David Whitaker, Esq. Director Irvin Corley, Jr. Executive Policy Manager Marcell R. Todd, Jr. Senior City Planner Janese Chapman Deputy Director

John Alexander LaKisha Barclift, Esq. M. Rory Bolger, Ph.D., AICP Elizabeth Cabot, Esq. Tasha Cowen **Richard Drumb** George Etheridge Deborah Goldstein

# City of **Betroit CITY COUNCIL**

# **LEGISLATIVE POLICY DIVISION**

208 Coleman A. Young Municipal Center Detroit, Michigan 48226

Phone: (313) 224-4946 Fax: (313) 224-4336

Christopher Gulock, AICP **Derrick Headd** Marcel Hurt, Esq. Kimani Jeffrey Anne Marie Langan Jamie Murphy Carolyn Nelson Kim Newby Analine Powers, Ph.D. Jennifer Reinhardt Sabrina Shockley Thomas Stephens, Esq. **David Teeter** Theresa Thomas Kathryn Lynch Underwood Ashlev A. Wilson

TO:

**COUNCIL MEMBERS** 

FROM:

David Whitaker, Director

Legislative Policy Division Staff

DATE:

November 13, 2019

RE:

Stone Soap Brownfield Redevelopment Plan

PA 381 of 1996 PUBLIC HEARING

# The Brownfield Redevelopment Financing Act 381 of 1996

The Brownfield Redevelopment Financing Act 381 of 1996 provides tax incentives (i.e. tax increment financing) to develop brownfields properties in an area at or on which there has been a release (or threat of release) or disposal of a hazardous substance.

Banyan Investments, LLC is the project developer and proposed owner of the property. Banyan is a local property development and management firm that restores, renovates and manages real estate in and around Detroit. The group focuses on single family homes, multi-units, and mixeduse buildings in target areas of the city. The property, which houses the vacant former Stone Soap warehouse buildings that are subject to the brownfield plan, includes three parcels located at 1450, 1460 and 1490 Franklin. The project involves the demolition of the buildings located at 1460 and 1490 Franklin Street and partial demolition, renovation and expansion of the building located at 1450 Franklin.

The plans for renovation include office, commercial, and theater space that will occupy approximately 23,000 square feet. Approximately 48 residential units are proposed to occupy floors 3 through 8, totaling approximately 58,000 square feet. It is anticipated that the theater will serve as the new home of Shakespeare in Detroit. The residential units as proposed will include 42 condos and 6 apartments. The apartments are anticipated to be marketed as affordable

<sup>&</sup>lt;sup>1</sup> Shakespeare in Detroit is a nonprofit organization that enhances and supports the cultural, educational and financial growth of Detroit with professional theatre created through a conscious lens of equity, diversity and inclusion. https://www.shakespeareindetroit.com/mission-vision

units (i.e. 80% Area Median Income (AMI)). In addition, the development will provide an onsite parking garage for residents. It is currently anticipated that construction will begin in the spring of 2020 and eligible activities will be completed in 2022.

Legal Description of the Eligible Property

Address	Tax ID	Owner
1450 Franklin Street	07000027.	City of Detroit – Planning & Development
1460 Franklin Street	07000026.	City of Detroit
1490 Franklin Street	07000025.	City of Detroit

The total overall investment in this project is estimated at approximately \$38.4 million. The developer is requesting an \$8,126,537 TIF,<sup>2</sup> with the overall value of the plan estimated at \$13,783,488, which includes state and local authority brownfield costs. It is currently anticipated that this project will create approximately 200-250 temporary construction jobs and 2 permanent jobs. In addition, it is anticipated that 10 tenant positions will be created as well.

### **Project Investment Estimates**

Capital Cost	Total Cost			
Acquisition Cost	\$	725,000		
Renovation/Rehabilitation	5	31,000,000		
Soft Costs	\$	6,675,000		
Total Capital Costs	\$	38,400,000		



A recent mage of the former Stone Soap Warehouse Buildings<sup>3</sup>

<sup>&</sup>lt;sup>2</sup> Tax Increment Financing (TIF) subsidizes an entity by refunding or diverting a portion of their taxes to help finance development in an area or on a project site.

<sup>&</sup>lt;sup>3</sup> Page 18 of the Brownfield plan

The reimbursement and the total costs allocation under the plan is indicated below:

Item/Activity Pre-Approved Activities		tal Request		MSF Act 381 Eligible	E	EGLE Act 381 Eligible	
				Activities	Activities		
	-		-			10000	
Pruse i ESAs	5	7,500	-	-	\$	7,500	
Phase II ESABEA/DDCC	5	20,000	-	-	\$	20,000	
Hazardous Materials Survey	5	15,000	-	-	\$	15,000	
Pro Approved Activities Sub-Total	\$	42,500	\$		3	42,500	
Department Specific Activities						WILLIAM TO THE	
Vapor Barrier Mitigation	S	400,000	-	-	S	400,000	
Soll transport, and disposal	5	110,000	÷		\$	110,000	
UST Removal	\$	70,000	3	-	\$	70,000	
Sampling, reporting, and overlaght	5	000,00	-	-	\$	60,000	
Department Specific Activities Sub-Total	1	640,000			\$	E40,000	
Dersotition		P-ONE NO.					
Building/Site Demolition Activities	5	560,472		560,472	\$	•	
Sheeting and Shoring Related to Demoition	5	79,500		79,500	\$	-	
Removal of Abandoned Utilities	\$	21,200		21,200	5	-	
Backfill Related to Site Demottion Activities	\$	151,580		151,580	\$	-	
Demoition Surveys	5	15,000		15,000	\$	-	
Demolition Sub-Total	\$	827,752	\$	827,752	\$		
Asbeston, Mold, and Lead Activities	Contract of	Sin Charles				Water bearing	
Asbestos Abatement	\$	176,740	s	176,740	5	-	
Azbeetoe and Lead Activities Sub-Total	1	176,740	-	176,740			
Intractructure Improvements	10000			- A - 10000000 10000		OVALUE OF THE REAL PROPERTY.	
Multi-level Parking Structure	\$	3,076,519	5	3.076.519	S	-	
Sidewalk Improvements	5	21,200	<u> </u>	21,200	•		
Curbs and Guiters	\$	8.077	5	8,077	\$		
Stormsewer Repairs Installations	s	106.000	<u> </u>		<u> </u>		
Landscaping	5		+	106,000	8	-	
Intractructure Sub-Total	\$		-	31,500	-		
Sife Preparation	•	3,243,590		3,243,596	*	•	
The state of the s	-	Constitution of the second					
Temporary Construction Access/Roads	\$	16,295	-	16,295	_	-	
Temporary Traffic Control	5	19,080	+-		2	-	
Temporary Site Control (fencing, gates, signage and/or lighting)	5	37,100	-	37,100	\$		
Temporary Facility	\$	100,700	-	100,700			
Temporary Sheeting and Shoring	5	53,000	\$	53,000	2		
Relocation of Active Littitles (Electric, Gas, Water, Sewier)	\$	31,800	5	31,500			
Subsurface Conditions, Soll Sampling, Assessing Risks Posed by Ste Conditions, Designing Earthworks and Structure Foundations	s	7,950	5	7,950	s	-	
Excavazion for Unistable Material (urban/historic fili) and related	S	151,898	5	151,895			
Site Preparation Sub-Total		417,823	-	417,823	-	-	
Preparation of Brownfield Plan and Act 381 Workplan	-	417,823		417,823	•	-	
			41		2.0		
Brownfield Plan/361 Work Plan	5	30,000	_	15,000	_	15,000	
Brownfield Plan Implementation	\$	30,000	-	15,000	_	15,000	
Brownfield Plan and Act 381 Workplan Sub-Total	\$	60,000		30,000		20,000	
Eligible Activities Sub-Total	\$ 100	5,408,411	-	4,635,911	-	712,500	
15% Contingency*	\$	795,687	<del>-</del>	699,687	\$	96,000	
Sub-Total Before Interest	\$	6,204,298	-	5,395,798	\$	808,500	
interest	2	1,922,239	-	1,731,950	\$	260,259	
Developer Eligible Reimbarrement Total	\$	8,126,537	*	7,127,748	18	1,068,789	
TIF Capture for Local Brownfield Revolving Fund (LBRF)	5	3,338,088	5		5	_	
Administrative Fee	5	1,723,669	_		5		
State Brownfield Fund	\$	595,194	_		5		
Total	2	13,783,488	_	7 117 749	-	1,000,783	
*15% Contingency excludes preparation of Brownfield Plan/381 W	· Constant			7,127,748	t Jan	LOGILY	

# Property Subject to the Plan

The property comprising the eligible property consists of three (3) parcels. All three parcels commonly known as, "1450, 1460, and 1490 Franklin Street" are considered a "facility."

# Basis of Eligibility

The Property is considered "eligible property" as defined by Act 381, Section 2 because (a) the Property was previously utilized for industrial, commercial and residential purposes; (b) it is located within the City of Detroit, a qualified local governmental unit under Act 381; and (c) the Property is determined to be a "facility" as defined by Act 381 and a "site" under Part 213.

The Property is an open Leaking Underground Storage Tank (LUST) site with one gasoline release (C-0016-10) reported in January 2010 based on the in-place closure of one 1,000-gallon and one 2,500-gallon gasoline USTs in the southeastern portion of the subject building.<sup>4</sup>

Additionally, based on current and previous site investigation activities contaminant concentrations identified in soil and groundwater on the Property indicate exceedances of the Part 201/213 Residential and Nonresidential Drinking Water Protection/Drinking Water (DWP/DW), Groundwater Surface Water Interface Protection/Groundwater Surface Water Interface (GSIP/GSI), Soil Volatilization to Indoor Air Inhalation (SVII) and Direct Contact (DC) cleanup criteria/Risked Based Screening Levels (RBSLs).

Groundwater analytical results identified concentrations of various metals collected from the property above the Part 201/213 Residential and Nonresidential DW and GSI cleanup criteria/RBSLs.5

# Eligible Activities and Projected Costs

The "eligible activities" that are intended to be carried out at the Property are considered "eligible activities" as defined by Section 2 of Act 381, because they include Pre-Approved Activities, Department Specific Activities, Demolition, Asbestos Activities, Infrastructure Improvements, Site Preparation and preparation and implementation of Brownfield Plan and/or 381 Work Plan.

In addition to the Brownfield, the developer will also apply for secured a Michigan Community Revitalization Program (CRP) loan, a Neighborhood Enterprise Zone (NEZ) tax abatement, and a Public Act 255 Commercial Redevelopment Act Tax Abatement for the project. The period for this Brownfield request is for 27 years.

<sup>&</sup>lt;sup>4</sup> Therefore, based on the soil and groundwater concentrations and the open LUST status, the Property is considered a facility under Part 201 and a site under Part 213.

<sup>&</sup>lt;sup>5</sup> A concentration of carbon tetrachloride was identified above the Part 201 Residential and Nonresidential DWP cleanup criteria. Concentrations of 1,2-dichloropropane were identified above the Part 201 Residential and Nonresidential DWP cleanup criteria. Concentrations of tetrachloroethylene (PCE) were identified in the soil samples above the Part 201 Residential and Nonresidential DWP and/or GSIP cleanup criteria. Concentrations of trichloroethylene (TCE) were identified in the soil samples above the Part 201 Residential and Nonresidential DWP, GSIP, and/or SVII cleanup criteria. Concentrations of mercury were identified in the soil samples above the Part 201 Residential and Nonresidential DWP and/or GSIP cleanup criteria.

Tax increments are projected to be captured and applied to (i) reimbursement of eligible activity costs and payment of DBRA administrative and operating expenses, (ii) make deposits into the State Brownfield Redevelopment Fund, and (iii) make deposits into the DBRA's Local Brownfield Revolving Fund, as follows:

All School Teres	POTACS	Refrobusionent of cods		CBSA Admin. Costs		State Redex, fund		Local Brownshid Resolving Fund		Surplus Capture Returned	
School Operating	\$4,144,292	5	2,723,678	5		5	595,194	s	588,472	\$236,941	
State Education Tax	\$1,381,431	-	1,257,872	\$		\$		5	84.067	\$39.49	
Total	\$6,626,722	5	3,981,550	\$		\$	595,194		\$672,539	\$276,43	
City Hon-School Taxes											
City Operating	\$4,386,028	\$	2,236,239	\$	835,568	1		5	1,283,219		
Library	\$1,020,061	\$	530,618	\$	191,608			5	297,825		
County Non-School Taxes		\$						\$			
Wayne County Operating Gummer	\$1,544,207	\$	647,221	\$	233,714	\$		5	363,272		
Wayne County Operating-Winter	\$218,011	\$	113,407	5	40,952	5		5	සුසා		
Wayne County Parks-Winter	\$54,187	\$	28,177	5	10,175	\$		\$	15,815		
Wayne Courty Jal-Winter	\$208,845	\$	107,494	5	38,816	\$		5	60,334		
Huron Cinton Metropolitan Authority (HCMA)	\$48,866	\$	25,310	5	9,139	5		5	14,206		
Wayne Courty ISD (RESA)	\$791,710	5	411,841	5	148,717	5		5	231,158		
Wayne County Special ISDIRESA	\$457,071	\$	237,763	5	85,857	\$		\$	133,451		
Wayne Courty Community College	\$740,858	\$	335,271	\$	139,123	5	-	5	215,245		
Total Incremental Local Taxes Paid	\$9,178,188	\$	4,773,341	\$	1,723,669	5	11.04		\$2,679,178	\$	
Total Schools and Hon-Schools Capturable Militage	- COL.	s	8,754,800	\$	1,723,669	5	595,194		\$3,351,717	\$27KA1	

<sup>\*</sup>The listing for Non-Capturable Mills was not provided in the plan's narrative.

# Feasibility of the Brownfield Approval

PM Environmental, Inc. (PM) completed a Baseline Environmental Assessment (BEA) for the Industrial Warehouse Property (Parcel IDs #07000027, #07000026, and #07000025) located at 1450-1490 Franklin Street in Detroit, dated February 7, 2019.

Banyan Investments, LLC purchased the subject property on January 2, 2019. Banyan Investments, LLC intends to redevelop the subject property for mixed residential and general commercial use.

The subject property is currently zoned SD-4 Special Development District/Riverfront Mixed Use. The intended use and zoning are consistent with a mixed Residential/Nonresidential property use.

PM performed a Phase I Environmental Site Assessment (ESA) for the subject property dated January 25, 2019.

PM's January 2019 Phase I ESA identified the following onsite recognized environmental conditions (RECs):

• The subject property is an open LUST site with one release (C-0016-10) reported in 2010. Additionally, historical operations at the subject property consisting of chemical mixing and soap factory operations with known bulk chemical storage. Previous site assessment activities

completed between 1997 and 2013 to assess the release and historical operations document that soil and groundwater contamination exist on-site above the current Michigan Department of Environmental Quality (MDEQ) Part 201 generic cleanup criteria and Part 213 Risk Based Screening Levels (RBSLs). Based on these analytical results and its open LUST status, the subject property meets the definition of a "site" and would also be classified as a "facility", in accordance with Part 201 and Part 213. Additionally, based on the concentrations of contaminants identified, the potential for vapor intrusion exists at the subject property.

- PM recommends the further assessment of the previously reported release (C-0127-07), located south of the subject property, identified during 2013 previous site assessments. Although the previously identified suspect underground storage tanks (USTs) and known release were not located within the subject property boundaries; the suspect USTs were likely installed associated with historical operations on the subject property. The potential exists for contamination from the known release to also exist on the subject property.
- PM observed four sumps<sup>6</sup> throughout the subject building. The westernmost basement sump was adequately assessed during previous site investigations; however, the remaining three were not assessed during the previous site assessment since they were not observed (likely due to interior limitations such as storage). The structural integrity of the three sumps is unknown, and based on the age of the subject building (at least 90 and up to 135 years), the potential exists for failure of the systems (i.e., cracks, leaks) to have occurred over time. The historical waste management practices associated with the sumps and former high risk operations (discussed above) are unknown and may be a source of subsurface contamination.<sup>7</sup>

Please contact us if we can be of any further assistance.

Auditor General's Office
Arthur Jemison, Chief of Services and Infrastructure
Maurice Cox, Planning and Development Department
Donald Rencher, HRD
Veronica Farley, HRD
Stephanie Grimes Washington, Mayor's Office
Malinda Jensen, DEGC
Kenyetta Bridges, DEGC
Jennifer Kanalos, DEGC
Brian Vosburg, DEGC

<sup>&</sup>lt;sup>6</sup> A sump is a container to collect water from a plumbed system.

<sup>&</sup>lt;sup>7</sup> PM Environmental, Inc. Baseline Environmental Assessment of the Industrial Warehouse Property Located at 1450-1490 Franklin Street, Detroit, Michigan; February 7, 2019



The Stone Soap building in Detroit's east riverfront district was constructed in phases starting in 1907 and ending with the final structure in 1927-29. 8



Rendering of the corner of Franklin and Riopelle 9

<sup>&</sup>lt;sup>8</sup> Crain's Detroit Business <a href="https://www.crainsdetroit.com/article/20171004/news/641141/banyan-plans-residences-market-shakespeare-in-detroit-home-at-stone">https://www.crainsdetroit.com/article/20171004/news/641141/banyan-plans-residences-market-shakespeare-in-detroit-home-at-stone</a>





Renderings of the Stone Soap Building Project

<sup>&</sup>lt;sup>9</sup> Stone Soap Building "Banyan plans to both renovate the building and add on three to six stories on top of the building. The plan includes 63 new residential units, including condos and rentals, 20 percent of them (13 apartments) reserved for residents making 80 percent of the area median income (about \$38,000 a year). 33 rental apartments will be in the renovated original building, built in the early 1900s, and 30 condos will be newly constructed. The building will include one, two and three bedroom units. It will also include a gym, pool, rooftop gardens, storage, and bike stations for residents." East Riverfront's Stone Soap Building redevelopment plans revealed, Crain's Detroit Business, By Robin Runyan Oct 4, 2017

https://detroit.curbed.com/2017/10/4/16421506/riverfront-stone-soap-building-redevelopment

# City of Betroit

### CITY COUNCIL

COUNCIL PRESIDENT BRENDA JONES

## Incentive Information Chart: 1450, 1460, 1490 Franklin Street, Detroit

Project Type	Incentive Type	Investment Amount	District
Commercial/Residential – Mixed Use		\$31 Million Hard Cost Investment	East Riverfront

Jobs Available							
Construction				Post Construction			
Professio nal	Non- Professional	Skilled Labor	Non-Skilled Labor	Professio nal	Non- Professional	Skilled Labor	Non-Skilled Labor
<u> </u>							
0	0	200	0	0	2	0	0

## 1. What is the plan for hiring Detroiters?

The development team will present at local trades sessions to solicit bidders and garner opportunities to employ Detroit residents. If the D2D program is available within the necessary timeframes, the developer will utilize this as an additional procurement source as needed.

Banyan Investments, LLC has a policy of non-discrimination in its hiring practices, as is required by prevailing non-discrimination laws. As long as Banyan remains in compliance with these policies and laws, Detroit-based worker hiring will be encouraged, both permanent and temporary.

2. Please give a detailed description of the jobs available as listed in the above chart, i.e. job type, job qualifications, etc.

Available construction jobs include demolition, asbestos abatement, underground storage tank removal, earthwork, site utilities, concrete, masonry, carpentry, steel work, architectural woodwork, roofing, window glass and glazing, framing, painting, flooring, tiling, plumbing and HVAC and electrical.

The Developer anticipates the creation of 2 full time equivalent permanent jobs at the new project associated with property maintenance. Additional tenant created jobs are anticipated to include opportunities in property management, retail/food & beverage outlets and the new theatre employees.

# City of Detroit

COUNCIL PRESIDENT BRENDA JONES

# 3. Will this development cause any relocation that will create new Detroit residents?

The development is anticipated to create an estimated 48 new residential units in the City of Detroit.

4. Has the developer reached out to any community groups to discuss the project and/or any potential jobs?

Yes. Both the Detroit River Front Conservancy and the Rivertown Business Association are supportive of this project. Written letters of support are being obtained and will be provided as soon as possible.

5. When is construction slated to begin?

Construction is slated to commence in spring 2020

6. What is the expected completion date of construction?

Approximately two years following project commencement.



COLEMAN A. YOUNG MUNICIPAL CENTER 2 WOODWARD AVENUE SUITE 808 DETROIT, MICHIGAN 48226 (313) 224-1339 \* TTY:711 (313) 224-1310 WWW.DETROITMI.GOY

July 22, 2019

Ms. Jennifer Kanalos Authorized Agent Detrolt Brownfield Redevelopment Authority 500 Griswold, Suite 2200 Detroit, Michigan 48226

RE: Stone Soap Brownfield Redevelopment Plan

Dear Ms. Kanalos,

The Detroit Brownfield Redevelopment Authority (DBRA) has asked that the Planning and Development Department to review and comment on the Stone Soap Brownfield Redevelopment Plan (the "Plan").

Banyan Investments, LLC is the project developer ("Developer"). The property in the Plan is located on three parcels located in Detroit's Rivertown neighborhood east of downtown and is roughly bounded by Franklin Street to the north, Riopelle Street to the east, an alleyway to the south, and commercial properties to the west. Previous uses include a variety of residential, industrial, and retail purposes, most notably Stone Soap Company, inc. from which the Development gained its namesake.

The Plan consists of the partial rehabilitation and redevelopment of three existing adjoining three and four-story buildings. The project entails the demolition of the two eastern buildings (1460 and 1490 Franklin Street) and renovation and expansion of the third building (1450 Franklin Street). When completed, the multistory building will function as residential and commercial space, totaling approximately 132,000 square feet. The addition features a sloping, wedge-like roof, connecting the eight-story section to the original, four-story 1450 Franklin building. The Stone Soap Development will feature commercial spaces on the first and second floors of the existing building, which include a theater, wine bar, market, and office space. The total office, commercial, and theater space will occupy approximately 23,000 square feet. Approximately 48 condominium and apartment units are proposed to occupy floors 3 through 8, totaling approximately 58,000 square feet. The apartment units will be reserved as affordable units at 80% Area Median Income (AMI).

The development will renovate and fully reactivate a significant building in the Rivertown neighborhood of Detroit. Total investment is estimated at \$38 million.

The review for this brownfield plan is complete and all comments have been forwarded to the developer. No adverse comments were received. The Planning and Development Department recommends approval of the brownfield plan as submitted.

Sincerely

Maurice Cox

Director

Planning and Development Department

c: B. Vosburg



COLDMAN A. YOUNG MUNICIPAL CLNTER 2 WOODWARD AVE., FOURTH FLOOR DETROIT, MICHIGAN 48226 (313) 224-0484 • TTY;711 WWW.DETROITHIGOV

August 12, 2019

Jennifer Kanalos Detroit Brownfield Redevelopment Authority (DBRA) 500 Griswold, Suite 2200 Detroit, Michigan 48226

RE: DBRA Document Review and Invoice Notice

Attached please find Exhibit B, approving the environmental documents submitted to the Buildings, Safety Engineering, and Environmental Department for review on the Stone Soap Project located at 1450-1490 Franklin Street for Banyan Investments LLC.

The review of a Phase I Environmental Site Assessment (ESA) and Baseline Environmental Assessment was completed on July 12, 2019 and Invoice #5691927 in the amount of \$1,000.00 for these services was submitted to your office for payment. Please remit a check payable to the Treasurer, City of Detroit by the due date to complete this activity.

If you have any questions, please contact my office at (313) 471-5115.

Sincerely,

Paul T. Max General Manager

PTM

Enclosure

cc: Brian Vosburg

### Attachment B

TO:	THE DETROIT BROWNFIELD REDEVELOPMENT AUTHORITY
FROM:	DETROIT, BUILDINGS, SAFETY ENGINEERING, AND ENVIRONMENTAL DEPARTMENT
PROJECT:	Stone Soap Project, Banyan Investments LLC

DATE: August 12, 2019

The undersigned, from the City of Detroit, Buildings, Safety Engineering, and Environmental Department acknowledges the receipt of the environmental documents listed below, which have been submitted by PM Environmental on behalf of Banyan Investments, LLC, as developer, as part of its Brownfield Plan submittal to the Detroit Brownfield Redevelopment Authority (DBRA), for the Stone Soap Project.

1_	Phase I Environmental Site Assessment, pursuant to USEPA's. All Appropriate Inquiry using American Society of Testing Materials (ASTM) Standard E 1527-13
	Phase II Environmental Site Assessment, pursuant to ASTM Standard 1903 (if appropriate)
1	Baseline Environmental Assessment, pursuant to Part 201 of Michigan 's Natural Resources and Environmental Protection Act, MCL 324.20101 et seq. (if appropriate).
	Due Care Plan, pursuant to Part 201 of Michigan's Natural Resources and Environmental Protection Act, MCL 324.20101 et seq. (if appropriate).

Based upon its review of the above environmental documents and the representations of the developer, the City of Detroit, Buildings, Safety Engineering, and Environmental Department agrees with the environmental consultant that the site is a facility and has determined that the documents received for this project satisfy the DBRA Guidelines.

City of Detroit, Buildings, Safety Engineering, and Environmental Department

Its: General Manager

# Parcel Map



September 4, 2018

0.00 ml 0.13 km SENCOO, EM CANAL EN, HERE, Gumm, INCREMENT P., USOS, EPA, USOS, AAFC, NACHA 0.00