



NEPA COMPLIANCE COMMITMENT MEMO

DATE: January 7, 2025

TO: Tyler Hardy
Felicia Burris
Kim Siegel
Penny Dwoinen
Tiffany Ciavattone

FROM: Melissa Owsiany
Environmental Compliance Specialist

RE: NEPA Compliance Commitment Memo for Villages of Parkside IA & IB

Under the authority of the National Environmental Policy Act (NEPA) (24 CFR Part 58), as amended, The City of Detroit has accepted the role of Responsible Entity on behalf of HUD to ensure compliance as it would relate to HUD under NEPA. As the Responsible Entity, the City of Detroit's Environmental Team shall monitor construction of the above referenced site.

In preparation of the commencement of construction, the requirements outlined in the attached approved mitigation plan must be documented. Upon receipt and review of the items outlined in the plan, the City of Detroit Environmental Team will determine whether any additional steps are required.

Please note that the Environmental Review Requirements under NEPA will not be complete until the mitigation conditions are met, and the completed work is documented. The Environmental Team will issue a Final Closeout Memo once the mitigation measures are complete or if there are continuing obligations required beyond construction closeout.

If unanticipated tanks, evidence of contamination, artifacts or bones are discovered during ground disturbing activities, work will be halted. Please contact me immediately for further guidance on how to proceed at melissa.owsiany@detroitmi.gov.

If you have any questions, you may contact me at the e-mail address listed above.

Village of Parkside 1A and 1B
Project Consultant: Triterra
October 25, 2024

Response Activity or Continuing Obligation	Required Activities	Party Responsible for Completing Activity	Timing of Activity	Cost	Required Follow-up or Reporting
Response Activity Plan for Compliance with 20107a (ResAP)	Complete ResAP detailing the necessary response activities to prevent undue exposure to future occupants.	Consultant	Prior to Construction	\$10,000	EGLE Approval
Potential Response Activity – Clean Fill to Mitigate Direct Contact Pathway	In order to presumptively mitigate the direct contact pathway, apply 12 inches of clean fill sand and topsoil over a geotextile demarcation barrier to prevent contact with underlying soil. The fill material brought to the site will be documented as clean by analytical results from samples collected from the site of origin documenting that the material does not contain VOCs, PAHs, or metals at concentrations above the applicable generic direct contact criteria.	Contractor	During Construction	100,000 SF at \$50/CY = ~\$186K (guesstimate)	Include results in DDCC report.
Potential Response Activity – Vapor Mitigation to Mitigate Volatilization to Indoor Air Pathway (VIAP)	Design and install active vapor mitigation systems (VMS) in each of the proposed buildings	Consultant and Contractors	Prior to and during construction	\$9-12 per SF at ~75,000 SF (guesstimate) = \$675K-\$900K	System Prove-Out and Regular Operations, Maintenance and Monitoring (OM&M)
Documentation of Due Care Compliance	A. Complete a DDCC report and submit to the City of Detroit Environmental Review Officer for review prior to submitting to EGLE for review and approval. Engineering controls (i.e., VMS and/or direct contact exposure barriers) will require an Operations and Maintenance plan.	Consultant	Following Construction	\$12,500	EGLE Approval and regular OM&M

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Section 106 – Conditional No Adverse Effect Requirements	A. Prior to the start of any work, building plans, specifications and photos must be submitted to the Preservation Specialist for review and Conditional Approval	General Contractor	Prior to Construction	N/A	Submit work to Preservation Specialist.
	B. If there is a change in the scope of work, those changes will be required to undergo additional Section 106 Review prior to the execution of any work.	General Contractor	At any time		Notify Preservation Specialist
Section 106 – Unanticipated Discoveries Plan	Once construction has started, the SHPO approved Unanticipated Discoveries Plan shall be followed for the duration of the project.	Construction Crew, Foremen, Developer	During Construction	N/A	Unanticipated Discoveries Plan with SHPO approval
Noise Analysis – Unacceptable Noise	Appropriate construction materials will be incorporated in the building to mitigate noise levels within the acceptable range, See HUD STraCAT calculation.	Architect, Construction, Crew, Foremen, Developer,	During Construction	N/A	Building specs

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