



**U.S. Department of Housing and Urban
Development**

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

Project Information

Project Name: 350 South Fifth Avenue

Responsible Entity: City of Ann Arbor / Michigan State Housing Development Authority (MSHDA)

Grant Recipient: Fifth Avenue MI LDHA LLC

State/Local Identifier: M-20SP260100

RE Preparer: Paul Glasser

Certifying Officer Name and Title: Milton Dohoney, Jr., Administrator, City of Ann Arbor / Tony Lentych, Chief Housing Investment Officer, MSHDA

Consultant: SME

Direct Project Specific Comments to: Christopher Nielsen, Director of Housing and Economic Development, Ann Arbor Housing Commission / Michael Vollick, Environmental Specialist, MSHDA

Project Location: 350 South Fifth Avenue, Ann Arbor, Michigan 48104

Description of the Proposed Project [24 CFR 50.21 & 58.32]:

350 S. Fifth Avenue will be a new construction, 20-story, high-rise apartment building located in downtown Ann Arbor, developed by Fifth Avenue MI LDHA LLC. The property will feature 330 units containing a mix of one bedroom and two bedrooms with 100% of the units reserved as affordable for individuals and families with an average income between 30% to 80% of the Area Median Income for the Ann Arbor Metropolitan Statistical Area (MSA). The building is also planned net-zero ready and 100% electric.

Statement of Purpose and Need for the Proposal:

350 S. Fifth Avenue will be the first high-rise apartment building in Ann Arbor where 100% of units are income restricted, helping to address the City's severe affordable housing shortage. Residents will have access to state-of-the-art amenities such as a fitness center, community rooms, co-working spaces, and a mail and package room. This mixed-use development will also have roughly 6,000 SF of ground-floor commercial space, for which the development team is actively seeking a grocery tenant. On the northern portion of 350 S. Fifth Ave. site is the Blake Transit Center, the public transportation hub in downtown Ann Arbor. In collaboration with the Ann Arbor Area Transportation Authority and Ann Arbor Downtown Development Authority, Fifth Avenue MI LDHA LLC will be incorporating the redevelopment of the Blake Transit Center with 350 S Fifth Ave, including enhancements to the bus station, additional bus lanes, and the complete reconstruction of the Fourth Avenue Street.

List of appendices which include maps, photographs, and other documentation of project location and description:

- Appendix A: Airport Hazards
- Appendix B: Coastal Barrier Resources Act
- Appendix C: Flood Insurance
- Appendix D: Air Quality
- Appendix E: Coastal Zone Management Act
- Appendix F: Contamination and Toxic Substances
- Appendix G: Endangered Species Act
- Appendix H: Explosive and Flammable Hazards
- Appendix I: Farmlands Protection
- Appendix J: Floodplain Management
- Appendix K: Historic Preservation
- Appendix L: Noise Abatement
- Appendix M: Sole Source Aquifers
- Appendix N: Wetlands Protection
- Appendix O: Wild and Scenic Rivers Act
- Appendix P: Mitigation Plan
- Appendix Q: Other Supporting Documentation

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

The site is developed with a paved parking lot. Areas surrounding the site include a bus depot to the north; a roadway and library to the east; residential developments, roadway, and a funeral home to the south; and a roadway and parking garage to the west. According to the 2020 US Census Bureau and ESRI, the overall population of the region (as defined by the Project Market Area in the 2024 Market Study) is projected to increase by approximately 116 people per year for the five years ending in 2029, resulting in an overall gain of 0.7 percent. The number of households is projected to increase at a rate of about 224 per year for a gain of 3.2 percent. A slightly greater increase is projected in owner-occupied units than in renter-occupied units.

Funding Information

Grant Number	HUD Program/Source	Funding Amount
M-20SP260100	Community Planning and Development – HOME Program	\$8,000,000
N/A	Equity	\$96,733,100
N/A	MSHDA Senior	\$56,000,000
N/A	Ann Arbor Housing Development Corporation	\$46,000,000
N/A	Construction Period Tax Capture	\$675,702
N/A	Deferred Developer Fee	\$17,861,338
N/A	Public Housing – Project-Based Voucher Program	110 vouchers

Estimated Total HUD Funded Amount: \$8,000,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$224,800,000

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 <input type="checkbox"/> <input checked="" type="checkbox"/>	Five airports have been identified within 20 miles of the Subject Property. Ann Arbor Municipal Airport (ARB) is located approximately 3.61 miles to the south. Willow Run Airport is located approximately 10.8 miles to the east. Canton-Plymouth Mettetal Airport is located 15.5 miles to the northeast. Tecumseh Mills Airport is located 17.8 miles to the southwest. Detroit Metropolitan Wayne County Airport (DTW) is located 19.1 miles east southeast. The Subject Property is not within 15,000 feet of a military airport or

		<p>2,500 feet of a civilian airport as referenced in 24 CFR Part 51 Subpart D. Appendix A - Airport Hazards Map depicts the proposed project area in relation to the nearest airport. Appendix A - Airport Hazards with distances depicts the Subject Property with the applicable distances in relation to the proposed building. The project is in compliance with Airport Hazards requirements.</p>
<p>Coastal Barrier Resources</p> <p>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>This Subject Property is not located in a Coastal Barrier Resources System (CBRS) Unit as referenced by the U.S. Fish and Wildlife Service CBRS map provided as Appendix B. Therefore, the project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.</p>
<p>Flood Insurance</p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area as shown on the map in Appendix C. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5</p>		
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Subject Property's county is in attainment status for all criteria pollutants, except for ozone, in which it is in attainment/maintenance status. The Michigan Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) Attainment Status for the National Ambient Air Quality Standards map and a General Conformity letter for ozone, dated June 18, 2025, are provided as Appendix D. The EGLE letter determined that the project “should not exceed the de minimis levels included in the federal general conformity requirements.” The</p>

		project is in compliance with 40 CFR Parts 6, 51 and 93 and the Clean Air Act.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	This Subject Property is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan, as shown in the map in Appendix E. The project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	Contamination and toxic substances were evaluated as follows: MSHDA Phase I Environmental Site Assessment dated March 18, 2026, Response Activity Plan (ResAP) dated January 23, 2026. The Subject Property consisted of residential development since at least 1888 to 1899, when a church was present on the southeast corner. Between 1916 and the 1960s, a Young Men’s Christian Association (YMCA) structure, a furniture and upholstery repair structure, and residential development were present on the Subject Property. By 1964, the residential and commercial structures were no longer depicted, and a YMCA structure was present near the center of the Subject Property. The YMCA structure was present until 2009, when the structure was demolished, and the Subject Property consisted of a paved parking lot. At the time of the site reconnaissance, the Subject Property consisted of a paved parking lot with three pad-mounted transformers on the north portion. Surrounding areas consisted of residential development from at least 1888 to the early 1900s, when a hotel and a sanitarium were located to the west and south. Between the 1910s and 2023, commercial development was present and consisted of automobile sales and service shops, a gasoline filling station, an automobile paint shop, storefronts, a funeral home, a dressmaker, a furniture sales shop, a library, a salon, a beer depot, a bus depot, and a parking garage. During the Phase I ESA, one Recognized

		<p>Environmental Concern (REC) was identified related to the presence of polynuclear aromatic hydrocarbons (PAHs) and metals that exceeded the Michigan Department of Environment, Great Lakes, and Energy (EGLE) cleanup criteria promulgated under Part 201 of Michigan’s Natural Resources and Environmental Protection Act. As a result of environmental site assessments, on-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property.</p> <p>The ResAP was conditionally approved by EGLE on April 2, 2026, and EGLE provided a Conditions Met letter on May 26, 2026. The approved environmental response activities include 1) the excavation and disposal of soil on an area on the Subject Property containing concentrations of PAHs above Part 201 criteria, 2) the collection of verification of soil remediation samples from the excavation floor and sidewalls, and 3) analytically test imported fill to verify fill it is clean prior to arrival and placement on the Subject Property after the excavation activities have been completed. The developer intends to mitigate potential unacceptable human exposure to radon with a passive mitigation system and will conduct a radon assessment prior to occupancy.</p> <p>Adverse environmental impacts can be mitigated. With mitigation identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Effects on threatened and endangered species were evaluated using the USFWS Information for Planning and Consultation (IPaC) database to identify federally listed species that could be present in the area of the Subject Property. The IPaC All Species Michigan Determination Key resulted in a No Effect determination for the following</p>

		<p>species: Indiana Bat, Whooping Crane, Eastern Massasauga Rattlesnake, Snuffbox Mussel, Mitchell's Satyr Butterfly, and the Monarch Butterfly. Please see the species list in Appendix G. No nesting migratory birds or Bald or Golden Eagles have been observed on the Subject Property, and the project is not anticipated to disturb migratory birds or Bald or Golden Eagles. The project is in compliance with the Endangered Species Act of 1973, particularly Section 7 and 50 CFR Part 402.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>At least 6 active stationary aboveground storage tanks covered by 24 CFR Part 51 Subpart C are present within 1 mile of the Subject Property. A regulatory database report listing the active tanks and depicting them on a map relative to the Subject Property, a table summarizing tank properties, contents, assumptions, and physical/acceptable separation distances (ASD), and screenshots of the ASD Calculator are provided as Appendix H. The aboveground storage tanks meet the Acceptable Separation Distance requirements from the Subject Property. The project is in compliance with 24 CFR Part 51 Subpart C and explosive and flammable hazard requirements.</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Subject Property is located on Prime Farmland; however, it is also in a US Census-defined Urbanized Area and on land already in or committed to urban development. Urbanized Area and USDA Prime Farmland Maps are provided as Appendix I. This project does not include any activities that could potentially convert agricultural land to non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The FEMA Flood Insurance Rate Map (FIRM) that includes the Subject Property was obtained (Panel 263 of 585, Map Number 26161C0263E, effective 4/3/2012). The highest base flood elevation (BFE)</p>

		<p>depicted on the FIRM was 821'; therefore, the calculated BFE based on the Freeboard Value Approach (FVA) is 823. The Subject Property elevation is 849.3' as verified by USGS-EQPS. The FIRM and USGS EQPS elevation data are provided as Appendix J. The project is in compliance with Executive Orders 11988 and 13690.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>A determination of “no historic properties will be affected” was found in regard to archaeological resources. A determination of “adverse effect” was found on the south-adjointing property due to the proposed project altering the characteristic of the district that qualifies the property for listing in the National Register of Historic Places. SHPO concurred with the adverse effect determination on December 11, 2025.</p> <p>The City of Ann Arbor prepared a Case Study, dated February 24, 2026, evaluating alternatives for the proposed project. The alternative to Build with Mitigating Features was proposed by the City of Ann Arbor. SHPO approved the Case Study on February 27, 2026, and recognized the need for the project and accepted the alternative. SHPO and the City of Ann Arbor completed a Memorandum of Agreement (MOA) to mitigate the adverse effects. MSHDA, as an additional Responsible Entity for this project, concurs with the findings of the Section 106 review and the mitigation measures described in the MOA. MSHDA declined to be a signatory to the MOA, understanding that the City of Ann Arbor is acting as the lead agency. The Advisory Council on Historic Preservation (ACHP) declined to be a consulting party to the MOA on March 2, 2026. The MOA is effective as of May 26, 2026, and the City of Ann Arbor provided a copy of the fully executed MOA to the ACHP. Relevant documents listed above are provided as Appendix K.</p> <p>Adverse impacts can be mitigated. With mitigation identified in the MOA and</p>

		mitigation section of this review, the project will be in compliance with historic preservation requirements.
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>A Day/Night Noise Assessment (DNL) was conducted within the HUD search distances of the proposed building. Major roads near the project area include Williams Street, South Fifth Avenue, South Fourth Avenue, and Packard Street. Ann Arbor Railroad is located 890 feet southwest of the project area. Ann Arbor Municipal Airport (ARB) is located approximately 3.6 miles south of the project area. The airport contour map for ARB indicates that the project is located outside less than 55 dB noise contours, and therefore, the airports have been removed from consideration in the overall total DNL. The total DNL was 74.0 dB, which is in HUD’s Normally Unacceptable range (above 65 dB but not exceeding 75 dB); therefore, noise abatement is required in the design of the proposed project site plan.</p> <p>Shiner Acoustics, LLC has completed the HUD STraCAT Sound Transmission Classification Assessment tool to calculate the acoustical attenuation provided by wall and window components of 19 unique dwelling units. The STraCAT analysis evaluates the five main components of the building’s exterior façade and indicates the analyses meets the required attenuation necessary, and Special Environmental Clearance is not necessary.</p> <p>In addition, a Noise and Vibration Impact Assessment was conducted to evaluate the potential noise and vibration impacts from the north-adjointing bus-related operations at the Blake Transit Center on the proposed project. The proposed project complies with FTA noise and vibration criteria, and no mitigation is required.</p> <p>Appendix L includes the following:</p> <ul style="list-style-type: none"> - Planimetric Map with distances provides the proposed project in

		<p>relation to the noise generators in the vicinity from the proposed building.</p> <ul style="list-style-type: none"> - DNL Calculator - HUD Exchange Points for all DNL calculations, - MDOT 2023 Traffic Volumes, - Ann Arbor Municipal Airport (ARB) Existing Noise Contours, - U.S. DOT Railroad Crossing Inventory - STraCAT Calculations, and - Noise and Vibration Impact Analysis of Blake Transit Center on 350 South Fifth Avenue, Soundscape Engineering.
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Subject Property is not located in a sole source aquifer area, as shown on the map in Appendix M. The project is in compliance with 40 CFR Part 149 and Sole Source Aquifer requirements.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Subject Property is not within an area of wetlands or wetland protection according to the USFWS NWI Map, shown in Appendix N. Additionally, as part of SME's Phase I Environmental Site Assessment, a site reconnaissance was conducted and did not identify any on-site or adjacent wetlands. The project will not impact on- 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.</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Subject Property is not within an area of Michigan near any wild or scenic rivers, as shown on the map in Appendix O. The project is in compliance with the Wild and Scenic Rivers Act.</p>

Environmental Assessment Factors [24 CFR 58.40] 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

LAND DEVELOPMENT		
Environmental Assessment Factor	Impact code	Impact Evaluation
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The project advances adopted City policy to concentrate density and height within the Downtown Core while preserving lower-scale land uses within the adjacent historic districts. The demand exists for the introduction of 330 general occupancy rental units at the site in Ann Arbor. The site location and scope of development make the proposed project marketable in the prevailing rental market within Ann Arbor. Based on the scope, the unit mix, unit sizes, rents and amenities are appropriate for the intended use and targeted market and the development is consistent with the competition within the primary market area. Consulted the September 2025 Market Feasibility Study, Section 106 Case Study, and October 2024 350 South Fifth Apartments LIHTC Family Housing MSHDA Compliant LIHTC Full Market Analysis, and the City of Ann Arbor Residential Zoning Analysis, October 25, 2019.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	1	The project site is relatively flat and is not sloped. In general, certain characteristics of the site (i.e., fill material) are not suitable for a traditional foundation system for the proposed building topology, and the project design team has selected auger cast-in-place (ACIP) piles as the deep foundation system. The proposed project is anticipated to not affect soil stability of the project site, to account for erosion control of local soils, and to properly design drainage and storm water runoff management systems through the use of best management practices (silt fence, inlet protection, sediment control tube, etc.) as outlined in the Soil Erosion and Sedimentation Control Plan. The system will be designed to provide full infiltration of the

		100-year storm event in a time span of 30.5 hours. For storms that exceed the 100-year frequency, stormwater will be routed to a standpipe outlet control structure before entering the stormwater system on South Fourth Avenue. Consulted the SME October 21, 2025, Geotechnical Evaluation Report and the Soil Erosion and Sedimentation Control Plan.
Hazards and Nuisances including Site Safety and Noise	2	The proposed project is anticipated to avoid hazards and nuisances through the duration of the project. The contractor will provide a safe and secure jobsite prior to, during, and after work, which includes providing necessary safety devices, lighting, and barriers as necessary. All work and materials will conform to the current edition of the State Health and Safety Regulations, State Fire Marshal, Local Fire Department and Health Department. Site safety measures and site-generated noise are anticipated to be in compliance local noise ordinances and verified by the contractor. Consulted the January 2026 Full Building Permit Drawing Set.

SOCIOECONOMIC		
Environmental Assessment Factor	Impact Code	Impact Evaluation
Employment and Income Patterns	1	The proposed project is supported by the need for strong and stable employment base which has resulted in a consistent demand for additional housing in the area. The project will increase employment opportunities, including approximately 700 construction jobs, 7 property managers, and the addition of employees associated with a future retail user on the ground floor. The project area's civilian employee population is most found in educational services, healthcare/social assistance, and professional/scientific/tech services. The project is not anticipated to negatively affect the local county or state workforce. Consulted the September 2025 Market Feasibility Study and October 2024 350 S 5 th Ave LIHTC Family Housing MSHDA Compliant LIHTC Full Market Analysis.
Demographic Character Changes, Displacement	1	The proposed project demographic is targeting low-income individuals, which will positively affect the minority group by increasing affordable housing in the City of Ann Arbor. Upon completion, the development will consist of 330 rental units targeting residents of all ages. These units will be available for residents earning 30, 60, 70, or 80 percent or less of the prevailing Washtenaw County AMI using the LIHTC Program targeting residents of all ages. 110 units at

		30 percent of AMI will operate with Project-based Vouchers (PBV), and tenants in these units will pay 30 percent of their income towards rent. The proposed project will not displace individuals or families and will not result in probable indirect displacement because the project site currently consists of a parking lot. Consulted the September 2025 Market Feasibility Study and October 2024 350 S 5 th Ave LIHTC Family Housing MSHDA Compliant LIHTC Full Market Analysis.
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COMMUNITY FACILITIES AND SERVICES		
Environmental Assessment Factor	Impact Code	Impact Evaluation
Educational and Cultural Facilities	2	Local educational and cultural facilities are projected to meet the needs of the proposed project. The primary market area demographic data forecasted an overall population increase by approximately 161 people per year by 2029, resulting in an overall gain of 0.1 percent. The percent increase of households is expected to increase by 0.6 percent, while the percent of families is projected to increase by 1.0 percent by 2029. The neighborhood linkages identified an elementary school, middle school, and high school located approximately 0.5 mile to 1.2 mile away from the proposed project site. Consulted the September 2025 Market Feasibility Study and October 2024 350 S 5 th Ave LIHTC Family Housing MSHDA Compliant LIHTC Full Market Analysis.
Commercial Facilities	2	The proposed project location has been chosen based on the proximity of downtown Ann Arbor, proximity to University of Michigan, and its proximity to nearby jobs, recreation, and businesses. The proposed project site is downtown Ann Arbor and approximately 0.25 miles west of the University of Michigan. The proposed project is not anticipated to displace existing retail establishments. The location of the site is very walkable to commercial facilities, or otherwise accessible via bus transportation. The Blake Transit Center is located directly north of the site. Shopping stores, a grocery store, a convenience store, and pharmacies are located within approximately half a mile of the project site. Consulted the September 2025 Market Feasibility Study and October 2024 350 S 5 th Ave LIHTC Family Housing MSHDA Compliant LIHTC Full Market Analysis and local online mapping.

Health Care and Social Services	2	<p>The proposed project is located in an area that has capacity and access to nearby health care, emergency services, and social services. The University of Michigan Medical Center is located 1.8 miles from the project site. Social services are located within 0.2 miles of the project site, and the project is not anticipated to negatively impact social services.</p> <p>Consulted September 2025 Market Feasibility Study and October 2024 350 S 5th Ave LIHTC Family Housing MSHDA Compliant LIHTC Full Market Analysis and local online mapping.</p>
Solid Waste Disposal / Recycling	2	<p>The proposed project will produce general construction waste and residential waste after completion. Debris created during the construction process will be removed and disposed of off-site in a safe and legal manner. The project is not anticipated to exceed the capacity of the local waste system/landfill. Consulted the January 2026 Full Building Permit Drawing Set.</p>
Waste Water / Sanitary Sewers	2	<p>The proposed project will connect to the local municipal sanitary and wastewater system managed by the City of Ann Arbor. The local municipal sanitary and wastewater system has the capacity for the proposed project. Consulted the January 2026 Full Building Permit Drawing Set.</p>
Water Supply	2	<p>The proposed project will be connected to the local municipal water supply from the City of Ann Arbor. The water supply is designed to support the sprinkler system demand, including hose stream allowance, for the duration specified by NFPA 13 or 30 minutes, whichever is greater. The civil and fire suppression drawings have additional details for on-site fire suppression water supply. The local municipal water supply system has the capacity for the proposed project. Consulted the January 2026 Full Building Permit Drawing Set.</p>
Public Safety – Police, Fire and Emergency Medical	2	<p>The proposed project is anticipated to be appropriately serviced by local public safety providers. Public safety, including police services, are located 0.4 miles from the project site which would likely provide a quick response time. The Ann Arbor fire department is located 0.4 miles from the site, which will also likely provide a quick response time. The University of Michigan Hospital Emergency Room is located 1.6 miles from the site, likely to provide a quick response time. The project will not likely create a significant burden on police, fire, or health care providers in terms of manpower and/or equipment.</p> <p>Consulted the September 2025 Market Feasibility Study and October 2024 350 S 5th Ave LIHTC Family Housing</p>

		MSHDA Compliant LIHTC Full Market Analysis and local online mapping.
Parks, Open Space and Recreation	2	The proposed project will be located in an area that is within walking distance or has adequate public transportation available to nearby cultural and recreational activity resources. The Hanover Square Park is located approximately 0.3 miles from the project site. Additionally, the site is located downtown Ann Arbor and Blake Transit Center is located directly north of the site, which provides additional access to parks and recreational spaces for tenants to use. Consulted the September 2025 Market Feasibility Study and October 2024 350 S 5 th Ave LIHTC Family Housing MSHDA Compliant LIHTC Full Market Analysis and local online mapping.
Transportation and Accessibility	1	The proposed project will be in close proximity to public transportation services, but there are currently no parking options onsite. The Blake Transit Center is located directly north of the site. The Developer has arranged for 165 limited-access parking spaces for resident parking at the west-adjointing 4 th and William Parking Structure. The proposed project will allow for expanded bus operations on the project site. Consulted the September 2025 Market Feasibility Study and October 2024 350 S 5 th Ave LIHTC Family Housing MSHDA Compliant LIHTC Full Market Analysis.

NATURAL FEATURES		
Environmental Assessment Factor	Impact Code	Impact Evaluation
Unique Natural Features, Water Resources	1	The project is not anticipated to adversely affect unique natural features on or near the site. The proposed project is not anticipated to affect groundwater or water quality in the surrounding area. The project will provide full infiltration of the 100-year storm event in a time span of 30.5 hours. For storms that exceed the 100 year frequency, stormwater will be routed to a standpipe outlet control structure before entering the stormwater system. Consulted the January 2026 Full Building Permit Drawing Set and SME's March 2026 Phase I Environmental Site Assessment.
Vegetation, Wildlife	2	The project location is currently paved parking lot with a few decorative trees and bushes. The project will not likely impact existing wildlife habitats. The project will have no

		effect on the following local endangered species: Indiana Bat, Whooping Crane, Eastern massasauga, Snuffbox Mussel, Mitchell's Satyr Butterfly, and the Monarch Butterfly. Effects on threatened and endangered species were evaluated using the USFWS Information for Planning and Consultation (IPaC) database.
Other Factors		

CLIMATE AND ENERGY		
Environmental Assessment Factor	Impact Code	Impact Evaluation
Climate Change Impacts	2	The proposed project is designed to withstand the expected climate related changes in the surrounding area. According to the National Risk Index for the Census Tract the proposed project is located in area with a relatively high hazard type index rating for cold wave, lightning, tornado, and winter weather, and relatively moderate hazard type index rating for hail, heat wave, ice storm, and landslide. The project area is either relatively low, very low, or not rated for all other hazard types. The building will be constructed to current new building construction standards which is anticipated to protect against and will not be impacted by the relatively moderate hazard types identified in the surrounding area. The building will be constructed to local codes with insulated walls, Energy Star windows and doors, and HVAC systems that will mitigate the potential future effects of climate change, including wind, tornado, extreme heat and cold, in the area. The project site is not located within a coastal zone or a floodplain. Consulted the January 2026 Full Building Permit Drawing Set, FEMA FIRM Map, CBRS Map, and FEMA National Risk Index Map Report and Mapping.
Energy Efficiency	1	The project design has been developed to meet the prescriptive method of Energy Star multifamily new construction standards and Enterprise Green Communities Criteria according to the January 2026 Full Building Permit. The proposed project design includes energy efficiency measures including added wall insulation and Energy Star appliances, lighting fixtures, windows, and doors manufactured based on MSHDA requirements. The proposed project includes programmable thermostats, temperature sensors, roller shades on all windows except

		for the retail space, and HVAC systems. Consulted the January 2026 Full Building Permit Drawing Set.
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Supporting Documentation:

350 S 5th Ave LIHTC General Occupancy Housing MSHDA Compliant LIHTC Full Market Analysis, Baker Tilly Advisory Group, LP, October 2024.

A Market Feasibility Study of: 350 South Fifth Avenue, Novogradac, August 30, 2025.

FEMA National Risk Index Census Tract and Risk Maps.pdf

Geotechnical Evaluation Report, 350 S. Fifth Avenue, Ann Arbor, Michigan, SME, October 21, 2025.

Soil Erosion and Sedimentation Control Plan.

Additional Studies Performed:

New Affordable Housing Construction, 350 S. Fifth Avenue, Ann Arbor, Washtenaw County, Kidorf Preservation Consulting, July 22, 2025.

Archaeological Records Review and Recommendation for the Section 106 Review Application for Proposed Affordable Housing Construction at 350 S. Fifth Avenue, Ann Arbor, Washtenaw County, Michigan, July 25, 2025.

STraCAT Calculations, Shiner Acoustics, LLC, September 12, 2025.

Response Activity Plan to Comply with Section 20107a(1)(b), SME, January 16, 2026.

Section 106 Case Study prepared by the City of Ann Arbor, February 24, 2026.

Phase I Environmental Site Assessment Report, SME, March 18, 2026.

Threatened and Endangered Species Review, SME via IPAC, May 19, 2026.

Field Inspection (Date and completed by):

Historic Architecture Survey (Section 106), Kidorf Preservation Consulting, February 26, 2025.

Phase I Environmental Site Assessment, SME, February 24, 2026.

List of Sources, Agencies and Persons Consulted:

Consulted the following sources and websites during this review:

- Google Maps (<https://www.google.com/maps>)
- U.S. Fish & Wildlife Service Coastal Barrier Resources Mapper used for CBRS (<https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/>);
- FEMA's National Flood Hazard Layer Viewer used for Floodplain data (<https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>);
- ESRI ArcGIS Online used for Coastal Zone Management Areas (<https://www.arcgis.com/apps/mapviewer/index.html?url=https://coast.noaa.gov:443/arcgis/rest/services/Hosted/CoastalZoneManagementAct/FeatureServer&source=sd>);
- US Coastal Zone Management Act Boundary used for Coastal Zone Management (<https://koordinates.com/data/>);
- U.S. Fish and Wildlife IPaC Website used for Endangered Species (<https://ipac.ecosphere.fws.gov/>);
- Michigan Licensing and Regulatory Affairs (<https://aca-prod.accela.com/LARA/Cap/CapDetail.aspx?Module=FireServices&capID1=16LAR&capID2=00000&capID3=018TT&agencyCode=LARA>);

- Environmental Risk Information Services (<https://www.erisinfo.com/>);
- HUD Exchange Acceptable Separation Distance (ASD) Electronic Assessment Tool (<https://www.hudexchange.info/programs/environmental-review/asd-calculator/>);
- U.S. Department of Agriculture Natural Resources Conservation Service used for Farmland information (<https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>);
- U.S. Census Bureau TIGERweb used for Farmland information (https://tigerweb.geo.census.gov/tigerwebmain/TIGERweb_apps.html);
- Federal Railroad Administration, Office of Safety Analysis (<https://safetydata.fra.dot.gov/OfficeofSafety/default.aspx>);
- U.S. Department of Transportation, Federal Railroad Administration, Rail Network (<https://experience.arcgis.com/experience/b6c12fd0a4774f38a303e3d034775854/>);
- Michigan Department of Transportation, Michigan Traffic AADT (https://experience.arcgis.com/experience/05113e1c2c1742a0b07cd22a77b46ee2/page/Michigan-Traffic-AADT?views=Legend%2FLayers#widget_3=active_datasource_id:dataSource_4,center:-9249654.470265456%2C5216820.674644687%2C102100,scale:20123.588359730038,rotation:0,viewpoint:%7B%22rotation%22%3A0%2C%22scale%22%3A20123.588359730038%2C%22targetGeometry%22%3A%7B%22spatialReference%22%3A%7B%22latestWkid%22%3A3857%2C%22wkid%22%3A102100%7D%2C%22x%22%3A-9249654.470265456%2C%22y%22%3A5216820.674644687%7D%7D,layer_visibility:%7B%22widget_3-dataSource_4%22%3A%7B%22widget_3-dataSource_4-19098c359d4-layer-28%22%3Atrue%7D%7D);
- HUD Exchange Day/Night Noise Level (DNL) Calculator (<https://www.hudexchange.info/programs/environmental-review/dnl-calculator/>);
- U.S. Department of Transportation Federal Railroad Administration, Rail Crossing Locator (<https://www.fra.dot.gov/railcrossinglocator>);
- U.S. Department of Transportation, Bureau of Transportation Statistics, National Transportation Noise Map (<https://maps.dot.gov/BTS/NationalTransportationNoiseMap/>);
- U.S. EPA Sole Source Aquifers Mapper used for Sole Source Aquifers map (<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>);
- U.S. Fish and Wildlife Service, National Wetlands Inventory (<https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>);
- National Wild and Scenic Rivers System used for Wild and Scenic Rivers map (<https://www.rivers.gov/map>);

List of Permits Obtained:

NA

Public Outreach [24 CFR 50.23 & 58.43]:

In 2019, the City of Ann Arbor and the project architect lead a community engagement process focusing on the development of this and other City-owned properties as affordable housing. This process identified broad public support for mixed-income development at the Subject Property.

In 2021, the re-zoning and entitlement process for the Subject Property began, led by the Ann Arbor Housing Commission and the project architect. The meetings included an initial

Affordable Housing Public Engagement Report, as well as resident engagement, citizen participation, formal Planning Commission, Design Review Board, and City Council meetings. After reviewing the reports and meeting minutes from these meetings, there was no commentary regarding the proposed height, density, design strategy, or intended use for the proposed project having an adverse impact on the surrounding area or the adjacent eligible historic district.

Community engagement for the property culminated in the Citizen Participation Meeting held in June 2025. The meeting emphasized the need for the community's desire for the proposed construction and density on the Subject Property. And it provided further validation that the proposed project will be an addition to the existing context of the Downtown Core and Interface districts.

When an adverse effect was identified under the National Historic Preservation Act, the City of Ann Arbor invited the Advisory Council on Historic Preservation (ACHP) to consult on resolving the adverse effect and the ACHP declined to be a consulting party. The City of Ann Arbor consulted with the State Historic Preservation Officer (SHPO) and those parties executed a Memorandum of Agreement, effective as of May 26, 2026, to resolve the adverse effect. The City of Ann Arbor provided the public with notice of the adverse effect and the proposed measures to resolve the adverse effect.

The City of Ann Arbor provided notice of the project to the affected Tribes and Tribal Historic Preservation Officers with an invitation to consult on the project, but did not receive any responses or requests for consultation during the 30-day notice period.

The City will comply with the applicable requirements of 24 CFR 50.23 & 58.43.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project is consistent with the comprehensive plan for the overall community's vision for its future, development plans and policies. The proposed project will positively impact the project area due to the high demand for affordable housing in the surrounding area and is helping the City achieve its long-term goal of increasing affordable housing. The proposed project would not adversely impact the existing multifamily housing market due to the limited amount of units being added and given the history of continued demand for housing units in Ann Arbor. The project is not anticipated to cumulatively or indirectly adversely effect the environment or incrementally impact the past, present, and reasonably foreseeable future actions. No additional current or planned projects in the foreseeable future have been identified within the project area. Any additional reasonably foreseeable indirect impacts of this project cannot be reasonably determined. No adverse effect to human health or the environment is anticipated after the proposed mitigations have been addressed. In performing its review, the City has aggregated related activities comprising the project.

Alternatives [24 CFR 58.40(e)]

The building design Alternatives below are summarized from the Section 106 Case Study prepared by the City of Ann Arbor, February 24, 2026.

Alternative 1: Reduced Height Development – assumes development of the site at a reduced height and density relative to the proposed design. This option does not materially change the broader development context affecting the East William Street Historic District (EWHHD) adverse effect and is not considered a reasonable or prudent alternative.

Alternative 2: Build with Mitigating Features (Preferred Alternative) - constructing the project as proposed with deliberate design, material, and site-planning measures intended to minimize and mitigate adverse effects on the EWHHD. This alternative best meets the project's purpose and need, responds appropriately to cumulative contextual change, and represents the most reasonable and prudent approach.

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

If no action were to occur, the proposed project would not be constructed, and the site would remain vacant. The current land use will remain and no maintenance or improvements to the property will occur. The No Action Alternative does not meet the stated Purpose and Need for the project.

Summary of Findings and Conclusions:

The proposed project will support low-income individuals with affordable rental housing while providing access to nearby jobs, transportation, recreation, and businesses. The project supports Ann Arbor's plan to build affordable housing for the low-income population while maintaining consistency with the comprehensive plans for the community's vision for its future. The demand exists for the introduction of 330 multifamily rental units at the site in Ann Arbor. The site location and scope of development make the proposed project marketable in the prevailing rental market within Ann Arbor. Based on the scope, the unit mix, unit sizes, rents and amenities, the proposed project is appropriate for the intended use within the targeted market and is consistent with the competition within the primary market area. During construction, there may be some short-term impacts from the temporary closure of portions of the street, construction noise, dust, and exhaust from construction equipment. These impacts are anticipated to be short in duration and less than the time needed to construct the project.

The proposed project is consistent with the City of Ann Arbor's community vision and development plans to provide affordable housing for low-income individuals and families within the City. The project is anticipated to have a positive impact for low-income individuals and families by providing affordable housing in a walkable neighborhood with access to local businesses, employment opportunities, and public facilities. There are no adverse effects anticipated associated with this project, as the proposed mitigation efforts will resolve any identified effects and will be followed throughout the duration of this project and after project completion.

Mitigation Measures and Conditions

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.

Project Mitigation Plan:

Please see the Mitigation Plan in Appendix P.

Supporting documentation on completed measures:

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1)]
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)]
The project may significantly affect the quality of the human environment.

Preparer's Signature: *Paul A. Glasser* Date: June 3, 2026

Name/Title/Organizaton: Paul A. Glasser, Senior Project Geologist, SME

Certifying Officer Signature: *Milton Dohoney Jr.*

Name/Title: Milton Dohoney Jr., City Administrator, City of Ann Arbor Date: June 8, 2026

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).