Fenkell	
		Avenue commercial corridor runs from	
		Glastonbury Avenue in the West to	
		Longacre Street in the East. The Grand River	
		Avenue/Fenkell Avenue commercial	
		corridor features Royal Fresh Market, three	
		pharmacies, a gym, retail, a bank,	
		restaurants, and a barbershop. The	
		proposed project is a residential project	
		that is anticipated to increase urban density	
		in the Grand River Saint Mary's	
		neighborhood which may be beneficial to	
		local businesses. See Appendix R for the	
		commercial corridor EA Factors map.	
Health Care / Social	1	There are multiple healthcare facilities near	
Services (Access and		the Subject Property. Detroit Medical	
Capacity)		Center: Sinai Grace Hospital at 6071 Outer	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code		
ASSESSMENT ACCOUNT	Couc	Drive West, is the nearest hospital to the Subject Property at approximately 1.78 miles away. Beaumont Northside Family Medicine at 14011 Greenfield Road is the nearest primary care medical office to the Subject Property which is approximately 3,482 feet away. The nearest dentist's office to the Subject Property is Krawiec Dentistry at 18400 Grand River Avenue, which is approximately 4,510 feet away. There are multiple pharmacies near the Subject Property. However, Rx Care Pharmacy at 16311 Grand River Avenue is the pharmacy nearest to the Subject Property which is approximately 434 feet away. The nearest social services provider to the Subject Property is the Michigan Department of Human Services: Grandmont Service Center at 17455 Grand River Avenue is approximately 1,978 feet away. The proposed project is a residential development project for permanent supportive housing for the chronically homeless with a housing first approach. The proposed project plans to help address the chronically homeless in the City of Detroit. Thereby, the proposed project may help alleviate the demand on emergency medical and social services in the City of Detroit. See Appendix R for the Health Care and Social	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Services EA Factors map. Solid waste disposal will be provided through a private contractor. The City of Detroit does offer recycling pickup services to multifamily properties via an application. Additionally, Detroit residents can drop off recyclables at the City of Detroit's Recycle Here! Facility at 5960 Lincoln Street, which is approximately 6.70 miles from the Subject Property. The proposed project is not anticipated to have an adverse impact on solid waste disposal or recycling services in the City of Detroit.	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code		
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	Waste water services to the Subject Property are provided by the Detroit Water and Sewerage Department. The Subject Property has an extant former school building that is surrounded by mostly residential development in a highly urbanized area of the City of Detroit. The proposed project is not anticipated to have an adverse impact on waste water services in the City of Detroit.	
Water Supply (Feasibility and Capacity)	2	Water supply services to the Subject Property are provided by the Detroit Water and Sewerage Department. The Subject Property has an extant former school building that is surrounded by mostly residential development in a highly urbanized area of the City of Detroit. A three-inch water service line provides water to the Subject Property. The proposed project is not anticipated to have an adverse impact on water services in the City of Detroit.	
Public Safety - Police, Fire and Emergency Medical	1	Public safety services to the Subject Property are provided by the City of Detroit: Police Department, Eighth Precinct at 21555 West McNichols Road, which is approximately 2.70 miles from the Subject Property. The Detroit Fire Department provides fire protection and emergency medical services to the Subject Property. The nearest fire station to the Subject Property is Engine 53, Ladder 25 at 15127 Greenfield Road, which is approximately 2,086 feet away. The proposed project is a residential development project for permanent supportive housing to address chronic homelessness. Through the proposed project, a reduction in homelessness may reduce the demand for emergency service calls, allowing public safety providers to address other safety issues in the City of Detroit. See Appendix R for the public services EA Factors map.	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code		
Parks, Open Space	2	There are many opportunities for potential	
and Recreation		future residents to seek engagement with	
(Access and Capacity)		parks and recreation near the Subject	
		Property. The nearest parks with amenities	
		to the Subject Property are: * Cook Park at	
		16001 Fenkell Avenue, featuring fitness	
		equipment, horseshoe pits, a picnic area, a	
		play area, and a walking path, which is	
		approximately 1,170 feet away. * Douglas	
		Ramsey Memorial Park at 17425 Grand	
		River Avenue features a basketball court, a	
		play area, and softball field, which is	
		approximately 2,015 feet away. *	
		Rosemont-Acacia Park at 14310 Rosemont	
		Avenue features a play area and a walking	
		path, which is approximately 3,739 feet	
		away. * Sawyer Park at 14000 Lyndon	
		Street features a basketball court, picnic	
		shelters, and a play area, which is	
		approximately 1.13 miles from the Subject	
		Property. * Kelley Park at 15825 Oakfield	
		Avenue features a basketball court, a picnic	
		area, and a play area, which is	
		approximately 4,175 feet away.	
		Additionally, there are several recreation	
		programs open for Detroit residents	
		through the City of Detroit Parks and	
		Recreation Department with programing	
		changing with the seasons. The proposed	
		project is a residential development project	
		and is not anticipated to have an adverse	
		impact on recreation opportunities,	
		including parks. See Appendix R for the	
		parks and recreation facilities EA Factors	
		map.	
Transportation and	2	The proposed project is a residential	
Accessibility (Access		project, which is focused on providing	
and Capacity)		permanent supportive housing to the	
''		chronically homeless. The Detroit	
		Department of Transportation (DDOT) route	
		3 runs by the Subject Property and the	
		nearest bus stop to the Subject property is	
		stop #5719, approximately 550 feet away.	
		DDOT line 3 intersects with lines 8, 7, 10,	
	l		

Assessment Factor 18, 38, 41, 43, and 60. DDDT line 3 intersects with the SMART bus routes of 280, 305, 375, and 610. Additionally, DDDT line 18, running along Fenkell Avenue, North of the Subject Property. The Subject Property is off Grand River Avenue / M-5, which intersects with Southfield Freeway / M-39 and I-96, connecting the Subject Property to the rest of the State of Michigan. The proposed project is anticipated to increase urban density, but the project is focused on providing housing to the chronically homeless, who are less likely to own a vehicle. The proposed project is anticipated to increase public transit usage for DDDT. The proposed project is not anticipated to significantly increase wehicular traffic near the Subject Property. See Appendix R for more information on transportation. NATURAL FEATURES	Environmental	Impact	Impact Evaluation	Mitigation
intersects with the SMART bus routes of 280, 305, 375, and 610. Additionally, DDOT line 18, running along Fenkell Avenue, North of the Subject Property. The Subject Property is off Grand River Avenue / M-5, which intersects with Southfield Freeway / M-39 and I-96, connecting the Subject Property to the rest of the State of Michigan. The proposed project is anticipated to increase urban density, but the project is focused on providing housing to the chronically homeless, who are less likely to own a vehicle. The proposed project is anticipated to increase public transit usage for DDOT. The proposed project is not anticipated to increase public transit usage for DDOT. The proposed project is not anticipated to significantly increase vehicular traffic near the Subject Property. See Appendix R for more information on transportation. **NATURAL FEATURES** Unique Natural Features / Water Resources** **Resources** Unique Natural Features or water resources on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit. The proposed project is not anticipated to have an adverse impact on unique natural features and water resources. Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.) 2 The vegetation on the Subject Property Consists of some small grass lawns and approximately 7 trees of diverse sizes. The proposed project, which is not anticipated to have an adverse impact on existing vegetation on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit, where there is little to no wildlife. The Subject Property predominantly consists of a former, vacant school building. The proposed project is not anticipated to have an adverse impact on wildlife.	Assessment Factor	Code		
Unique Natural Features / Water Resources Unique Natural Features / Water Resources There are no unique natural features or water resources on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit. The proposed project is not anticipated to have an adverse impact on unique natural features and water resources. Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.) The vegetation on the Subject Property consists of some small grass lawns and approximately 7 trees of diverse sizes. The proposed project is a rehabilitation and conversion project, which is not anticipated to have an adverse impact on existing vegetation on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit, where there is little to no wildlife. The Subject Property predominantly consists of a former, vacant school building. The proposed project is not anticipated to have an adverse impact on wildlife.	Assessment Factor	Code	intersects with the SMART bus routes of 280, 305, 375, and 610. Additionally, DDOT line 18, running along Fenkell Avenue, North of the Subject Property. The Subject Property is off Grand River Avenue / M-5, which intersects with Southfield Freeway / M-39 and I-96, connecting the Subject Property to the rest of the State of Michigan. The proposed project is anticipated to increase urban density, but the project is focused on providing housing to the chronically homeless, who are less likely to own a vehicle. The proposed project is anticipated to increase public transit usage for DDOT. The proposed project is not anticipated to significantly increase vehicular traffic near the Subject Property. See Appendix R for more	
Unique Natural Features /Water Resources There are no unique natural features or water resources on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit. The proposed project is not anticipated to have an adverse impact on unique natural features and water resources. Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.) The vegetation on the Subject Property consists of some small grass lawns and approximately 7 trees of diverse sizes. The proposed project is a rehabilitation and conversion project, which is not anticipated to have an adverse impact on existing vegetation on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit, where there is little to no wildlife. The Subject Property predominantly consists of a former, vacant school building. The proposed project is not anticipated to have an adverse impact on wildlife.			·	
Resources water resources on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit. The proposed project is not anticipated to have an adverse impact on unique natural features and water resources. Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.) The vegetation on the Subject Property consists of some small grass lawns and approximately 7 trees of diverse sizes. The proposed project is a rehabilitation and conversion project, which is not anticipated to have an adverse impact on existing vegetation on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit, where there is little to no wildlife. The Subject Property predominantly consists of a former, vacant school building. The proposed project is not anticipated to have an adverse impact on wildlife.	II. C N	2		
(Introduction, Modification, Removal, Disruption, etc.) consists of some small grass lawns and approximately 7 trees of diverse sizes. The proposed project is a rehabilitation and conversion project, which is not anticipated to have an adverse impact on existing vegetation on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit, where there is little to no wildlife. The Subject Property predominantly consists of a former, vacant school building. The proposed project is not anticipated to have an adverse impact on wildlife.	Features /Water	2	water resources on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit. The proposed project is not anticipated to have an adverse impact on unique natural	
	(Introduction, Modification, Removal, Disruption,	2	consists of some small grass lawns and approximately 7 trees of diverse sizes. The proposed project is a rehabilitation and conversion project, which is not anticipated to have an adverse impact on existing vegetation on the Subject Property. The Subject Property is located in a highly urbanized area of the City of Detroit, where there is little to no wildlife. The Subject Property predominantly consists of a former, vacant school building. The proposed project is not anticipated to have	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment Factor	Code		
Other Factors 2			
		CLIMATE AND ENERGY	
Climate Change	2	The Subject Property is located in Detroit, Wayne County, Michigan. FEMA has classified Wayne County to have a risk index of relatively high for adverse impacts from natural disasters. Wayne County has an expected annual loss rating of relatively high, a social vulnerability rating of very high, and a community resilience rating of relatively moderate. The natural disasters with very high-risk index ratings likely to occur in Wayne County are cold waves, strong winds, and tornadoes. Heat waves, lightning, riverine flooding, and winter weather are natural disasters with relatively high risk index ratings that are likely to occur in Wayne County. The average daily maximum temperature for the City of Detroit in 2054 is predicted to be 65.1 degrees Fahrenheit with higher emissions and 63.8 degrees with lower emissions, when compared to 58.6 degrees from the 1961-1990 observed average. The Subject Property is not anticipated to be impacted by a 10 foot sea level rise, based on NOAA's Sea Level Rise database. The City of Detroit is located in an area where 2 to 4 damaging earthquakes are expected in 10,000 years. Additionally, the City of Detroit is in a level 4 out of 120 for seismic hazards. The Subject Property is not anticipated to be adversely impacted by climate change hazards. The proposed project is planned to protect the chronically homeless from most natural disasters likely to occur in Wayne County, e.g., heat waves, winter weather,	
		tornadoes, etc. See Appendix R for more information on climate change impacts.	
Energy Efficiency	2	The proposed project is anticipated to	
	_	increase urban density in the Grand River-	
		Saint Mary's Neighborhood of Detroit. To	
		help offset the increased energy demand	
		caused by the urban density increase, the	
	1	caused by the arban actisity increase, the	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		proposed project is seeking the NGBS certification for Green and Zero Energy. To achieve the NGBS certification the proposed project plans to install new insulation, low flow plumbing, and Energy Star appliances. To achieve the Zero Energy certification, the proposed project plans to purchase two years worth of renewable credits, to equal the amount the Subject Property building is anticipated to use, after project completion. The proposed project is not anticipated to have an adverse impact on energy efficiency. See Appendix R for the MSHDA Qualified Allocation Plan Green Policy.	

Supporting documentation

R11-NGBS Forms 110923 Signed.pdf

R10-2014hazmap-induced-lg.pdf

R9-Sea Level Rise.pdf

R8-Climate Map.pdf

R7-Climate Graph.pdf

R6-Community Report - Wayne County Michigan National Risk Index.pdf

R5-MI Royal Oak 20230706 TM geo.pdf

R3-DDOT-SystemMapEdit.pdf

R4-SMART Map.pdf

R2-A24-075600 EA Factors.pdf

R1-zmap67.pdf

L-EJScreen Community Report(1).pdf

K-Soil Report(1).pdf

Additional Studies Performed:

ASTI Environmental. Noise Assessment: VOA Saint Mary, 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Noise Assessment prepared for Volunteers of America of Michigan. November 9, 2023. Novogradac. A Market Feasibility Study of VOA St. Mary's: 14751 Mansfield Street, Detroit, Wayne County, Michigan 48227. November 17, 2023. ASTI Environmental. Phase I Environmental Site Assessment: VOA St. Mary, 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Phase I Environmental Site Assessment prepared for Volunteers of America Michigan. November 22, 2023. ASTI Environmental. Asbestos-Containing Materials Inspection: VOA St. Mary, 14751 Mansfield Street, Detroit, Michigan 48227. ASTI Environmental Asbestos-Containing Materials Inspection prepared for Volunteers of America Michigan. September 26, 2024. ASTI Environmental. Lead-Based Paint Inspection

and Risk Assessment: VOA St. Mary, 14751 Mansfield Street, Detroit, Michigan 48227. ASTI Environmental Lead-Based Paint Inspection and Risk Assessment prepared for Volunteers of America Michigan. September 10, 2024. ASTI Environmental. Limited Phase II Environmental Site Assessment: 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Limited Phase II Environmental Site Assessment prepared for Volunteers of America Michigan. October 22, 2024. ASTI Environmental. Sub-Slab Soil Gas Investigation: 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Sub-Soil Gas Investigation prepared for Volunteers of America Michigan. February 11, 2025. ASTI Environmental. Soil Gas Investigation: 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Soil Gas Investigation prepared for Volunteers of America Michigan. March 10, 2025. ASTI Environmental. Volatilization to Indoor Air Pathway Evaluation: 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Soil Gas Investigation prepared for Volunteers of America Michigan. June 5, 2025.

Field Inspection [Optional]: Date and completed by:

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

1. ASTI Environmental. Asbestos-Containing Materials Inspection: VOA St. Mary, 14751 Mansfield Street, Detroit, Michigan 48227. ASTI Environmental Asbestos-Containing Materials Inspection prepared for Volunteers of America Michigan. September 26, 2024. 2. ASTI Environmental. Lead-Based Paint Inspection and Risk Assessment: VOA St. Mary, 14751 Mansfield Street, Detroit, Michigan 48227. ASTI Environmental Lead-Based Paint Inspection and Risk Assessment prepared for Volunteers of America Michigan. September 10, 2024. 3. ASTI Environmental. Limited Phase II Environmental Site Assessment: 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Limited Phase II Environmental Site Assessment prepared for Volunteers of America Michigan. October 22, 2024. 4. ASTI Environmental. Noise Assessment: VOA Saint Mary, 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental noise assessment prepared for Volunteers of America of Michigan. November 9, 2023. 5. ASTI Environmental. Phase I Environmental Site Assessment: VOA St. Mary, 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Phase I Environmental Site Assessment prepared for Volunteers of America Michigan. November 22, 2023. 6. ASTI Environmental. Soil Gas Investigation: 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Soil Gas Investigation prepared for Volunteers of America Michigan. March 10, 2025. 7. ASTI Environmental. Sub-Slab Soil Gas Investigation: 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Sub-Soil Gas Investigation prepared for Volunteers of America Michigan. February 11, 2025. 8. ASTI Environmental. Volatilization to Indoor Air Pathway Evaluation: 14751 Mansfield Street, Detroit, Michigan. ASTI Environmental Soil Gas Investigation

prepared for Volunteers of America Michigan. June 5, 2025. See attachment for a complete list of sources.

VOA Saint Mary-Sources.pdf

List of Permits Obtained:

Public Outreach [24 CFR 58.43]:

Public outreach will be conducted by the Responsible Entity at a later date.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project is anticipated to reuse a vacant former school building to house the chronically homeless individuals. The proposed project is anticipated to provide housing and supportive services to people experiencing chronic homelessness in the Detroit Metro area. The Saint Mary's of Redford Church has had a vacant former school building for several years and through the proposed project the school building can be reused for housing in an area of Detroit along a major transportation corridor. The adoptive reuse of the Subject Property building may help reduce potential blight. The proposed project may provide stable housing for homeless individuals, which may help reduce overall demand for social services, particularly emergency social services.

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

The proposed project had considered additions and alterations to the Subject Property building. However, additions and alterations would have compromised the historic character of the Subject Property building, which was intended to be retained as part of the proposed project.

No Action Alternative [24 CFR 58.40(e)]

The no-action alternative is not desirable alternative to the proposed project. By pursuing the no-action alternative, the Subject Property building will remain vacant. The lack of permanent supportive housing with a housing-first approach to homeless, will allow chronic homelessness to persist in the City of Detroit. Chronic homelessness causes the communities to spend more resources addressing poor health outcomes, public safety concerns, and treatment programs for people, too focused on meeting their basic necessities. The city of Detroit has been seeking to address the demand for affordable housing and retain its historical built character, which the city will further struggle to meet.

Summary of Findings and Conclusions:

The proposed project seeks to rehabilitate a former school building into permanent supportive housing. The Metro Detroit area has a lack of affordable housing and has experienced issues with blight. The Subject Property is eligible for listing on the NRHP, to undergo an adoptive and compatible use of the former school building. The proposed project is intended to help address housing shortages for the chronically homeless within the Metro Detroit area. The proposed project is located in an urbanized area with a vacant building, where the impact to the human and natural environment is not anticipated to have an adverse impact.

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	The work is conducted in accordance with the specifications submitted to the Preservation Specialist, as approved in the federal tax credit application with photographs of the completed work, or a copy of the Part III tax credit certification are provided.	N/A	1. If there is a change in the scope of work, those changes will be required to undergo additional Section 106 Review prior to the execution of any work. 2. Documentation of the completed work via photographs to the City of Detroit's Preservation Specialist to determine that all completed work is in	

	T	1	· · · · · · · · · · · · · · · · · · ·
			accordance
			with the
			specifications
			approved
			during the
			Section 106
			review.
24 CFR Part	Removal of all ACMs from the	N/A	1. Removal of
50.3(i) &	Subject Property by a licensed	14,71	all ACMs and
	abatement company, prior to		AACMs from
58.5(i)(2)			
	general construction activities.		the Subject
			Property by a
			licensed
			abatement
			company, prior
			to general
			construction
			activities. 2.
			Complete an
			ACM closeout
			report by a
			licensed ACM
			survey
			contractor
			after general
			construction
			activities have
			been
			completed.
24 CFR Part	Removal of all LBP hazards	N/A	1. Removal of
50.3(i) &	from the Subject Property by a		all LBP hazards
58.5(i)(2)	licensed abatement company,		from the
	prior to general construction		Subject
	activities.		Property by a
	detivities.		licensed
			abatement
			company, prior
			to general
			construction
			activities. 2.
			Complete an
			LBP closeout
			report by a
			licensed LBP
			survey
			contractor
	l	l	Contractor

Project Mitigation Plan

The mitigation plan will be administered and monitored by the City of Detroit: Housing and Revitalization Department.

A24-075600 HRD Model Mitigation Plan.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		24 CFR Part 51 Subpart D
prevent incompatible development		
around civil airports and military airfields.		

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

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

There are three airports within a 15-mile radius of the Subject Property. The Coleman A. Young International Airport is approximately 9.69 miles from, Detroit Metropolitan Wayne County Airport is approximately 12.98 miles from, and Windsor International Airport is approximately 14.75 miles from the Subject Property. The Subject Property is outside of all airport runway protection, clear, and accident potential zones. The Subject Property is not anticipated to be adversely impacted by airport hazards and is in compliance with this regulation. See Appendix P for an airport location map.

Supporting documentation

P-A24-075600 ALM.pdf

Are formal compliance steps or mitigation required?

Yes

Coastal Barrier Resources

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

1. Is the project located in a CBRS Unit?

✓ No

Document and upload map and documentation below.

Yes

Compliance Determination

The Subject Property is located in Detroit, Wayne County, Michigan. Wayne County has one coastal barrier resource known as MI-04, along its southern coast. The Subject Property is located in the inland portion of western Detroit, of Wayne County's North-Central portion. The proposed project is not anticipated to have an adverse impact on coastal barrier resources and is in compliance with this statute. See Appendix Q for the John H. Chafee Coastal Barrier Resources System map of Michigan.

Supporting documentation

<u>Q2-Coastal_Resource_Map.pdf</u> Q1-Coastal Barrier Resource Map.pdf

Are formal compliance steps or mitigation required?

Yes

Flood Insurance

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

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

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:

D-FIRMETTE.pdf

The Federal Emergency Management Agency (FEMA) designates floodplains. The <u>FEMA Map Service Center</u> 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 Subject Property is located in Zone X, the area of minimal flood hazard as seen in the FEMA flood map 26160C0100E, effective February 2, 2012. The Subject Property is not anticipated to be adversely impacted by flood hazards, flood insurance is not required for the proposed project, and the project is in compliance with this statute. See Appendix D for the FEMA FIRMette map.

Supporting documentation

D-FIRMETTE(1).pdf

Are formal compliance steps or mitigation required?

Yes

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered	Clean Air Act (42 USC 7401 et	40 CFR Parts 6, 51
by the U.S. Environmental	seq.) as amended particularly	and 93
Protection Agency (EPA), which	Section 176(c) and (d) (42 USC	
sets national standards on	7506(c) and (d))	
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.		

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

Ozone 0.07 ppb (parts per million)

Provide your source used to determine levels here:

U.S. EPA. "Status of Michigan Designated Areas." March 12, 2021. https://www3.epa.gov/airquality/urbanair/sipstatus/reports/mi_areabypoll.html.

- 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:

Ozone 0.07 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 Subject Property is located in Detroit, Wayne County, Michigan. Wayne County is in an ozone attainment/maintenance zone and has a sulfur dioxide nonattainment zone in its Southeast portion of the county. The Subject Property is located in the Northwest portion of the City of Detroit, outside of the Wayne County sulfur dioxide nonattainment. However, the Subject Property is located in the ozone attainment/maintenance zone. Construction on the proposed project is to begin in

the third quarter of 2025 and last into the fourth quarter of 2026. Through their review of the proposed project, EGLE had determined that the size, scope, and duration of the proposed project is small enough in scale which is not anticipated to exceed de minimis levels for ozone standards. See Appendix J for more information on air quality standards.

Supporting documentation

<u>J2-Gen Conformity Letter_St Marys_0624.pdf</u> <u>J1-2025-naaqs-ambient-status-map.pdf</u>

Are formal compliance steps or mitigation required?

Yes

Coastal Zone Management Act

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

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

The Subject Property is located in Detroit, Wayne County, Michigan. The City of Detroit has coastline in the Eastern portion of the city. The Subject Property is located in an inland portion of Detroit. The proposed project is not anticipated to have an adverse impact on coastal zone management area and is in compliance with this statute. See Appendix F for the coastal zone management map of northern Wayne County.

Supporting documentation

F-Coastal Zone Boundary Maps Grosse Point-Detroit.pdf

Are formal compliance steps or mitigation required?

Yes

Contamination and Toxic Substances

General Requirements	Legislation	Regulations		
It is HUD policy that all properties that are being		24 CFR		
proposed for use in HUD programs be free of		58.5(i)(2)		
hazardous materials, contamination, toxic		24 CFR 50.3(i)		
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.				
Reference				
https://www.onecpd.info/environmental-review/site-contamination				

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

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.

^{*} 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.

✓ No

Explain:

A Phase I ESA completed in 2023 by ASTI found that the Subject Property is a Part 201 site and may have an abandoned UST. Based on the Tier II Evaluation results for naphthalene in the soil gas at the Subject Property and given that the GSIP pathway is not relevant for the Subject Property, no unacceptable exposures are present.

Yes

- * This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.
- ** Utilize EPA's Enviromapper, NEPAssist, 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

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

No

If no testing was conducted and a review of science-based data offered a lack of science-based data for the project site, then document and upload the steps taken to look for documented test results and science-based data as well as the basis for the conclusion that testing would be infeasible or impracticable.

Explain:

File Upload:

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

Non-radon contamination was found in a previous question.

6. How was radon data collected?

All buildings involved were tested for radon

✓ A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data:

1.1

Provide the documentation* used to derive this value:

The Subject Property is located in Detroit, Wayne County, Michigan. Wayne County has been designated as Zone 3 for radon risk by the EPA, the lowest level in the State of Michigan. Environment, Great Lakes, and Energy (EGLE) has found that 17 percent of homes have tested equal to or above the 4 pCi/L guideline in Wayne County. The Subject Property is located in the 48227 zip code, where the median value of the first time radon tests is 0.8 pCi/L and the average value is 1.1 pCi/L. See Appendix N for the radon maps of Michigan.

File Upload:

N2-SP_Radon-Zip_Code.pdf
N1-2022 Michigan Radon Maps Combined.pdf

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

Radon concentration value is greater than or equal to 4.0 pCi/L and/or non-radon contamination was found in a previous question. Continue to Mitigation.

* For example, if you conducted radon testing then provide a testing report (such as an ANSI/AARST report or DIY test) if applicable (note: DIY tests are not eligible for use in multifamily buildings), or documentation of the test results. If you conducted a scientific data review, then describe and cite the maps and data used and include copies of all supporting documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

Screen Summary

Compliance Determination

Phase I ESA, 11/22/2023 ASTI Environmental was retained to conduct a Phase I ESA (Tab Attachment 2) of the Subject Property. REC: Saint Mary's Church at 14750 Saint Mary's, Detroit adjoins the Subject Property to the South, and it is listed in the Voluntary Cleanup Program database as a Part 201 site. Part 201 listings indicate

some level of subsurface contamination and ASTI has been unable to determine the risk to the Subject Property. Additionally, verbal information had been received by former site personnel that indicates the REC is likely connected to a potential heating oil UST that may or may not have been removed from the south adjoining site. Limited Phase II ESA, 10/22/2024 ASTI was retained to conduct a Limited Phase II ESA (Tab Attachment 3) of the Subject Property. The GPR survey identified an anomaly indicating a potential UST on the south adjoining property. Another anomaly indicative of a subsurface utility corridor was identified on the Southwestern portion of the Subject Property. Naphthalene was detected, but at concentrations below the VIAP SL. Based on the results of the Limited Phase II ESA, the Subject Property has not been determined to be a "facility" as defined in Part 201. Sub-Slab Soil Gas Investigation, 02/11/2025 ASTI was retained to conduct a Sub-slab Soil Gas Investigation (Tab Attachment 4) at the Subject Property. Naphthalene was detected at a concentration that exceeded the residential VIAP SLs in soil gas sample VP-18. Soil Gas Investigation, 03/10/2025 ASTI was retained to conduct a Soil Gas Investigation (Tab Attachment 5) at the Subject Property. Based on the historical usage of the Subject Property, and results of the investigations conducted on and adjoining the Subject Property, the naphthalene detection is likely from a building material that is off-gassing low concentrations of naphthalene and not volatilization from the soil. EGLE's unrestricted residential VIAP SLs were derived with the assumption that a source of vapor is present in soil and/or groundwater. Volatilization to Indoor Air Pathway Evaluation, 06/05/2025 ASTI was retained to conduct a VIAP Evaluation (Tab Attachment 6) at the Subject Property. Based on the Tier II Evaluation results for naphthalene in the soil gas at the Subject Property and given that the GSIP pathway is not relevant for the Subject Property, no unacceptable exposures are present. Therefore, no response actions are required for the owner or operator to comply with their due care obligations under Part 20107a. Asbestos-Containing Materials Inspection, 09/26/2024 ASTI was retained to conduct an ACM inspection (Tab Attachment 7) of the Subject Property. Based on the inspection conducted between June 17-19 and 24, 2024, ACMs were identified. Lead-Based Paint Inspection and Risk Assessment, 09/10/2024 ASTI conducted a LBP Inspection and Risk Assessment (Tab Attachment 8) of the Subject Property on June 17-19, 2024. ASTI collected 813 measurements of painted surfaces. Of these measurements, 93 measurements were positive for LBP. During the evaluation, ASTI observed 92 areas with paint-lead hazards, including deteriorated LBP and LBP on impact, friction, or chewable surfaces. No potential paint-lead hazards were identified. ASTI personnel collected 147 lead dust wipe samples including 6 media blanks. Each sample was submitted to an NLLAP-certified laboratory. Review of the lead dust wipe sample results revealed that 119 of the samples collected exceeded the State of Michigan clearance levels and HUD and EPA standards.

Supporting documentation

N2-SP Radon-Zip Code(2).pdf

N3-EGLE Radon-Info.pdf

T3-A24-075600 Mansfield St Marys PHII Final REPORT.pdf

T8-A24-075600 LIRA Report Final.pdf

T7-A24-075600 St Marys ACM Report FINAL.pdf

T6-A24-075601 - Vapor Assessment - FINAL - R1 - REPORT.pdf

T5-A24-075601 - Supplemental Soil Gas Inv - FINAL REPORT.pdf

T4-A24-075601 Sub Slab Soil Gas FINAL REPORT.pdf

T2-12982 Phase I MSHDA - FINAL REPORT.pdf

N2-SP Radon-Zip Code(1).pdf

N1-2022 Michigan Radon Maps Combined(1).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)	The Endangered	50 CFR Part
mandates that federal agencies ensure that	Species Act of 1973	402
actions that they authorize, fund, or carry out	(16 U.S.C. 1531 et	
shall not jeopardize the continued existence of	seq.); particularly	
federally listed plants and animals or result in	section 7 (16 USC	
the adverse modification or destruction of	1536).	
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").		

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

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

This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

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

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.

Screen Summary

Compliance Determination

The Indiana Bat, Northern Long-eared Bat, Rufa Red Knot, Eastern Massasauga Rattlesnake, and the Eastern Prairie Fringed Orchid are all species listed on the Threatened and Endangered Species List known to have critical habitats in Wayne County. The Subject Property is a former school building, located in a highly urbanized area of the City of Detroit, where no critical habitats for animal species are known to

be present. The proposed project is not anticipated to have an adverse impact on threatened and endangered species and is in compliance with this statute. See Appendix H for the Threatened and Endangered Species List for Michigan Species.

Supporting documentation

H-2024 Listed Endangered Species.pdf

Are formal compliance steps or mitigation required?

Yes

Explosive and Flammable Hazards

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

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
require	d separation distance from all covered tanks?

✓ Yes

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

No

Screen Summary

Compliance Determination

Based on the EDR Radius Map Report of the Subject Property, dated October 4, 2023, reports no Above-ground Storage Tanks (ASTs) are reported to be within a one-mile radius of the Subject Property. However, in reviewing aerial photographs of Wayne County, there is one property with ASTs. At 15850 Glendale Street, there are two ASTs with an estimated capacity of 16,457 gallons, which has an Acceptable Separation Distance for Blast Over Pressure (ASDBOP) of 552.87 feet each, and Acceptable Separation Distance for Thermal Radiation for People (ASDPPU) of 888.24 feet each, and the ASTs are approximately 5,041 feet from the Subject Property. The Subject Property is located beyond the minimum acceptable separation distance for the two ASTs and is not anticipated to be adversely impacted by explosive and flammable hazards. The proposed project is in compliance with this regulation. See Appendix O for more information on explosive and flammable hazards.

Supporting documentation

O2-15850 Glendale St Acceptable Separation Distance (ASD) Electronic Assessment Tool - HUD Exchange.pdf
O1-A24-075600 ASD.pdf

Are formal compliance steps or mitigation required?

Yes

√ No

Farmlands Protection

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

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



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

There is no prime farmland in the City of Detroit.

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

The soil present on the Subject Property consists of Urban land-Riverfront complex which is classified as not prime farmland. The proposed project is not anticipated to have an adverse impact on prime farmland and is in compliance with this statute. See Appendix K for the USDA soil survey of the Subject Property.

Supporting documentation

K-Soil Report.pdf

Are formal compliance steps or mitigation required?

Yes

√ No

Floodplain Management

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

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.

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Descri	ш	n	Δ	•
DESCI	ш	u	c	

✓ 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 information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ 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.

¹ 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.

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

³ 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).

Does your project occur in the FFRMS floodplai	n?
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Yes

✓ No

Screen Summary

Compliance Determination

The Subject Property is located in Zone X, the area of minimal flood hazard as seen in the FEMA flood map 26160C0100E, effective February 2, 2012. The Subject Property is not anticipated to be adversely impacted by flood hazards and the proposed project is in compliance with this executive order. See Appendix D for the FEMA FIRMette map.

Supporting documentation

D-FIRMETTE(2).pdf

Are formal compliance steps or mitigation required?

Yes

Historic Preservation

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

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 Offer (SHPO) Completed

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

Other Consulting Parties

Describe the	process of select	ng consulting	g parties and in	nitiating consu	ultation here:

Consulting parties were selected based on the scope of work of the proposed project.

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 APE consists of the Subject Property, 16098 Grand River Avenue, and 14771 Mansfield Street.

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	SHPO	Sensitive
	Register Status	Concurrence	Information
Saint Mary's Roman Catholic	Eligible	Yes	✓ Not Sensitive
Church Parish Complex			

Additional Notes:

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

Yes

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:

The work is conducted in accordance with the specifications submitted to the Preservation Specialist, as approved in the federal tax credit application with photographs of the completed work, or a copy of the Part III tax credit certification are provided.

Does the No Adverse Effect finding contain conditions?

✓ Yes (check all that apply)

Avoidance

Modification of project

✓ Other

Describe conditions here:

The work is conducted in accordance with the specifications submitted to the Preservation Specialist, as approved in the federal tax credit application with photographs of the completed work, or a copy of the Part III tax credit certification are provided.

No

Adverse Effect

Screen Summary

Compliance Determination

The proposed project is a rehabilitation and conversion project of a former, vacant school building. Due to the age of the Subject Property building and the eligibility for listing on the National Register of Historic Places (NRHP) for the building on the adjoining property at 14751 Mansfield Street, the proposed project underwent a Section 106 review. Under the programmatic agreement with the State Historic Preservation Office (SHPO), the City of Detroit has determined that the proposed project will have no adverse effect on cultural resources nearby the Subject Property. However, the City of Detroit has stipulated that after the proposed project is completed, photographs of the completed work are to be provided to the City of Detroit to document that the completed work is in accordance with the specifications provided to the City's Preservation Specialist. See Appendix C for the Section 106 application and response letter.

Supporting documentation

C3-VOA St Mary NAE Section 106 Letter.pdf
C2-Appendix 2 Detroit Section 106 Request Application_2024 _0 - EL(2).pdf
C1-St Mary School 106 Kidorf report DRAFT.pdf

Are formal compliance steps or mitigation required?

✓ Yes

No

Noise Abatement and Control

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

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

New construction for residential use

✓ Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

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: 61

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: 61

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

Screen Summary

Compliance Determination

ASTI conducted a noise assessment of the Subject Property, using one noise assessment location, which was found to be at 61 decibels and within the Acceptable noise range. The proposed project is not anticipated to be adversely impact by noise and is in compliance with this statute. See Appendix M for the noise assessment.

Supporting documentation

M-12892 2033-Noise Assessment-FINAL.pdf

Are formal compliance steps or mitigation required?

Yes

Sole Source Aquifers

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

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

✓ Yes

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

No

Screen Summary

Compliance Determination

The Subject Property is located in Detroit, Wayne County, Michigan. There are no designated sole source aquifers in the State of Michigan. The proposed project is not anticipated to have an adverse impact on sole sources aquifers and is in compliance with this statute. See Appendix G for the Designated Sole Source Aquifers in Region 5 map.

Supporting documentation

G2-EPASole Source Aquifers Map.pdf G1-Sole Source Aquifers Map.pdf

Are formal compliance steps or mitigation required?

Yes

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or	Executive Order	24 CFR 55.20 can be
indirect support of new construction impacting	11990	used for general
wetlands wherever there is a practicable		guidance regarding
alternative. The Fish and Wildlife Service's		the 8 Step Process.
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.		

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

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

Yes

Screen Summary

Compliance Determination

The Subject Property is located in a highly urbanized area of the City of Detroit. Based on the U.S. Fish and Wildlife Service wetlands database, there are no wetlands on or near the Subject Property. The proposed project is not anticipated to have an adverse impact on wetlands and is in compliance with this executive order. See Appendix E for the wetland map of the Subject Property.

Supporting documentation

E-NWI.pdf

Are formal compliance steps or mitigation required?

Yes

Wild and Scenic Rivers Act

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

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

The Subject Property is located in Detroit, Wayne County, Michigan. Wayne County is in Michigan's Southeast Region. There are no designated Wild and Scenic Rivers in Southeast Michigan. There are no designated Inventory Rivers on or near the Subject Property. The proposed project is not anticipated to have an adverse impact on Wild and Scenic Rivers and the project is in compliance with this statute. See Appendix I for more information on Wild and Scenic Rivers.

Supporting documentation

<u>I2-Inventory_Rivers.pdf</u> <u>I1-2024 Michigan WIld and Scenic Rivers.pdf</u>

Are formal compliance steps or mitigation required?

Yes

√ No

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project	Executive Order 12898	
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.		

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

The proposed project is a rehabilitation and conversion project of a former school building for affordable housing. The pollution levels selected by the EPA surrounding the Subject Property are higher than the State of Michigan average, except for superfund proximity, hazardous waste proximity, RMP facility proximity, and wastewater discharge, which are below the state averages. The population surrounding the Subject Property consists of 97 percent are people of color, 53 percent are low-income, 19 percent are unemployed, 1 percent are members of limited English speaking households, 13 percent hold less than a high school education, 7 percent are under 5 years of age, 18 percent are over 64 years of age, 26 percent have a low life expectancy, 17.6 percent are persons with disabilities, 29 percent lack broadband internet access, 6 percent lack health insurance, and 59 percent of households are owner occupied. The per capita income of the population surrounding the Subject Property is \$21,517.00 annually and the average life expectancy is 72 years of age. Out of the limited English-speaking households, Spanish is the most spoken language at 1 percent. The Subject Property is currently vacant, and the proposed project is not anticipated to displace any persons. Nor is the

proposed project expected to have an adverse impact on housing stock near the Subject Property. The proposed project is in compliance with this executive order. See Appendix L for the EPA's EJ Screen Report.

Supporting documentation

L-EJScreen Community Report.pdf

Are formal compliance steps or mitigation required?

Yes



U.S. Department of Housing and Urban Development 451 Seventh Street, SW Washington, DC 20410 www.hud.gov espanol.hud.gov

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

Project Information

Project Name: VOA-Saint-Mary

HEROS Number: 900000010478583

Start Date: 06/23/2025

Project Location: 14751 Mansfield St, Detroit, MI 48227

Additional Location Information:

14751 Mansfield Street, Detroit, Wayne County, Michigan 48227

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

The proposed project seeks to purchase, rehabilitate, and convert a former Catholic school building into permanent supportive housing, apartment building at 14751 Mansfield Street, Detroit, Wayne County, Michigan 48227 (Subject Property). The Subject Property is located in Detroit's Grand River-Saint Mary's Neighborhood. The Subject Property building is a former three-story, school building and is currently vacant. Through their purchase of the Subject Property, Volunteers of America: Michigan plans to split the Subject Property from the Saint Mary's of Redford Church property, which is currently part of the Saint Mary's Church parcel. The proposed rehabilitation and conversion are to develop 61 apartment units. The breakdown of apartment units is to be 12 studio apartments of approximately 550 square feet, 45 onebedroom apartments of approximately 650 square feet, and 4 two-bedroom apartments of approximately 850 square feet. All 61 apartments are to be reserved as permanent supportive housing for the chronically homeless and persons from the top 10 percent of the Detroit Continuum of Care's (DCoC) priority list scoring households based on SPDAT. The supportive housing is to use the housing first approach with low barrier admissions practices and referrals from the DCoC. Additionally, the proposed project will accept referrals through Detroit's Coordinated Assessment Model (CAM), who focuses on homeless persons in Detroit, Highland Park, and Hamtramck. This review is for \$2,900,000.00 in HOME-ARP funds, \$163,566.57 in HOME 2024, \$199,984.96 in HOME 2023, \$386,448.47 in HOME 2022, and \$100,000 in CDBG-CV funds from the City of Detroit. This review is valid for five years.

Funding Information

Grant Number	HUD Program	Program Name	
B20MW260006	Community Planning and	Community Development Block	\$100,000.00
	Development (CPD)	Grant CARES Act (CDBG-CV)	
M21MP260202	Community Planning and	HOME American Rescue Plan	\$2,900,000.00

VOA-Saint-Mary Detroit, MI 90000010478583

	Development (CPD)	(HOME-ARP)	
M22MC260202	Community Planning and Development (CPD)	HOME Program	\$386,448.47
M23MC260202	Community Planning and Development (CPD)	HOME Program	\$199,984.96
M24MC260202	Community Planning and Development (CPD)	HOME Program	\$163,566.57

Estimated Total HUD Funded Amount: \$3,750,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$31,523,216.00

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
Historic Preservation	The work is conducted in accordance with the
	specifications submitted to the Preservation
	Specialist, as approved in the federal tax credit
	application with photographs of the completed
	work, or a copy of the Part III tax credit certification
	are provided.
24 CFR Part 50.3(i) & 58.5(i)(2)	Removal of all ACMs from the Subject Property by a
	licensed abatement company, prior to general
	construction activities.
24 CFR Part 50.3(i) & 58.5(i)(2)	Removal of all LBP hazards from the Subject Property
	by a licensed abatement company, prior to general
	construction activities.

Project Mitigation Plan

The mitigation plan will be administered and monitored by the City of Detroit: Housing and Revitalization Department.

A24-075600 HRD Model Mitigation Plan.pdf

Determination:

X	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		
	Finding of Significant Impact		
Prepare	er Signature:	Date: 10/9/2025	

10/09/2025 16:46 Page 2 of 3

Name / Title / Organization: Kim Siegel / / DETROIT

Certifying Officer Signature: Date: 10/10/2025

Name / Title: Julie Schneider, Director, Housing and Revitalization Department

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

10/09/2025 16:46 Page 3 of 3

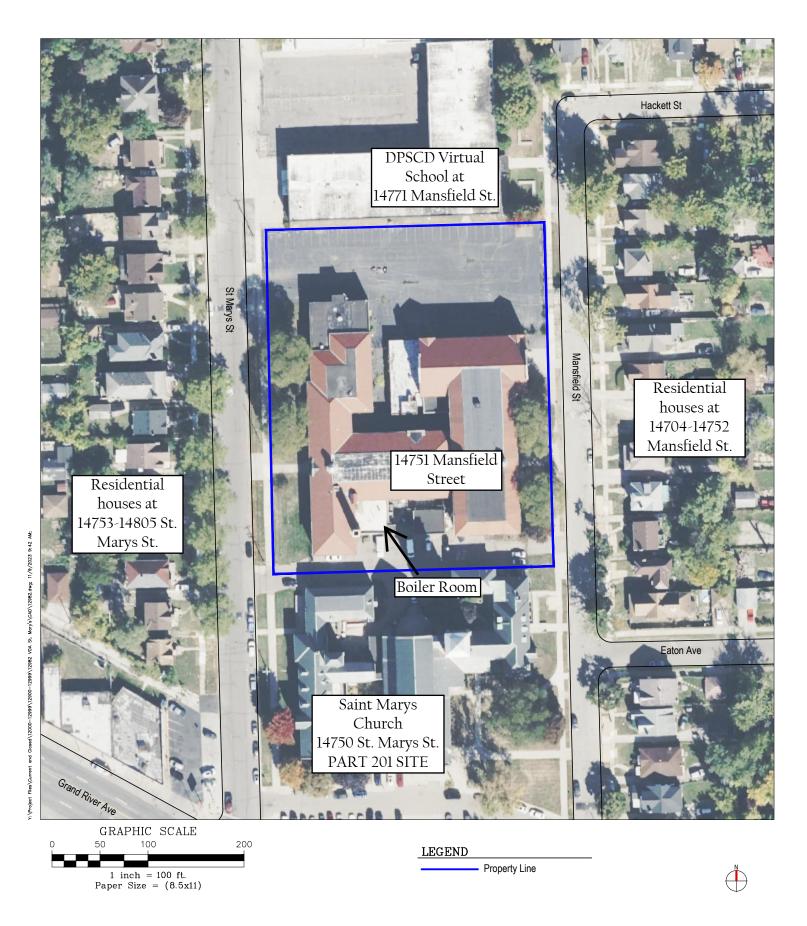


EXHIBIT 1 PROJECT NARRATIVE

EXHIBIT 1 VOA ST. MARY PROJECT NARRATIVE

Overview

The VOA St. Mary project is an adaptive reuse of an existing historic Catholic school building located at 14751 Mansfield Street in Detroit. The project sponsor, Volunteers of America Michigan (VOAMI), intends to purchase the building and convert it to 61 units of Permanent Supportive Housing that will serve the chronically homeless and those in the top 10% of the Detroit Continuum of Care's priority list. **The project will be financed using 4%/9% twinning with 44 units being financed through the 9% LIHTC program and 17 being financed through the 4% LIHTC program.** The Owner of the 9% LIHTC transaction, the subject of this application, will be VOA St. Mary Limited Dividend Housing Association Limited Partnership, and the owner of the 4% transaction will be VOA St. Mary 4 Limited Dividend Housing Association Limited Partnership.

The 9% LIHTC Self-Score for this project is **145**.

The project is currently co-located on a single parcel with St. Mary of Redford Church. As part of the project, the lot will be split and the developer will purchase the northern part of the lot which contains the school. The building has three floors and no elevators. To promote accessibility, an elevator will be added. Two condominiums will be created to divide the building as follows between the 9% and 4% LIHTC transactions:

9% LIHTC Units (44)

Studio	6
1 Bdrm	36
2 Bdrm	2
Total Number of Units	44

4% LIHTC Units (17)

Studio	3
1 Bdrm	12
2 Bdrm	2
Total Number of Units	17

A site plan for the project that has been approved by the City of Detroit is included with this Exhibit, as well as a site map.

The City of Detroit is in strong support of this project as demonstrated in the letter included with this Exhibit.

Development Team

Members of the development team have a strong background in LIHTC development.

Sponsor/Developer: Volunteers of America Michigan, Inc.

Co-sponsor/Developer: COVE Investments, LLC

Consultant: Ethos Development Partners

Property Manager: KMG Prestige, Inc.

Attorney: Mallory, Lapka, Scott & Selin, PLLC

Accountant: Regency Financial Consulting

General Contractor: O'Brien Construction

Architect: Fusco, Schaffer, and Pappas, Inc.

Project Financing

The 9% project will be financed with MSHDA permanent and construction loans, LIHTC equity and deferred developer fee. The 4% project will be financed with MSHDA permanent and construction loans, LIHTC equity and City of Detroit HOME funding. Please see letter from MSHDA approving the 4%/9% twinning in **Exhibit 8A**.

Volunteers of America Michigan (VOAMI) – Sponsor and Lead Service Agency

Founded in 1896, by social crusaders Ballington and Maude Booth, Volunteers of America is a faith-based organization whose mission has always been to "go wherever we are needed and do whatever comes to hand". Volunteers of America Michigan specializes in providing critical services, shelter and food for veterans, affordable housing for aging seniors, and supportive services for struggling families. For 125 years, we have been empowering veterans, seniors, and families across the state of Michigan. Our work touches the mind, body, heart — and ultimately the spirit — of those we serve, integrating our deep compassion with highly effective programs and services.

- VOAMI provides help for the people experiencing homeless, food for the hungry, employment and shelter for veterans, housing for vulnerable seniors, and a helping hand for struggling families.
- VOAMI is the state's largest private provider of services to veterans. Outside the VA, nobody works with more of the men and women who have served this country.
- VOAMI one of the largest nonprofit providers of housing to vulnerable seniors, families and people with disabilities with a portfolio close to 700 apartments this year.
- VOAMI provides other programs that reach out to the lonely and impoverished during the holidays, with hot meals, gifts and gestures of caring.

Target Population

The VOA St. Mary Project will be primarily targeted to chronically homeless individuals and those from the top 10% of the Continuum of Care's priority list scoring households based on SPDAT. This new PSH community will help these individuals to gain their health, independence, and self-esteem. Homelessness in Detroit continues to be a staggering public problem. According to the 2021 Homeless Action Network of Detroit (HAND) annual report, there were a total of 5,687 individuals experiencing homelessness, of whom 3,454 were single adults over the age of 25. Of this population, 1,120 were identified as chronically homeless.

Housing First

VOA St. Mary is a Housing First project, an approach and philosophy embraced by the development team, all of whom have significant experience with this model. Using this approach, the VOAMI will move individuals into PSH and provide an array of voluntary supportive services aimed at stabilizing clients. The supportive services model is built upon low-barrier admissions practices and referrals from the Detroit Continuum of Care.

Service Coordination Model

The supportive services model for this new PSH community is built upon low-barrier admissions practices by providing housing to the most vulnerable clients on the project waitlist who will be given priority based upon assessment scores.

The project will accept referrals through Detroit's Coordinated Assessment Model (CAM), a systematic approach to homelessness in Detroit, Highland Park, and Hamtramck that focuses on aligning the needs of individuals and families experiencing homelessness or at imminent risk of becoming homeless to available shelter and housing resources. VOAMI will rely on CAM for screening community members for various housing programs based on homeless status, disability status, and Vulnerability Index Service Prioritization Decision Assistance Tool (VI- SPDAT) scores to determine vulnerability and the immediacy of their needs.

The supportive service plan for this new community will be structured to leverage VOAMI's extensive experience providing supportive services to vulnerable populations. Specifically, their experience with service coordination will be an anchor for providing stability to project residents. VOAMI will serve as the Lead Service Agency for the project to offer their extensive experience with providing services to residents who qualify for PSH. The VOAMI onsite case manager will coordinate services for residents both onsite and offsite.

The project team recognize that The United States Interagency Council on Homelessness calls Housing First, "a proven approach in which people experiencing homelessness are provided with permanent housing directly and with few to no treatment preconditions, behavioral contingencies, or barriers. VOAMI is committed to implementing an overall tenant screening criterion that is not more restrictive than the MSHDA Housing Choice Voucher criteria.

Project Based Vouchers

The project will be applying for project-based vouchers provided by MSHDA for 34 of the units in the 9% portion of the building. If these vouchers are awarded, MSHDA will provide a HAP contract that will guarantee that these vouchers will be available for at least 20 years. The other 10 units in the 9% portion of the building will be subsidized by the HUD-Veterans Affairs Supportive Housing (VASH) program per the letter from the Department of Veterans Affairs in **Exhibit 31**. This subsidy does not have an expiration

date. The vouchers will ensure that the project will be financially viable while supporting extremely low-income and low-income tenants.

Job Creation

The management of the property will generate the equivalent of approximately 1.5 permanent full-time jobs and 146 temporary jobs. This includes the administration, operation and maintenance of the building and services, such as accounting. The temporary jobs created is based on 1 job per \$100,000 of direct construction expenditure, plus 1 job per \$100,000 in development period professional fees (A/E, accounting, legal, environmental consulting, etc.).

Project Timeline

The development team anticipates that if awarded LIHTC, the design and financing phase would begin in April of 2024 and last until the end of March of 2025. At that point, construction would begin and last until the end of September 2026. As there is critical need for PSH in Detroit it is expected that the project will lease-up by approximately February of 2027. Please refer to **Tab A Program Application** for a full timeline.

Alignment with Michigan Statewide Housing Plan

Michigan Statewide Housing Plan Priorities: Preventing and Ending Homelessness & Housing Stock

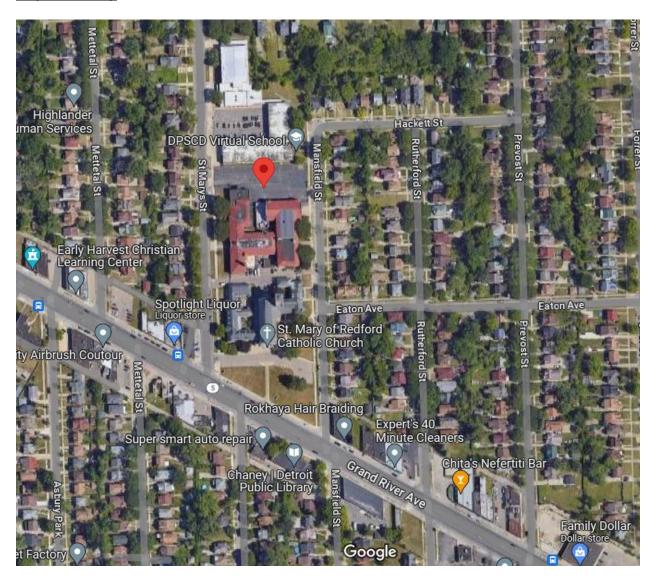
The VOA St. Mary project will provide a stable and secure housing environment, meeting the immediate need for shelter and aligning with the overarching goal of **preventing and ending homelessness**. The model adopts a "Housing First" philosophy, prioritizing the provision of housing as a primary step, recognizing the fundamental role stable housing plays in addressing underlying issues. Supportive services, a key component of PSH, are tailored to individual needs and may encompass mental health counseling, substance abuse treatment, job training, and other essential programs.

By offering a holistic approach, the project will address the root causes of homelessness and aim to break the cycle, preventing recurrence. This not only benefits the individuals and families directly impacted by homelessness but also proves to be cost-effective over time. The upfront costs of housing and support services are offset by a reduction in the utilization of emergency services such as shelters, hospitals, and law enforcement.

Moreover, the project contributes to the overall increase in **housing stock** available for individual's experiencing homelessness. The project is designed for those experiencing chronic homelessness; helping to alleviate the shortage of affordable and stable housing options. The Project is an example of successful collaboration between the local government agencies, the non-profit, and the private sector. This collaborative effort maximizes resources, expertise, and funding, creating a more comprehensive and effective response to the complex issue of homelessness and housing instability Michigan is experiencing. Overall, this project with support services represents a multifaceted approach that not only provides housing but also helps to address homelessness.

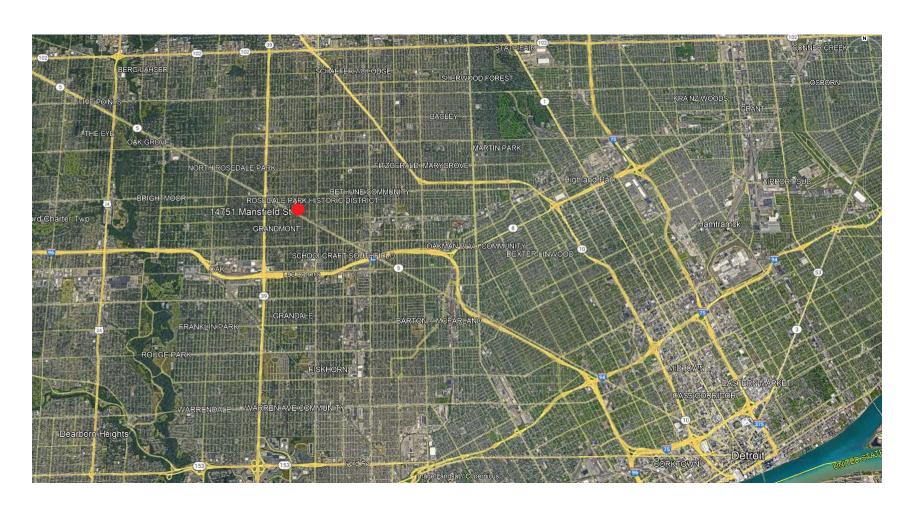
The project will support MSHDA's statewide housing goals by adding 61 new units of housing between the 4% and 9% projects, reducing equity gaps by serving tenants with incomes of less than 30% of AMI, and by making homelessness rarer. It also addresses several of MSHDA's priority areas by providing quality housing in a predominantly minority neighborhood and preserving a historic building that had long been vacant.

Project Site Map



VOA - ST. MARY

ST. MARY SITE 14751 Mansfield Street Detroit, MI 48227 63 units

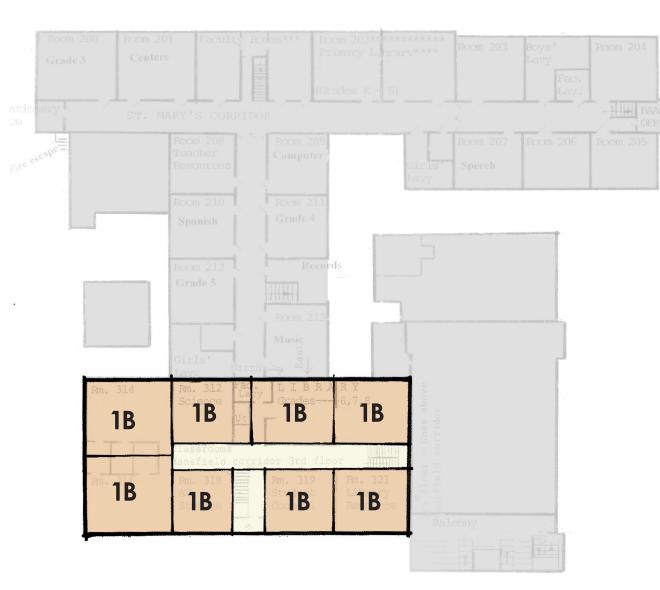








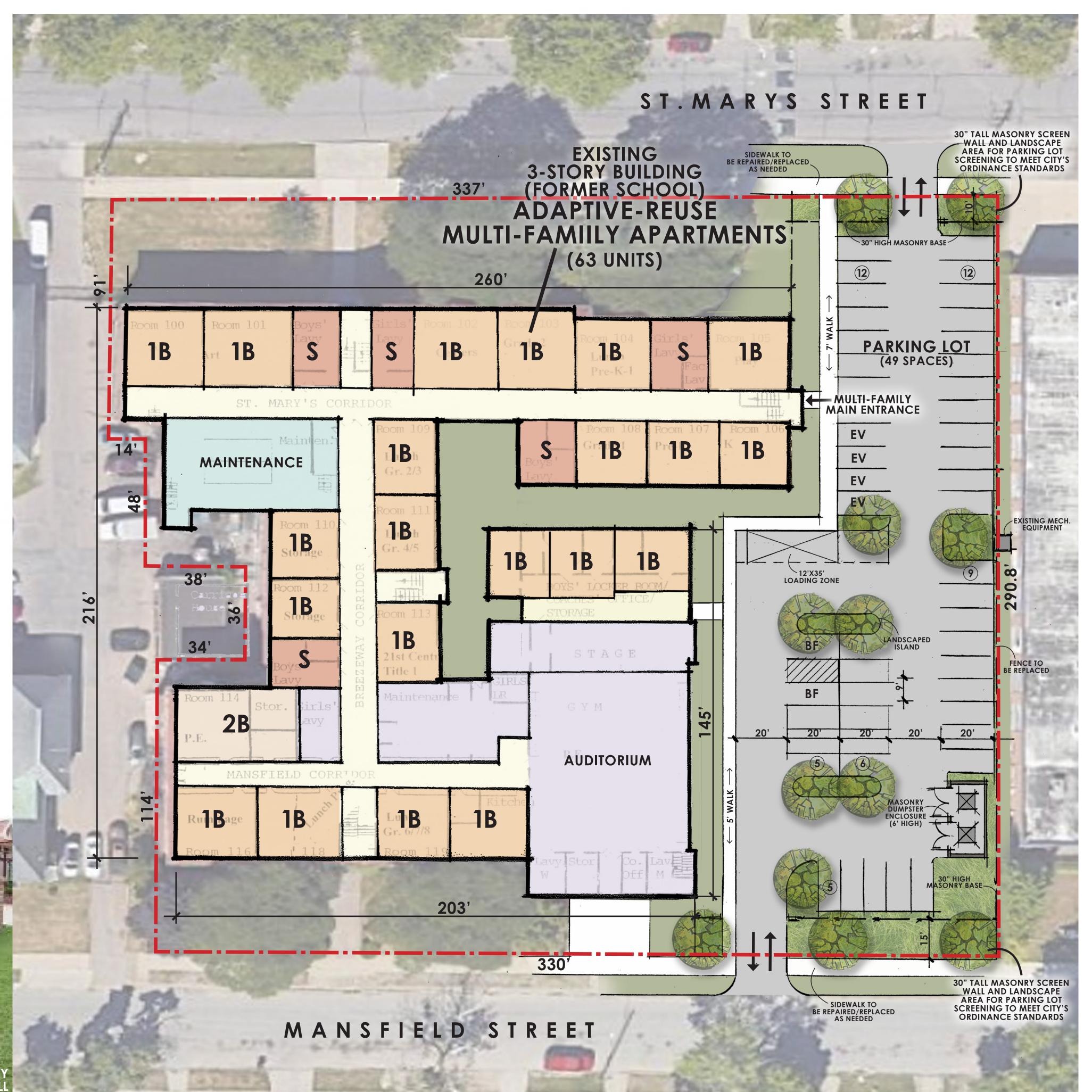




N THIRD FLOOR PLAN (8 UNITS)







SITE DATA

ZONING

EXISTING R5 (MEDIUM DENSITY RESIDENTIAL DISTRICT)

PROPOSED R5 (MEDIUM DENSITY RESIDENTIAL DISTRICT)

USE PERMITTED BY-RIGHT

<u>+</u>75,000 G.S.F.

SITE AREA 2.30 AC. OR 100,500 G.S.F.

BUILDING AREA (EXISTING)

BUILDING HEIGHT (EXISTING) 3 - STORY

UNIT MIX/COUNT

 STUDIO
 9 UNITS (15%)

 1 BEDROOM
 48 UNITS (79%)

 2 BEDROOM
 4 UNITS (6%)

TOTAL 61 UNITS

PARKING

REQUIRED 46 SPACES

(.75 SPACES PER DWELLING UNIT FOR MULTI-FAMILY DWELLING IF .5 MILES FROM A RAPID BUS TRANSIT OR WITHIN THE GRAND RIVER/LAHSER TRADITIONAL MAIN STREET OVERLAY)

PROVIDED

49 SPACES (4 E.V. SPACES)

1,078 SF

INTERIOR LANDSCAPING

REQUIRED (22 SF PER PARKING SPACE)

·

PROVIDED 4,200 SF

NOTES:

- PARKING LOT LANDSCAPING TO MEET CITY ORDINANCE STANDARDS.
- UNDERGROUND DETENTION TO BE PROVIDED BENEATH PARKING LOT.
- MINIMAL ALTERATIONS TO EXTERIOR ALL UPGRADES TO COMPLIMENT AND RETAIN HISTORICAL CHARACTER OF THE BUILDING FACADES.

SAINT MARY'S OF REDFORD
ADAPTIVE REUSE RENOVATION
VOLUNTEERS OF AMERICA
DETROIT, MICHIGAN



FIRST FLOOR/SITE PLAN (27 UNITS)

0 10' 20' 40'



A.102



Adopta Family



8,892 3,417 individuals children

1,612 families

YOU helped us connect those who needed help to those who could help during the holiday season.

YOU answered prayers and brought joy and smiles to children on Christmas morning.

OPERATION BACKP/ICK



1883 students served 165 caring donors

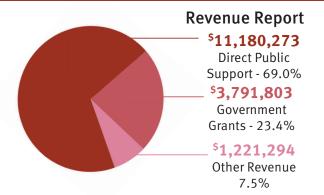
5 90 districts supported

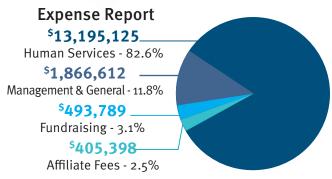
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YOU made sure students across Michigan had the tools they needed to succeed this school year.

YOU helped them feel prepared and ready to take on the year.

Financial Report





*Numbers reported are from the 2022 fiscal year.

You created joy this season

You set students up for success

Thank You!

2022 IMPACT REPORT



12,111
Lives changed because of you



Last year, you made an incredible difference for those in our community that needed you.

You were there for the men and women who served our country only to fall on hard times when they returned home. You were there for the seniors and families looking for a haven to call home. You gave children and families the support they needed when they encountered hard times.

Because of you, Volunteers of America Michigan has helped veterans, seniors, and families maintain their dignity, strengthen their purpose, and reach their full potential for more than 125 years. You are changing lives.

Thank you!

Follow us on social media



@voami

@voamithrift



@voami



@voamithrift



@voami



@voamithrift



Volunteers of America Michigan









VETERANS

SENIORS

VOLUNTEERS



58,400 meals served to

veterans 479

veteran families supported



29,200 bednights for homeless veterans

veterans received employment & training

YOU made sure veterans in your community were taken care of.

YOU gave them shelter and made sure their basic needs were met.



836 low-income seniors and families living with independence



affordable housing facilities for aging seniors, struggling families, and persons with disabilities

^{\$201,443} impact value



6726 volunteer hours served

YOU made sure seniors had safe, affordable housing, food in their pantries, and a friendly faces to keep them company.

Volunteers like **YOU** are critical to the mission and daily work of Volunteers of America Michigan.

YOU stepped up at every opportunity to show others vou care.



You gave veterans shelter and hope

You gave seniors independence

You spent time caring for others



Coleman A. Young Municipal Center 2 Woodward Avenue. Suite 908 Detroit. Michigan 48226 Phone: 313.224.6380 Fax: 313.224.1629 www.detroitmi.gov

November 30, 2023

Amy Hovey Michigan State Housing Development Authority 735 E. Michigan Avenue Lansing, MI 48912

RE: VOA St. Mary

Dear Amy Hovey,

In 2018, the City of Detroit released its Multifamily Affordable Housing Strategy (the "Plan"). The Plan calls for the development of high quality, affordable housing in strategic neighborhoods through transformative developments, preservation of existing affordable housing, and development of permanent supportive housing (PSH) to end homelessness.

The City of Detroit recognizes that economically sustainable urban neighborhoods are often built around a commercial main street and that the best main streets are walkable areas that include a mix of building uses and a healthy mix of housing options. The City prioritizes projects that align with these goals and advance the City's efforts to produce equitable, sustainable, resilient and healthy communities.

Project's Alignment with City Goals

The proposed Volunteers of America Michigan (VOAMI) St. Mary development is an adaptive re-use conversion of an existing historic school building into new units of permanent supportive housing (PSH). Located at 14750 Mansfield Street in the Grand River-St. Marys neighborhood, the project is in alignment with City of Detroit Affordable Housing Goals with the addition of sixty-one (61) PSH units intended to serve those who are chronically homeless and/or on the top 10% of the of Detroit's Continuum of Care's (CoC) priority list.

The proposed project falls within one of the City of Detroit's Strategic Neighborhoods that has experienced substantial investment over the last five years, both public and private. Throughout the planning process, the community expressed a desire for new medium- density housing, particularly for seniors and/or low-income residents. One of the near-term implementation projects that came out of the study was the Grand River streetscape improvement project.

The historic St. Mary's of Redford School building that is being proposed for adaptive re-use is located just north of Grand River Ave., offering access to one of the City's best bus lines. There



Coleman A. Young Municipal Center 2 Woodward Avenue. Suite 908 Detroit. Michigan 48226 Phone: 313.224.6380 Fax: 313.224.1629 www.detroitmi.gov

has been \$50,150,120 million total investment that has occurred within the last 5 years within a one-mile radius of the site. Of that total investment, \$35,980,670 is private investment and \$14,169,450 of public investment. There is also \$48,500,000 of planned future development within a one-mile radius of the site.

Contributing to the \$35,980,670 of private investment includes:

- Quality Team 1 or Detroit Manufacturing Systems' \$28,846,400 investment into their facility;
- Foot Lockers \$1,000,000 investment into their neighborhood location; and
- Millions of dollars of private investment in commercial and residential properties in the neighborhood.

There is also \$48,500,000 of intended investment within a one-mile radius of the site:

- Fellowship Estates (Amandla CDC) has a \$37 million, 269 mixed-income, mixed-use project anticipated to be complete in 2025; and
- Detroit's Coleman A. Young Elementary will be investing \$11,500,000 into their facility.

The VOA St. Mary project would bring additional density to the neighborhood and greatly complement the existing residential and commercial assets within the Grand River/Northwest community.

The developer(s) for this project applied for \$3,000,000 in HOME Investment Partnerships Program (HOME) funds to support the 4% component of the 4%/9% LIHTC transaction, and the request is currently being evaluated by the underwriting team. The City has performed a financial analysis of the attached pro formas for the 4% LIHTC and 9% LIHTC components using the following underwriting assumptions: 2% rental income trending, 3% operating expense trending, 7% vacancy loss, and a combined 20-year average debt service coverage ratio (DSCR) of 1.09. With this analysis, the City also supports the approval of a 4% Payment in Lieu of Taxes (PILOT) for this project, with a final PILOT determination subject to the City's Board of Assessors review and Detroit City Council approval.

We believe that the VOA St. Mary project will further promote the ongoing redevelopment in the Grand River/Northwest community. The Housing and Revitalization Department looks forward to working closely with Volunteers of America Michigan (VOAMI) to ensure this project supports the City's efforts to develop affordable housing, and to promote a more equitable landscape for new developments in Detroit.



Coleman A. Young Municipal Center 2 Woodward Avenue. Suite 908 Detroit, Michigan 48226 Phone: 313.224.6380 Fax: 313.224.1629 www.detroitmi.gov

Sincerely,

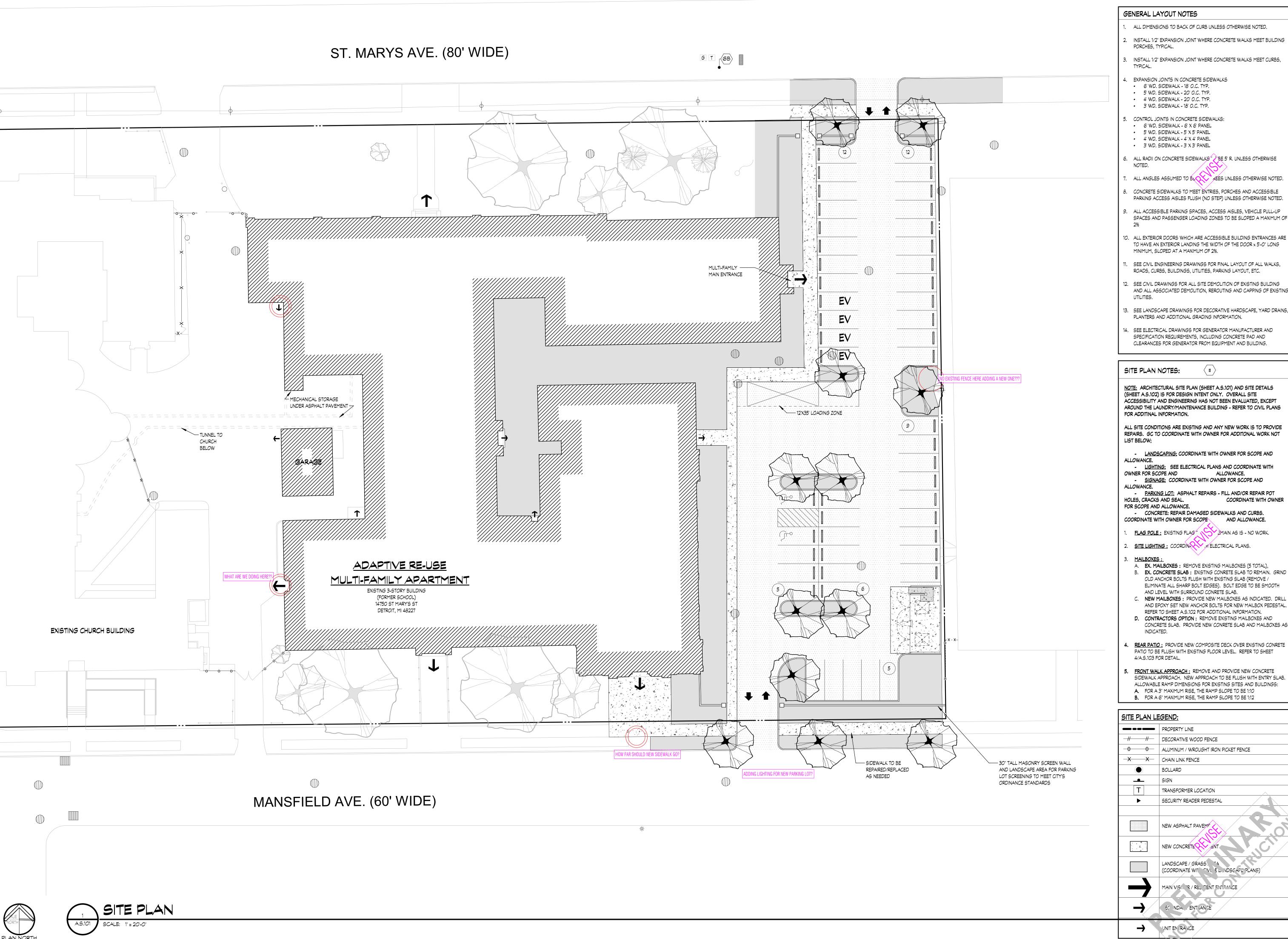
—DocuSigned by: Rebecca Labor

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Rebecca Labov

Chief Development & Investment Officer

City of Detroit, Housing & Revitalization Department





- ALL DIMENSIONS TO BACK OF CURB UNLESS OTHERWISE NOTED.
- INSTALL 1/2" EXPANSION JOINT WHERE CONCRETE WALKS MEET BUILDING PORCHES, TYPICAL.
- INSTALL 1/2" EXPANSION JOINT WHERE CONCRETE WALKS MEET CURBS,
- EXPANSION JOINTS IN CONCRETE SIDEWALKS
- 5' WD. SIDEWALK 20' O.C. TYP.
- 4' WD. SIDEWALK 20' O.C. TYP.
- CONTROL JOINTS IN CONCRETE SIDEWALKS:
- 5' WD. SIDEWALK 5' X 5' PANEL
- 3' WD. SIDEWALK 3' X 3' PANEL
- . ALL RADII ON CONCRETE SIDEWALKS BE 5' R. UNLESS OTHERWISE
- ALL ANGLES ASSUMED TO BE KEES UNLESS OTHERWISE NOTED.
- CONCRETE SIDEWALKS TO MEET ENTRIES, PORCHES AND ACCESSIBLE PARKING ACCESS AISLES FLUSH (NO STEP) UNLESS OTHERWISE NOTED.
- ALL ACCESSIBLE PARKING SPACES, ACCESS AISLES, VEHICLE PULL-UP SPACES AND PASSENGER LOADING ZONES TO BE SLOPED A MAXIMUM OF
- D. ALL EXTERIOR DOORS WHICH ARE ACCESSIBLE BUILDING ENTRANCES ARE TO HAVE AN EXTERIOR LANDING THE WIDTH OF THE DOOR imes 5'-0" LONG
- SEE CIVIL ENGINEERING DRAWINGS FOR FINAL LAYOUT OF ALL WALKS,
- . SEE CIVIL DRAWINGS FOR ALL SITE DEMOLITION OF EXISTING BUILDING
- AND ALL ASSOCIATED DEMOLITION, REROUTING AND CAPPING OF EXISTING
- . SEE LANDSCAPE DRAWINGS FOR DECORATIVE HARDSCAPE, YARD DRAINS, PLANTERS AND ADDITIONAL GRADING INFORMATION.
- . SEE ELECTRICAL DRAWINGS FOR GENERATOR MANUFACTURER AND SPECIFICATION REQUIREMENTS, INCLUDING CONCRETE PAD AND CLEARANCES FOR GENERATOR FROM EQUIPMENT AND BUILDING.

NOTE: ARCHITECTURAL SITE PLAN (SHEET A.S.101) AND SITE DETAILS (SHEET A.S.102) IS FOR DESIGN INTENT ONLY. OVERALL SITE ACCESSIBILITY AND ENGINEERING HAS NOT BEEN EVALUATED, EXCEPT AROUND THE LAUNDRY/MAINTENANCE BUILDING - REFER TO CIVIL PLANS

ALL SITE CONDITIONS ARE EXISTING AND ANY NEW WORK IS TO PROVIDE REPAIRS. GC TO COORDINATE WITH OWNER FOR ADDITONAL WORK NOT

- LANDSCAPING: COORDINATE WITH OWNER FOR SCOPE AND

ALLOWANCE. - <u>SIGNAGE:</u> COORDINATE WITH OWNER FOR SCOPE AND

- PARKING LOT: ASPHALT REPAIRS - FILL AND/OR REPAIR POT - CONCRETE: REPAIR DAMAGED SIDEWALKS AND CURBS.

COORDINATE WITH OWNER FOR SCOPE AND ALLOWANCE.

- SITE LIGHTING: COORDINATION OF ELECTRICAL PLANS.
- B. EX. CONCRETE SLAB: EXISTING CONRETE SLAB TO REMAIN. GRIND OLD ANCHOR BOLTS FLUSH WITH EXISTING SLAB (REMOVE / ELIMINATE ALL SHARP BOLT EDGES). BOLT EDGE TO BE SMOOTH AND LEVEL WITH SURROUND CONRETE SLAB. NEW MAILBOXES: PROVIDE NEW MAILBOXES AS INDICATED. DRILL
- AND EPOXY SET NEW ANCHOR BOLTS FOR NEW MAILBOX PEDESTAL REFER TO SHEET A.S.102 FOR ADDITIONAL INFORMATION. D. CONTRACTORS OPTION: REMOVE EXISTING MAILBOXES AND
- **REAR PATIO:** PROVIDE NEW COMPOSITE DECK OVER EXISTING CONRETE PATIO TO BE FLUSH WITH EXISTING FLOOR LEVEL. REFER TO SHEET
- FRONT WALK APPROACH: REMOVE AND PROVIDE NEW CONCRETE SIDEWALK APPROACH. NEW APPROACH TO BE FLUSH WITH ENTRY SLAB. ALLOWABLE RAMP DIMENSIONS FOR EXISTING SITES AND BUILDINGS: A. FOR A 3" MAXIMUM RISE, THE RAMP SLOPE TO BE 1:10

	-ULIND.
	PROPERTY LINE
	DECORATIVE WOOD FENCE
0 0	ALUMINUM / WROUGHT IRON PICKET FENCE
-XX-	CHAIN LINK FENCE
	BOLLARD
	SIGN
Т	TRANSFORMER LOCATION
•	SECURITY READER PEDESTAL
	NEW ASPHALT PAVEME
, 4 , 1	NEW CONCRETE ENT

LANDSCAPE / GRASS , TA (COORDINATE WIT CIVIL & L. NDSCAFE PLANS)

EC NDA. ENT (AN JE

550 E. NINE MILE ROAD

FERNDALE, MICHIGAN, 48220 PHONE 248.543.4100 FAX 248.543.4141

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ISSUE

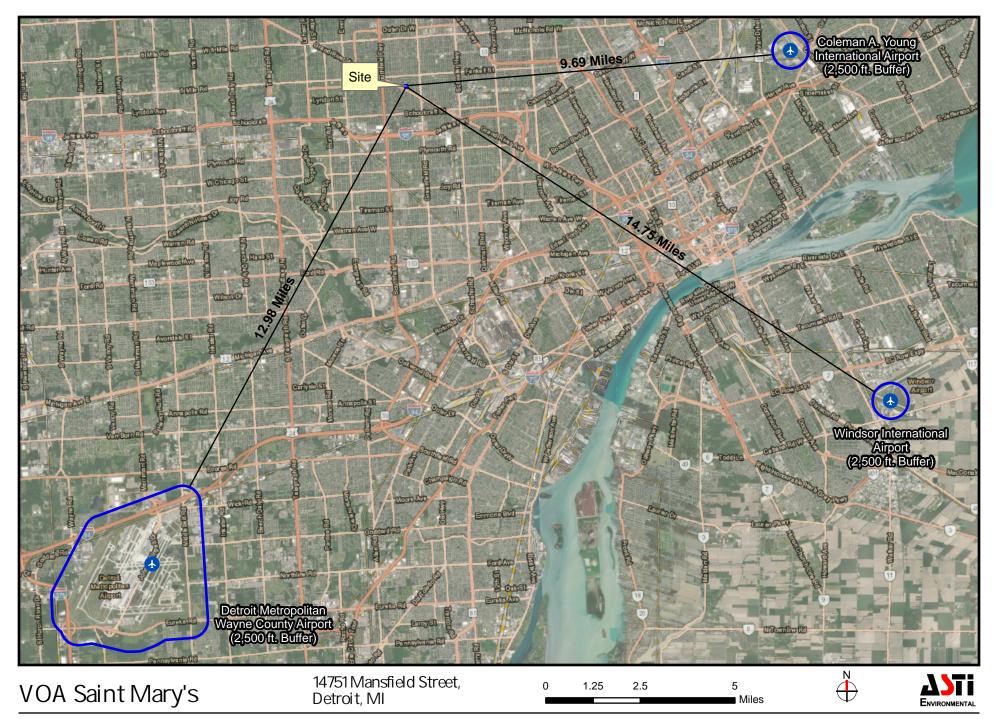
KEY PLAN

FSP PROJECT NO.

VOA22.105 DRAWING TITLE

ARCHITECTURAL SITE PLAN

DRAWING NUMBER





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

14751 Mansfield Street



June 23, 2025

CBRS Units

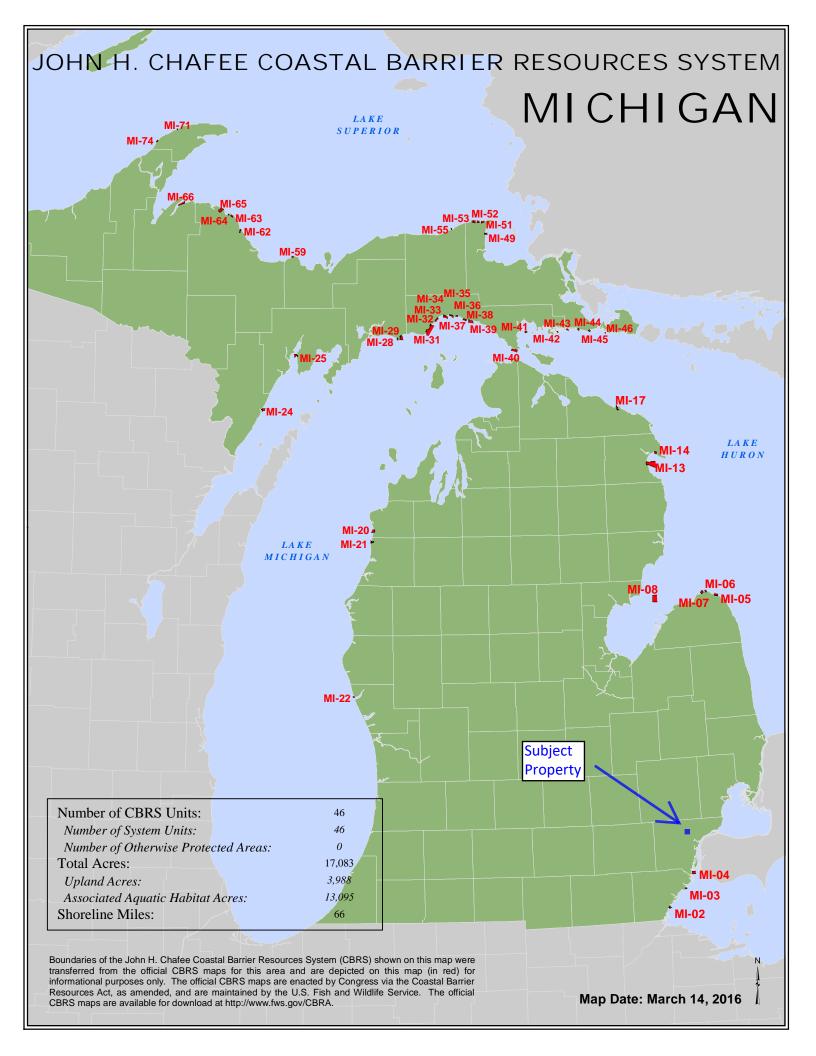
Otherwise Protected Area

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.



National Flood Hazard Layer FIRMette



FEMA Legend SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT Without Base Flood Elevation (BFE) With BFE or Depth Zone AE, AO, AH, VE, AR SPECIAL FLOOD HAZARD AREAS Regulatory Floodway 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 OTHER AREAS OF FLOOD HAZARD Area with Flood Risk due to Levee Zone D NO SCREEN Area of Minimal Flood Hazard Zone X Effective LOMRs OTHER AREAS Area of Undetermined Flood Hazard Zone D - - - Channel, Culvert, or Storm Sewer **GENERAL** STRUCTURES | LILLI Levee, Dike, or Floodwall 20.2 Cross Sections with 1% Annual Chance 17.5 Water Surface Elevation **Coastal Transect** Base Flood Elevation Line (BFE) Limit of Study Jurisdiction Boundary --- Coastal Transect Baseline OTHER **Profile Baseline FEATURES** Hydrographic Feature Digital Data Available No Digital Data Available MAP PANELS 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 6/13/2024 at 1:49 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.



Attainment Status for the National Ambient Air Quality Standards

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

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

Houghton

Ontonagon

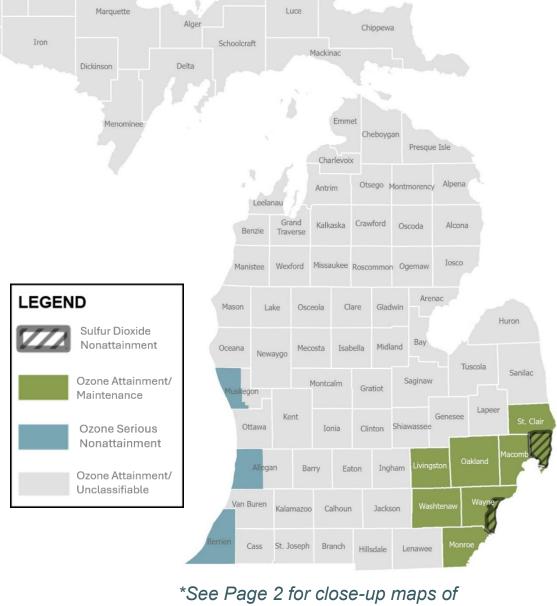
Areas of the state that are below the NAAQS concentration level are called **attainment areas**. The entire state of Michigan is in attainment for the following pollutants:

- Carbon Monoxide (CO)
- Lead (Pb)
- Nitrogen Dioxide (NO2)
- Particulate Matter (PM10 & PM2.5)

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 serious.

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 webpage or contact the division directly.

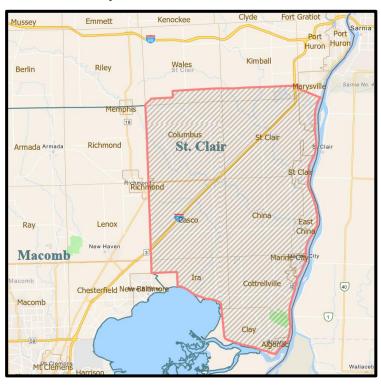


*See Page 2 for close-up maps of partial county nonattainment areas.

Close-Up Maps of Partial County Nonattainment Areas

Sulfur Dioxide Nonattainment Areas

St. Clair County



Wayne County

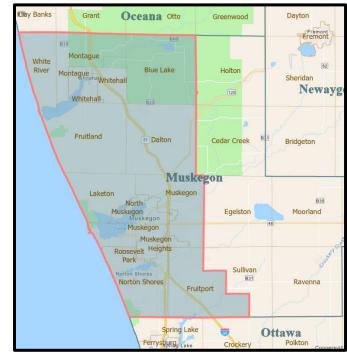


Ozone Serious Nonattainment Areas

Allegan County



Muskegon County







STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING



June 18, 2024

Tony Lentych MSHDA 735 East Michigan Avenue P.O. Box 30044 Lansing, Michigan 48909

Via Email Only

Dear Tony Lentych:

Subject: St. Mary's Project, Wayne County, Michigan

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) 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; 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 St. Mary's Project proposed to be completed with federal grant monies, including the purchase, rehabilitation and conversion of a former Catholic school building into permanent supportive housing in Detroit's Grand River-Saint Mary's Neighborhood. The former three-story school building is located at 14751 Mansfield Street and is currently vacant.

The rehabilitation and conversion will result in the development of 61 apartment units including nine studio apartments approximately 550 square feet in size, 48 one-bedroom apartments approximately 650 square feet in size, and four two-bedroom apartments approximately 850 square feet in size. All 61 apartments are to be reserved

Tony Lentych Page 2 June 18, 2024

as permanent supportive housing for the chronically homeless and persons from the top 10 percent of the Detroit Continuum of Care's priority list scoring house. Construction on the proposed project is expected to begin in the third quarter of 2025 and last until the fourth quarter of 2026.

In reviewing the "Air Quality and Greenhouse Gas Study: Uptown Orange Apartments in Orange, California," dated December 2012, prepared for KTGY 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 St. Mary's Project proposed for completion in Wayne County, Michigan is much smaller in scale than 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.

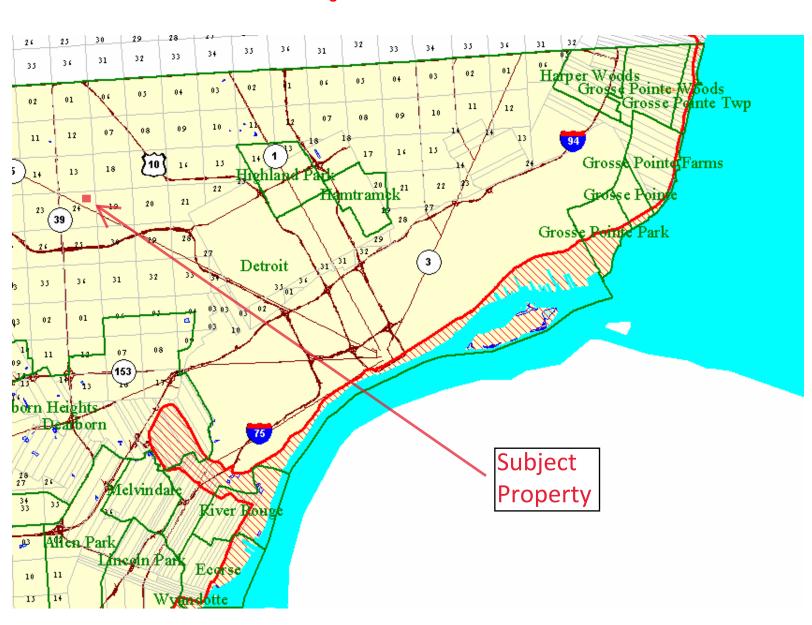
Sincerely, Breune Brikanski

Breanna Bukowski Environmental Quality Analyst Air Quality Division

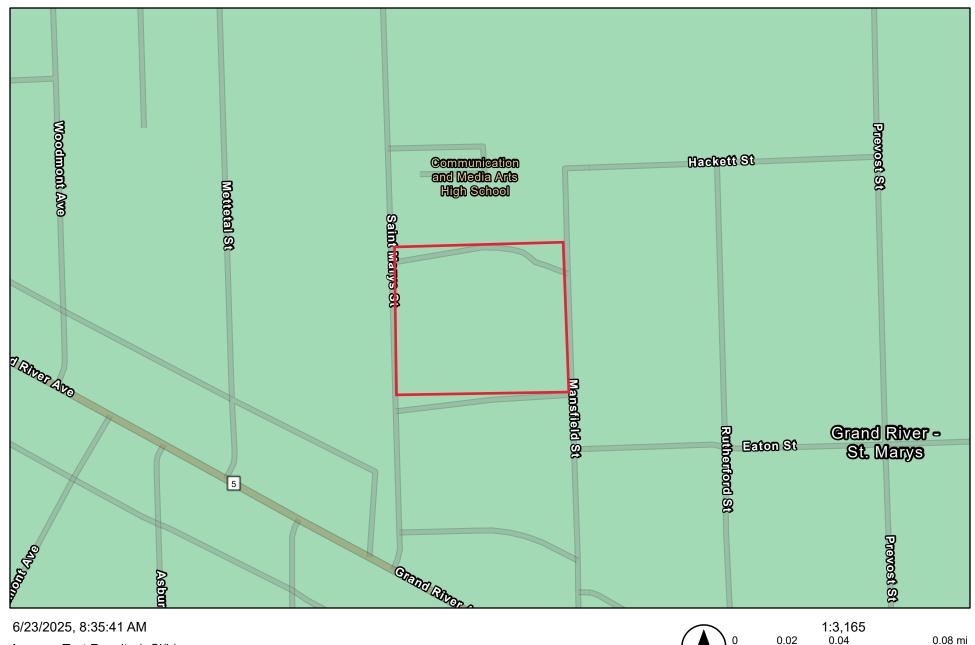
cc: Michael Leslie, USEPA Region 5
Dan Lince, Michigan State Housing Development Authority
Aubrey MacFarlane, Volunteers of America Michigan
Penny Dwoinen, City of Detroit - Housing and Redevelopment Department
Julie Schneider, City of Detroit - Housing and Redevelopment Department
Christopher Yelonek, ASTI Environmental

Wayne County
Grosse Point Township, Grosse Point Woods, Grosse Point Farms
Grosse Point, Grosse Point Park, and Detroit, T1S R14E
Detroit, T1S R14E, T2S R13E, andT2S R12E
River Rouge, T2S R11E

The heavy red line is the **Coastal Zone Management Boundary**The red hatched area is the **Coastal Zone Management Area**.



14751 Mansfield Street EGLE Radon Map



Average Test Results (pCi/L)

< 2 pCi/L (Retest every 2-5 years)</p>
World Imagery

Low Resolution 15m Imagery
High Resolution 60cm Imagery
High Resolution 30cm Imagery

Citations

0 0.02 0.04

0 0.03 0.06

60cm Resolution Metadata

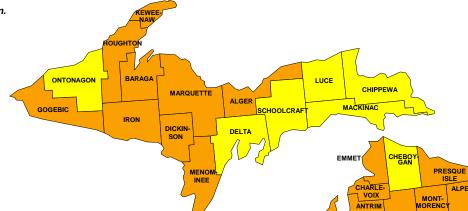
Maxar, Microsoft, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, @ OpenStreetMap contributors, and the GIS User Community

0.12 km

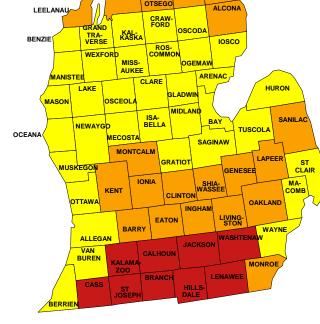
The purpose of this map is to assist National, State and local organizations to target their resources and to implement radon-resistant building codes.

This map is not intended to determine if a home in a given zone should be tested for radon. Homes with elevated levels of radon have been found in all three zones.

All homes should be tested, regardless of zone designation.



IMPORTANT: Consult the publication entitled "Preliminary Geologic Radon Potential Assessment of Michigan" (USGS Open-file Report 93-292-E) before using this map. http://energy.cr.usgs.gov/radon/grpinfo.html This document contains information on radon potential variations within counties. EPA also recommends that this map be supplemented with any available local data in order to further understand and predict the radon potential of a specific area.







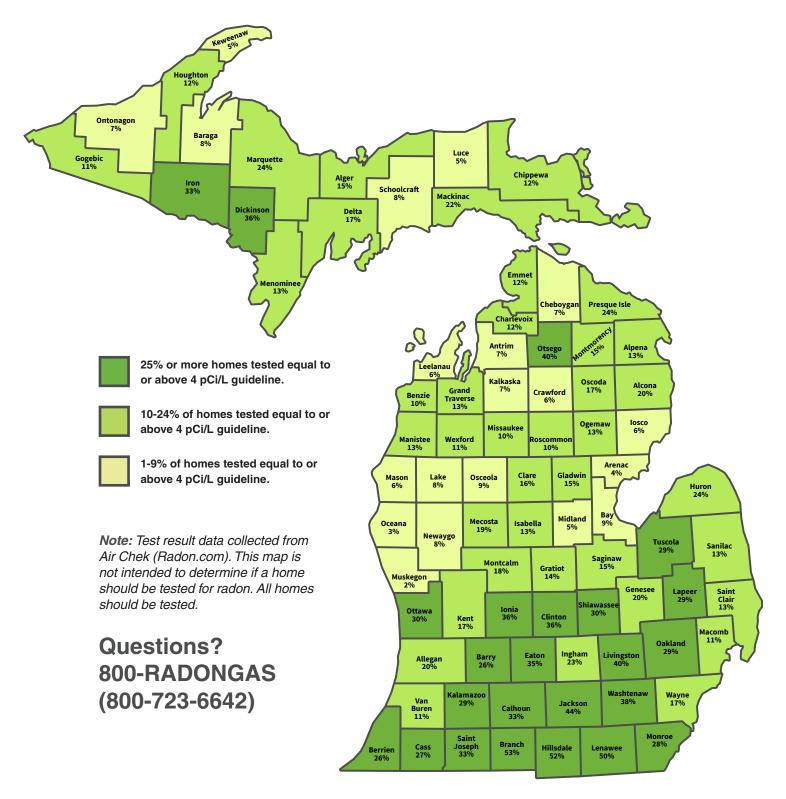


Zone 1

Zone 2

Zone 3

Percentage of Elevated Radon Test Results by County



Michigan Indoor Radon Results

Michigan Department of Environment, Great Lakes, and Energy

About the Map

EGLE created this map to show the radon information for first time tests, without active radon mitigation systems, by ZIP code. This map is based on results from the supplier that manufactures and analyzes short-term radon test kits purchased through the EGLE radon program.

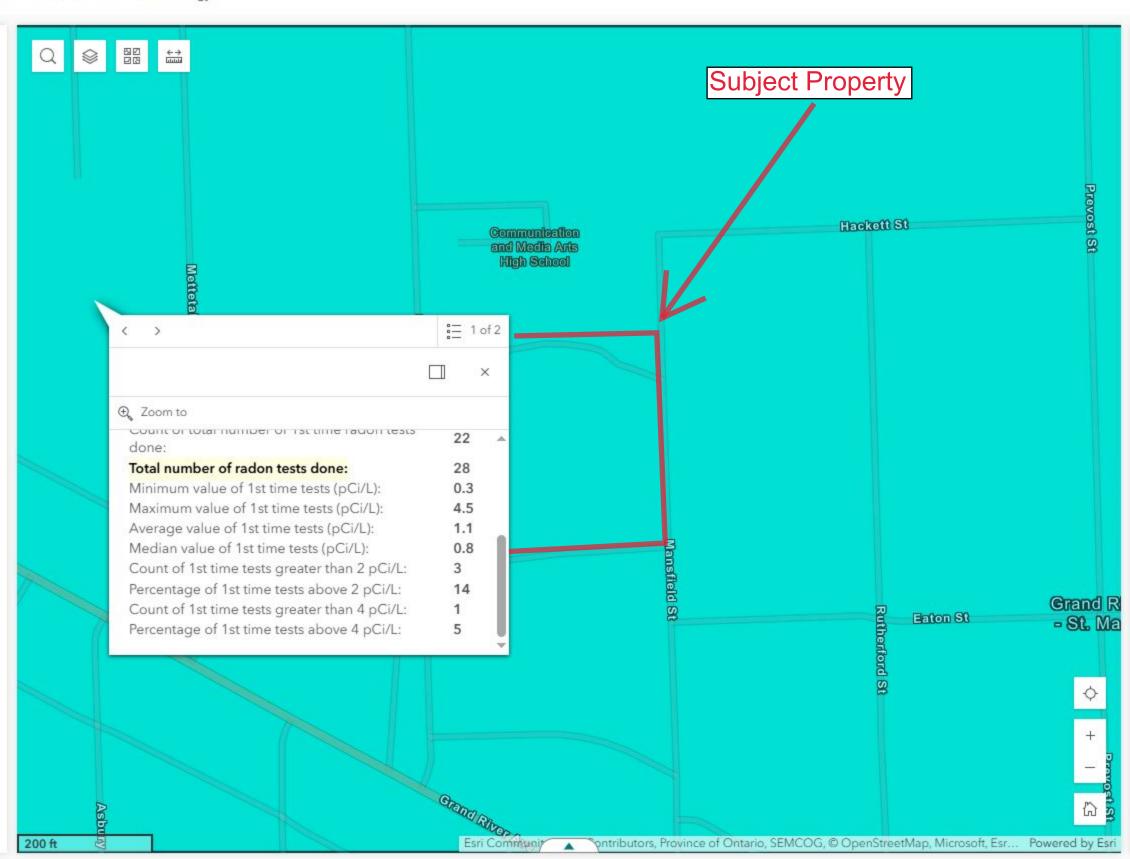
The data includes: minimum and maximum radon levels total number of tests; mean and median values; the number of test results below a level of concern (2 picocuries per liter, pCi/L), in the recommended retest range (2 - 4 pCi/L), and the recommended mitigation level (greater than 4 pCi/L); percentage of tests greater than 2 pCi/L; and percentage of tests greater than 4 pCi/L.

Full analytical data will not be displayed for ZIP codes with less than 5 test results, only the test kit county will be shown. A zero-value indicated insufficient data for analysis and a null value indicates no tests were provided. The data set is updated every quarter with the preceding 10 years' worth of test results.

Visit the <u>Finding and Using a Radon Test</u>
<u>Kit webpage</u> for more information on requesting your own.

Help

- Visit our <u>How to Use Guide</u> for help using this application
- · Ouastians shout man contest small



2/2/24, 11:23 AM Listed Species



ECOS / Species Reports

/ Listed species with spatial current range believed to or known to occur in MI

Listed species with spatial current range believed to or known to occur in Michigan

Notes:

- This report includes species only if they have a **Spatial Current Range** in ECOS.
- As of 02/13/2015 the data in this report has been updated to use a different set of information. Results are based on where the species is believed to or known to occur. The FWS feels utilizing this data set is a better representation of species occurrence. Note: there may be other federally listed species that are not currently known or expected to occur in this state but are covered by the ESA wherever they are found; Thus if new surveys detected them in this state they are still covered by the ESA. The FWS is using the best information available on this date to generate this list.
- This report shows listed species or populations believed to or known to occur in MI
- This list does not include experimental populations and similarity of appearance listings.
- Click on the highlighted scientific names below to view a Species Profile.

Sort by group: ✓ Show All ✓ entries Search: 26 Species Listings Scientific Common Name Where Listed Region € Status € Birds

Scientific Name	Common Name	Where Listed	Region ①	ESA Listing Status 1
<u>Charadrius</u> <u>melodus</u>	Piping Plover	[Great Lakes watershed DPS] - Great Lakes, watershed in States of IL, IN, MI, MN, NY, OH, PA, and WI and Canada (Ont.)	3	Endangered
<u>Calidris</u> <u>canutus rufa</u>	rufa red knot	Wherever found	5	Threatened
<u>Grus</u> <u>americana</u>	Whooping crane	U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY)	2	Experimental Population, Non-Essential
Clams				
<u>Pleurobema</u> <u>clava</u>	Clubshell	Wherever found; Except where listed as Experimental Populations	5	Endangered
<u>Epioblasma</u> <u>rangiana</u>	Northern riffleshell	Wherever found	5	Endangered
<u>Villosa fabalis</u>	Rayed Bean	Wherever found	3	Endangered
Obovaria subrotunda	Round hickorynut	Wherever found	3	Threatened
<u>Epioblasma</u> <u>triquetra</u>	Snuffbox mussel	Wherever found	3	Endangered
Ferns and Allies				

Scientific Name	Common Name	Where Listed	Region 1	ESA Listing Status 1
Asplenium scolopendrium var. americanum	American hart's-tongue fern	Wherever found	5	Threatened
Flowering Plants				
<u>Iris lacustris</u>	Dwarf lake iris	Wherever found	3	Threatened
<u>Platanthera</u> <u>leucophaea</u>	Eastern prairie fringed orchid	Wherever found	3	Threatened
Solidago houghtonii	Houghton's goldenrod	Wherever found	3	Threatened
<u>Hymenoxys</u> <u>herbacea</u>	Lakeside daisy	Wherever found	3	Threatened
Mimulus michiganensis	Michigan monkey- flower	Wherever found	3	Endangered
<u>Cirsium</u> <u>pitcheri</u>	Pitcher's thistle	Wherever found	3	Threatened
Insects				
Somatochlora hineana	Hine's emerald dragonfly	Wherever found	3	Endangered
Brychius hungerfordi	Hungerford's crawling water Beetle	Wherever found	3	Endangered
<u>Lycaeides</u> <u>melissa</u> <u>samuelis</u>	Karner blue butterfly	Wherever found	3	Endangered

Scientific Name	Common Name	Where Listed	Region 1	ESA Listing Status 1
Neonympha mitchellii mitchellii	Mitchell's satyr Butterfly	Wherever found	3	Endangered
<u>Oarisma</u> <u>poweshiek</u>	Poweshiek skipperling	Wherever found	3	Endangered
Mammals				
<u>Lynx</u> <u>canadensis</u>	Canada Lynx	Wherever Found in Contiguous U.S.	6	Threatened
Canis lupus	Gray wolf	U.S.A.: All of AL, AR, CA, CO, CT, DE, FL, GA, IA, IN, IL, KS, KY, LA, MA, MD, ME, MI, MO, MS, NC, ND, NE, NH, NJ, NV, NY, OH, OK, PA, RI, SC, SD, TN, TX, VA, VT, WI, and WV; and portions of AZ, NM, OR, UT, and WA. Mexico.	6	Endangered
<u>Myotis sodalis</u>	Indiana bat	Wherever found	3	Endangered
<u>Myotis</u> <u>septentrionalis</u>	Northern Long-Eared Bat	Wherever found	3	Endangered
Reptiles				
Nerodia erythrogaster neglecta	Copperbelly water snake	Indiana north of 40 degrees north latitude, Michigan, Ohio	3	Threatened

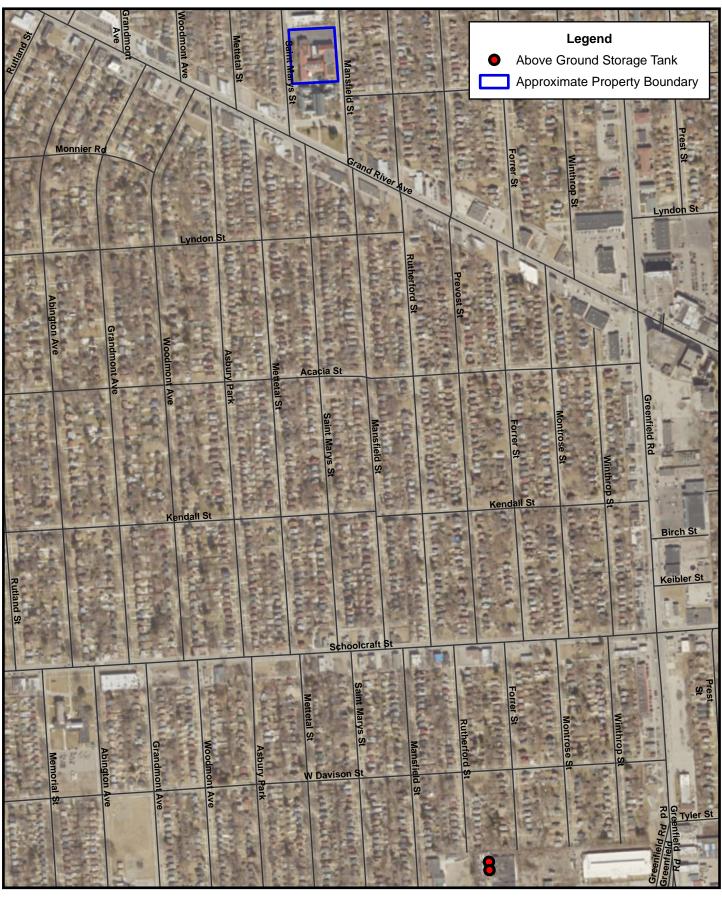
2/2/24, 11:23 AM Listed Species

Scientific Name	Common Name	Where Listed	Region 1	ESA Listing Status ①
<u>Sistrurus</u> <u>catenatus</u>	Eastern Massasauga (=rattlesnake)	Wherever found	3	Threatened

Showing 1 to 26 of 26 entries

Previous

1 Next



VOA Saint Mary's

14751 Mansfield Street, Detroit, MI

0 150 300 600 Feet





Home (/) > Programs (/programs/) > Environmental Review (/programs/environmental-review/) > ASD Calculator

Acceptable Separation Distance (ASD) Electronic Assessment Tool

The Environmental Planning Division (EPD) has developed an electronic-based assessment tool that calculates the Acceptable Separation Distance (ASD) from stationary hazards. The ASD is the distance from above ground stationary containerized hazards of an explosive or fire prone nature, to where a HUD assisted project can be located. The ASD is consistent with the Department's standards of blast overpressure (0.5 psi-buildings) and thermal radiation (450 BTU/ft² - hr - people and 10,000 BTU/ft² - hr - buildings). Calculation of the ASD is the first step to assess site suitability for proposed HUD-assisted projects near stationary hazards. Additional guidance on ASDs is available in the Department's guidebook "Siting of HUD- Assisted Projects Near Hazardous Facilities" and the regulation 24 CFR Part 51, Subpart C, Sitting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature.

Note: Tool tips, containing field specific information, have been added in this tool and may be accessed by hovering over the ASD result fields with the mouse.

Acceptable Separation Distance Assessment Tool

Is the container above ground?	Yes: ☑ No: □	
Is the container under pressure?	Yes: ☑No: □	
Does the container hold a cryogenic liquified gas?	Yes: ☐ No: ☑	
Is the container diked?	Yes: No:	
What is the volume (gal) of the container?	16457	
What is the Diked Area Length (ft)?		
What is the Diked Area Width (ft)?		
Calculate Acceptable Separation Distance		
Diked Area (sqft)		
ASD for Blast Over Pressure (ASDBOP)	552.87	
ASD for Thermal Radiation for People (ASDPPU)	888.24	
ASD for Thermal Radiation for Buildings (ASDBPU)	183.54	
ASD for Thermal Radiation for People (ASDPNPD)		
ASD for Thermal Radiation for Buildings (ASDBNPD)		

For mitigation options, please click on the following link: Mitigation Options (/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/)

Providing Feedback & Corrections

After using the ASD Assessment Tool following the directions in this User Guide, users are encouraged to provide feedback on how the ASD Assessment Tool may be improved. Users are also encouraged to send comments or corrections for the improvement of the tool.

Please send comments or other input using the Contact Us (https://www.hudexchange.info/contact-us/) form.

Related Information

- ASD User Guide (/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/)
- ASD Flow Chart (/resource/3840/acceptable-separation-distance-asd-flowchart/)

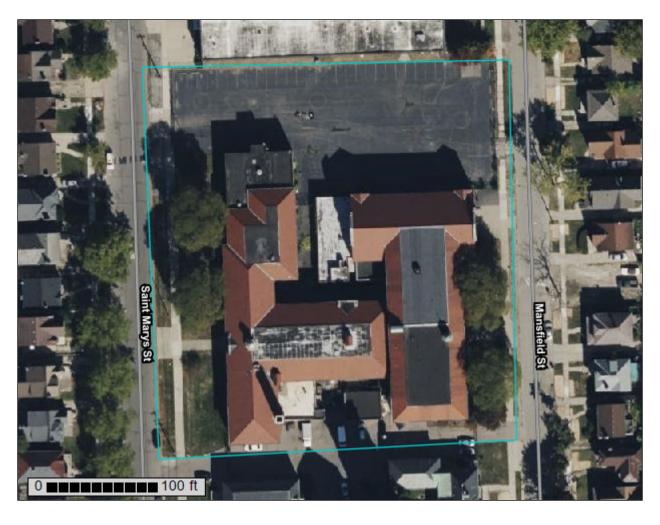


NRCS

Natural Resources Conservation Service A product of the National Cooperative Soil Survey, a joint effort of the United States Department of Agriculture and other Federal agencies, State agencies including the Agricultural Experiment Stations, and local participants

Custom Soil Resource Report for Wayne County, Michigan

VOA Saint Mary's



Preface

Soil surveys contain information that affects land use planning in survey areas. They highlight soil limitations that affect various land uses and provide information about the properties of the soils in the survey areas. Soil surveys are designed for many different users, including farmers, ranchers, foresters, agronomists, urban planners, community officials, engineers, developers, builders, and home buyers. Also, conservationists, teachers, students, and specialists in recreation, waste disposal, and pollution control can use the surveys to help them understand, protect, or enhance the environment.

Various land use regulations of Federal, State, and local governments may impose special restrictions on land use or land treatment. Soil surveys identify soil properties that are used in making various land use or land treatment decisions. The information is intended to help the land users identify and reduce the effects of soil limitations on various land uses. The landowner or user is responsible for identifying and complying with existing laws and regulations.

Although soil survey information can be used for general farm, local, and wider area planning, onsite investigation is needed to supplement this information in some cases. Examples include soil quality assessments (http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/health/) and certain conservation and engineering applications. For more detailed information, contact your local USDA Service Center (https://offices.sc.egov.usda.gov/locator/app?agency=nrcs) or your NRCS State Soil Scientist (http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/contactus/?cid=nrcs142p2 053951).

Great differences in soil properties can occur within short distances. Some soils are seasonally wet or subject to flooding. Some are too unstable to be used as a foundation for buildings or roads. Clayey or wet soils are poorly suited to use as septic tank absorption fields. A high water table makes a soil poorly suited to basements or underground installations.

The National Cooperative Soil Survey is a joint effort of the United States Department of Agriculture and other Federal agencies, State agencies including the Agricultural Experiment Stations, and local agencies. The Natural Resources Conservation Service (NRCS) has leadership for the Federal part of the National Cooperative Soil Survey.

Information about soils is updated periodically. Updated information is available through the NRCS Web Soil Survey, the site for official soil survey information.

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or a part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require

alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

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percent slopes	13
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How Soil Surveys Are Made

Soil surveys are made to provide information about the soils and miscellaneous areas in a specific area. They include a description of the soils and miscellaneous areas and their location on the landscape and tables that show soil properties and limitations affecting various uses. Soil scientists observed the steepness, length, and shape of the slopes; the general pattern of drainage; the kinds of crops and native plants; and the kinds of bedrock. They observed and described many soil profiles. A soil profile is the sequence of natural layers, or horizons, in a soil. The profile extends from the surface down into the unconsolidated material in which the soil formed or from the surface down to bedrock. The unconsolidated material is devoid of roots and other living organisms and has not been changed by other biological activity.

Currently, soils are mapped according to the boundaries of major land resource areas (MLRAs). MLRAs are geographically associated land resource units that share common characteristics related to physiography, geology, climate, water resources, soils, biological resources, and land uses (USDA, 2006). Soil survey areas typically consist of parts of one or more MLRA.

The soils and miscellaneous areas in a survey area occur in an orderly pattern that is related to the geology, landforms, relief, climate, and natural vegetation of the area. Each kind of soil and miscellaneous area is associated with a particular kind of landform or with a segment of the landform. By observing the soils and miscellaneous areas in the survey area and relating their position to specific segments of the landform, a soil scientist develops a concept, or model, of how they were formed. Thus, during mapping, this model enables the soil scientist to predict with a considerable degree of accuracy the kind of soil or miscellaneous area at a specific location on the landscape.

Commonly, individual soils on the landscape merge into one another as their characteristics gradually change. To construct an accurate soil map, however, soil scientists must determine the boundaries between the soils. They can observe only a limited number of soil profiles. Nevertheless, these observations, supplemented by an understanding of the soil-vegetation-landscape relationship, are sufficient to verify predictions of the kinds of soil in an area and to determine the boundaries.

Soil scientists recorded the characteristics of the soil profiles that they studied. They noted soil color, texture, size and shape of soil aggregates, kind and amount of rock fragments, distribution of plant roots, reaction, and other features that enable them to identify soils. After describing the soils in the survey area and determining their properties, the soil scientists assigned the soils to taxonomic classes (units). Taxonomic classes are concepts. Each taxonomic class has a set of soil characteristics with precisely defined limits. The classes are used as a basis for comparison to classify soils systematically. Soil taxonomy, the system of taxonomic classification used in the United States, is based mainly on the kind and character of soil properties and the arrangement of horizons within the profile. After the soil

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scientists classified and named the soils in the survey area, they compared the individual soils with similar soils in the same taxonomic class in other areas so that they could confirm data and assemble additional data based on experience and research.

The objective of soil mapping is not to delineate pure map unit components; the objective is to separate the landscape into landforms or landform segments that have similar use and management requirements. Each map unit is defined by a unique combination of soil components and/or miscellaneous areas in predictable proportions. Some components may be highly contrasting to the other components of the map unit. The presence of minor components in a map unit in no way diminishes the usefulness or accuracy of the data. The delineation of such landforms and landform segments on the map provides sufficient information for the development of resource plans. If intensive use of small areas is planned, onsite investigation is needed to define and locate the soils and miscellaneous areas.

Soil scientists make many field observations in the process of producing a soil map. The frequency of observation is dependent upon several factors, including scale of mapping, intensity of mapping, design of map units, complexity of the landscape, and experience of the soil scientist. Observations are made to test and refine the soil-landscape model and predictions and to verify the classification of the soils at specific locations. Once the soil-landscape model is refined, a significantly smaller number of measurements of individual soil properties are made and recorded. These measurements may include field measurements, such as those for color, depth to bedrock, and texture, and laboratory measurements, such as those for content of sand, silt, clay, salt, and other components. Properties of each soil typically vary from one point to another across the landscape.

Observations for map unit components are aggregated to develop ranges of characteristics for the components. The aggregated values are presented. Direct measurements do not exist for every property presented for every map unit component. Values for some properties are estimated from combinations of other properties.

While a soil survey is in progress, samples of some of the soils in the area generally are collected for laboratory analyses and for engineering tests. Soil scientists interpret the data from these analyses and tests as well as the field-observed characteristics and the soil properties to determine the expected behavior of the soils under different uses. Interpretations for all of the soils are field tested through observation of the soils in different uses and under different levels of management. Some interpretations are modified to fit local conditions, and some new interpretations are developed to meet local needs. Data are assembled from other sources, such as research information, production records, and field experience of specialists. For example, data on crop yields under defined levels of management are assembled from farm records and from field or plot experiments on the same kinds of soil.

Predictions about soil behavior are based not only on soil properties but also on such variables as climate and biological activity. Soil conditions are predictable over long periods of time, but they are not predictable from year to year. For example, soil scientists can predict with a fairly high degree of accuracy that a given soil will have a high water table within certain depths in most years, but they cannot predict that a high water table will always be at a specific level in the soil on a specific date.

After soil scientists located and identified the significant natural bodies of soil in the survey area, they drew the boundaries of these bodies on aerial photographs and

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identified each as a specific map unit. Aerial photographs show trees, buildings, fields, roads, and rivers, all of which help in locating boundaries accurately.

Soil Map

The soil map section includes the soil map for the defined area of interest, a list of soil map units on the map and extent of each map unit, and cartographic symbols displayed on the map. Also presented are various metadata about data used to produce the map, and a description of each soil map unit.



MAP LEGEND

Area of Interest (AOI)

Area of Interest (AOI)

Soils

Soil Map Unit Polygons

Soil Map Unit Lines

Soil Map Unit Points

Special Point Features

(o)

Blowout

Borrow Pit

Clay Spot

Closed Depression

Gravel Pit

Gravelly Spot

Landfill

Lava Flow Marsh or swamp

Mine or Quarry

Miscellaneous Water Perennial Water

Rock Outcrop

Saline Spot

Sandy Spot

Severely Eroded Spot

Sinkhole

Sodic Spot

Slide or Slip

Spoil Area



Stony Spot

Very Stony Spot

Ŷ

Wet Spot Other

Δ

Special Line Features

Water Features

Streams and Canals

Transportation

Rails

Interstate Highways

US Routes

Major Roads

00

Local Roads

Background

Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:12.000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Wayne County, Michigan Survey Area Data: Version 9, Aug 25, 2023

Soil map units are labeled (as space allows) for map scales 1:50.000 or larger.

Date(s) aerial images were photographed: Oct 9, 2022—Oct 21, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
UrbarB	Urban land-Riverfront complex, dense substratum, 0 to 4 percent slopes	2.6	100.0%
Totals for Area of Interest		2.6	100.0%

Map Unit Descriptions

The map units delineated on the detailed soil maps in a soil survey represent the soils or miscellaneous areas in the survey area. The map unit descriptions, along with the maps, can be used to determine the composition and properties of a unit.

A map unit delineation on a soil map represents an area dominated by one or more major kinds of soil or miscellaneous areas. A map unit is identified and named according to the taxonomic classification of the dominant soils. Within a taxonomic class there are precisely defined limits for the properties of the soils. On the landscape, however, the soils are natural phenomena, and they have the characteristic variability of all natural phenomena. Thus, the range of some observed properties may extend beyond the limits defined for a taxonomic class. Areas of soils of a single taxonomic class rarely, if ever, can be mapped without including areas of other taxonomic classes. Consequently, every map unit is made up of the soils or miscellaneous areas for which it is named and some minor components that belong to taxonomic classes other than those of the major soils.

Most minor soils have properties similar to those of the dominant soil or soils in the map unit, and thus they do not affect use and management. These are called noncontrasting, or similar, components. They may or may not be mentioned in a particular map unit description. Other minor components, however, have properties and behavioral characteristics divergent enough to affect use or to require different management. These are called contrasting, or dissimilar, components. They generally are in small areas and could not be mapped separately because of the scale used. Some small areas of strongly contrasting soils or miscellaneous areas are identified by a special symbol on the maps. If included in the database for a given area, the contrasting minor components are identified in the map unit descriptions along with some characteristics of each. A few areas of minor components may not have been observed, and consequently they are not mentioned in the descriptions, especially where the pattern was so complex that it was impractical to make enough observations to identify all the soils and miscellaneous areas on the landscape.

The presence of minor components in a map unit in no way diminishes the usefulness or accuracy of the data. The objective of mapping is not to delineate pure taxonomic classes but rather to separate the landscape into landforms or landform segments that have similar use and management requirements. The delineation of such segments on the map provides sufficient information for the development of resource plans. If intensive use of small areas is planned, however,

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onsite investigation is needed to define and locate the soils and miscellaneous areas.

An identifying symbol precedes the map unit name in the map unit descriptions. Each description includes general facts about the unit and gives important soil properties and qualities.

Soils that have profiles that are almost alike make up a *soil series*. Except for differences in texture of the surface layer, all the soils of a series have major horizons that are similar in composition, thickness, and arrangement.

Soils of one series can differ in texture of the surface layer, slope, stoniness, salinity, degree of erosion, and other characteristics that affect their use. On the basis of such differences, a soil series is divided into *soil phases*. Most of the areas shown on the detailed soil maps are phases of soil series. The name of a soil phase commonly indicates a feature that affects use or management. For example, Alpha silt loam, 0 to 2 percent slopes, is a phase of the Alpha series.

Some map units are made up of two or more major soils or miscellaneous areas. These map units are complexes, associations, or undifferentiated groups.

A *complex* consists of two or more soils or miscellaneous areas in such an intricate pattern or in such small areas that they cannot be shown separately on the maps. The pattern and proportion of the soils or miscellaneous areas are somewhat similar in all areas. Alpha-Beta complex, 0 to 6 percent slopes, is an example.

An association is made up of two or more geographically associated soils or miscellaneous areas that are shown as one unit on the maps. Because of present or anticipated uses of the map units in the survey area, it was not considered practical or necessary to map the soils or miscellaneous areas separately. The pattern and relative proportion of the soils or miscellaneous areas are somewhat similar. Alpha-Beta association, 0 to 2 percent slopes, is an example.

An *undifferentiated group* is made up of two or more soils or miscellaneous areas that could be mapped individually but are mapped as one unit because similar interpretations can be made for use and management. The pattern and proportion of the soils or miscellaneous areas in a mapped area are not uniform. An area can be made up of only one of the major soils or miscellaneous areas, or it can be made up of all of them. Alpha and Beta soils, 0 to 2 percent slopes, is an example.

Some surveys include *miscellaneous areas*. Such areas have little or no soil material and support little or no vegetation. Rock outcrop is an example.

Wayne County, Michigan

UrbarB—Urban land-Riverfront complex, dense substratum, 0 to 4 percent slopes

Map Unit Setting

National map unit symbol: 2whsx

Elevation: 560 to 720 feet

Mean annual precipitation: 28 to 38 inches Mean annual air temperature: 45 to 52 degrees F

Frost-free period: 135 to 210 days

Farmland classification: Not prime farmland

Map Unit Composition

Urban land: 80 percent

Riverfront, dense substratum, and similar soils: 19 percent

Minor components: 1 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Urban Land

Properties and qualities

Slope: 0 to 1 percent

Depth to restrictive feature: 0 inches to manufactured layer

Runoff class: High

Capacity of the most limiting layer to transmit water (Ksat): Very low (0.00 to 0.00

in/hr)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 8

Hydrologic Soil Group: D Hydric soil rating: No

Description of Riverfront, Dense Substratum

Setting

Landform: Deltas, water-lain moraines, wave-worked till plains

Down-slope shape: Linear

Across-slope shape: Convex, linear

Parent material: Loamy human-transported material over clayey lodgment till

Typical profile

^Au - 0 to 6 inches: sandy loam

^Cu1 - 6 to 16 inches: very artifactual sandy loam ^Cu2 - 16 to 46 inches: gravelly-artifactual loam ^Cu3 - 46 to 68 inches: very artifactual loam

2Cd - 68 to 80 inches: clay

Properties and qualities

Slope: 0 to 4 percent

Depth to restrictive feature: 56 to 78 inches to densic material

Drainage class: Well drained

Runoff class: Low

Capacity of the most limiting layer to transmit water (Ksat): Very low (0.00 to 0.00

in/hr)

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Depth to water table: More than 80 inches

Frequency of flooding: None Frequency of ponding: None

Calcium carbonate, maximum content: 28 percent

Gypsum, maximum content: 1 percent

Maximum salinity: Nonsaline (0.1 to 1.5 mmhos/cm)

Available water supply, 0 to 60 inches: Low (about 4.9 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 8

Hydrologic Soil Group: B

Ecological site: F099XY007MI - Lake Plain Flats

Hydric soil rating: No

Minor Components

Riverfront, dense substratum, steep

Percent of map unit: 1 percent

Landform: Deltas, water-lain moraines, wave-worked till plains

Down-slope shape: Linear

Across-slope shape: Convex, linear

Ecological site: F099XY007MI - Lake Plain Flats

Hydric soil rating: No

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Coleman A. Young Municipal Center 2 Woodward Avenue. Suite 908 Detroit, Michigan 48226 Phone: 313.224.6380 Fax: 313.224.1629 www.detroitmi.gov

January 9, 2025

Penny Dwoinen
City of Detroit Housing & Revitalization Department
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 908
Detroit, MI 48226

RE: Section 106 Review of the HUD Funded Project Located at 14751 Mansfield in the City of Detroit, Wayne County, Michigan

Dear Mrs. Dwoinen,

In accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, I am providing a determination of historic eligibility regarding the above-referenced project under the authority of the "Programmatic Agreement between the Michigan State Historic Preservation Office and the City of Detroit, Michigan...," dated December 21, 2022.

The proposed project involves the historic rehabilitation and adaptive use of the St. Mary of Redford School.

Per Stipulation VI of Programmatic Agreement (PA), the proposed undertaking is exempt from review by SHPO's archaeologist and consultation with Tribes.

Based on historic research, the building at **14751 Mansfield** has been identified as eligible for the National Register of Historic Places and is in the process of being listed. Therefore, per Stipulation V.B of the PA, the project shall be carried out in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. The project is seeking federal historic tax credits and has provided a copy of the Part II tax credit application with the Section 106 Application.

The rehabilitation work to St. Mary of Redford school will meet *The Secretary of the Interior's Standards for Rehabilitation*. The proposed rehabilitation will not change the setting, atmosphere, or feeling of the St. Mary of Redford Roman Catholic Parish. The proposed project will not destroy any character defining features of the historic property, and the proposed rehabilitation and associated parking lot will not change the setting, feeling, or atmosphere of the St. Mary Roman Catholic Parish.

This project has been given a **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:



Coleman A. Young Municipal Center 2 Woodward Avenue. Suite 908 Detroit, Michigan 48226 Phone: 313.224.6380 Fax: 313.224.1629 www.detroitmi.gov

• The work is conducted in accordance with the specifications submitted to the Preservation Specialist or as approved in the federal tax credit application, and photos of the completed work, or a copy of the Part III tax credit certification are provided.

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 Ciavattonet@detroitmi.gov.

Sincerely,

Tiffany Ciavattone

Historic Preservation Specialist

City of Detroit

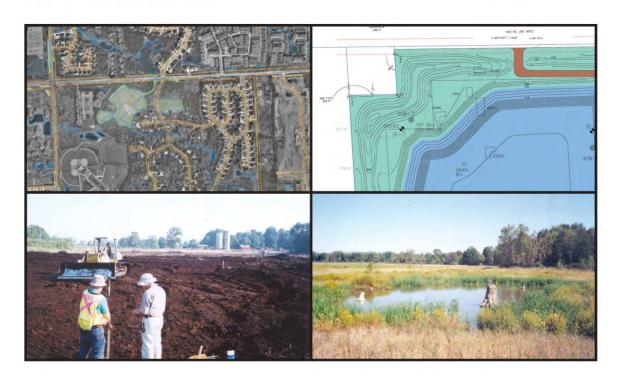
Housing & Revitalization Department

Noise Assessment VOA Saint Mary 14751 Mansfield Street Detroit, Michigan

Volunteers of America of Michigan

November 9, 2023

ASTI ENVIRONMENTAL





Noise Assessment VOA Saint Mary Detroit, Michigan

November 9, 2023

Report Prepared For:

Volunteers of America of Michigan 21415 Civic Center Drive, Suite 306 Southfield, Michigan 48076

Report Prepared By:

ASTI Environmental 10448 Citation Drive, Suite 100 Brighton, Michigan 48116 800-395-ASTI

ASTI Project No. 12982

Report Prepared by: Report Reviewed by:

Christopher Yelonek David Amir

Architectural Historian/Env. Scientist Director-Site Redevelopment Services

ENVIRONMENTAL

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ATTACHMENTS

- A NAL Location MapB Airport Noise Contour Map
- C AADT InformationD Day-Night Level Electronic Assessment

1.0 Introduction

Volunteers of America of Michigan proposes the adaptive reuse utilizing funding provided from the Michigan State Housing Development Authority of VOA Saint Mary, 14751 Mansfield Street, Detroit, Michigan, referred to herein as "Subject Property".

This assessment was conducted to provide the noise level and associated noise category at each designated Noise Assessment Location (NAL) at the Subject Property. This assessment does not include an evaluation of noise attenuation but general guidance is provided at the end of this assessment.

This evaluation was conducted per guidelines set forth in 24 CFR 51B. This noise analysis evaluates the Subject Property's exposure to three major sources of noise: aircraft, roadways, and railways. If identified, additional non-transportation noise sources such as loud impulse sounds from nearby industry are also evaluated.

The following three sources of transportation noise and their applicable search distances are outlined below when evaluating noise at a site.

- 1. Aircraft All military and FAA-regulated civil airfields within 15 miles of the Subject Property.
- Roadways Major roadways and limited access highways/freeways within 1,000 feet
 of the Subject Property utilizing a 10-year projection. Roadways considered are
 generally based on number of lanes, speed limit, presence of stop signs or lights,
 overall traffic counts, and/or number of medium or heavy trucks.
- 3. Railroad All active railroads within 3,000 feet of the Subject Property.

The noise level calculated at a NAL is known as the day-night average sound level or Day/Night Noise Level (DNL). A calculated DNL can fall within three categories as follow.

- 1. Acceptable DNL not exceeding 65 decibels (dB)
- 2. Normally Unacceptable DNL above the 65 dB threshold but not exceeding 75 dB
- 3. Unacceptable DNL above 75 dB

One NAL (NAL #1) was selected on the Subject Property for this analysis based on proximity to noise sources. A map with the Subject Property boundaries and NAL location is included as Attachment A.

The following is a summary of the applicable noise sources identified at the NAL.

NAL #1

Noise Source with Applicable Distance	Name	Distance to NAL
Airports	Coleman A. Young International Airport	9.69 Miles
	Detroit Metropolitan Wayne County Airport	12.98 Miles
	Windsor International Airport	14.75 Miles
Busy Roads	Saint Mary's Street	84 Feet
	West Grand River Avenue (M-5)	399 Feet
Railroad	None	NA
Non-Transportation	None	NA

2.0 EVALUATION OF NOISE SOURCES

2.1 Airports

Coleman A. Young International Airport is approximately 9.69 miles distant. Based on the Noise Contour Map for the airport, (Attachment B), the site is not within a distance of concern.

Detroit Metropolitan Wayne County Airport is approximately 12.98 miles distant. Based on the Noise Contour Map for the airport, (Attachment B), the site is not within a distance of concern.

Windsor International Airport is approximately 14.75 miles distant. Based on the Noise Contour Map for the airport, (Attachment B), the site is not within a distance of concern.

2.2 Busy Roadways

The major roadways are:

- Saint Mary's Street
- West Grand River Avenue (M-5)

Saint Mary's Street is a 2-lane road. The speed limit is 25 mph near the Subject Property. The roadway is an approximate effective distance of 84 feet from the southwestern corner of the building (NAL #1).

West Grand River Avenue (M-5) is a 4-lane road with a center median/turn lane. The speed limit is 35 mph near the Subject Property. The roadway is an approximate effective distance of 399 feet from the southwestern corner of the building (NAL #1).

Traffic counts were obtained through MDOT. Projections were done through 2033. After review of the traffic count information of each street, a growth rate of 1% per year compounded was judged appropriate as traffic levels are expected to remain relatively stable or increase slightly. Traffic projections are included in Attachment C.

2.3 Railroads

Not applicable.

2.4 Non-Transportation Sources

Not applicable.

3.0 CALCULATIONS

A Noise DNL calculator worksheet for the NAL is provided in Attachment D.

Using the HUD DNL calculator, the noise level at NAL #1, as predicted in 2033, is calculated to be 61 dB and within the Acceptable range.

4.0 CONCLUSIONS

The following is a summary of the findings of this assessment.

NAL#	Combined Source DNL (dB)	Category
1	61	Acceptable

For more information on HUD noise guidance for the proposed project, see section 6.0 HUD Attenuation Guidance for direction on how to proceed with the project.

5.0 REFERENCES

- 24 CFR Part 51 Subpart B
- The Noise Guidebook, U.S. Department of Housing and Urban Development,
- U.S. DOT
- https://mdot.ms2soft.com/
- https://fragis.fra.dot.gov/GISFRASafety/
- https://safetydata.fra.dot.gov/OfficeofSafety/PublicSite/Crossing/Crossing.aspx
- https://www.hudexchange.info/programs/environmental-review/dnl-calculator/

6.0 HUD ATTENUATION GUIDANCE

https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/

All sites whose environmental or community noise exposure exceeds the day night average sound level (DNL) of 65 decibels (dB) are considered noise-impacted areas. For new construction that is proposed in high noise areas, grantees shall incorporate noise attenuation features to the extent required by HUD environmental criteria and standards contained in Subpart B (Noise Abatement and Control) of 24 CFR Part 51. The interior standard is 45 dB.

The "Normally Unacceptable" noise zone includes community noise levels from above 65 dB to 75 dB. Approvals in this noise zone require a minimum of 5 dB additional sound attenuation for buildings having noise-sensitive uses if the day-night average sound level is greater than 65 dB but does not exceed 70 dB, or a minimum of 10 dB of additional sound attenuation if the day-night average sound level is greater than 70 dB but does not exceed 75 dB.

Locations with day-night average noise levels above 75 dB have "Unacceptable" noise exposure. For new construction, noise attenuation measures in these locations require the approval of the Assistant Secretary for Community Planning and Development (for projects reviewed under Part 50) or the Responsible Entity's Certifying Officer (for projects reviewed under Part 58). The acceptance of such locations normally requires an environmental impact statement.

The environmental review record should contain **one** of the following:

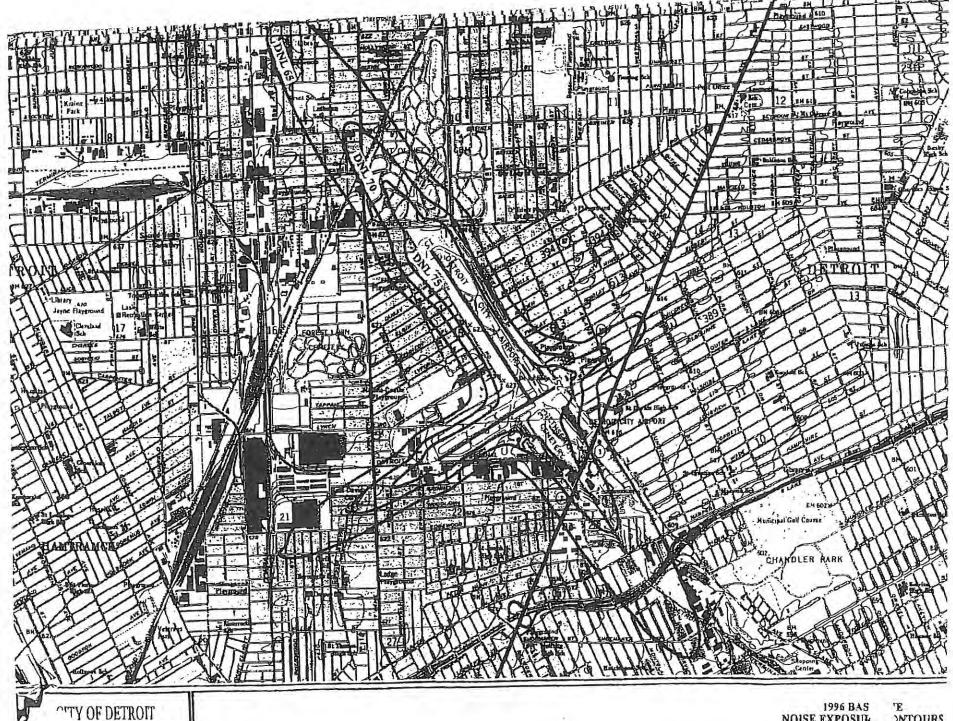
- Documentation the proposed action is not within 1000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles of a military or FAA-regulated civil airfield.
- If within those distances, documentation showing the noise level is Acceptable (at or below 65 DNL).
- If within those distances, documentation showing that there's an effective noise barrier (i.e., that provides sufficient protection).
- Documentation showing the noise generated by the noise source(s) is Normally
 Unacceptable (66 75 DNL) and identifying noise attenuation requirements that will
 bring the interior noise level to 45 DNL and/or exterior noise level to 65 DNL.

ATTACHMENT A NAL Location Map



ATTACHMENT B

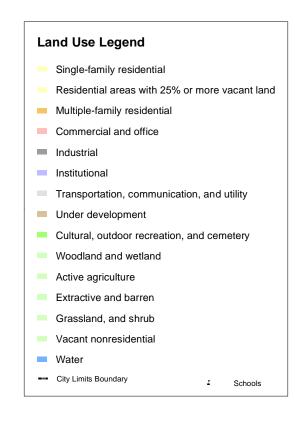
Airport Noise Contour Maps



NOISE EXPOSUR ONTOURS

...APORT DEPARTMENT

Figure D25 Existing (2004) Noise Exposure Map



	Existing (2004)	
65-70 DNL	Population	Housing
Huron Township	160	60
Romulus	1,060	490
Taylor	10	10
Westland	110	50
Subtotal	1,340	610
70-75 DNL		
Romulus	<u>40</u>	<u>20</u>
Subtotal	40	20
65 DNL & Greater		
Huron Township	160	60
Romulus	1,100	510
Taylor	10	10
Westland	110	50
Subtotal	1,380	630
60 DNL & Greater*		
Dearborn Heights	1,100	360
Huron Twp.	2,460	920
Inkster	4,420	1,870
Romulus	4,340	1,810
Sumpter Twp.	40	10
Taylor	3,860	1,500
Westland	2,970	1,250
Total	19,190	7,720

WESTLAND

HURON

DEARBOI

The 70 DNL contour contains approximately 4,505 acres, 30 residential structures and 40 people. The 75 DNL contour contains approximately 1,580 acres, no residential structures and no people. Planning jurisdictions are shown on the map. Noise measurement sites and flight tracks are depicted on the Noise Measurement Sites and Flight Tracks Maps. Residential land use, as defined by FAR Part 150, is an ncompatible use without proper sound attenuation within the 65 DNL or greater contour. The Noise Exposure Maps and accompanying documentation for the Noise Exposure Map for Detroit Metropolitan Wayne County Airport, submitted in accordance with FAR Part 150 with the best available information, are hereby certified as true and complete to the best of my knowledge and belief.

In addition, it is hereby certified that the public was afforded the opportunity to review and comment on the document and its contents Signed State Wobinson Date 3-6-06

The 65 DNL contour contains approximately 9,475 acres, 750 residential structures and 1,400 people.

for digits less than 5, rounded to 10.

1.000 2.000

WAYNE

20 ONL

ROMULUS

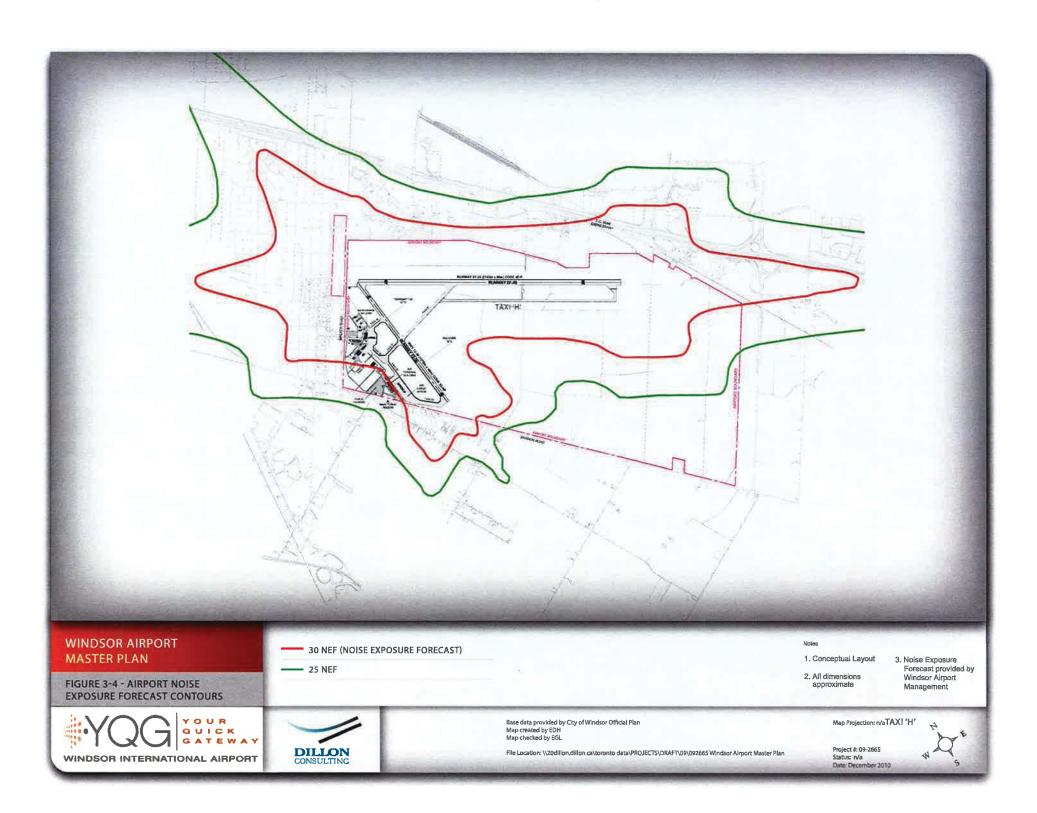
Based on 522,641 operations.

BROWNST

* includes the 65 DNL & Greater

METROPOLITAN WAYNE COUNTY AIRPORT

D.48



ATTACHMENT C

AADT Information

Auto and Heavy Truck 10-year ADT Projections Saint Mary's Street

	Cars	% Change	Trucks	% Change
2016	2071		0	
2017	2076	0.2	80	
2018	2101	1.2	55	-31.3
2019	2060	-2.0	85	54.5
2020	1703	-17.3	129	51.8
2021	1288	-24.4	82	-36.4
2022	1332	3.4	39	-52.4
	Avg % change:	-6.5	Avg % change:	-2.76
	Avg % change (Last 5-yr Trend):	3.4	Avg % change (Last 5-yr Trend):	-52.44
	% Change/Year Assumption	1	%/Year Change Assumption	1

2033 Projections

	Cars	Trucks
2022	1332	39
2023	1345	39
2024	1359	40
2025	1372	40
2026	1386	41
2027	1400	41
2028	1414	41
2029	1428	42
2030	1442	42
2031	1457	43
2032	1471	43
2033	1486	44

Predicted 2033 Auto ADT	Predicted 2033 Truck ADT
1486	44

Auto and Heavy Truck 10-year ADT Projections Grand River Avenue (M-5)

	Cars	% Change	Trucks	% Change
2016	24804		429	
2017	25039	0.9	472	10.0
2018	25001	-0.2	510	8.1
2019	24748	-1.0	635	24.5
2020	19774	-20.1	507	-20.2
2021	22503	13.8	577	13.8
2022	14849	-34.0	272	-52.9
	Avg % change:	-6.8	Avg % change:	- 2.77
	Avg % change (Last 5-yr Trend):	-34.0	Avg % change (Last 5-yr Trend):	-52.86
	% Change/Year Assumption	1	%/Year Change Assumption	1

2033 Projections

	Cars	Trucks
2022	14849	272
2023	14997	275
2024	15147	277
2025	15299	280
2026	15452	283
2027	15606	286
2028	15763	289
2029	15920	292
2030	16079	295
2031	16240	297
2032	16403	300
2033	16567	303

Predicted 2033 Auto ADT	Predicted 2033 Truck ADT
16567	303

ATTACHMENT D

Day-Night Level Electronic Assessments

Home (/) > Programs (/programs/) > Environmental Review (/programs/environmental-review/) > DNL Calculator

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

Site ID	14751 Mansfield	Street NAL #1				
Record Date	11/09/2023					
User's Name	ASTI Environmer	ntal				
Road # 1 Name:	Saint Mary's Str	eet				
Road #1						
Vehicle Type	Cars 🗸	Medium Trucks \Box	Heavy Trucks 🗸			
Effective Distance	84		84			
Distance to Stop Sign						
Average Speed	25		25			
Average Daily Trips (AD1	Г) 1486		44			
Night Fraction of ADT	15		15			
Road Gradient (%)			2			
Vehicle DNL	49	0	57			
Calculate Road #1 DNL	. 58	Reset				
Road # 2 Name:	West Grand Rive	er Avenue (M-5)				
Road #2						
Vehicle Type	Cars 🔽	Medium Trucks \Box	Heavy Trucks 🗸			

Effective Distance	399		399				
Distance to Stop Sign							
Average Speed	35		35				
Average Daily Trips (ADT)	16567		303				
Night Fraction of ADT	15		15				
Road Gradient (%)			2				
Vehicle DNL	52	0	56				
Calculate Road #2 DNL	57	Reset					
Add Road Source Add Rail Source							
Airport Noise Level							
Loud Impulse Sounds?		○Yes ○ No					
Combined DNL for all Road and Rail sources 61							
Combined DNL including Airport N/A							
Site DNL with Loud Impuls	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/environmentalreview/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

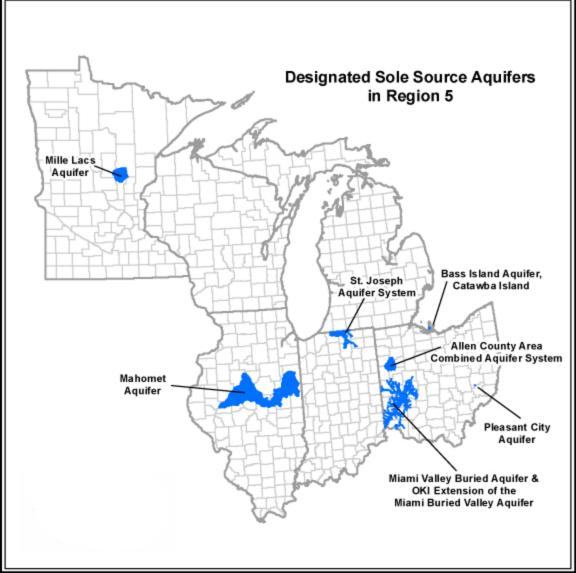
Day/Night Noise Level Assessment Tool User Guide (/resource/3822/day-night-noise-level-assessment-tool-user-guide/)

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

14751 Mansfield Street Sole Source Aquifers



Esri Community Maps Contributors, Province of Ontario, SEMCOG, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS

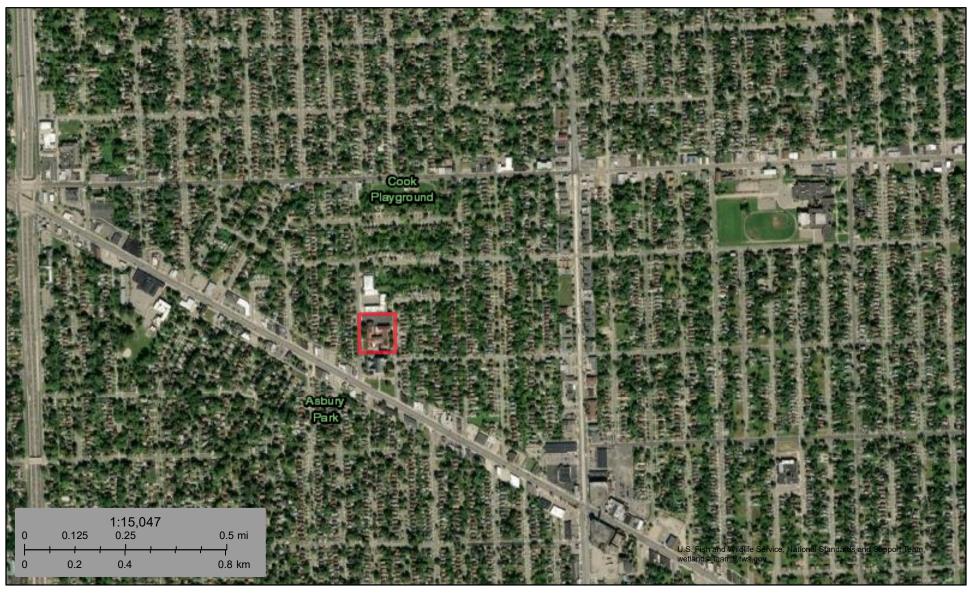


PISH A WILDLIPE SERVICE

U.S. Fish and Wildlife Service

National Wetlands Inventory

VOA Saint Mary's



June 13, 2024

Wetlands

Estuarine and Marine Deepwater

Estuarine and Marine Wetland

Freshwater Emergent Wetland

Freshwater Forested/Shrub Wetland

Freshwater Pond

Lake

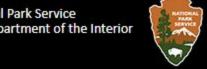
Other

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.

National Park Service U.S. Department of the Interior

This is a listing of more than 3,200 free-flowing river segments in the U.S. that are believed to possess one or more "outstandingly remarkable" values.







EJScreen Community Report

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

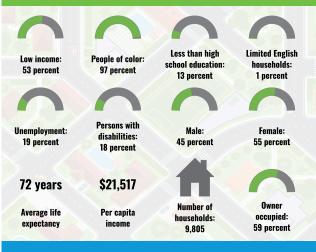
Detroit, MI

A3 Landscape

To remain from Boselas - Construction of Factor of F

1 mile Ring around the Area Population: 25,137 Area in square miles: 3.41

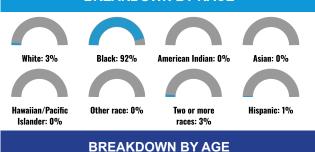
COMMUNITY INFORMATION



LANGUAGES SPOKEN AT HOME

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

BREAKDOWN BY RACE



EJScreen Community Report

From Ages 1 to 4	7%
From Ages 1 to 18	24%
From Ages 18 and up	76%
From Ages 65 and up	18%

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) 2017 -2021. Life expectancy data comes from the Centers for Disease Control.

Environmental Justice & Supplemental Indexes

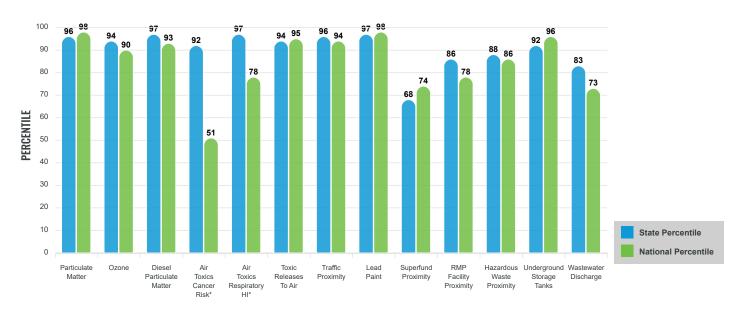
The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations 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



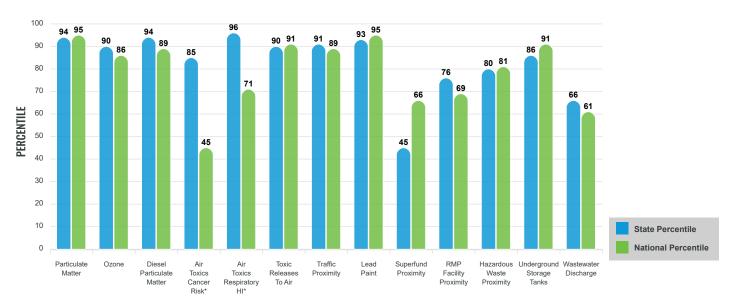


SUPPLEMENTAL INDEXES

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

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION





These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for 1 mile Ring around the Area

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter (µg/m³)	10.4	8.51	94	8.08	96
Ozone (ppb)	62.9	60	76	61.6	62
Diesel Particulate Matter (µg/m³)	0.334	0.183	95	0.261	74
Air Toxics Cancer Risk* (lifetime risk per million)	20	19	14	25	5
Air Toxics Respiratory HI*	0.3	0.2	88	0.31	31
Toxic Releases to Air	2,700	2,500	78	4,600	77
Traffic Proximity (daily traffic count/distance to road)	390	120	94	210	87
Lead Paint (% Pre-1960 Housing)	0.9	0.38	94	0.3	96
Superfund Proximity (site count/km distance)	0.038	0.15	22	0.13	35
RMP Facility Proximity (facility count/km distance)	0.14	0.31	50	0.43	41
Hazardous Waste Proximity (facility count/km distance)	0.83	1.1	57	1.9	58
Underground Storage Tanks (count/km²)	12	8	76	3.9	91
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.00016	0.13	37	22	33
SOCIOECONOMIC INDICATORS					
Demographic Index	75%	28%	94	35%	93
Supplemental Demographic Index	22%	14%	87	14%	83
People of Color	97%	26%	96	39%	94
Low Income	53%	31%	83	31%	83
Unemployment Rate	19%	7%	92	6%	94
Limited English Speaking Households	1%	2%	74	5%	57
Less Than High School Education	13%	9%	78	12%	67
Under Age 5	7%	5%	68	6%	65
Over Age 64	18%	18%	56	17%	60
Low Life Expectancy	26%	20%	89	20%	92

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are 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. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figures here are due to rounding. 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:	Other community features within defined area:
Superfund	Schools 5 Hospitals 0

6/13/24, 2:55 PM

Water Dischargers	0
Air Pollution	0
Brownfields	2
Toxic Release Inventory	n

	EJScreen	Community	Report
--	----------	-----------	--------

Places of Worship	11
Other environmental data:	
Air Non-attainment	Yes

Selected location contains American Indian Reservation Lands*	D
Selected location contains a "Justice40 (CEJST)" disadvantaged community Yes	S
Selected location contains an EPA IRA disadvantaged community Yes	S

Report for 1 mile Ring around the Area

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS						
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE	
Low Life Expectancy	26%	20%	89	20%	92	
Heart Disease	7.2	6.6	66	6.1	72	
Asthma	15.7	11.6	94	10	99	
Cancer	5.2	6.6	15	6.1	29	
Persons with Disabilities	17.6%	14.6%	72	13.4%	78	

		CLIN	NATE INDICATORS		
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	1%	7%	18	12%	17
Wildfire Risk	0%	0%	0	14%	0

CRITICAL SERVICE GAPS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	29%	14%	90	14%	87
Lack of Health Insurance	6%	5%	61	9%	43
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Report for 1 mile Ring around the Area

www.epa.gov/ejscreen

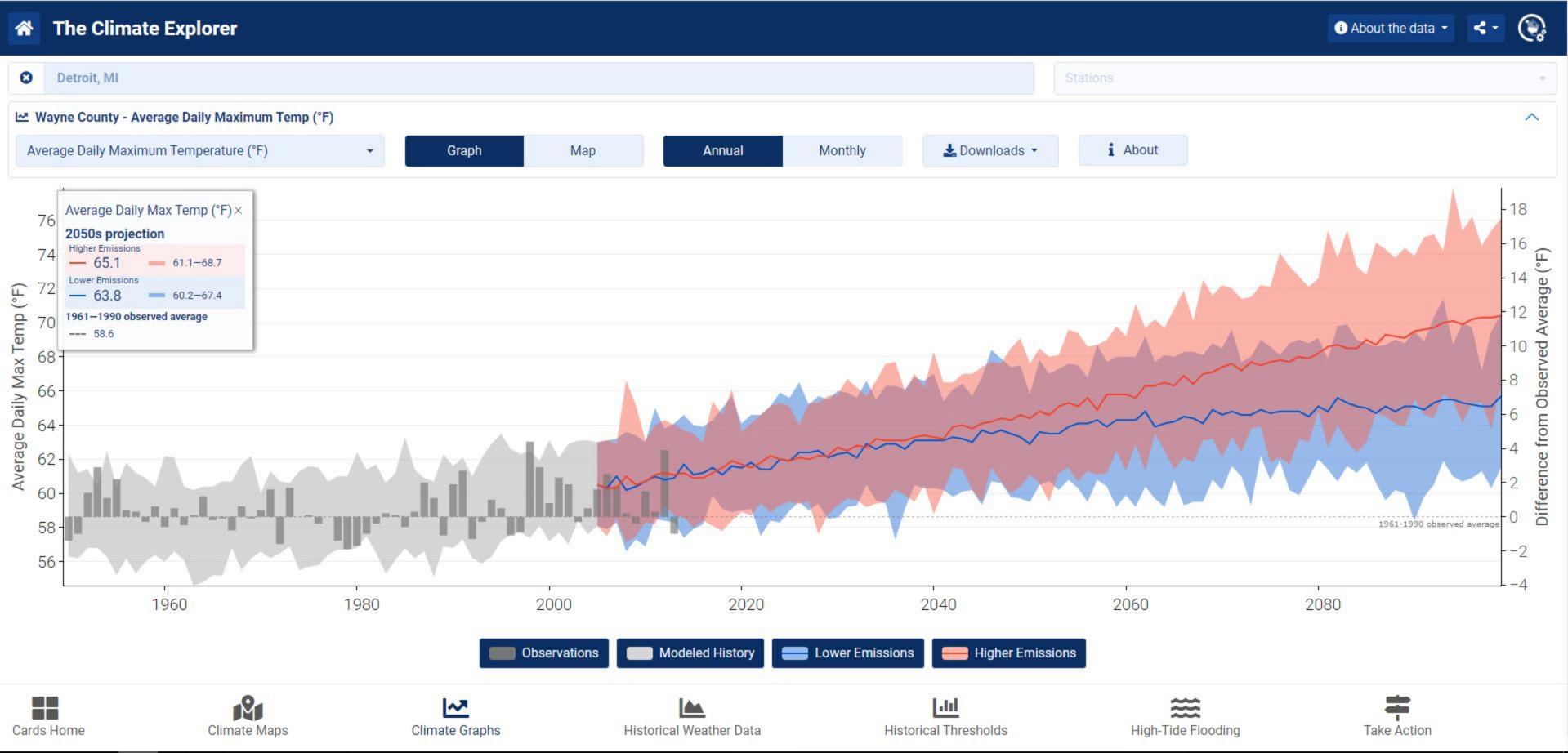
Historical Thresholds

Take Action

Cards Home

Climate Maps

Climate Graphs





June 18, 2024

Wayne County, Michigan

Summary

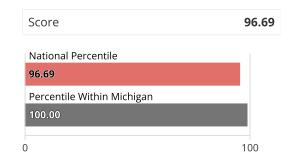


While reviewing this report, keep in mind that low risk is driven by lower loss due to natural hazards, lower social vulnerability, and higher community resilience.

For more information about the National Risk Index, its data, and how to interpret the information it provides, please review the **About the National Risk Index** and **How to Take Action** sections at the end of this report. Or, visit the National Risk Index website at hazards.fema.gov/nri/learn-more to access supporting documentation and links.

Risk Index

The Risk Index rating is Relatively High for Wayne County, MI when compared to the rest of the U.S.



97% of U.S. counties have a lower Risk Index100% of counties in Michigan have a lower Risk Index

Risk Index Legend	
Very High Relatively High Relatively Moderate Relatively Low Very Low	
No Rating Not Applicable Insufficient Data	

Hazard Type Risk Index

Hazard type Risk Index scores are calculated using data for only a single hazard type, and reflect a community's Expected Annual Loss value, community risk factors, and the adjustment factor used to calculate the risk value.

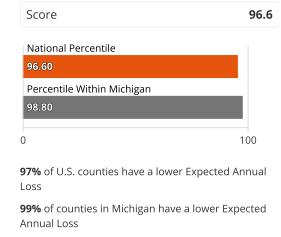
Hazard Type	Risk Index Rating	Risk Index Score	National Percentile
Avalanche	Not Applicable		
Coastal Flooding	Relatively Low	62.2	0 100
Cold Wave	Very High	99.9	0 100
Drought	No Rating	0	0 100
Earthquake	Relatively Low	89.1	0 100
Hail	Relatively Low	53	0 100
Heat Wave	Relatively High	99.4	0 100
Hurricane	Relatively Low	64.2	0 100
Ice Storm	Relatively Moderate	82.8	0 100
Landslide	Relatively Moderate	83.9	0 100
Lightning	Relatively High	98.7	0 100
Riverine Flooding	Relatively High	99.5	0 100
Strong Wind	Very High	99.9	0 100
Tornado	Very High	99.2	0 100
Tsunami	Insufficient Data		
Volcanic Activity	Not Applicable		
Wildfire	Relatively Low	65.5	0 100
Winter Weather	Relatively High	86.3	0 100

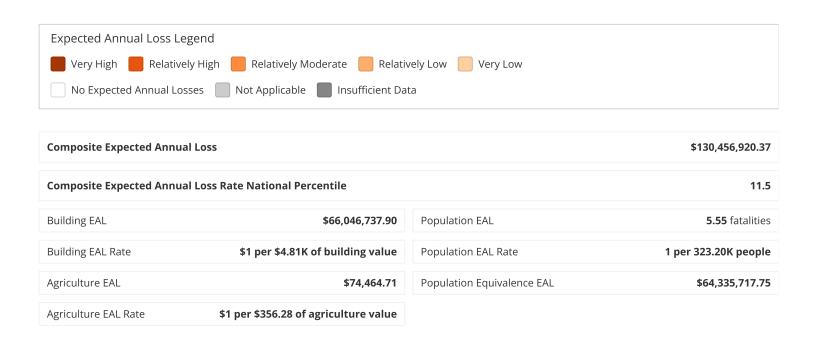
Risk Factor Breakdown

Hazard Type	EAL Value	Social Vulnerability	Community Resilience	CRF	Risk Value	Risk Index Score
Riverine Flooding	\$45,776,220	Very High	Relatively Moderate	1.17	\$51,213,805	99.5
Tornado	\$39,003,027	Very High	Relatively Moderate	1.17	\$46,272,409	99.2
Heat Wave	\$15,206,700	Very High	Relatively Moderate	1.17	\$18,284,942	99.4
Strong Wind	\$14,474,540	Very High	Relatively Moderate	1.17	\$17,081,580	99.9
Cold Wave	\$9,723,972	Very High	Relatively Moderate	1.17	\$11,692,544	99.9
Earthquake	\$2,336,822	Very High	Relatively Moderate	1.17	\$2,808,325	89.1
Lightning	\$2,063,005	Very High	Relatively Moderate	1.17	\$2,471,431	98.7
Hurricane	\$632,187	Very High	Relatively Moderate	1.17	\$745,686	64.2
Coastal Flooding	\$343,167	Very High	Relatively Moderate	1.17	\$389,707	62.2
Ice Storm	\$293,182	Very High	Relatively Moderate	1.17	\$348,278	82.8
Winter Weather	\$255,771	Very High	Relatively Moderate	1.17	\$301,900	86.3
Landslide	\$122,400	Very High	Relatively Moderate	1.17	\$132,535	83.9
Hail	\$104,135	Very High	Relatively Moderate	1.17	\$124,082	53
Wildfire	\$121,792	Very High	Relatively Moderate	1.17	\$122,134	65.5
Drought	\$0	Very High	Relatively Moderate	1.17	\$0	0
Avalanche		Very High	Relatively Moderate	1.17		
Tsunami		Very High	Relatively Moderate	1.17		
Volcanic Activity		Very High	Relatively Moderate	1.17		

Expected Annual Loss

In Wayne County, MI, expected loss each year due to natural hazards is Relatively High when compared to the rest of the U.S.





Expected Annual Loss for Hazard Types

Expected Annual Loss scores for hazard types are calculated using data for only a single hazard type, and reflect a community's relative expected annual loss for only that hazard type.

 $15\ of\ 18\ hazard\ types\ contribute\ to\ the\ expected\ annual\ loss\ for\ Wayne\ County,\ MI.$

Hazard Type	Expected Annual Loss Rating	EAL Value	Score
Riverine Flooding	Very High	\$45,776,220	99.5
Tornado	Very High	\$39,003,027	99.1

Hazard Type	Expected Annual Loss Rating	EAL Value	Score
Heat Wave	Relatively High	\$15,206,700	99.5
Strong Wind	Very High	\$14,474,540	99.8
Cold Wave	Very High	\$9,723,972	99.9
Earthquake	Relatively Low	\$2,336,822	87.2
Lightning	Very High	\$2,063,005	98.1
Hurricane	Relatively Low	\$632,187	62.6
Coastal Flooding	Relatively Low	\$343,167	63.9
Ice Storm	Relatively Moderate	\$293,182	82.3
Winter Weather	Relatively High	\$255,771	86.4
Landslide	Relatively Moderate	\$122,400	85.2
Wildfire	Relatively Low	\$121,792	66.9
Hail	Relatively Low	\$104,135	53.9
Drought	No Expected Annual Losses	\$0	0.0
Avalanche	Not Applicable		
Tsunami	Insufficient Data		
Volcanic Activity	Not Applicable		

Expected Annual Loss Values

Hazard Type	Total	Building Value	Population Equivalence	Population	Agriculture Value
Avalanche					
Coastal Flooding	\$343,167	\$340,886	\$2,281	0.00	n/a
Cold Wave	\$9,723,972	\$917	\$9,722,961	0.84	\$95
Drought	\$0	n/a	n/a	n/a	\$0
Earthquake	\$2,336,822	\$1,822,753	\$514,069	0.04	n/a
Hail	\$104,135	\$630	\$103,344	0.01	\$161
Heat Wave	\$15,206,700	\$454	\$15,204,614	1.31	\$1,633
Hurricane	\$632,187	\$629,594	\$2,213	0.00	\$380
Ice Storm	\$293,182	\$256,725	\$36,458	0.00	n/a
Landslide	\$122,400	\$105,000	\$17,400	0.00	n/a
Lightning	\$2,063,005	\$54,164	\$2,008,841	0.17	n/a
Riverine Flooding	\$45,776,220	\$34,851,340	\$10,853,314	0.94	\$71,566

Hazard Type	Total	Building Value	Population Equivalence	Population	Agriculture Value
Strong Wind	\$14,474,540	\$8,702,262	\$5,771,920	0.50	\$359
Tornado	\$39,003,027	\$18,941,673	\$20,061,161	1.73	\$194
Tsunami	n/a	n/a	n/a	n/a	n/a
Volcanic Activity					
Wildfire	\$121,792	\$111,608	\$10,182	0.00	\$2
Winter Weather	\$255,771	\$228,734	\$26,961	0.00	\$76

Exposure Values

Hazard Type	Total	Building Value	Population Equivalence	Population	Agriculture Value
Avalanche					
Coastal Flooding	\$133,082,442,357	\$2,381,391,904	\$130,701,050,453	11,267.33	n/a
Cold Wave	\$21,111,085,227,410	\$317,490,691,843	\$20,793,568,004,964	1,792,548.97	\$26,530,603
Drought	\$0	n/a	n/a	n/a	\$0
Earthquake	\$21,122,792,681,000	\$317,485,081,000	\$20,805,307,600,000	1,793,561.00	n/a
Hail	\$21,111,085,626,233	\$317,490,695,630	\$20,793,568,400,000	1,792,549.00	\$26,530,603
Heat Wave	\$21,111,085,227,410	\$317,490,691,843	\$20,793,568,004,964	1,792,548.97	\$26,530,603
Hurricane	\$21,082,773,744,465	\$317,227,162,061	\$20,765,520,051,800	1,790,131.04	\$26,530,603
Ice Storm	\$21,110,277,410,905	\$317,476,534,553	\$20,792,800,876,352	1,792,482.83	n/a
Landslide	\$473,220,150,895	\$12,642,166,181	\$460,577,984,714	39,705.00	n/a
Lightning	\$21,111,059,095,630	\$317,490,695,630	\$20,793,568,400,000	1,792,549.00	n/a
Riverine Flooding	\$473,310,608,670	\$6,116,553,936	\$467,191,252,270	40,275.11	\$2,802,463
Strong Wind	\$21,111,085,626,233	\$317,490,695,630	\$20,793,568,400,000	1,792,549.00	\$26,530,603
Tornado	\$21,111,085,626,233	\$317,490,695,630	\$20,793,568,400,000	1,792,549.00	\$26,530,603
Tsunami	n/a	n/a	n/a	n/a	n/a
Volcanic Activity					
Wildfire	\$1,712,692,299,570	\$27,902,120,261	\$1,684,777,294,662	145,239.42	\$12,884,647
Winter Weather	\$21,111,085,227,410	\$317,490,691,843	\$20,793,568,004,964	1,792,548.97	\$26,530,603

Annualized Frequency Values

Hazard Type	Annualized Frequency	Events on Record	Period of Record
Avalanche			

Hazard Type	Annualized Frequency	Events on Record	Period of Record
Coastal Flooding	0 events per year	n/a	Various (see documentation)
Cold Wave	0.6 events per year	9	2005-2021 (16 years)
Drought	0 events per year	0	2000-2021 (22 years)
Earthquake	0.029% chance per year	n/a	2021 dataset
Hail	3.1 events per year	100	1986-2021 (34 years)
Heat Wave	1.1 events per year	18	2005-2021 (16 years)
Hurricane	0 events per year	2	East 1851-2021 (171 years) / West 1949-2021 (73 years)
Ice Storm	1.9 events per year	120	1946-2014 (67 years)
Landslide	0 events per year	0	2010-2021 (12 years)
Lightning	46.1 events per year	943	1991-2012 (22 years)
Riverine Flooding	2.5 events per year	61	1996-2019 (24 years)
Strong Wind	5.4 events per year	171	1986-2021 (34 years)
Tornado	0.2 events per year	23	1950-2021 (72 years)
Tsunami	n/a	n/a	1800-2021 (222 years)
Volcanic Activity			
Wildfire	Less than 0.001% chance per year	n/a	2021 dataset
Winter Weather	2.5 events per year	40	2005-2021 (16 years)
Volcanic Activity Wildfire	 Less than 0.001% chance per year	n/a	2021 dataset

Historic Loss Ratios

Hazard Type	Overall Rating
Avalanche	
Coastal Flooding	Relatively Moderate
Cold Wave	Very Low
Drought	No Rating
Earthquake	Very Low
Hail	Very Low
Heat Wave	Relatively Low
Hurricane	Very Low
Ice Storm	Very Low
Landslide	Very Low
Lightning	Very Low

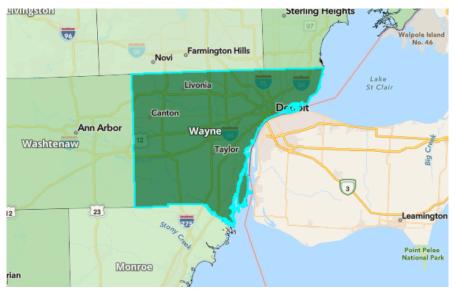
Hazard Type	Overall Rating
Riverine Flooding	Very Low
Strong Wind	Very Low
Tornado	Relatively Low
Tsunami	Insufficient Data
Volcanic Activity	
Wildfire	Relatively Low
Winter Weather	Very Low

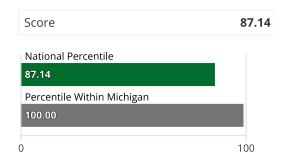
Expected Annual Loss Rate

Hazard Type	Building EAL Rate (per building value)	Population EAL Rate (per population)	Agriculture EAL Rate (per agriculture value)
Avalanche			
Coastal Flooding	\$1 per \$931.37K	1 per 9.11B	
Cold Wave	\$1 per \$346.39M	1 per 2.14M	\$1 per \$279.19K
Drought			
Earthquake	\$1 per \$174.18K	1 per 40.45M	
Hail	\$1 per \$503.94M	1 per 201.21M	\$1 per \$164.60K
Heat Wave	\$1 per \$699.86M	1 per 1.37M	\$1 per \$16.25K
Hurricane	\$1 per \$504.28K	1 per 9.40B	\$1 per \$69.85K
ce Storm	\$1 per \$1.24M	1 per 570.35M	
Landslide	\$1 per \$3.02M	1 per 1.20B	
Lightning	\$1 per \$5.86M	1 per 10.35M	
Riverine Flooding	\$1 per \$9.11K	1 per 1.92M	\$1 per \$370.72
Strong Wind	\$1 per \$36.48K	1 per 3.60M	\$1 per \$73.98K
Tornado	\$1 per \$16.76K	1 per 1.04M	\$1 per \$137.08K
Tsunami			
/olcanic Activity			
Wildfire	\$1 per \$2.84M	1 per 2.04B	\$1 per \$15.16M
Winter Weather	\$1 per \$1.39M	1 per 771.26M	\$1 per \$348.83K

Social Vulnerability

Social groups in Wayne County, MI have a Very High susceptibility to the adverse impacts of natural hazards when compared to the rest of the U.S.



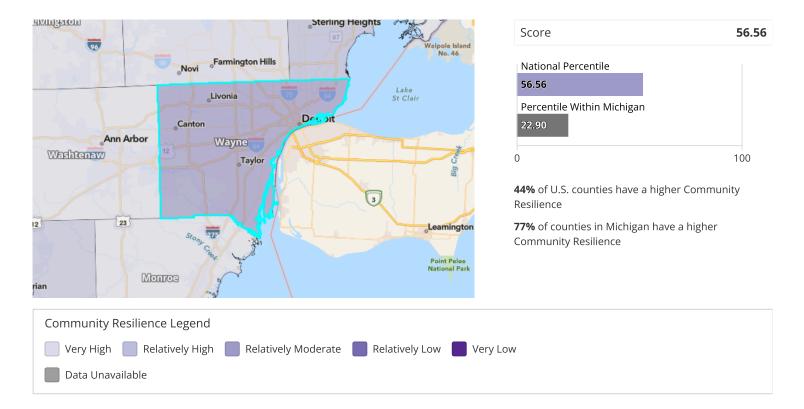


87% of U.S. counties have a lower Social Vulnerability **100%** of counties in Michigan have a lower Social Vulnerability



Community Resilience

Communities in **Wayne County, MI** have a **Relatively Moderate** ability to prepare for anticipated natural hazards, adapt to changing conditions, and withstand and recover rapidly from disruptions when compared to the rest of the U.S.



About the National Risk Index

The National Risk Index is a dataset and online tool to help illustrate the United States communities most at risk for 18 natural hazards: Avalanche, Coastal Flooding, Cold Wave, Drought, Earthquake, Hail, Heat Wave, Hurricane, Ice Storm, Landslide, Lightning, Riverine Flooding, Strong Wind, Tornado, Tsunami, Volcanic Activity, Wildfire, and Winter Weather.

The National Risk Index leverages available source data for Expected Annual Loss due to these 18 hazard types, Social Vulnerability, and Community Resilience to develop a baseline relative risk measurement for each United States county and Census tract. These measurements are calculated using average past conditions, but they cannot be used to predict future outcomes for a community. The National Risk Index is intended to fill gaps in available data and analyses to better inform federal, state, local, tribal, and territorial decision makers as they develop risk reduction strategies.

Explore the National Risk Index Map at hazards.fema.gov/nri/map.

Visit the National Risk Index website at hazards.fema.gov/nri/learn-more to access supporting documentation and links.

Calculating the Risk Index

Risk Index scores are calculated using an equation that combines scores for Expected Annual Loss due to natural hazards, Social Vulnerability and Community Resilience:

Risk Index = Expected Annual Loss × Social Vulnerability ÷ Community Resilience

Risk Index scores are presented as a composite score for all 18 hazard types, as well as individual scores for each hazard type.

For more information, visit hazards.fema.gov/nri/determining-risk.

Calculating Expected Annual Loss

Expected Annual Loss scores are calculated using an equation that combines values for exposure, annualized frequency, and historic loss ratios for 18 hazard types:

Expected Annual Loss = Exposure × Annualized Frequency × Historic Loss Ratio

Expected Annual Loss scores are presented as a composite score for all 18 hazard types, as well as individual scores for each hazard type.

For more information, visit hazards.fema.gov/nri/expected-annual-loss.

Calculating Social Vulnerability

Social Vulnerability is measured using the Social Vulnerability Index (SVI) published by the Centers for Disease Control and Prevention (CDC).

For more information, visit hazards.fema.gov/nri/social-vulnerability.

Calculating Community Resilience

Community Resilience is measured at the County level using the Baseline Resilience Indicators for Communities (HVRI BRIC) published by the University of South Carolina's Hazards and Vulnerability Research Institute (HVRI).

For more information, visit hazards.fema.gov/nri/community-resilience.

How to Take Action

There are many ways to reduce natural hazard risk through mitigation. Communities with high National Risk Index scores can take action to reduce risk by decreasing Expected Annual Loss due to natural hazards, decreasing Social Vulnerability, and increasing Community Resilience.

For information about how to take action and reduce your risk, visit hazards.fema.gov/nri/take-action.

Disclaimer

The National Risk Index (the Risk Index or the Index) and its associated data are meant for planning purposes only. This tool was created for broad nationwide comparisons and is not a substitute for localized risk assessment analysis. Nationwide datasets used as inputs for the National Risk Index are, in many cases, not as accurate as available local data. Users with access to local data for each National Risk Index risk factor should consider substituting

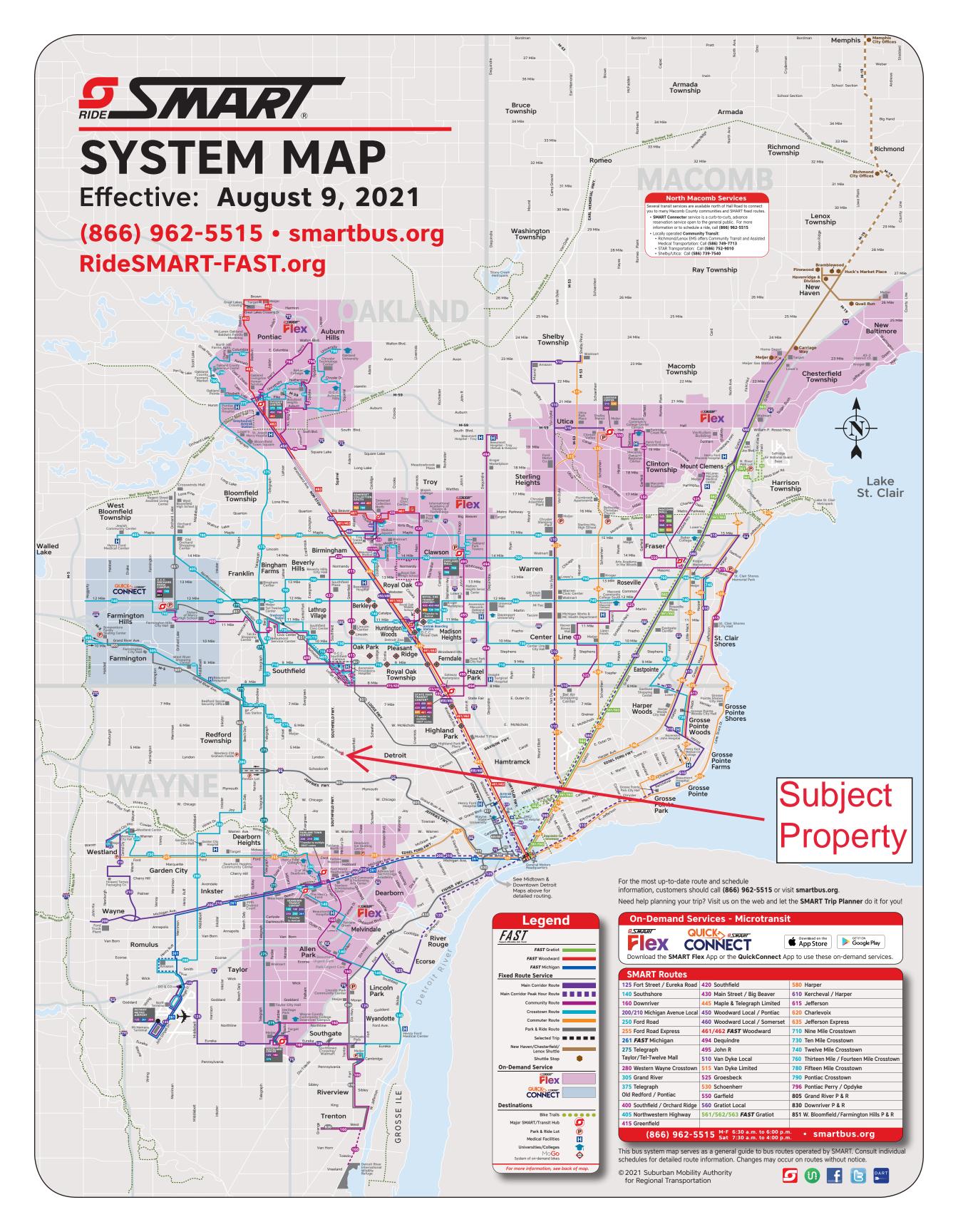
the Risk Index data with local data to recalculate a more accurate risk index. If you decide to download the National Risk Index data and substitute it with local data, you assume responsibility for the accuracy of the data and any resulting data index. Please visit the **Contact Us** page if you would like to discuss this process further.

The methodology used by the National Risk Index has been reviewed by subject matter experts in the fields of natural hazard risk research, risk analysis, mitigation planning, and emergency management. The processing methods used to create the National Risk Index have produced results similar to those from other natural hazard risk analyses conducted on a smaller scale. The breadth and combination of geographic information systems (GIS) and data processing techniques leveraged by the National Risk Index enable it to incorporate multiple hazard types and risk factors, manage its nationwide scope, and capture what might have been missed using other methods.

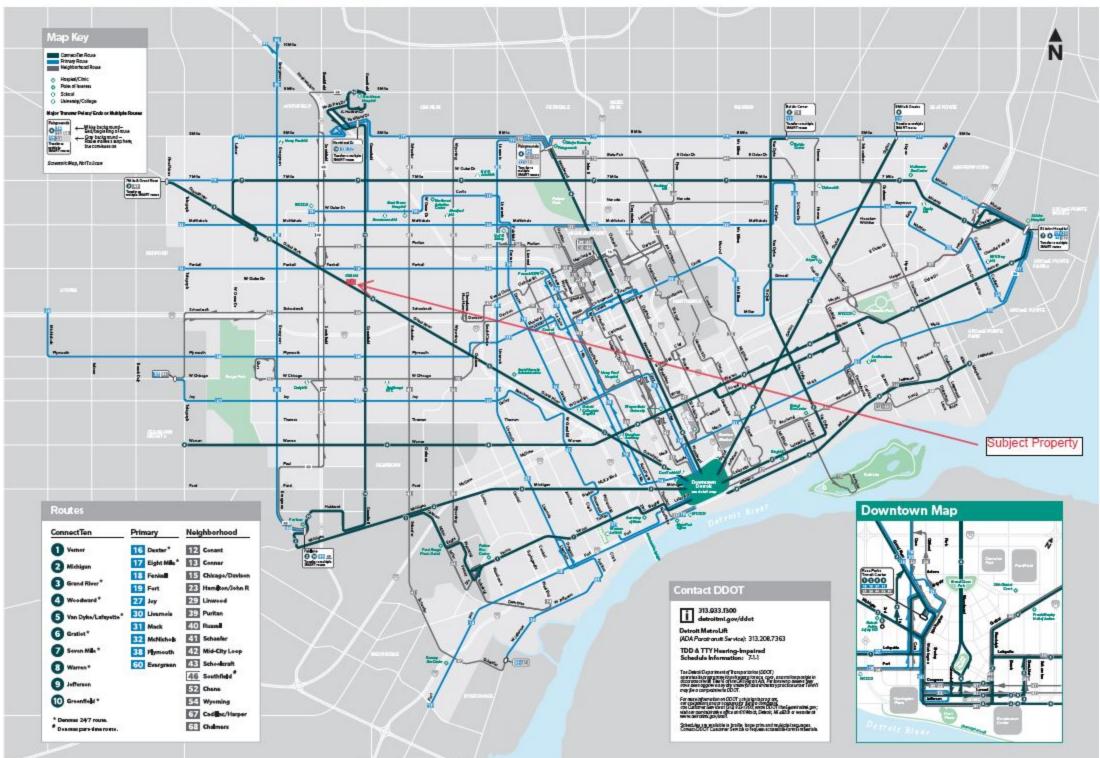
The National Risk Index does not consider the intricate economic and physical interdependencies that exist across geographic regions. Keep in mind that hazard impacts in surrounding counties or Census tracts can cause indirect losses in your community regardless of your community's risk profile.

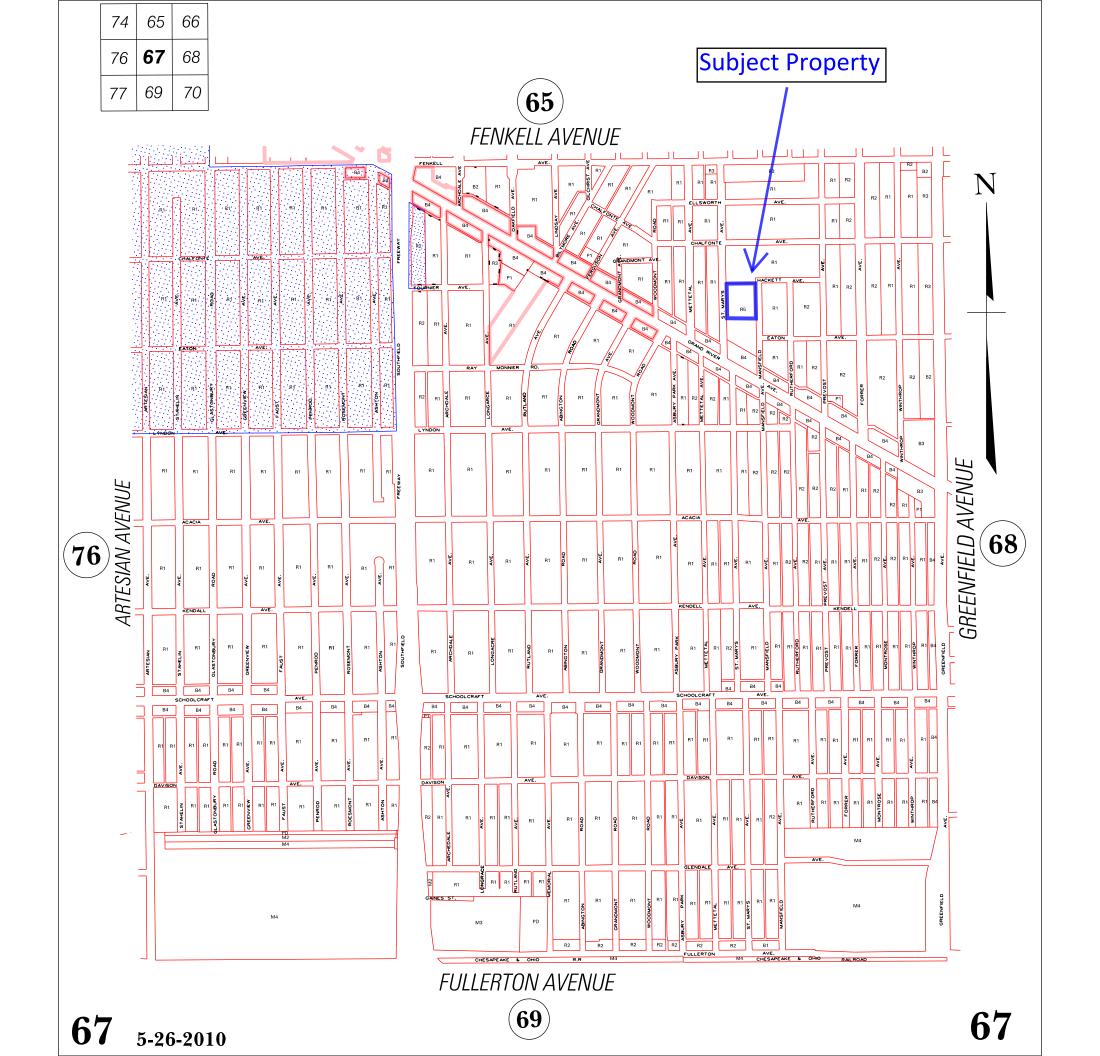
Nationwide data available for some risk factors are rudimentary at this time. The National Risk Index will be continuously updated as new data become available and improved methodologies are identified.

The National Risk Index Contact Us page is available at hazards.fema.gov/nri/contact-us.











Qualified Allocation Plan Green Policy

MSHDA Green Policy Certification

Project Name: St. Mary VOA
Project Number (if applicable):
All projects applying for LIHTC must select ONE of the green standards threshold requirements below and clearly identify the applicable subcategory. The undersigned hereby certify that to the best of our knowledge the project will incorporate features that will allow the project to:
 □ Obtain an Enterprise Green Communities Certification for: □ Mandatory Green Communities Criteria for New Construction plus 40 optional points (threshold) □ Mandatory Green Communities Criteria for Moderate Rehab plus 35 optional points (threshold) □ Mandatory Green Communities Criteria for Substantial Rehab plus 35 optional points (threshold) □ Enterprise Green Communities Plus (threshold + points)
 X Obtain an National Green Building Certification for: □ NGBS Silver, Gold, or Emerald (threshold) X NGBS Green+ Zero Energy (threshold + points)
 □ Obtain a U.S Green Building Council rating for: □ LEED Silver, Gold, or Platinum (threshold) □ LEED Zero Energy (threshold + points)
To score an additional point, a project must select one of the above thresholds, as well as: □ Obtain a PHIUS+ Certification (points)

The undersigned hereby certify that the architectural plans, drawings and specifications, construction contracts, and other construction documents for the proposed project will include the amenities for which points are awarded. The undersigned shall certify the inclusion of the amenities identified in the referenced documents above within one year after issuance of the Reservation and the incorporation of these amenities into the project upon completion of construction. The undersigned owner and applicant hereby certify that the management agent has been informed that ongoing maintenance and management of the project will, when reasonably possible, incorporate the amenities for which points are awarded. The undersigned shall report any discrepancies between the tax credit application and the as-built project to the Michigan State Housing Development Authority.



Qualified Allocation Plan Green Policy

Failure to adhere to this certification may result in negative points in future applications, which may further result in suspension of a future project application, loss of tax credits in future applications, or other penalties.

OWNER:
VOA St. Mary Limited Dividend Housing Association Limited Partnership
Ву:
Aubrey Macfarlane Its: Authorized Signatory
APPLICANT:
Volunteers of America Michigan
Ву:
Aubrey Macfarlane Its: Authorized Signatory
ARCHITECT:
Fusco, Shaffer & Pappas, Inc. By: NOV 0 9 2023 James Pappas Its: Authorized Signatory
CONTRACTOR:
O'Brien Construction Company, Inc.
By:
Dave Vivio Its: Authorized Signatory

