

MEMORANDUM

DATE: July 5, 2023
TO: MITC Board
FROM: James Harless, PhD, CHMM
MITC Brownfield Operations Consultant
SUBJECT: Environmental Issues – MITC Parcel 11 (Northville Downs at Plymouth Township)

Recent discussions about redevelopment of the property identified as MITC Parcel 11, where Northville Downs at Plymouth Township has proposed a redevelopment project, have involved statements and questions about environmental contamination on the property. The following is a summary of the known environmental conditions of MITC Parcel 11 and the north-adjointing MITC Parcel 12. The parcels are depicted on the attached MITC Redevelopment Area map.

A Phase I Environmental Site Assessment of MITC Parcel 11 and MITC Parcel 12 was conducted in 2018 in accordance with requirements of the Comprehensive Environmental Cleanup, Liability and Response Act (CERCLA; aka Superfund), ASTM Standard Practice for Environmental Site Assessments 1527-13, and Part 201 of the Michigan Natural Resources and Environmental Protection Act (Part 201). At the time of the assessment, both parcels were included in the redevelopment plans of Hillside Realty Investments and were included in the Phase I ESA; the parcels are now separate for the purposes of future redevelopment. MITC Parcel 11 is the site of the Northville Downs' proposed redevelopment, while Parcel 12 remains under the ownership of Hillside Ridge Road Holdings West, LLC.

MITC Parcel 11 – Proposed Northville Downs at Plymouth Township Redevelopment

Results from the Phase I ESA of MITC Parcel 11 revealed no evidence, or reason to suspect, that past uses of the property resulted in environmental contamination or threat of contamination. No additional assessment of Parcel 11 was conducted. Under both federal and state statutes described above, the purchaser of Parcel 11 would have no reason to believe the property was contaminated and would be free to redevelop it.

MITC Parcel 12 – Undeveloped Land North of Railroad Tracks (not part of Northville Downs redevelopment)

The results of the Phase I ESA of MITC Parcel 12 revealed the presence of Recognized Environmental Conditions (RECs), primarily the historical storage of farm equipment in a shed, that could indicate the potential for environmental impact on the property from historical site uses. A Phase II ESA, which included collection and analysis of soil and groundwater samples, was conducted on MITC Parcel 12 in October 2018. The results of that assessment are presented below:

- Five of nine soil samples collected near the former equipment storage building location contained arsenic at levels greater than the Part 201 generic residential use criterion for human direct contact and groundwater protection. However, the concentrations of arsenic were within

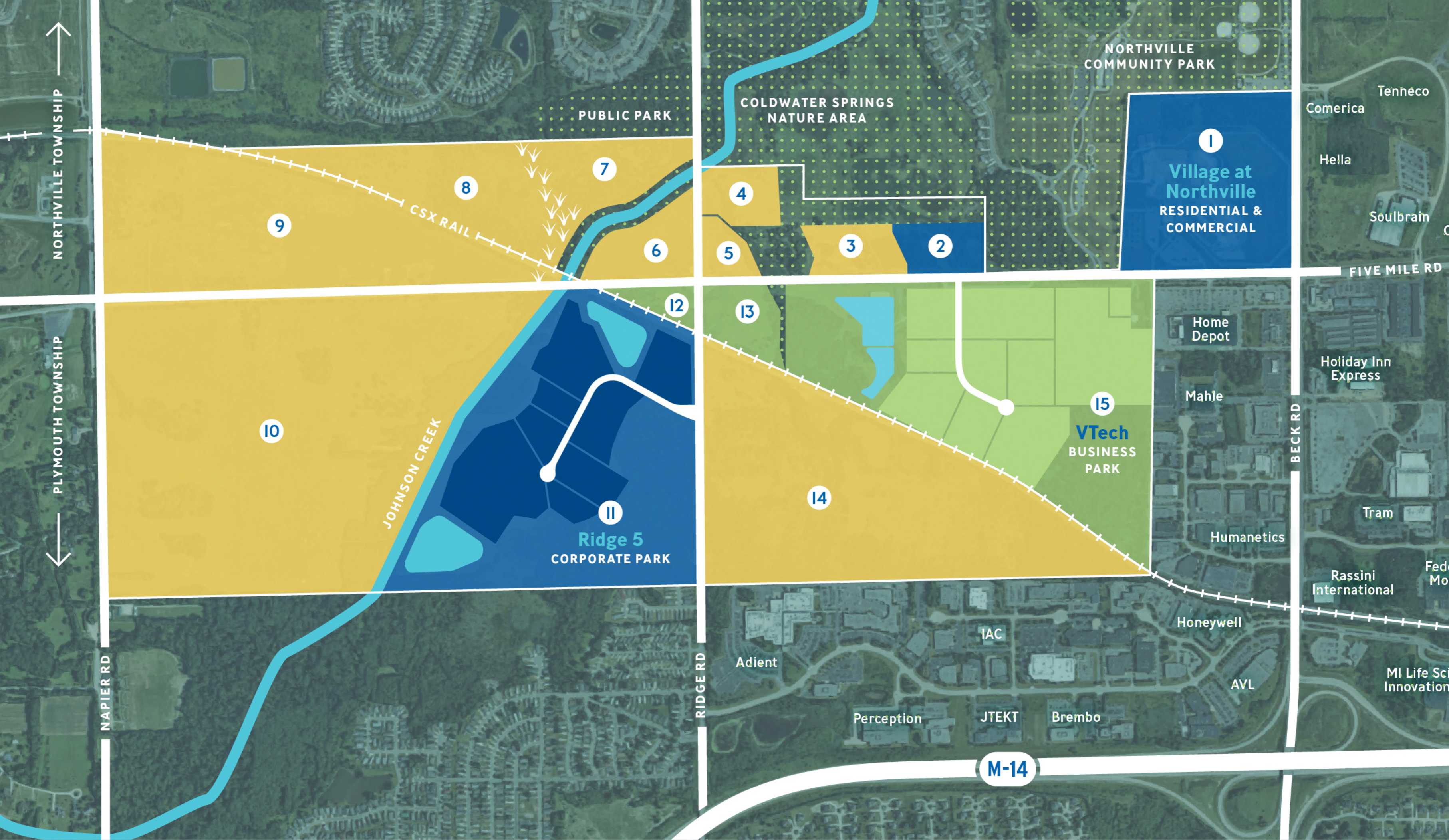
the range of naturally occurring concentrations in Southeast Michigan, so the potential release of arsenic from past uses is suspect. No samples contained arsenic at levels greater than the Part 201 generic non-residential (commercial) use criterion for human direct contact. This means that no remediation would be needed to protect human health for future commercial developments.

- One of the above soil samples, collected within the approximate footprint of the former equipment storage building, also contained copper, mercury, selenium, and zinc at concentrations that exceeded the Part 201 generic criteria for protection of groundwater that may migrate to a surface water body (groundwater -surface water interface; GSI). Some or all of these results may represent natural variations in soil chemistry. None of the reported concentrations of metals in groundwater pose a threat to human health.
- One groundwater sample collected adjacent to Ridge Road contained cadmium at a concentration slightly above the Part 201 generic residential criteria for drinking water and groundwater-surface water interface (GSI). Cadmium was not measured at a concentration greater than the analytical reporting limit in the groundwater sample collected approximately 250 feet west, between the first sample and Johnson Creek. The cumulative results indicated the cadmium result in the eastern sample was isolated and did not represent a significant area of impact or plume, or migration toward Johnson Creek. The potential environmental impact in groundwater does not pose a threat to human health because the area is serviced by a municipal water system, and use of the shallow groundwater at approximately 10 feet below ground level is prohibited by law.

MITC Parcel 11 is separated from MITC Parcel 12 by an active railroad at an elevation higher than both adjacent parcels. Groundwater on MITC Parcel 12 is projected to flow westward toward Johnson Creek, and not southward toward MITC Parcel 11. There is no reason to believe that the environmental conditions on MITC Parcel 12 are in any way connected to the conditions on MITC Parcel 11.

Purchasers of MITC parcels will not be liable for cleanup of contamination identified on the parcels, provided they comply with the environmental due diligence requirements of CERCLA and Part 201. They will be responsible for complying with Part 201 Due Care obligations to redevelop each property in a manner that protects all future users of the property from potential negative impacts of any existing contamination. This may include remediation and/or the use of exposure barriers.

The environmental assessment information contained in this memorandum is derived from the *Baseline Environmental Assessment Report, Approximately 130 Acres at the Southwest Corner of Five Mile Road and Ridge Road*, prepared by SME and dated November 16, 2018. Copies of this report are available from the Michigan Department of Environment, Great Lakes and Energy (EGLE).



NORTHVILLE TOWNSHIP

PLYMOUTH TOWNSHIP

NAPIER RD

RIDGE RD

BECKER RD

FIVE MILE RD

PUBLIC PARK

COLDWATER SPRINGS NATURE AREA

NORTHVILLE COMMUNITY PARK

9

8

7

6

4

5

3

2

I
Village at Northville
RESIDENTIAL & COMMERCIAL

Tenneco
Comerica
Hella
Soulbrain

10

JOHNSON CREEK

12

13

14

15
VTech
BUSINESS PARK

Home Depot

Mahle

Holiday Inn Express

Tram

Humanetics

Rassini International

Fed Mo

II
Ridge 5
CORPORATE PARK

Adient

IAC

Honeywell

AVL

Perception

JTEKT

Brembo

MI Life Sci
Innovation

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