

HUD PHASE I ENVIRONMENTAL SITE ASSESSMENT



**BUREAU
VERITAS**

PREPARED FOR:

Gladstone Housing Commission

217 Dakota Avenue

Gladstone, Michigan 49837

Michael Lindahl



HUD PHASE I ENVIRONMENTAL SITE ASSESSMENT

Fairview Manor

415 South 4th Street

Gladstone, Michigan 49837

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BV PROJECT #:

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DATE OF REPORT:

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ONSITE DATE:

June 30, 2026

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ESA Summary Table

ASTM E 1527-21 Scope Considerations

Assessment Component	Acceptable	Finding	Routine Solution	Phase II	Estimated Cost \$	Reference Section	Page
Adjacent Properties (Section 3.3)	✓					9.1.1.1	36
Regulatory Review (Section 5.2)	✓					9.1.1.2	36
Tier I Vapor Encroachment Screening (Section 5.4)	✓					9.1.1.3	36
Historical Review (Section 5.6 & 5.7)	✓					9.1.1.4	36
Operational Activities (Section 6.3.1)	✓					9.1.1.5	36
Hazardous Materials / Petroleum Products (Section 6.3.2)	✓					9.1.1.6	37
Wastes (Section 6.3.3)	✓					9.1.1.7	37
Surface Areas (Section 6.3.4)	✓					9.1.1.8	37
Facility Storage Tanks (underground or aboveground) (Section 6.3.5)	✓					9.1.1.9	37
Polychlorinated Biphenyls (PCBs) (Sections 6.3.6)	✓					9.1.1.10	37

Conditions noted in the Project Summary Table are representative of the overall conditions of the property. There may be more detail on specific assessment components in the report text, therefore the Project Summary Table should not be used as a stand-alone document.

§ Costs depicted are for investigation/program development activities. Remediation costs, if required, will be identified as a result of the activities.

ASTM E 1527-21 Non-scope and HUD-specific Scope Considerations

Assessment Component	Acceptable	Finding	Routine Solution	Phase II	Estimated Cost \$	Reference Section	Page
Lead Based Paint (Section 8.1)		BER HUD	✓		Not applicable ⁽¹⁾	9.1.2.1	38
Asbestos-Containing Materials (Section 8.2)		BER HUD	✓		Not applicable ⁽²⁾	9.1.2.2	38
Radon Gas (Section 8.3)	✓					9.1.2.3	38
Floodplain (Section 8.4)	✓					9.1.2.4	38
Wetlands (Section 8.5)	✓					9.1.2.5	38
Landfills (Section 8.6)	✓					9.1.2.6	39
Sole Source Aquifer Recharge Area (Section 8.7)	✓					9.1.2.7	39
Coastal Barriers (Section 8.8)	✓					9.1.2.8	39
Farmlands Protection (Section 8.9)	✓					9.1.2.9	39
Coastal Zone Management (Section 8.10)	✓					9.1.2.10	39
Endangered or Threatened Species or Habitat (Section 8.11)	✓					9.1.2.11	39
Historic Preservation (Section 8.12)	✓					9.1.2.12	40
Noise (Section 8.13)	✓					9.1.2.13	40
Rail Lines (Section 8.14)	✓					9.1.2.14	40
Explosive or Flammable Hazards (Section 8.15)	✓					9.1.2.15	40
Natural Gas or Petroleum Pipelines (Section 8.16)	✓					9.1.2.16	40
High Voltage Power Transmission or Other Towers (Section 8.17)	✓					9.1.2.17	40
Airport Hazards (Section 8.18)	✓					9.1.2.18	41
Oil and Gas Operations (Section 8.19)	✓					9.1.2.19	41

Conditions noted in the Project Summary Table are representative of the overall conditions of the property. There may be more detail on specific assessment components in the report text, therefore the Project Summary Table should not be used as a stand-alone document.

§ Costs depicted are for investigation/program development activities. Remediation costs, if required, will be identified as a result of the activities.

⁽¹⁾ Based on the date of construction (pre January 1, 1978), lead based paint is likely to have been used at the subject property. Therefore, the paint at the project site is assumed to be lead-based. All applicable local, state, and federal guidelines for the handling and disposal of potential hazardous wastes to include lead-based paint containing wastes, including Toxicity Characteristic Leaching Procedures (TCLPs,) should be adhered to during demolition activities.

⁽²⁾ Based on the date of construction (pre January 1, 1989), ACM testing was performed concurrently with this Phase I ESA. Multiple suspect

ACMs were identified during the course of the Pre-Demolition Survey. Samples of various suspect materials were collected based on friability and condition of the materials as observed by the Asbestos Inspector. Of the materials sampled, pipe fitting insulation and vinyl floor tile were determined to be ACM. However, it is possible that additional ACM is present in areas that were inaccessible during the sampling activities. The identified ACM was reported to be in good condition; however, it was noted that the asbestos containing pipe fitting insulation was reportedly present behind walls and may be damaged in areas that were unobservable. The asbestos-containing materials should be removed by a licensed asbestos contractor in accordance with all applicable federal, state, and local regulations prior to demolition. Materials uncovered during renovation or demolition activities that were not addressed in the inspection report must be sampled by an accredited asbestos inspector prior to any disturbance.

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1. SUMMARY

Bureau Veritas Technical Assessments LLC (BV) performed a Phase I Environmental Site Assessment, that included on-site observations of the accessible areas of Fairview Manor.

Property Summary	
Subject Property Name	Fairview Manor
Subject Property Address	415 South 4th Street Gladstone, Delta County, Michigan 49837
Additional Current/Historical Addresses	None identified
Number of Parcels	1
Tax Map ID	052-200-044-00 A copy of the tax map is included in the Appendices .
Subject Property Lands	2.98 acres
Subject Property Use	Multi-family age-restricted housing
Year of Construction	1967
Number of Buildings	1
Number of Stories	3
Number of Units	50 apartments
Number of Ancillary Buildings	Two used as a smoking shed and maintenance garage
Commercial Uses on Subject Property	No
Generalized Vicinity Property Use	Residential



NORTH ELEVATION OF SUBJECT BUILDING



NORTHEAST ELEVATION OF SUBJECT BUILDING



SOUTHEAST ELEVATION OF SUBJECT BUILDING



SOUTH ELEVATION OF SUBJECT BUILDING



WEST ELEVATION OF SUBJECT BUILDING



MAINTENANCE GARAGE



SMOKING SHED

the subject property and their subsequent analytical results for asbestos. Analysis was performed using the "positive-stop" method, whereby analysis is stopped on a group of samples once the first positive sample is analyzed, the entire homogeneous material is considered asbestos-containing, in accordance with applicable federal, state, and local requirements.

Please note, that in the event of any repair, renovation, or demolition activities at the subject property, U.S. Occupational Safety and Health Administration (OSHA) regulations, as well as various state and local regulations, require that additional materials also be considered as suspect ACM until tested and proven otherwise. These materials, as listed in the USEPA Green Book, include resilient floor tile, asbestos-cement board (transite), and roofing felt, which are considered by OSHA to be suspect regardless of installation date (these materials continue to be manufactured and installed in the United States).

- For residential properties constructed prior to January 1, 1978, visual observations for the potential presence of lead-based paint and a determination if there is an X-ray Fluorescence (XRF) Survey evaluating for lead-based paint at the subject property.
- An evaluation of information contained in programs such as the NPL, CERCLIS, SHWS, RCRIS, SWF, LUST, and other governmental information systems within specific search distances of the subject property. This evaluation was performed to identify any sites that would have the potential to impact the environmental integrity of the subject property.
- The regulatory agency report provided is based on an evaluation of the data collected and compiled by a contracted data research company. The report is based on a radius search which focuses on both the subject property and neighboring sites which may impact the subject property. Neighboring sites listed in governmental environmental records are identified within a specific search distance. The search distance varies depending upon the particular government record being checked. The search is designed to meet the requirements of ASTM Standard E 1527-21 and the applicable Scope of Work. The information provided is assumed to be correct and complete.
- Visual observation of the adjacent properties to identify high-risk neighbors and the potential for contamination, if present or suspected, to migrate onto the subject property.
- An evaluation of sources noted above to determine the potential for vapor encroachment conditions at the subject property from both current and former activities at the subject property and adjacent properties. The vapor encroachment screening is designed to meet the requirements of **ASTM Standard E 2600-22**.
- A review of Federal and State regulatory database records related to per- and polyfluoroalkyl substances (PFAS), a review of available mapping resources for known PFAS releases and suspected PFAS uses, and the identification of any current and/or past uses of the subject property that may indicate a current elevated risk of PFAS contamination, specifically the compounds PFOA and PFOS. It should be noted that BV's assessment of potential PFAS concerns is based solely on review of the resources cited, and this discussion is not intended to guarantee the presence or absence of PFAS at a given site. It should also be noted that only two PFAS compounds, perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS) are currently designated as hazardous substances under CERCLA (as of the Final Rule effective date of July 8, 2024); therefore, only these two PFAS substances are included in the current ASTM E1527-21 Scope. However, where it is not possible to identify the specific PFAS compounds, the assumption will be made that PFOA and PFOS are included.
- Radon gas propensity, through the review of the USEPA's Map of Radon Zones. In instances where samples were collected and analyzed, radon gas concentrations are evaluated through the exposure and analysis of canisters, using the charcoal liquid scintillation method for all residential properties. At a minimum, the testing will be performed in accordance to ANSI/AARST protocol for conducting radon and radon decay product measurements in multifamily buildings (ANSI-AARST MAMF-2017, section 111.3.1).

2.3 Significant Assumptions

Factual information presented in this report regarding operations, conditions, and test data provided by the Client, owner, or their representative have been assumed by BV to be correct and complete. BV assumes no responsibility for misrepresentation of conditions or information by the property owner, its representatives, public information officials or any authority consulted in connection with the compilation of this report.

BV assumes that all information provided by Environmental Risk Information Services (ERIS) regarding the regulatory status of facilities within the approximate minimum search distance is complete, accurate and current.

2.4 Assessment Viability

This assessment is presumed to be viable for 180 days after the earliest date of the components of the assessment according to the ASTM Standard E1527.

Assessment Component Dates	
Assessment Component	Date
Interviews with owners, operators, and occupants:	June 30, 2026
Reviews of federal, tribal, state, and local government records:	June 30, 2026
Visual inspections of the subject property and of adjoining properties:	June 30, 2026
Declaration by the environmental professional responsible for the assessment:	July 29, 2026
Searches for recorded environmental cleanup liens:	User responsibility

2.5 Limitations and Exceptions

BV identified the following limitations, exceptions, and/or data gaps as part of this Phase I ESA:

- Discussions pertaining to on-site observations are based solely on data collected on June 30, 2026. Observations do not reflect conditions that may have existed prior to this time, or since this time, except as noted in regard to previous investigations conducted at the subject property.
- According to 40 CFR Part 312, Standards and Practices for All Appropriate Inquiries: Final Rule, CERCLA liability rests with the owner or operator of a property and not with an environmental professional hired by the prospective landowner and who is not involved with the ownership or operation of the property.
- Where appropriate and necessary, BV has amended the distances between the subject property and the sites listed in the regulatory database report in order to reflect real world distances.
- The findings, opinions, and conclusions presented here represent BV's best professional judgment based on information and data available to us during the course of this assignment. Additionally, the conclusions presented are based on the conditions that existed at the time of the assessment.

2.5.1 Data Gaps

No significant data gaps in historical information were identified that would impact BV's ability to identify RECs. While data gaps in information may exist, because the data gaps were not determined to be material in identifying a Recognized Environmental Conditions (RECs) they are not considered by ASTM standards to be *significant* and therefore, are not individually addressed in this report.

2.6 User Reliance

BV has completed a Phase I Environmental Site Assessment of Fairview Manor (the "subject property"), located at 415 South 4th Street in Gladstone, Michigan, 49837. The assessment was performed at the Client's request using the methods and procedures consistent with good commercial and customary practice designed to conform with acceptable industry standards. This report is written to meet the guidelines of the U.S. Department of Housing and Urban Development (HUD) regulations and may be relied upon by HUD. HUD has been named as an authorized User of this report. The purpose for which this report shall be used shall be limited to the use as stated in the contract between the client and BV.

This report, or any of the information contained therein, is not for the use or benefit of, nor may it be relied upon by any other person or entity, for any purpose without the advance written consent of BV. Any reuse or distribution without such consent shall be at the client's or recipient's sole risk, without liability to BV.

2.7 Certification

In expressing the opinions stated in this report, BV has exercised the degree of skill and care ordinarily exercised by a reasonable prudent environmental professional in the same community and in the same time frame given the same or similar facts and circumstances. Documentation and data provided by the Client, designated representatives of the Client or other interested third parties, or from the public domain, and referred to in the preparation of this assessment, have been used and referenced with the understanding that BV assumes no responsibility or liability for their accuracy.

The independent conclusions represent our professional judgment based on information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided by the Client or their representative has been assumed to be correct and complete. The conclusions presented are based on the data provided, observations, and conditions that existed on the date of the on-site visit.

If you have any questions regarding this report, please contact the Senior Environmental Consultant listed on the cover page of this report.

Researched by: Paul Kittelson, Project Manager
Surveyed by: Paul Kittelson, Project Manager
Written by: Paul Kittelson, Project Manager

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312.

I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the All Appropriate Inquiries in conformance with the standard and practices set forth in 40 CFR Part 312.



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Reviewed by:



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3. SITE DESCRIPTION

3.1 Subject Property Description

Property Summary	
Subject Property Name	Fairview Manor
Subject Property Address	415 South 4th Street Gladstone, Delta County, Michigan 49837
Additional Current/Historical Addresses	None identified
Number of Parcels	1
Tax Map ID	052-200-044-00 A copy of the tax map is included in the Appendices .
Subject Property Lands	2.98 acres
Subject Property Use	Multi-family age-restricted housing
Year of Construction	1967
Number of Buildings	1
Number of Stories	3
Number of Units	50 apartments
Number of Ancillary Buildings	Two used as a smoking shed and maintenance garage
Commercial Uses on Subject Property	No
Generalized Vicinity Property Use	Residential

Subject Property Utility Providers	
Utility	Supplier
Natural Gas Service	DTE
Electric Service	City of Gladstone
Sanitary Sewer	City of Gladstone
Domestic Water	City of Gladstone

No on-site septic systems or potable water wells were identified at the subject property.

According to the local water utility's most recent Water Quality Report, the potable water supplied to the subject property is within federal, state, and local drinking water quality standards.

3.2 Miscellaneous Systems

The subject property utilizes one natural gas-fired emergency generator. The presence of this equipment is not anticipated to adversely impact the subject property as there is no bulk storage of fuel at the subject property.

The subject property utilizes one sump pump, which is located basement and discharge to sewer. The presence of this equipment is not anticipated to adversely impact the subject property.

3.3 Current Uses of Adjacent Properties

North	
Bordering Street/Road:	Dakota Avenue
Address Range:	Not applicable
Description of Property Use:	Residential
East	
Bordering Street/Road:	Not applicable
Address Range:	Not applicable
Description of Property Use:	Multi-family residential
South	
Bordering Street/Road:	Not applicable
Address Range:	Not applicable
Description of Property Use:	Residential
West	
Bordering Street/Road:	South 4th Street
Address Range:	Not applicable
Description of Property Use:	Residential
Findings	
Environmentally Suspect Uses:	No environmentally suspect uses, such as gas stations or dry cleaners, were identified.
Visual Evidence of a Release:	No visual evidence of a release, such as staining or monitoring wells, was observed.
Releases Reported:	No releases were reported on the regulatory database review (Section 5.2.2) for the adjoining properties.
Conclusion:	Based on the information above, no recognized environmental conditions or environmental concerns were identified.



ADJOINING NORTH RESIDENTIAL



ADJOINING EAST MULTI-FAMILY RESIDENTIAL



ADJOINING SOUTH RESIDENTIAL



ADJOINING WEST RESIDENTIAL

4. USER PROVIDED INFORMATION

This Section documents whether the user reported to BV information pursuant to the responsibilities described in Section 6 of the ASTM Standard E 1527-21.

4.1 Property Ownership

Review of the available tax assessor records indicates that the subject property has been owned by Gladstone Housing Commission since 2021.

Review of available tax assessor records did not identify any previous environmentally suspect ownership, easements, right of ways, or other environmental entries/restrictions associated with the subject property.

Chain of Title	
Owner	Year Purchased
City of Gladstone	Not reported
Waterview Apartments I LDHA, LLC	2019
Gladstone Housing Commission	2021

4.2 User Engaged Environmental Cleanup Liens and Activity and Use Limitation (AUL) Review

The user did not engage BV to review title and judicial records for environmental liens or Activity and Use Limitations (AULs) recorded against the subject property. Furthermore, these documents were not provided to BV for review. The lack of or inability to obtain this information represents a data gap. However, based on the findings of this report, the absence of this information is not considered a *significant* data gap.

4.3 User Questionnaire

A User Questionnaire was provided to the user (Client) to assist the user and BV in gathering information from the user that may be material to identifying RECs. BV did not receive a response to the User Questionnaire that was provided to the user. Furthermore, the user did not provide any of the information requested in the questionnaire and required by Section 6 of the ASTM Standard E 1527-21. The lack of or inability to obtain this information represents a data gap. However, based on the findings of this report, the absence of this information is not considered a *significant* data gap.

4.4 Reason for Assessment

The purpose of this report is to provide the Client an assessment concerning environmental conditions (limited to those issues identified in the report) as they existed at the subject property. The assessment was conducted utilizing generally accepted Phase I industry standards in accordance with ASTM Standard E 1527-21 and the HUD Scope of Work for Demolition and Disposition under Section 18.

In addition, the reason for the assessment is assumed to be to qualify for an LLP to CERCLA liability.

5. RECORDS REVIEW

5.1 Physical Setting

5.1.1 Topography

Copies of topographic maps are included in the [Appendices](#).

USGS Topographic Map and Google Earth Review	
Topographic Map Name:	Gladstone, Michigan
Topographic Map Year:	2023
Subject Property Topography	
Upper Elevation (feet):	586
Lower Elevation (feet):	584
Surface Slope:	Relatively flat
Slope Direction:	South
General Vicinity Topography	
Slope Direction:	South
Nearest Surface Water Feature:	Little Bay de Noc
Nearest Surface Water Feature Distance:	Approximately 350 feet
Nearest Surface Water Feature Direction:	South

5.1.2 Soils / Geology

Review of information available from the United States Department of Agriculture Web Soil Survey indicated the following:

Soil Series Name	Drainage	Texture	Hydric Soils
Eastport-Roscommon	Excessively drained	Sand	No
Grayling	Excessively drained	Sand	No

Generalized Geology	
Source:	ERIS
Unit Name:	Trenton Limestone
Primary Rock Type:	Limestone
Secondary Rock Type:	Dolostone

5.1.3 Groundwater Hydrology

Estimated groundwater levels may vary due to seasonal fluctuations in precipitation, local usage demands, geology, underground structures, or dewatering operations.

Hydrogeology	
Source:	Estimated from local topography and presence of nearby surface water features
Estimated Depth to Shallow Groundwater:	Approximately 5 to 10 feet below ground surface
Estimated Direction of Shallow Groundwater Flow:	South

5.2 Standard Environmental Record Sources

The purpose of the records review is to obtain and review records that will help identify recognized environmental conditions. ASTM E1527-21 requires the review of reasonably ascertainable records from standard sources as defined in Section 8.2.1 of ASTM E1527-21. Additional records sources, such as local fire department records, local building department records, and local environmental health department records may be obtained and reviewed at the discretion of the environmental professional.

The availability of record information varies widely, depending on the source. Reasonably ascertainable records are those records that are publicly available, obtainable within reasonable time and cost constraints, and practically reviewable. In addition, the records must be provided by the agency within 20 calendar days of receiving a request, at no more than a nominal cost intended to cover the source's cost of retrieving and duplicating the information.

BV obtained a regulatory database report from ERIS in an effort to determine if the subject property is a listed regulatory site and whether there are any mappable regulatory database sites. The regulatory database search was run in accordance with the Scope of Work for this assessment. BV made a reasonable attempt to field-verify the locations of the ERIS-identified regulatory sites, as well as confirm distances and locations relative to the subject property using available mapping software. Therefore, the distances and/or directions noted in this section may not match the ERIS Report. In addition, BV reviewed the unmappable sites in the database report, cross-referencing addresses and site names. Unmappable sites are environmental risk sites that cannot be plotted with confidence, but can be located by zip code or city name. In general, a site cannot be geocoded because of inaccurate or missing location information in the record provided by the agency. Any identified sites within the specified search radii are included below. A copy of the regulatory database report is included in the [Appendices](#).

See the appended regulatory database report for details of databases reviewed for this assessment.

Regulatory Report Summary

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
PROPOSED NPL	1.0	0	1	0	0	0	1
RCRA VSQG	0.25	0	0	2	-	-	2
RCRA NON GEN	0.25	0	0	2	-	-	2

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
FED BROWNFIELDS	0.5	0	0	1	1	-	2
FRP	0.25	0	0	1	-	-	1
SHWS	1.0	0	0	2	0	4	6
DELISTED SHWS	1.0	0	0	1	0	0	1
WASTE	0.5	0	1	5	2	-	8
LUST	0.5	0	0	1	4	-	5
UST	0.25	0	0	1	-	-	1
AST	0.25	0	0	1	-	-	1
AUL	0.5	0	0	0	3	-	3
BROWNFIELDS	0.5	0	0	1	1	-	2
BFLD UST	0.5	0	0	0	1	-	1
FINDS/FRS	0.125	0	1	-	-	-	1
PFAS IND	0.5	0	1	0	0	-	1
ICIS	0.125	0	2	-	-	-	2
BEA	1.0	0	0	2	0	5	7

5.2.1 Subject Property Regulatory Database Review

The search for sites listed on regulatory databases did not identify any listings for the subject property.

5.2.2 Off-Site Regulatory Database Review

Fox River NRDA/PCB Release	
Facility Address:	Fox River and Green Bay
Databases:	Proposed NPL
Distance:	Approximately 360 feet
Direction:	South
Estimated Groundwater Flow:	South
Relationship to Subject Property:	Away from the subject property
Release Reported:	Yes
Release Date:	See discussion below
Contaminant(s) of Concern:	PCB, mercury
Media Impacted:	Sediments
Regulatory Status of Release:	See discussion below
Regulatory Status Date:	See discussion below
Other Significant Database Information:	None
Significant Information from Other Sources:	This listing is related to the zone of contamination (ZOC) associated with PCB contaminated sediments beginning on the Neenah Channel and Menasha Channel sections of the Fox River and extending to Green Bay. The source of contamination was determined to be historic paper mills along the river. This site is located at least 30 miles from the subject property.
Significant Factors:	Distance from the subject property. Lack of reported groundwater contamination. Estimated direction of groundwater flow.
Conclusion:	Based on the factors discussed above, this facility is unlikely to have impacted the subject property and therefore does not represent a recognized environmental condition.
Vapor Migration Concern:	No

The initial search distances employed for this assessment were defined by ASTM E 1527-21. BV has evaluated the listings noted in the initial determination made by ERIS. It is BV's opinion that none of the remaining listed sites are anticipated to impact the subject property. This determination was based on, but not limited to, such factors such as topographic gradient in relation to the subject property, estimated groundwater flow direction at each site, distance between the listed site and the subject property, and/or the type of site or materials involved.

5.3 Additional Environmental Record Sources

BV reviewed local agency records to supplement the database listings discussed above. Please refer to [Interviews](#) below for detailed discussion of departments contacted and information obtained.

5.4 Tier 1 Vapor Encroachment Screening

Bureau Veritas performed a Non-Invasive Tier 1 Vapor Encroachment Screening in compliance with ASTM E 2600-22 "Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions". The purpose of the Tier 1 Screening is to conduct an initial screen to determine if a Vapor Encroachment Condition (VEC) exists in connection with the subject property (referenced as the "Target Property" in the ASTM E 2600-22 Standard). A VEC is defined as the presence or likely presence of vapors from any chemical of concern (COC) in the subsurface of a property caused by the release of vapors on or near the property.

Bureau Veritas reviewed standard environmental record sources to identify if there are known or suspected sources of contamination within the area of concern. The approximate minimum search distance is based upon the chemical of concern (*i.e.* petroleum hydrocarbons vs. non-petroleum hydrocarbons) and the location of a known or suspected source of contamination. According to ASTM E 2600-22, for contaminated sites with petroleum hydrocarbon COCs, the search radius is 528 feet (1/10th mile) from the contaminated site to the boundary of the Target Property. For contaminated site with non-petroleum hydrocarbon COC, the search radius is 1,760 feet (1/3rd mile) from the contaminated site to the boundary of the Target Property. The AOC search distances were determined by ASTM based upon conservative consideration of both contaminated plume lengths and the distances vapors volatilized from contaminated plumes might travel along a path of least resistance in relatively permeable soil from a source through the vadose zone directly to a Target Property. The default AOC may be expanded or reduced by the environmental professional using experience and professional judgment. Consideration may be given, for example, to groundwater flow direction, subsurface characteristics, surficial features and man-made features.

Bureau Veritas obtained a regulatory database report from ERIS in an effort to determine if the subject property is a listed regulatory site and whether there are any mappable regulatory database sites within the specified search distance. Bureau Veritas attempted to confirm distances and locations relative to the subject property using available mapping software. Therefore, the distances and/or directions noted in this section may not match the Database Report. In addition, Bureau Veritas reviewed the unmappable sites in the database report, cross-referencing addresses and site names.

A Vapor Screening Report (VSR) was generated through the ERIS Vapor Screening Tool in order to help identify vapor risks associated with the Subject Property. The ERIS Vapor Screening Tool is designed to assist those in conducting a VES on a property involved in Real Estate Transactions under the ASTM Standard Designation E2600-22. The search distances listed in the VSR are based on search distances used in the Database Report and the search results are grouped based on the minimum default search distances for COCs and petroleum hydrocarbon COCs (PHCOCs). Sites that were identified as potential vapor concerns were further analyzed with respect to distance from the Subject Property, groundwater flow gradient, the presence of preferential pathways, hydraulic barriers, physical barriers, and soil geology when applicable.

A copy of the Vapor Encroachment Screening is attached in the [Appendices](#).

5.4.1 Subject Property Sources

Based on on-site observations, a review of the ERIS Regulatory Database Report, and the ERIS Vapor Encroachment Screening Report, no on-site sources of VECs were identified, and a VEC associated with on-site activities can be ruled out.

5.4.2 Off-Site Sources

Based on observations of adjacent and nearby properties, a review of the ERIS Regulatory Database Report, and the ERIS Vapor Encroachment Screening Report, no off-site sources of VECs were identified, and a VEC associated with off-site properties can be ruled out.

5.5 Historical Use Information

5.5.1 Historical Data Sources

A history of the previous uses of the subject property, and properties in the surrounding area to the extent that this information was revealed in the course of researching the subject property, was developed consistent with practices specified in ASTM Standard E 1527-21 § 8.3. A summary of the standard historical sources and data reviewed by BV is listed below. Copies of representative historical source information are provided in applicable [Appendices](#).

Standard Historical Sources		
Data Type	Source	Years Covered
USGS Topographic Maps:	ERIS	1932, 1958, 1985, 2014, 2017, 2019, 2023
Aerial Photographs:	ERIS	1939, 1953, 1964, 1969, 1975, 1979, 1981, 1988, 1993, 1998, 2005, 2006, 2009, 2010, 2012, 2014, 2016, 2018, 2020, 2022, 2024
Fire Insurance (Sanborn) Maps:	ERIS	None identified
Local Street Directories:	ERIS	1924, 1929, 1934, 1937, 1941, 1945, 1948, 1953, 1956, 1959, 1963, 1967, 1972, 1976, 1981, 1986, 1991, 1996, 2000, 2003, 2008, 2012, 2016, 2020, 2023, 2024
Building Department Records:	City of Gladstone Building Department	Pending response from agency
Fire Department Records:	Gladstone Volunteer Fire Department	Pending response from agency
Zoning/Land Use Records:	City of Gladstone Planning Department	2014-Current
Property Tax Files:	Delta County Assessor	2019-Current
Recorded Land Title Records:	Delta County Assessor	Current
Other Historical Sources:	Not applicable	Not applicable

5.5.2 Prior Use Interviews

Prior-Use Interviews				
Person	Contacts	Knowledgeable	Associated with Property Since	Comments
Michael Lindahl Executive Director Gladstone Housing Commission	906.428.2215	Yes	2008	Prior to the current use, the subject property was undeveloped municipal land.

No adjacent property owners were interviewed regarding the prior use of the surrounding area.

5.5.3 Historical Environmental Documentation

Historical Environmental Documentation					
Report Title	Prepared By	Report Date	Obtained From	Copy of Report	Concerns Identified
Phase I Environmental Site Assessment	Bureau Veritas	September 29, 2026	Client	Appended	No

The previous environmental assessment did not identify any recognized environmental conditions or significant environmental concerns. No additional actions or investigations were recommended.

5.6 Historical Use Information for the Subject Property

Based on review of the historical resources identified in Section 5.5.1, the following chronological history was developed for the subject property.

Historical Use Information			
From	To	Subject Property Use	Environmental Concerns
Not Applicable	1932	No historical data available	No
1932	Mid 1960s	The subject property was naturally vegetated land.	No
1967	Current	The subject property was developed with the current multi-family residential building.	No

The historical information developed and reviewed for the subject property revealed no evidence of recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), or controlled recognized environmental conditions (CRECs).

BV was not able to obtain the subject property history in five year intervals. This data failure represents a data gap; however, this data gap is not considered a significant data gap and therefore is not addressed in Section 2.5.1.

5.7 Historical Use Information for the Adjoining Properties

To the extent that indications of current and past uses of adjoining properties were identified through reconnaissance observation, interviews, records review or through client provided information, they are described below. Locations of adjoining properties discussed can be found on the site vicinity sketch in the [Appendices](#).

Chronological History of Adjoining Properties			
From	To	Adjoining Property Use	Environmental Concern
North			
Not Applicable	1932	No historical data available	No
1932	1970s	Naturally vegetated	No
1970s	Current	Residential	No
East			

Chronological History of Adjoining Properties			
From	To	Adjoining Property Use	Environmental Concern
Not Applicable	1932	No historical data available	No
1932	1980s	Naturally vegetated	No
1980s	Current	Multi-family residential	No
South			
Not Applicable	1932	No historical data available	No
1932	1970s	Naturally vegetated	No
1970s	Current	Residential	No
West			
Not Applicable	1932	No historical data available	No
1932	Current	Residential	No

The historical information developed and reviewed for the adjoining properties revealed no evidence of recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), or controlled recognized environmental conditions (CRECs).

6. SUBJECT PROPERTY RECONNAISSANCE

6.1 Methodology and Limiting Conditions

The objective of the site reconnaissance is to obtain information indicating the likelihood of identifying recognized environmental conditions in connection with the property. In accordance with ASTM E1527-21, BV attempted to visually observe the periphery of the subject property and all structures to the extent not obstructed by obstacles. In addition, BV attempted to visually observe interior common areas, maintenance and repair areas, and a representative sample of occupant spaces. In general, BV does not look under floors, above ceilings, behind walls, in confined spaces, in transformer vaults, or in other areas not considered to be safe to access.

Site Reconnaissance Conditions	
Date Completed:	June 30, 2026
BV Project Manager:	Paul Kittelson
On-Site Point-of-Contact (POC)	Michael Lindahl, Executive Director, Gladstone Housing Commission
Weather Conditions:	Cloudy
Temperature (F):	70s
Percent of Units Observed:	10%
Areas Accessed:	Areas accessed included apartment units 105, 204, 208, 210, and 313; all common areas; all exterior areas (except the roofs); and the subject property boundaries.
Access Limitations:	None
Unaccessed Areas:	Visual observation of pipe chases, behind walls, and above drop ceiling tiles was not performed as part of this assessment.
Pre-Survey Questionnaire	
Pre-Survey Questionnaire	A Pre-Survey Questionnaire was completed as a part of this assessment
PSQ Included in the Appendices?	Yes

6.2 General Site Setting

General Site Setting	
Generalized Vicinity Property Use	Residential

6.3 Interior and Exterior Observations

6.3.1 Operational Activities / Noteworthy Tenants

Current Property Use	
Current Property Use	Multi-family residential - age-restricted housing
Noteworthy tenants at the Property?	No
Environmental permits, registrations, notifications on file?	No

Current Property Use	
Environmentally suspect activities or operations conducted at this Property?	No

BV observed no circumstances of environmental concern associated with the operational activities at the subject property. No further action or investigation is recommended regarding operational activities at the subject property.



RESIDENT LIVING ROOM



RESIDENT KITCHEN



RESIDENT BATHROOM



RESIDENT BEDROOM



COMMON AREA



COMMON AREA



BASEMENT

6.3.2 Hazardous Materials / Petroleum Products Storage and Handling

Visual observation for the use and/or storage of hazardous materials and petroleum products was performed. The following products listed in the Observed Materials Table below were identified.

Drums and Small Containers			
Material	Quantity	Storage Location	Spills or Leaks
Janitorial and maintenance supplies	Retail-sized containers	Janitor closets and other designated areas	No



CLEANING SUPPLIES



CLEANING SUPPLIES

Review of the hazardous materials use and storage at the subject property did not identify any recognized environmental conditions or environmental concerns with regards to the materials listed in the table above.

6.3.3 Waste Generation, Treatment, Storage, and Disposal

Waste Generation, Storage, and Disposal	
Feature	Identified at Subject Property
Waste Generation:	Yes. Further discussed below.
Septic Systems:	No
Sewer Lift Stations:	No
Grease Traps:	No
Oil Water Separators:	No
Unknown Drums or Containers:	No
Waste Disposal Ponds or Lagoons:	No

Waste Generation			
Waste Type	Disposal Method	Storage Location	Spills or Leaks
Domestic sewage	Sanitary sewer	Not applicable	No
Municipal trash	Contracted waste hauler	Trash containers	No



TRASH CONTAINERS

Review of waste storage and disposal information did not identify any recognized environmental conditions or environmental concerns with regards to the wastes listed in the table above.

6.3.4 Surface Areas

Surface Areas	
Feature	Identified at Subject Property
Parking Provisions:	Yes. Further discussed below.
Environmentally Significant Floor Drains, Sumps and Pits:	Yes. Further discussed below.
Pools of Liquid Waste:	No
Surface Staining:	No
Unusual or Noxious Chemical Odors:	No
Landfilling:	No
Stressed Vegetation:	No
Stormwater Retention/Detention Basins:	No
Domestic Water Wells:	No
Monitoring Wells:	No
Irrigation Wells:	No
Dry Wells:	No

Parking Provisions	
Parking provisions:	Surface-level paved parking and drive areas
Collection of run-off:	Stormwater from drive and parking surfaces is directed to surface drains via sheet flow.
Staining or Discharges:	Minor oil discharges were observed on the parking surfaces; however, the discharges are incidental in nature and corrective action is neither practical nor warranted.

Environmentally Significant Floor Drains, Sumps, and Pits					
Type of Drain	# of Drains	Discharge Point	Staining or Odors Observed	Connected to Oil/Water Separator	Location
Sump	1	Sanitary sewer	No	No	Basement



SUMP PUMP

6.3.5 Facility Storage Tanks (underground and aboveground)

Visual observations for manways, vent pipes, fill connections, concrete pads, and saw cuts in paved areas did not identify any surface connections or disturbances that would indicate the potential for an underground storage tank (UST) installation at the subject property.

No aboveground storage tanks (ASTs) were observed on the subject property.

The manways and surface caps observed at the subject property were for site services (i.e., domestic water, storm water, and sanitary sewer system).

Furthermore, review of currently installed mechanical equipment and historical information concerning mechanical equipment identified the use of alternate fuel sources (i.e., electric, natural gas), thereby eliminating the need for additional on-site fuel storage at the subject property.

Based on the review of the state list of registered USTs, no USTs are registered for the subject property.

Interviews with persons knowledgeable of the subject property did not identify any evidence of current or historic storage tanks (above or below ground) at the subject property.

6.3.6 Polychlorinated Biphenyls (PCBs)

Potential PCB-Containing Equipment	
Feature	Identified at Subject Property
Oil Cooled Transformers:	Yes. Further discussed below.
Hydraulic Elevators:	Yes. Further discussed below.
Hydraulic Lifts:	No
Other Hydraulic Equipment:	No

Oil Cooled Transformers	
Type:	Pole-mounted
Number of Units:	3
Owner:	Utility company
Labeled:	Labeled "Non-PCB"
Age:	Appears to have been installed after 1979
PCB Status:	Non-PCB, based on transformer labeling.
Spills or Leaks Observed:	No
Conclusion:	Based on the information above, the presence of this equipment does not represent a recognized environmental condition.



POLE-MOUNTED TRANSFORMERS

Hydraulic Elevators	
Number of Elevators:	1
Owner:	Property
Age:	Appears to have been installed after 1979
PCB Status:	Unlikely to be PCB-contaminated based on the apparent age of the equipment.
Spills or Leaks Observed:	No
Conclusion:	Based on the information above, the presence of this equipment does not represent a recognized environmental condition.



ELEVATOR OPERATING EQUIPMENT

7. INTERVIEWS

7.1 Owner

BV submitted an Owner Questionnaire to the client in an effort to identify the owner of the subject property who could be interviewed to provide information regarding proceedings involving the subject property.

A completed Owner Questionnaire was not returned to BV. The lack of this information represents a data gap. However, based on the other information obtained during the completion of this assessment, the lack of the Owner Questionnaire does not represent a significant data gap. A copy of the blank Owner Questionnaire is included in the Appendices.

7.2 Key Site Manager

BV attempted to interview the Key Site Manager as part of this assessment. In addition, a Questionnaire was provided to the Key Site Manager to assist BV in determining if recognized environmental conditions exist at the subject property.

Key Site Manager Interviews			
Name	Relationship To Property	Years With Property	Telephone Number
Michael Lindahl	Executive Director	18	906.428.2215

The Key Site Manager did not identify any recognized environmental conditions or environmental concerns with the current or historical use of the subject property. A copy of the Key Site Manager Questionnaire is included in the Appendices.

7.3 Occupants

BV made a reasonable attempt to interview all major occupants and also those other occupants whose operations are likely to indicate a recognized environmental condition.

The subject property is a multifamily residential and contains no non-residential tenants. Therefore, based on the ASTM Standard guidance, occupants were not interviewed.

7.4 Past Owners, Operators, and Occupants

No past owners of the subject property, who likely would have material information regarding recognized environmental conditions at the subject property, were identified.

7.5 Owners or Occupants of Adjacent or Nearby Property

The subject property was not an abandoned property with evidence of unauthorized uses or uncontrolled access; therefore, interviews were not conducted with adjacent or nearby property owners or occupants.

7.6 Interviews with Local Government Officials

Building Department

Name of Agency:	City of Gladstone Building Department
Contact Name/Telephone:	Not applicable
Review Method:	A written request for information has been submitted. A response is currently pending.
Records Date Back To:	Pending response from agency
Summary of Records Reviewed:	No response has been received to date. However, based on review of other historical and regulatory resources, it is not anticipated the information from this agency, if any, would significantly alter the findings and conclusions of this report. Upon receipt and review, any environmentally significant information not identified through other sources will be provided to the Client.
Environmentally Significant Information:	Pending information from agency

Fire Department	
Name of Agency:	Gladstone Volunteer Fire Department
Contact Name/Telephone:	Not applicable
Review Method:	A written request for information has been submitted. A response is currently pending.
Records Date Back To:	Pending response from agency
Summary of Records Reviewed	No response has been received to date. However, based on review of other historical and regulatory resources, it is not anticipated the information from this agency, if any, would significantly alter the findings and conclusions of this report. Upon receipt and review, any environmentally significant information not identified through other sources will be provided to the Client.
Environmentally Significant Information:	Pending response from agency

Planning/Zoning Department	
Name of Agency:	City of Gladstone Planning Department
Review Method:	Review of online records.
Current Zoning:	R3 - Residential

7.7 Interviews with Others

No other individuals were interviewed as part of this assessment.

8. NON-ASTM SCOPE AND HUD SCOPE OF WORK CONSIDERATIONS

8.1 Lead-Based Paint

Based on the date of construction, there is potential that the paint at the subject property is lead-based. Based on the scope of work, lead-based paint sampling was not conducted during this assessment.

8.2 Asbestos-Containing Materials

Based on the date of construction (pre January 1, 1978), ACM testing was performed concurrently with this Phase I ESA. Multiple suspect ACMs were identified during the course of the Pre-Demolition Survey. Samples of various suspect materials were collected based on friability and condition of the materials as observed by the Asbestos Inspector. Of the materials sampled, pipe fitting insulation and vinyl floor tile were determined to be ACM. However, the asbestos inspection was limited in scope and not all suspect materials were sampled and analyzed. A copy of the Inspection Report (BV Project No. 176424.25R-001.086) including complete results, findings and conclusions is appended.

8.3 Radon Gas

Review of the USEPA's Radon Map for Delta County, Michigan indicated that the subject property is located in Zone 3, areas with a predicted average indoor radon screening level less than 2 pCi/L (picoCuries per liter of air).

Radon sampling was not performed as part of this assessment.

8.4 Floodplain

Flood Zone Map Review			
Community Panel	Map Date	Subject Property Flood Zone	Area
26041C0607D	March 7, 2023	Zone X (unshaded): Minimal risk areas outside the 1-percent and .2-percent-annual-chance floodplains. No base flood elevations or base flood depths are shown within these zones	Entire subject property

No preliminary or pending FEMA maps were identified for the subject property address.

A copy of the floodplain map is appended (Appendix D).

The subject property is not within a 100-year or 500-year floodplain.

There is no current development within a floodplain and there is no proposed development within a floodplain.

The subject property was determined to be located outside of the FFRMS floodplain using the 0.2 percent flood approach (0.2 PFA). The project is not considered a critical action. No federal, state, or local sources of CISA data were identified for the subject property. Review of the FEMA Flood Insurance Rate Map (Community/Panel No. 26041C0607D, dated March

7, 2023) indicated that the 500-year floodplain is mapped for the nearest floodplain, and the subject property is not located in the 500-year floodplain. No preliminary or pending FEMA maps were identified on file for the subject property location. The subject property is in compliance with Floodplain Management requirements.

8.5 Wetlands

Wetlands Review	
Subject Property	Adjacent Properties
Review of the NWI data did not identify any wetlands.	Review of the NWI data did not identify any wetlands.

A copy of the Wetlands map is appended (Appendix D).

8.6 Landfills

Review of regulatory databases, and information provided by the Michigan Department of Environment, Great Lakes, and Energy, indicates that there are no active or inactive landfills located within 3,000 feet of the subject property.

8.7 Sole Source Aquifer Recharge Area

Based on review of the Designated Sole Source Aquifers Nationally Map, published by the U.S. Environmental Protection Agency (EPA), the subject property is not located in an area with a sole source aquifer.

8.8 Coastal Barriers

Based on the review of the USFWS Coastal Barrier Resources System Mapper, the subject property is not located within a designated coastal barrier as established by the U.S. Congress through the Coastal Barrier Improvement Act.

8.9 Farmlands Protection

The Farmland Protection Policy Act (FPPA) of 1981 requires Federal Agencies to minimize the extent to which their programs contribute to commitment if farmland is converted to nonagricultural use. USDA Regulations implementing the FPPA require Federal agencies to conduct a farmland conversion impact rating when a proposed project may convert farmlands to non-agricultural uses.

The Farmlands Protection Factor was not addressed based upon the fact that the undertaking is based on the demolition and disposition of an existing property that is not used for agricultural purposes.

8.10 Coastal Zone Management

According to the Michigan EGLE Coastal Zone Management Areas Map, the subject property is located within a Coastal Zone Management Zone.

8.11 Endangered or Threatened Species or Habitat

The proposed demolition activities may result in alteration of stormwater drainage patterns. Bureau Veritas has reviewed information on the US Fish and Wildlife Service mapper, NOAA Fisheries, and the Michigan Natural Heritage Program to determine whether any federally listed threatened or endangered species, or their habitat may exist on or in close proximity to the project site. Based on review of these resources, it is possible that the project could impact up to eight threatened or endangered species. Final or proposed critical habitat has been designated for five of these species, and it was determined by USFWS that the critical habitat does not overlap with the project. Therefore, these species were not evaluated as part of this review. Based on review of available information, the project site does not include habitat suitable for any of the remaining three listed species; therefore, the proposed demolition project is not anticipated to impact any threatened or endangered species.

8.12 Historic Preservation

BV has submitted a request to the Michigan State Historic Preservation Officer (SHPO) for consultation in accordance with Section 106 requirements.

The response from the SHPO has not yet been received. The response will be included in the final report or forwarded as an addendum soon as it is made available.

8.13 Noise

HUD Guidelines indicate the following noise sources should be evaluated:

- Freeways, major highways, or busy roads within 1,000 feet
- Railroads within 3,000 feet
- Civil airports within five miles
- Military airports within 15 miles

There are to be no new wings, floors, or residential structures built or rehabilitated at the subject property. The subject property is not located within 1,000 feet of a freeway, major highway, or busy road. In addition, the subject property is not located within 3,000 feet of a railroad, five miles of a civil airport, or 15 miles of a military airport.

8.14 Rail Lines

There are no right-of-ways for surface-level railroads within 100 feet of the subject property boundary.

8.15 Explosive or Flammable Hazards

An explosive/flammable hazard is a stationary container which stores, handles, or processes explosive or fire prone substances, such as liquid propane or gasoline that is greater than 20 gallons (pressurized) or greater than 100 gallons (unpressurized).

No explosive/flammable hazards were identified at the subject property. In addition, there is no direct line of sight from any part of the subject property to any explosive/flammable hazard. In addition, review of available aerial photographs did not identify any explosive/flammable hazards, nor is there an explosive or flammable hazard in the near vicinity that is not

shielded from the subject property by topography, existing structures, or other barriers, natural or man-made. Furthermore, no documentation or information was available that would indicate that any new aboveground storage tanks or containers of more than 100 gallons are proposed to be installed at the subject property.

8.16 Natural Gas or Petroleum Pipelines

Visual observations did not identify any surface markings indicating the existence of significant natural gas or petroleum pipelines at the subject property or adjacent properties.

8.17 High Voltage Power Transmission or Other Towers

The on-site buildings are not located within the easement of any overhead high voltage transmission line. In addition, the on-site buildings are also not located within the engineered fall distance of any high voltage power transmission, radio antennae, satellite, cellular, or other towers.

8.18 Airport Hazards

The subject property is not located within 2,500 feet from the end of a civil airport runway or 15,000 feet from the end of a runway at a military airfield.

8.19 Oil and Gas Operations

The subject property is not located within 300 feet from any existing or planned oil and gas drilling operations or any hydraulic fracturing (fracking) activities.

Furthermore, the subject property is not located within 75 feet of an operating or abandoned oil or gas well.

9. FINDINGS / OPINIONS / CONCLUSIONS

The following summarizes the independent conclusions representing BV's best professional judgment based on information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided by the Client, owner, or their representative have been assumed to be correct and complete. Additionally, the conclusions presented are based on the conditions that existed at the time of the assessment.

9.1 Findings and Opinions

9.1.1 ASTM E 1527-21 Scope Considerations

9.1.1.1 Adjacent Properties (Section 3.3)

- BV identified no adjacent properties that are anticipated to have a negative impact on the environmental integrity of the subject property. No further action or investigation is recommended regarding the adjacent properties.

9.1.1.2 Regulatory Review (Section 5.2)

- Based on review of the regulatory database report, the subject property is not located on any of the databases evaluated. In addition, the review does not suggest that the subject property is involved in the generation, treatment, storage, or disposal of hazardous waste. No further action or investigation is recommended regarding the on-site regulatory review.
- Based on review of the regulatory database report, none of the sites listed are anticipated to have an impact on the subject property. No further action or investigation is recommended regarding the off-site regulatory review.

9.1.1.3 Tier I Vapor Encroachment Screening (Section 5.4)

- A VEC does not exist and is not likely to exist at the subject property. No further action or investigation is recommended regarding vapor encroachment at the subject property.

9.1.1.4 Historical Review (Section 5.6 & 5.7)

- The review of the historical data available for the subject property and surrounding area revealed no evidence that may have led to an environmental impact to the subject property. No further action or investigation is recommended regarding historical uses.

9.1.1.5 Operational Activities (Section 6.3.1)

- BV observed no circumstances of environmental concern associated with the operational activities at the subject property. No further action or investigation is recommended regarding operational activities at the subject property.

9.1.1.6 Hazardous Materials / Petroleum Products (Section 6.3.2)

- The subject property is not involved in the use of petroleum products; however, the subject property is involved in the use of hazardous materials in the form of routine janitorial and maintenance supplies. The identified materials appear to be properly stored. The materials observed do not appear to pose a hazard to the subject property, provided they continue to be used as designed, are properly handled, and all regulations regarding their use are followed. No further action or investigation is recommended regarding the use of hazardous materials or petroleum products at the subject property.

9.1.1.7 Wastes (Section 6.3.3)

- The subject property is not involved in the generation, treatment, storage, or disposal of hazardous, medical, or regulated wastes; however, the subject property generates non-hazardous solid and liquid wastes. Generated wastes appear to be stored and disposed of properly. No further action or investigation is recommended regarding wastes at the subject property.

9.1.1.8 Surface Areas (Section 6.3.4)

- No issues associated with surface areas were identified. No further action or investigation is recommended regarding surface areas at the subject property.

9.1.1.9 Facility Storage Tanks (underground or aboveground) (Section 6.3.5)

- No evidence of storage tanks (underground or aboveground) was identified at the subject property. No further action or investigation is recommended regarding storage tanks at the subject property.

9.1.1.10 Polychlorinated Biphenyls (PCBs) (Sections 6.3.6)

- BV identified utility-owned transformers at the subject property that are labeled as "Non-PCB". This equipment appeared to be in good condition with no evidence of leaks. No further action or investigation is recommended regarding the transformers at the subject property.
- The subject property contains an elevator that uses hydraulic fluid. PCB-containing hydraulic fluid has not been manufactured or used since 1979. Therefore, based on the date of installation, PCB-containing hydraulic fluid is not likely to be found in the elevator operating system. No indication of leakage was observed in the area of elevator operating equipment. The hydraulic elevator unit at the subject property should be periodically inspected for leakage. If leakage is identified, the unit should be repaired and any fluid or fluid-soaked waste disposed of in accordance with applicable federal, state, and local regulations. No further action or investigation is recommended regarding this equipment.

9.1.2 Non-ASTM E 1527-21 Scope and HUD Scope of Work Considerations

9.1.2.1 Lead Based Paint (Section 8.1)

- Based on the date of construction (pre January 1, 1978), lead based paint is likely to have been used at the subject property. Therefore, the paint at the project site is assumed to be lead-based. All applicable local, state, and federal guidelines for the handling and disposal of potential hazardous wastes to include lead-based paint containing wastes, including Toxicity Characteristic Leaching Procedures (TCLPs,) should be adhered to during demolition activities.

9.1.2.2 Asbestos-Containing Materials (Section 8.2)

- Based on the date of construction (pre January 1, 1989), ACM testing was performed concurrently with this Phase I ESA. Multiple suspect ACMs were identified during the course of the Pre-Demolition Survey. Samples of various suspect materials were collected based on friability and condition of the materials as observed by the Asbestos Inspector. Of the materials sampled, pipe fitting insulation and vinyl floor tile were determined to be ACM. However, it is possible that additional ACM is present in areas that were inaccessible during the sampling activities. The identified ACM was reported to be in good condition; however, it was noted that the asbestos containing pipe fitting insulation was reportedly present behind walls and may be damaged in areas that were unobservable. The asbestos-containing materials should be removed by a licensed asbestos contractor in accordance with all applicable federal, state, and local regulations prior to demolition. Materials uncovered during renovation or demolition activities that were not addressed in the inspection report must be sampled by an accredited asbestos inspector prior to any disturbance.

9.1.2.3 Radon Gas (Section 8.3)

- The subject property is located within USEPA Radon Zone 3.
- Radon sampling was not performed as part of this assessment; however, based on the project description, the project is exempt from having to consider radon in the contamination analysis. No further action or investigation is recommended regarding radon gas.

9.1.2.4 Floodplain (Section 8.4)

- The subject property is located outside the 100-year, 500-year floodplains, and FFRMS floodplains. Furthermore, there is no current development within a floodplain, and there is no proposed development within a floodplain. No further action or investigation is recommended regarding floodplains.

9.1.2.5 Wetlands (Section 8.5)

- No wetland areas are indicated at the subject property or adjacent properties. No further action or investigation is recommended regarding wetlands.

9.1.2.6 Landfills (Section 8.6)

- Review of regulatory databases, and information provided by the Michigan Department of Environment, Great Lakes, and Energy, indicates that there are no active or inactive landfills located within 3,000 feet of the subject property. No further action or investigation is recommended regarding landfills.

9.1.2.7 Sole Source Aquifer Recharge Area (Section 8.7)

- Based on review of the Designated Sole Source Aquifers Nationally Map, published by the United States Environmental Protection Agency (USEPA), the subject property is not located in an area with a sole source aquifer. No further action or investigation is recommended regarding sole source aquifers.

9.1.2.8 Coastal Barriers (Section 8.8)

- Based on the review of the USFWS Coastal Barrier Resources System Mapper, the subject property is not located within a designated coastal barrier as established by the U.S. Congress through the Coastal Barrier Improvement Act. No further action or investigation is recommended regarding coastal barriers.

9.1.2.9 Farmlands Protection (Section 8.9)

- The Farmlands Protection Factor was not addressed based upon the fact that the undertaking is based on the demolition of an existing property that is not used for agricultural purposes.

9.1.2.10 Coastal Zone Management (Section 8.10)

- Based on review of the Coastal Zone Management Areas map available from the Michigan Department of Environment, Great Lakes, and Energy, the project is located in a designated Coastal Zone. However, the project is for demolition/disposition of existing improvements and will not involve any new ground disturbance; therefore, a finding of concurrence with Coastal Zone Management is not required. The project is in compliance with the Coastal Zone Management Act. No further action or investigation is recommended regarding coastal zone management.

9.1.2.11 Endangered or Threatened Species or Habitat (Section 8.11)

- The proposed demolition activities may result in alteration of stormwater drainage patterns. Bureau Veritas has reviewed information on the US Fish and Wildlife Service mapper, NOAA Fisheries, and the Michigan Natural Heritage Program to determine whether any federally listed threatened or endangered species, or their habitat may exist on or in close proximity to the project site. Based on review of these resources, it is possible that the project could impact up to eight threatened or endangered species. Final or proposed critical habitat has been designated for five of these species, and it was determined by USFWS that the critical habitat does not overlap with the project. Therefore, these species were not evaluated as part of this review. Based on review of available information, the project site does not include habitat suitable for any of the remaining three listed species;

therefore, the proposed demolition project is not anticipated to impact any threatened or endangered species. This project is in compliance with the Endangered Species Act without mitigation. No further action or investigation is recommended at this time regarding endangered or threatened species/habitat.

9.1.2.12 Historic Preservation (Section 8.12)

- BV has submitted a request to the Michigan State Historic Preservation Officer (SHPO) for consultation in accordance with Section 106 requirements. The response from the SHPO has not yet been received. The response will be included in the final report or forwarded as an addendum soon as it is made available.

9.1.2.13 Noise (Section 8.13)

- The subject property is not located within 1,000 feet of a freeway, major highway, or busy road. Furthermore, the subject property is not located within 3,000 feet of a railroad, five miles of a civil airport, or 15 miles of a military airport. No further action or investigation is recommended regarding noise.

9.1.2.14 Rail Lines (Section 8.14)

- There are no right-of-ways for surface-level railroads within 100 feet of the subject property boundary. No further action or investigation is recommended regarding rail lines.

9.1.2.15 Explosive or Flammable Hazards (Section 8.15)

- Within a one-mile radius of the subject property, there is no direct line of sight from any part of the subject property to any hazard, nor is there a hazard in the near vicinity which is not shielded from the subject property by topography. No further action or investigation is recommended regarding Explosive or Flammable Hazards.

9.1.2.16 Natural Gas or Petroleum Pipelines (Section 8.16)

- Visual observations did not identify any surface markings indicating the existence of natural gas or petroleum pipelines at the subject property or adjacent properties. No further action or investigation is recommended regarding Natural Gas or Petroleum Pipelines.

9.1.2.17 High Voltage Power Transmission or Other Towers (Section 8.17)

- The on-site buildings are not located within the easement of any overhead high voltage transmission line. In addition, the on-site buildings are also not located within the engineered fall distance of any high voltage power transmission, radio antennae, satellite, cellular, or other towers. No further action or investigation is recommended regarding high voltage transmission or other towers.

9.1.2.18 Airport Hazards (Section 8.18)

- The subject property is not located within 2,500 feet from the end of a civil airport runway or 15,000 feet from the end of a runway at a military airfield. No further action or investigation is recommended regarding airport hazards.

9.1.2.19 Oil and Gas Operations (Section 8.19)

- The subject property is not located within 300 feet from any existing or planned oil and gas drilling operations or any hydraulic fracturing (fracking) activities. Furthermore, the subject property is not located within 75 feet of an operating or abandoned oil or gas well. No further action or investigation is recommended regarding oil and gas operations.

9.2 Recommendations

BV recommends the following:

Recommendation	Estimated Cost
All applicable local, state, and federal guidelines for the handling and disposal of potential hazardous wastes to include lead-based paint containing wastes, including Toxicity Characteristic Leaching Procedures (TCLPs,) should be adhered to during demolition activities.	Not applicable
The identified asbestos-containing materials should be removed by a licensed asbestos contractor in accordance with all applicable federal, state, and local regulations prior to demolition. Materials uncovered during renovation or demolition activities that were not addressed in the inspection report must be sampled by an accredited asbestos inspector prior to any disturbance.	Not applicable

APPENDIX A: ENVIRONMENTAL REVIEW DOCUMENTATION



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: Demolition and Disposition of Fairview Manor

Responsible Entity: City of Gladstone

Grant Recipient (if different than Responsible Entity): Gladstone Housing Commission

State/Local Identifier:

RE Preparer:

Certifying Officer Name and Title:

Consultant (if applicable): Bureau Veritas

Direct Comments to:

Bureau Veritas
Attn: Ms. Joslyn Smith
6021 University Boulevard
Ellicott City, Maryland 21043
Phone: 800.733.0660, ext. 7296254 | Mobile: 501.276.1835
Joslyn.Smith@bureauveritas.com

Project Location:

415 South 4th Street
Gladstone, Delta County, MI 49837

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

The project involves the demolition and disposition of Fairview Manor, an existing age-restricted housing facility containing 50 residential units on approximately 2.98 acres of land. Project improvements consist of a three-story building, a maintenance garage, a smoking shed, paved surface drives/parking areas, and landscaping. The facility was constructed in 1967. The project involves demolition of the building, infrastructure, and site improvements under authorization of

Section 18 of the U.S. Housing Act of 1937. Any existence of hazardous materials to be encountered in the demolition process will be mitigated in accordance with all regulatory requirements. Site re-use is anticipated to be as rental housing; however, re-use will be dependent upon the final terms of a disposition. This project will not involve new construction or ground disturbance.

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

The Gladstone Housing Commission has determined that the facility is considered physically obsolete per HUD standards. The property needs significant rehabilitation work to make it habitable and existing funding sources are in limited supply. Therefore, it was determined that the best approach for this property is to demolish the existing improvements to allow for the eventual construction of a modern community to better meet the needs of area seniors. This action aligns with the City of Gladstone's redevelopment plans, as expressed in the city's Master Plan document dated 2015.

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

The project site is currently occupied and operates as public housing for seniors. Age, use, and declining funding have caused the property to fall into disrepair. Property management indicated various recurring issues including basement flooding and mold growth related to a high water table. The site is located in a residential neighborhood with a suburban character. Surrounding properties exhibit varying levels of property maintenance and condition. These trends would likely continue in the absence of the project, along with the continued need for decent and affordable senior housing. The City of Gladstone has reported a "modest amount" of available multifamily and senior housing options, while its population is growing at a faster rate than surrounding communities.

Funding Information

Grant Number	HUD Program	Funding Amount
	Public Housing	

Estimated Total HUD Funded Amount: \$

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$

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

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes ☐ No ☒	Review of the USEPA NEPAAssist tool and available mapping resources indicated that the project is not located within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. Map attached. https://www.epa.gov/nepa/nepassist
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes ☐ No ☒	According to review of the U.S. Fish and Wildlife Service Coastal Barrier Resources System Mapper the project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act. Map attached. https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/
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 project does not involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property. Therefore, the project is in compliance with flood insurance requirements. Map attached. https://msc.fema.gov/portal/home
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes ☐ No ☒	The project does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units. Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act. https://www3.epa.gov/airquality/greenbook/anayo_mi.html
Coastal Zone Management	Yes ☐ No ☒	Based on review of the Coastal Zone Management Areas map available from the Michigan Department of Environment, Great Lakes, and Energy, the project

Coastal Zone Management Act, sections 307(c) & (d)		is located in a designated Coastal Zone. However, the project is for demolition/disposition of existing improvements and will not involve any new ground disturbance; therefore, a finding of concurrence with Coastal Zone Management is not required. The project is in compliance with the Coastal Zone Management Act. Map attached. https://gis-michigan.opendata.arcgis.com/
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No ☐ ☒	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements. Based on the date of construction (pre January 1, 1978), lead based paint is likely to have been used at the subject property. Therefore, the paint at the project site is assumed to be lead-based. All applicable local, state, and federal guidelines for the handling and disposal of potential hazardous wastes to include lead-based paint containing wastes, including Toxicity Characteristic Leaching Procedures (TCLPs,) should be adhered to during demolition activities. Based on the project description, the project is exempt from having to consider radon in the contamination analysis. Based on the date of construction (pre January 1, 1989), ACM testing was performed concurrently with this Phase I ESA. Multiple suspect ACMs were identified during the course of the Pre-Demolition Survey. Samples of various suspect materials were collected based on friability and condition of the materials as observed by the Asbestos Inspector. Of the materials sampled, pipe fitting insulation and vinyl floor tile were determined to be ACM. However, it is possible that additional ACM is present in areas that were inaccessible during the sampling activities. The identified ACM was reported to be in good condition; however, it was noted that the asbestos containing pipe fitting insulation was reportedly present behind walls and may be damaged in areas that were unobservable. The asbestos-containing materials should be removed by a licensed asbestos contractor in accordance with all applicable federal, state, and local regulations prior to demolition. Materials uncovered during renovation or demolition activities that were not addressed in the inspection report must be sampled by an accredited asbestos inspector prior to any disturbance. BV Phase I Environmental Site Assessment, dated July 2026
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part	Yes No ☐ ☒	The proposed demolition activities may result in alteration of stormwater drainage patterns. Bureau Veritas has reviewed information on the US Fish and Wildlife Service mapper, NOAA Fisheries, and the

402		Michigan Natural Heritage Program to determine whether any federally listed threatened or endangered species, or their habitat may exist on or in close proximity to the project site. Based on review of these resources, it is possible that the project could impact up to eight threatened or endangered species. Final or proposed critical habitat has been designated for five of these species, and it was determined by USFWS that the critical habitat does not overlap with the project. Therefore, these species were not evaluated as part of this review. Based on review of available information, the project site does not include habitat suitable for any of the remaining three listed species; therefore, the proposed demolition project is not anticipated to impact any threatened or endangered species. This project is in compliance with the Endangered Species Act without mitigation. https://ipac.ecosphere.fws.gov/ https://www.fisheries.noaa.gov/ https://mnfi.anr.msu.edu/
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No ☐ ☒	The project does not include development, construction, rehabilitation that will increase residential densities, or conversion. Based on the project description the project includes no activities that would require further evaluation under this section. Furthermore, no explosive/flammable hazards were identified at the project site. Within a one-mile radius of the project, there is no direct line of sight from any part of the project to any hazard, nor is there a hazard in the near vicinity which is not shielded from the project by topography. The project is in compliance with explosive and flammable hazards requirements. Map attached. BV Phase I Environmental Site Assessment, dated July 2026, Section 8.15
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No ☐ ☒	The project does not include any activities that could potentially convert agricultural land to a non-agricultural use such as new construction, acquisition of undeveloped land, or conversion. The project is in compliance with the Farmland Protection Policy Act. BV Phase I Environmental Site Assessment, dated July 2026, Section 8.9
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No ☐ ☒	The project was determined to be located outside of the FFRMS floodplain using the 0.2 percent flood approach (0.2 PFA). The project is not considered a critical action. No federal, state, or local sources of CISA data were identified for the project location. Review of the FEMA Flood Insurance Rate Map (Community/Panel No. 26041C0607D, dated March 7, 2023) indicated that the 500-year floodplain is mapped for the nearest floodplain, and the project site is not located in the 500-year floodplain. No preliminary or pending FEMA maps were identified on file for the project location. The project is in compliance with Floodplain Management requirements. https://msc.fema.gov/portal/home

Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No ☐ ☐	BV has submitted a request to the Michigan State Historic Preservation Officer (SHPO) for consultation in accordance with Section 106 requirements. The response from the SHPO has not yet been received. BV Phase I Environmental Site Assessment, dated July 2026, Section 8.12
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No ☐ ☒	The project is for the demolition of the existing building and will not involve new construction, substantial rehabilitation, or conversion of non-residential areas to residential. Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No ☐ ☒	Review of the USEPA Interactive Map of Sole Source Aquifers indicated that the project is not located on a Sole Source Aquifer. Furthermore, the project consists solely of demolition of an existing multifamily residential facility. Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements. Map attached. https://www.epa.gov/dwssa/map-sole-source-aquifer-locations
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No ☐ ☒	Based on a review of the U.S. Fish & Wildlife Service National Wetlands Inventory (NWI) map, there are no wetland areas on the project site or vicinity. The project does not involve new construction, expansion of a building's footprint, or ground disturbance. Furthermore, the project will not indirectly impact on-site or off-site wetlands. Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990. Map attached. https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No ☐ ☒	Based on review of the National Wild & Scenic Rivers System and list of Study Rivers maintained by the U.S. Bureau of Land Management, National Park Service, US Fish and Wildlife Service, and US Forest Service, as well as the Nationwide Rivers Inventory (NRI) maintained by the National Park Service, this project is not within proximity of a designated Wild and Scenic River, Study River, or NRI River. The project is in compliance with the Wild and Scenic Rivers Act. Maps attached. https://rivers.gov/ https://www.nps.gov/subjects/rivers/nri-map.htm

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

Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

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

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project is located within a small city and is fully developed with a multifamily residential facility. The existing improvements are planned for demolition so that the property may be eventually repositioned to serve more seniors. As such, this action supports the goals outlined in the City of Gladstone's Master Plan through elimination of substandard housing and provision of additional affordable housing. The project is zoned R3 (High Density Residential), which allows for multifamily uses. Based on the project description, the project will not contribute to urban sprawl or environmental injustices. No impacts are anticipated. https://www.gladstonemi.gov/community-development
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The project consists of existing developed land. The site topography is relatively flat. Evidence of a high water table was noted; however, the project does not include new construction, acquisition, or conversion. No evidence of ground disturbance, seismic activity, or other unusual conditions at the site were noted during the site reconnaissance. The demolition contractor is expected to ensure compliance with all local, state, and federal requirements related to sediment control, drainage, and discharge of surface runoff and stormwater from the site. Based on the project description, no impacts are anticipated. https://www.usgs.gov/programs/national-geospatial-program/topographic-maps

Hazards and Nuisances including Site Safety and Noise	2	Worker safety will be addressed with the preparation and implementation of a site-specific Health and Safety Plan. Temporary impacts from noise, vibration, and dust will be mitigated with best management practices. Based on site observations and review of available planning resources, the project will not be affected by any natural hazards such as earthquakes, severe storms, floods, or forest and range fires; or by any man-made site hazards or nuisances. No impacts are anticipated. https://www.fema.gov/emergency-managers/practitioners/resilience-analysis-and-planning-tool
Energy Consumption	1	Tools and equipment used during the demolition activities will consume modest quantities of energy. However, as the existing building is planned for demolition, the overall energy consumption at the site will be reduced. https://www.hudexchange.info/resource/5115/renewable-energy-toolkit/

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	The demolition project is expected to create some temporary construction-related jobs. According to the U.S. Bureau of Labor Statistics, Delta County has a civilian workforce of approximately 13,782 and the average weekly wage is \$1,008. According to the Federal Reserve Bank of St. Louis, the current unemployment rate is 6.0%. https://www.bls.gov/regions/midwest/news-release/countyemploymentandwages_michigan.htm https://fred.stlouisfed.org/series/MIDELT1URN
Demographic Character Changes, Displacement	2	The population of Gladstone is approximately 5,189. Among this total, approximately 24% are aged 65 years and older and 20% are aged under 18. The population is largely White (94%); however, the population reporting Two or More Races comprises the next largest group (5%). The demolition project will have a limited timeframe and anticipates the use of local labor. Proceeds from the sale of the property may be used to fund construction of a new development that better meets the needs of the community. Resident displacement will be handled in accordance with professionally prepared plans and in accordance with HUD guidelines as part of the planned project. Therefore, the project is not expected to impact the physical, social, and psychological characteristics of the community. https://www.census.gov/quickfacts/fact/table/gladstonecitymichigan/IPE120224 https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	As the existing improvements are planned for demolition, there will be no increase in demand for educational and cultural facilities. No impacts are anticipated.
Commercial Facilities	2	This project will not result in an increase in demand for commercial facilities. Furthermore, based on the scale of the project, harm to existing businesses is not anticipated. No impacts are anticipated.

Health Care and Social Services	2	As the existing improvements are planned for demolition, this project will not result in an increase in demand for health care and social services. No impacts are anticipated.
Solid Waste Disposal / Recycling	2	Demolition debris, as well as any waste materials containing lead and asbestos, will be removed and disposed of in accordance with professionally prepared construction specifications and in accordance with federal, state, and local regulations as part of the planned project. Waste disposal facilities are located throughout Delta County. The primary solid waste landfill is the Delta County Landfill (5701 19 th Ave N, Escanaba), which accepts construction and demolition debris. https://deltacountymi.gov/delta-solid-waste-management-authority/
Waste Water / Sanitary Sewers	2	The existing waste water/sanitary sewer infrastructure is to be removed during demolition activities. No impacts are anticipated.
Water Supply	2	The existing water supply infrastructure is to be removed during demolition activities. No impacts are anticipated.
Public Safety - Police, Fire and Emergency Medical	2	As the existing improvements are planned for demolition, this project will not result in an increase in demand for public safety services. No impacts are anticipated.
Parks, Open Space and Recreation	2	As the existing improvements are planned for demolition, this project will not increase the demand for parks or open space, or result in the deterioration of existing facilities. No impacts are anticipated.
Transportation and Accessibility	1	As the building is planned for demolition, the project is expected to ease neighborhood traffic. There will be no increase in demand for transportation services.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	Based on review of project plans, site observations, aerial photography, topographic maps, and information available from the National Natural Landmarks Program, no unique natural features or water resources are present within the area of the property or visible from the property. Therefore, the project is not expected to adversely impact unique natural features or ecosystem services. https://www.nps.gov/subjects/nnlandmarks/nation.htm
Vegetation, Wildlife	2	The project is located in a developed area and does not contain significant undisturbed natural areas. The project has been continuously used as a multifamily residential facility since the late 1960s. Furthermore, the project has been determined to have no effect on federally listed threatened or endangered species, or their habitat. No impacts are anticipated. https://ipac.ecosphere.fws.gov/ https://cfpub.epa.gov/wizards/qiwiz/
Other Factors	2	The project includes demolition of an existing multifamily residential facility and therefore is not expected to contribute significantly to climate change impacts in the form of increased vehicular traffic or energy use. In addition, no further consideration is warranted regarding climate change impacts that would threaten resident safety, wellbeing, or property within the useful life of the project. https://crt-climate-explorer.nemac.org/

Additional Studies Performed:

- Phase I Environmental Site Assessment, prepared by Bureau Veritas and dated July 2026
- Asbestos Survey Report, prepared by Bureau Veritas and dated July 2026

Field Inspection (Date and completed by):

June 30, 2026, completed by Paul Kittelson, Bureau Veritas

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

- Phase I Environmental Site Assessment, prepared by Bureau Veritas and dated July 2026
- Asbestos Survey Report, prepared by Bureau Veritas and dated July 2026
- GoogleTM Earth Pro aerial imagery
- USEPA Envirofacts, <http://www.epa.gov/enviro/>
- USEPA NEPAAssist Tool, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>
- City of Gladstone, Michigan, Community Development, <https://www.gladstonemi.gov/community-development>
- USGS Topographic Maps, <https://www.usgs.gov/programs/national-geospatial-program/topographic-maps>
- FEMA Resilience Analysis and Planning Tool (RAPT), <https://www.fema.gov/emergency-managers/practitioners/resilience-analysis-and-planning-tool>
- HUD Community Planning and Development Renewable Energy Toolkit, <https://www.hudexchange.info/resource/5115/renewable-energy-toolkit/>
- Bureau of Labor Statistics, County Employment and Wages in Michigan – Fourth Quarter 2025, https://www.bls.gov/regions/midwest/news-release/countyemploymentandwages_michigan.htm
- Federal Reserve Bank of St. Louis, Unemployment Rate in Delta County, MI, <https://fred.stlouisfed.org/series/MIDELT1URN>
- U.S. Census Bureau, QuickFacts, Gladstone City, Michigan, <https://www.census.gov/quickfacts/fact/table/gladstonecitymichigan/IPE120224>
- USDA Economic Research Service, Food Access Research Atlas, <https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx>
- Delta County Solid Waste Management Authority, <https://deltacountymi.gov/delta-solid-waste-management-authority/>
- National Park Service, National Natural Landmarks Program, <https://www.nps.gov/subjects/nnlandmarks/nation.htm>
- U.S. Fish and Wildlife Service, Information for Planning and Consultation, <https://ipac.ecosphere.fws.gov/>
- USEPA, Green Infrastructure Wizard, <https://cfpub.epa.gov/wizards/giwiz/>
- Climate Explorer Tool, <https://crt-climate-explorer.nemac.org/>

List of Permits Obtained:

Public Outreach [24 CFR 50.23 & 58.43]:**Cumulative Impact Analysis [24 CFR 58.32]:**

As the existing facility is planned for demolition, cumulative impacts to the environment are expected to be minimal. The project is expected to produce immediate beneficial impacts in the form of elimination of substandard housing, decreased energy consumption and local traffic, and the creation of temporary jobs. In the longer term, this action will allow for eventual repositioning of the property to better serve the needs of local seniors. Any potentially adverse impacts resulting from this project are minor and include those typical of any similar scale demolition project. These impacts include temporary impacts from soil erosion, sediment deposition, and nonagricultural runoff, which can be mitigated with the installation of erosion and sediment controls. Worker safety is to be addressed through the preparation and implementation of a project specific Health and Safety Plan. Temporary impacts from noise, vibration, and dust are to be mitigated with best management practices.

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

No alternatives were considered, other than "No Action."

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

The "No Action" alternative would leave the physically obsolete building on the property, resulting in increasingly difficult and costly maintenance, as well as issues with the health, safety, and welfare of its residents.

Summary of Findings and Conclusions:

The project will not result in significant impacts to the environment. However, the project should comply with all applicable local, state, and federal guidelines for the handling and disposal of potential hazardous wastes to include lead-based paint containing wastes, including Toxicity Characteristic Leaching Procedures (TCLPs.). In addition, identified asbestos containing materials should be removed by a licensed asbestos contractor in accordance with all applicable federal, state, and local regulations. The Environmental Assessment identified temporary construction hazards that may affect project workers and the surrounding environment. However, no specific actions are recommended as project plans already incorporate measures to mitigate these impacts. No additional formal compliance steps or mitigation are recommended at this time.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

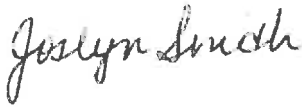
Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development 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
Not applicable	Not applicable

Determination:

☐ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature:  Date: 7/28/2026

Name/Title/Organization: Joslyn Smith, Senior Environmental Consultant, Bureau Veritas

Certifying Officer Signature: _____ Date: _____

Name/Title: _____

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

The following statements summarize the independent conclusions representing BV's best professional judgment based on information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided by the Client, owner, or their representatives, has been assumed to be correct and complete. Additionally, the conclusions presented are based on the conditions that existed at the time of the assessment.

The purpose of this report is to provide the Client an assessment concerning environmental conditions (limited to those issues identified in the report), as they existed at the subject property. The assessment was conducted utilizing generally accepted Phase I industry standards, using American Society for Testing and Materials (ASTM) Standard Practice E 1527-21 and the U.S. Housing and Urban Development (HUD) Scope of Work. HUD/NEPA-specific scope considerations beyond those specified in ASTM E 1527-21 are considered to be business environmental risks for the purposes of this evaluation. Key terms and definitions in this report are referenced in Appendix M.

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-21 of the subject property. Any exceptions to, or deletions from, this practice are described in Section 2 of this report.

This assessment has revealed no evidence of significant data gaps, Recognized Environmental Conditions (RECs), Historical RECs, or Controlled RECs in connection with the subject property.

However, the following business environmental risks and HUD/NEPA Scope of Work items were identified:

- Lead-based paint sampling was not conducted during this assessment. Please refer to Section 8.1 for additional information.
- Asbestos containing materials were identified at the subject property. Please refer to Section 8.2 for additional information.
- Radon sampling was not conducted during this assessment. Please refer to Section 8.3 for additional information.
- The subject property is located within a Coastal Zone Management area. Please refer to Section 8.10 for additional information.
- The proposed demolition activities may result in alteration of stormwater drainage patterns which has to potential to affect endangered species. Please refer to Section 8.11 for additional information.

2. SURVEY APPROACH / PURPOSE

2.1 Purpose

The purpose of this report is to provide the Client an assessment concerning environmental conditions (limited to those issues identified in the report) as they existed at the subject property. The assessment was conducted utilizing generally accepted Phase I industry standards in accordance with ASTM Standard E 1527-21 and the applicable HUD scope of work for Demolition and Disposition under Section 18.

2.2 Detailed Scope of Services

BV reviewed available federal, state, and local records in an effort to identify sites of known or suspected hazardous waste activity located at or near the subject property which could have an adverse impact on the subject property. In an attempt to determine whether historical uses of the subject property and surrounding area have had an environmental impact on the subject property, BV interviewed individuals knowledgeable about the subject property and reviewed available pertinent records and documents. This assessment is based on the evaluation of the information gathered, laboratory analysis of samples collected (when required), and accessibility at the time of the assessment.

The scope of work included an evaluation of:

- The subject property history in an attempt to identify any possible ownership(s) and/or uses that would suggest an impact to the environmental integrity of the subject property as identified through review of reasonably ascertainable standard historical sources.
- Physical characteristics of the subject property as identified through review of reasonably ascertainable topographic, wetlands, flood plain, soils, geology, and groundwater data.
- Current subject property conditions (as applicable), including compliance with appropriate regulations as they pertain to the presence or absence of:
 - Facility storage tanks, drums, containers (above or below ground), etc.
 - Transformers and other electrical equipment which utilize fluid which may potentially contain PCBs
 - The use of hazardous materials/chemicals and petroleum products, and/or the generation, treatment, storage, or disposal of hazardous, regulated, or medical wastes

The scope of work further included:

- For properties built prior to January 1, 1989, a determination if asbestos sampling has previously been performed at the Subject Property, and an assessment for the potential existence of asbestos, including the identification of all suspect materials in areas (interior and exterior) accessed during the site visit. Any materials not sampled are considered suspect until tested and proven otherwise.

The assessment is designed to meet the “baseline survey” requirements of **ASTM E 2356-18**.

The basis for “suspect” determination is taken from the materials listed in Appendix G of the USEPA publication *Managing Asbestos in Place* (the “Green Book”). For the purposes of this report, and following the applicable HUD Guidelines, only those sites constructed prior to January 1, 1989 are evaluated for asbestos.

In instances where samples were collected and analyzed, the laboratory reports list the samples taken from