

# MEMO

## ASTI Environmental

**Date:** April 2, 2018

**To:** Sara Roediger, City of Rochester Hills  
Pam Valentik, City of Rochester Hills  
City of Rochester Hills Brownfield Redevelopment Authority

**From:** Tom Wackerman

**Subject:** Review of Draft 381 Work Plan for Redevelopment of the Northeast Corner of Hamlin and Adams Roads, Rochester Hills, Michigan (ASTI files No. 9675-21)

As requested, this memo is a review of the following draft document. Additional documents were reviewed as indicated in the attached Brownfield Plan review memo dated February 27, 2018.

1. Draft *Act 381 Work Plan, To Conduct MDEQ Environmental Activities, Legacy Rochester Hills Redevelopment Project, Northeast Corner of Hamlin and Adams Roads, Rochester Hills, Michigan 48309* dated March 13, 2018 (the 381 Work Plan).
2. IRR calculations from file named *Rochester IRR* with date March 16, 2018.
3. Presentation of interest requirements from file named *TIF & Interest* with date March 16, 2018.

### Background

This 381 Work Plan would replace the existing 381 Work Plan (Existing 381 Work Plan) dated February 12, 2008, amended June 17, 2008, and approved by the MDEQ on July 11, 2008. That Existing 381 Work Plan was prepared in conjunction with a Consent Judgment (dated April 19, 2006 as Case no. 04-060730-CZ), which included additional requirements associated with environmental mitigation activities. An Amended Consent Judgment dated January 30, 2018 (the ACJ) has been prepared for this applicant.

All of the environmental mitigation language from the original Consent Judgment has been removed in the ACJ. All activities are now to be completed according to the City approved Brownfield Plan and the MDEQ approved 381 Work Plan. As such, any requirements for mitigation, remediation or long-term operation and maintenance must be included in the 381 Work Plan to be required under the ACJ.

However, the City can only approve the Brownfield Plan dated February 20, 2018 (the Brownfield Plan) and does not approve the 381 Work Plan and it is possible that an activity included in the Brownfield Plan may not be approved by the MDEQ in the 381 Work Plan. In addition, MDEQ approval of the 381 Work Plan is not intended to be an approval of the adequacy of the remedy or the due care obligations, but rather the applicability of the cost for reimbursement. Adequacy for the remedy will be based on the MDEQ issuing a No Further Action (NFA) letter for Parcel A and providing approval for a Documentation of Due Care Compliance report for Parcel B.



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## Project Description

The 381 Work Plan includes two parcels (the Property) located on the northeast corner of Hamlin Road and Adams Road (Parcel ID Numbers 15-29-101-022 and 15-29-101-023). The Property parcels have been referred to as the “West Parcel” (15-29-101-022) at approximately 18.9 acres, and the “East Parcel” (15-29-101-023) at approximately 9.3 acres. A portion of the “East Parcel”, described as the “fenced area”, has historically been presumed to be the location of highest environmental impacts. The “East Parcel” has also been known as the former Christianson-Adams Landfill. The Property will be a residential apartment complex with up to 368 units and a separate natural open area (the Project).

The residential component of the Project will redevelop all of the West Parcel and approximately half of the East Parcel. This portion of the Project is referred to as Parcel A. Parcel A may be split in the future into Phases 1 and 2. The remaining eastern half of the East Parcel is referred to as Parcel B. Parcel B will be created prior to commencement of the Project, and will be maintained as natural open area with the potential surface parking to augment recreational activities on the adjacent City owned property and will be owned by a separate entity. The boundaries of Parcels A and B have not yet been finalized, but the Plan illustrates Parcel B to include the majority of the “fenced area” and some property along Hamlin Road.

## Eligible Activities

All activities described in the Plan and listed for reimbursement are eligible activities in a non-core community.

The 381 Work Plan includes a reference to grant funding under the Oakland County 2017 EPA Site Assessment Grant that was not included in the Brownfield Plan. To the extent that eligible costs are reimbursed by the Assessment Grant, they would not be eligible for reimbursement under the Brownfield Plan or the 381 Work Plan.

## Review of 381 Work Plan

The scope of the Project and the associated eligible activities, including the environmental remediation and controls, as described in the 381 Work Plan are the same as included in the Brownfield Plan with the following exception:

- The 381 Work Plan adds the costs of waterproofing seals and gaskets for the stormwater piping at \$40,000. This was not included as an eligible expense in the Brownfield Plan, and therefore would only be eligible for school tax capture.

As a result, the requested reimbursement for Department Specific Activities is \$40,000 more than included in the Brownfield Plan, while the contingency is \$40,000 less, resulting in the same request for reimbursement for eligible activities of \$9,619,587.

Unlike the Brownfield Plan, the 381 Work Plan does not include capture of the Local Brownfield Revolving Fund. This results in the 381 Work Plan requiring 16 years for reimbursement of eligible costs (not including interest) rather than the 17 years in the Brownfield Plan. The total duration for capture (eligible costs and interest) in the 381 Work Plan is now 20 years rather than 24 years. The request for interest is the same as in the Brownfield Plan (at \$4,581,988), but with the reduced repayment period, the actual interest expenses should be lower. Table 3 illustrates actual interest capture at \$4,006,896, but the year to date total in that table is at the requested \$4,581,988. This discrepancy needs to be addressed.



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In addition, although the City does not currently have a local fund, inclusion of the capture in the Brownfield Plan and the 381 Work Plan will reserve the ability to capture these incremental taxes in the event that a local fund is established. Exclusion of that capture in the 381 Work Plan will limit local fund capture to local taxes only.

The 381 Work Plan does not address the possibility of encountering drums in the landfill area. Drums were encountered during the MDEQ removal activities, and if still present, would be expected to be in the former landfill area. The possibility of drums has been mentioned by the applicant team in at least one public meeting. As such, a spill contingency plan is recommended.

Additional plans and reports are required by the Act 381 Work Plan and ACJ prior to and during site development. As indicated in the ACJ, the City has the option to have an environmental consultant present during site activities. The following are referenced in, but not included in, the 381 Work Plan or ACJ, and will require review when they have been completed.

1. Reimbursement Agreement
2. Report on the results of proposed additional soil and groundwater sampling, including background calculations for metals
3. Soil Erosion and Sedimentation Control Plan
4. The Health and Safety Plan
5. Fugitive Dust Emission Control and Contingency Plan
6. Environmental Construction Management Plan
7. Construction Summary Report
8. Operation and Maintenance Plan for engineered controls in Parcel B
9. Operations and Maintenance plan for venting system along Hamlin Road, if required.
10. NFA Request for Parcel A
11. Documentation of Due Care Compliance for Parcel B

### **Review of Supplemental Information**

The additional documents provided by the applicant (the review of IRR and the discussion of interest capture described above) provide information required by the RHBRA policy.

Review of the IRR analysis provided by the applicant indicates that the IRR for the project will be 6.80% with all incentives. A review of the applicant's assumptions using the MEDC Proforma worksheet indicates an IRR of 7.72% (over a 20 year period). Although the RHBRA has not set a threshold IRR, in other municipalities a fully subsidized IRR of less than 10-12% would indicate a need for incentives for the project to succeed.

The discussion of the interest requirements for the project indicates that the project has greater than a \$3.5M gap, apparently associated with the environmental mitigation of Parcel B. Because Parcel B will not generate additional taxes, the only opportunity for environmental mitigation of Parcel B is in conjunction with a development on the remainder of the property, so the additional costs have become a condition of site redevelopment. The applicant is requesting simple interest of 5% on the outstanding balance of eligible expenses annually, to be reimbursed at the end of the capture period.

The IRR calculations described above include the capture of TIF for interest expenses, indicating that without the interest reimbursement, the IRR would be lower. Therefore, the low IRR and the carrying costs for the Parcel B mitigation may support a need for interest expense reimbursement.



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**Recommendations:**

Because this 381 Work Plan is the basis for implementation of the ACJ, the following additional information is recommended in the 381 Work Plan prior to submittal to the MDEQ.

1. Add to Section 1.0 that expenses funded under the grant will not be reimbursed as part of the Brownfield Plan or 381 Work Plan.
2. The resolution adopting the Brownfield Plan did not include removing the local revolving loan funding. The 381 Work Plan should include the same local revolving loan funding as the Brownfield Plan to provide a conservative estimate of the capture period required and to preserve the ability to capture incremental taxes for the local fund when that fund is established.
3. The actual interest capture request should be reviewed and modified based on the reduced reimbursement period. Table 3 should be internally consistent and consistent with the text.
4. The schedule for implementation of environmental mitigation on Parcel B is not included (Sections 3.1 and 4.1), but was described at the RHBRA meeting as being completed in 2019. A schedule for Parcel B should be included in the 381 Work Plan.
5. It was indicated in a previous BRA meeting that piping would not penetrate the engineered controls in Parcel B. This should be described in Section 3.1.1.9.
6. The 381 Work Plan should state that cost reimbursement for waterproofing seals and gaskets for the stormwater piping is limited to school tax capture (Section 3.1.1.9).
7. Design and installation specifications for the barrier wall (Clay Backfill Wall), slurry wall, and clay cover in Parcel B should be provided to the City for review. This should be listed in the 381 Work Plan as a specific plan for review by the City and approval by the MDEQ.
8. Design and installation specifications for the ventilation system along Hamlin Road should be provided to the City for review. This should be listed in the 381 Work Plan as a specific plan for review by the City and approval by the MDEQ.
9. Truck cleaning activities are briefly described, but should be listed in the 381 Work Plan as a specific plan for review by the City and approval by the MDEQ. This plan should consider a wheel wash.
10. The starting year for capture in Section 5.2 (fourth line) has been removed and needs to be replaced.
11. A spill contingency plan should be listed in the 381 Work Plan as a specific plan for review by the City and approval by the MDEQ.

**Next Steps:**

The following are the recommended next steps.

1. Determine if The IRR evaluation supports the need for the incentive.
2. Determine if the project requires interest capture to succeed, and if so, at what amount and interest rate.
3. Once the the 381 Work Plan is administratively complete and consistent with the Brownfield Plan and ACJ, the City will submit the 381 Work Plan to the MDEQ for review and approval.

Please contact me if you have any questions, or need additional information.



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# MEMO

ASTI Environmental

**Date:** February 27, 2018

**To:** Sara Roediger, City of Rochester Hills  
Pam Valentik, City of Rochester Hills

**From:** Tom Wackerman

**Subject:** Review of Brownfield Plan and Associated Documents for Redevelopment of the Northeast Corner of Hamlin and Adams Roads, Rochester Hills, Michigan (ASTI files No. 9675-21)

As requested, this memo is a review of the following document:

1. *Brownfield Plan, Parcels 15-29-101-022 and 15-29-101-023, Northeast Corner of Hamlin and Adams Roads, Rochester Hills, Michigan*, dated February 20, 2018 (the Plan). ASTI Environmental reviewed previous drafts dated July 27, 2017, September 12, October 6, and November 9 in the memos dated August 8, 2017, September 29, November 6, and January 30, 2018 respectively.
2. *Brownfield Program Application for the City of Rochester Hills* (the Application) dated February 20, 2018.

The following documents were also provided by the applicant and are included in this review:

- Draft Amended Consent Judgment for Case No. 04-060730-CZ dated January 30, 2018
- Draft *Act 381 Work Pan, To Conduct MDEQ Environmental Activities, Hamlin-Adams Redevelopment Project, Northeast Corner of Hamlin and Adams Roads, Rochester Hills, Michigan 48309* dated September 12, 2017
- Letter to Mr. Thomas Wackerman from AKT Peerless dated September 5, 2017, titled Previous Environmental Investigations, Northeast Corner of Hamlin and Adams Roads, Rochester Hills, Michigan, AKT Peerless Project No. 3679F6 including the following attachments:
  - Site Map with Historical Subsurface Investigation Activities, dated 9/6/17 (with overlay of proposed development)
  - Summary Table of Soil Analytical Results from June 2017
- Draft *Limited Soil Gas Investigation* for GCI Construction, LLC dated May 16, 2017
- Draft *Phase I ESA* for Parcels 15-29-101-022 and 15-29-101-023 for GCI Acquisitions LLC and Goldberg Companies LLC dated January 13, 2017.
- *Baseline Environmental Assessment*, Parcel 15-29-101-022 for DBB Hamlin, LLC dated October 21, 2016. (Parcel A only)
- *Baseline Environmental Assessment* for 15-29-101-023 for DBB Adams, LLC dated October 21, 2016. (Parcel B only)



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- Letter to Ms. Jean M. Greensly at the USEPA from AKT Peerless dated February 20, 2008, titled *PCB Migration Risk at Chistenson Landfill, Northeast Corner of Hamlin and Adams Roads, Rochester Hills, Michigan*.
- *Additional Assessment Report, 28-Acre Vacant Parcel* for Hamlin & Adams Properties, LLC dated October 9, 2007
- *Baseline Environmental Assessment* for 27-Acre Vacant Property for Hamlin\Adams Properties, LLC dated November 10, 2005.
- Letter to Ms. Cheryl Wilson at the MDEQ from Dean & Fulkerson dated December 13, 1997, titled *Partial Closure Request for Christianson/Adams Road Facility*.
- Letter to Mr. Joe Balous from Michigan Department of Natural Resources dated May 31, 1995, titled *Christianson/Adams Road Dumpsite, Oakland County, MERA #630015*
- Letter to Mr. Greg Smith at GBS Associates from Michigan Department of Natural Resources dated December 2, 1991, titled *Act 307 27.5 acre parcel: "Christiansen/Adams Dumpsite", Rochester Hills, Oakland County, MI*.
- Letter to Mr. Roman Halanski from Michigan Department of Natural Resources dated March 30, 1989, titled *Christianson & Adams Road Dump, Hamlin Road at Adams Road, Rochester, Michigan*
- *Site Assessment for Christenson Landfill, Oakland County*, dated September 1984 with cover letter to Mr. Andrew Hogarth, MDNR from USEPA dated March 24, 1986, titled *Christenson Landfill, Oakland County, MI*.

## Background

The Plan includes two parcels (the Property) located on the northeast corner of Hamlin Road and Adams Road (Parcel ID Numbers 15-29-101-022 and 15-29-101-023). The Property parcels have been referred to as the "West Parcel" (15-29-101-022) at approximately 18.9 acres, and the "East Parcel" (15-29-101-023) at approximately 9.3 acres. A portion of the "East Parcel", described as the "fenced area", has historically been presumed to be the location of highest environmental impacts. The "East Parcel" has also been known as the former Christianson-Adams Landfill.

The proposed redevelopment of the Property will be a residential apartment complex with up to 368 units (please note that the Application lists 400 units and should be modified) and a separate natural open area (the Project). Although final plans are not yet available, an updated site plan (December 7<sup>th</sup>) indicates that there will be approximately 7 apartment buildings, several detached garage buildings, a pool amenity area, playground, dog park, retention pond, underground detention area, various bioswales, and open space area.

The residential component of the Project will redevelop all of the West Parcel and approximately half of the East Parcel, which is referred to as Parcel A. The remaining eastern half of the East Parcel is referred to as Parcel B. Parcel B will be created prior to commencement of the Project, and will be maintained as natural open area with the potential surface parking to augment recreational activities on the adjacent City owned property. The boundaries of Parcels A and B have not yet been finalized, but the Plan illustrates Parcel B to include the majority of the "fenced area" and some property along Hamlin Road, and Parcel A to include the remainder of the Property (see Figure 2 in the Plan).

The total estimated investment is \$49 million. Total job creation is estimated at 10 full time jobs and 400 temporary construction jobs. The listed initial taxable value is \$37,440. The future taxable value is based on 30% of the total capital investment, as approved during discussions with the City of Rochester Hills assessor, at \$4,511,232.



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The Plan will start capture in 2019 and will require an estimated 23 years for reimbursement to the Developer. The Plan is requesting total reimbursement to the Developer of \$14,201,575 (based on eligible activity costs of \$8,328,415, a contingency of \$1,245,172, and interest costs of \$4,581,988). Capture includes RHBRA administrative fees each year of \$10,000, and contributions to the local revolving loan fund each year at 3% of the annual capture, as per the RHBRA policy. The Plan includes additional capture for the local revolving loan fund in the last three years of the Plan.

This Plan is for the capture of non-school (local) and school taxes, not including non-capturable millages. Capture of school taxes will require approval by the state of a 381 Work Plan. In the event that school tax capture is not approved for an eligible activity, reimbursement from local taxes will not change because reimbursement is limited to the proportional share of the local taxes.

### **Basis for Eligibility**

Based on the following, the Project is eligible.

*Eligible Applicant:* The Plan indicates that a Phase I ESA was completed in January of 2017, and this review assumes that it was complete for the application, Goldberg Companies, Inc. (the Developer). The Developer has not completed a Baseline Environmental Assessment for the Property, but the Plan indicates that the BEA will be completed prior to purchase.

*Eligible Property:* Each of the two parcels is a “facility” as defined by Part 201 and therefore each is an eligible property.

*Eligible Activities:* The Plan includes capture for eligible activities applicable in a non-core community.

### **Required Items**

All items required by Section 13(1) of Act 381 (MCL 125.2663) are included in the Brownfield Plan

### **Key Assumptions**

1. The Plan assumes an annual appreciation of 2.1% in taxable value (Please note that Table 2 lists an annual appreciation of 1.021% in error). Changes in this assumption will result in a longer or shorter reimbursement period.
2. The Plan includes 5% simple interest on the outstanding balance each year, to be paid after reimbursement for eligible activities. If interest is not approved, the Plan will require an estimated 17 years for reimbursement.
3. Tax capture is assumed to include personal property. The Plan estimates that the amount of personal property is anticipated to be small. Inclusion of personal property tax capture may result in a shorter reimbursement period.
4. The Plan assumes that the property will be split prior to construction into two parcels and that these parcels may not be owned by the same entity.

### **Eligible Activities**

All activities described in the Plan and listed for reimbursement are eligible activities in a non-core community.



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## Environmental Control and Remediation

The Property has been the subject of environmental investigations since at least 1984. The EPA, the Michigan Department of Natural Resources, and various private consultants have conducted soil and groundwater investigations. The most recent investigation was in 2017, and additional assessment will be conducted as part of this Project. Therefore, the selected remedies may be modified as a result of future investigations.

In addition to the remedial activities described below, a Soil Erosion and Sedimentation Control Plan, and a Fugitive Dust Emission Control and Contingency Plan will be prepared and implemented for the entire Project during site remedial actions. Following completion of development activities, a Construction Summary Report will be prepared and submitted to the MDEQ.

According to the Plan, remediation of Parcel A will be completed to unrestricted residential criteria as defined by Part 201, and a No Further Action letter will be obtained from the MDEQ following remediation. Remediation costs in the Plan associated with Parcel A total \$4,404,000 and will take approximately 3 to 4 months to complete. Eligible activities on Parcel A are expected to be conducted in 2018. This will include the following:

- Removal and off-site disposal of approximately 43,668 yd<sup>3</sup> of soil, removal and off-site disposal of associated perched groundwater, and backfill in six source areas (Areas A, B, C-1, C-2, D, and F in Figure 3).
- Removal and off-site disposal of approximately 1,500 yd<sup>3</sup> of soil, removal and off-site disposal of associated perched groundwater, and backfill in six additional hot spots.
- Installation of a MDEQ approved passive vent system below all residential buildings. An Operation and Maintenance Plan (O&M Plan) will be prepared and implemented for the sub-slab venting system.
- Excavation areas will be fenced or barricaded and a dust monitoring program (details not included in the Plan) will be implemented during mitigation. Silt fencing will be provided to the north and east to control run-off during remediation and construction. A gravel mat to reduce dirt tracking to public roads will be used during mitigation.

Limited remediation of the “most significant contamination...outside of the fenced area” will be completed in Parcel B, and the remaining impacts will be managed with engineering controls. Remediation costs in the Plan associated with Parcel B total approximately \$3,246,000. No schedule for eligible activities on Parcel B is provided in the Plan, but the Plan indicates that remedial work will not commence on Parcel B until remedial work has been completed on Parcel A and will be funded by tax increment revenues from Parcel A. As such, based on the tax capture tables in the Plan, remedial work on Parcel B could require an estimated 7 years following the redevelopment of Parcel A to complete.

Remediation and engineered controls on Parcel B will be completed to non-residential criteria as defined by Part 201, and “in consultation with MDEQ”. A Documentation of Due Care Compliance report will be completed following site activities, and will be submitted to the MDEQ for review and approval, but does not include closure. Remediation and engineered controls will include the following:

- Preparation of an Environmental Construction Management Plan for any soils relocation within Parcel B.
- Removal and off-site disposal of approximately 23,185 yd<sup>3</sup> of soil, removal and off-site disposal of associated perched groundwater, and backfill in one source area (Area E in Figure 3).



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- Relocation of “minimal amounts” of contaminated soil within Parcel B is anticipated, but has not been quantified. Contaminated soils will not be relocated from Parcel B to Parcel A, or within Parcel A.
- Engineered control of the landfill area using the following (construction details not provided):
  - An approximately 1,400 ft. hydraulic barrier around the perimeter of the landfill which will be tied into the underlying native clay. According to Figure 3, this will consist of two components: 1) a Clay Backfill Wall to be installed on the western side of the landfill area after excavation in Area E, and 2) a minimum of 2-foot thick clay Slurry Wall to be installed on the eastern and northern sides. The details of the construction, including depth of the barrier wall and the connection with underlying clays, were not provided.
  - A 2-foot thick clay cap with flexible membrane liner over the landfill area, which will be tied into the hydraulic barrier. Figure 3 illustrates the cap to cover the landfilled area that is not included in Area E soils remediation.
- The Plan indicates that an O&M Plan will be prepared and implemented for the landfill area for 30 years.
- Excavation areas will be fenced or barricaded and a dust monitoring program (details not included in the Plan) will be implemented during mitigation. Silt fencing will be provided to the north and east to control run-off during remediation and construction. A gravel mat to reduce dirt tracking to public roads will be used during mitigation.

The following will be implemented, but only if “deemed necessary by the MDEQ”: These passive gas collection systems are contingent on consultation with, and recommendations from, the MDEQ, and provided specifically to protect the residential portions of the Project. There currently is insufficient data to determine if these systems are necessary, but additional investigation is proposed and assumed to include methane monitoring. The system along Hamlin Road has been presented in meetings as a preventive measure, but if necessary, would be required to obtain the NFA. Installation of the system on Parcel B will depend on the actual site conditions, but is not for remediation on Parcel B, and therefore not part of the due care program for Parcel B. Following DDCC review by the MDEQ, it is possible that a third gas collection system, not currently included in the Plan, will be required around the capped landfill area to meet non-residential criteria.

- A lateral passive venting system as illustrated in Figure 3 is located between Parcel A and the landfill area of Parcel B. This system is a presumptive remedy to intercept any methane gas that may migrate from Parcel B to Parcel A.
- A passive venting system will be installed along Hamlin Road. Figure 3 illustrates this system from approximately sample location SB-3 to just west of the Project entrance. This system is a presumptive remedy to intercept methane gas that may be migrating from the landfill located south of the Property to Parcel A. The Plan indicates that an O&M Plan will be prepared for this system, but O&M implementation costs are not listed as an eligible expense or included as a cost in Table 1.

### Recommendations:

Based on this review, the Plan is administratively complete and ready for review by the RHBRA. However, some open issues still remain. The following are recommendations to the RHBRA to address these items.

1. The Plan indicates that remediation and engineered controls for Parcel B will comply with non-residential criteria under Part 201. Because the adjacent property will be used for residential, this may not permit use of Parcel B as a park (per 324.20101(ii)(ii) of Part 201), although it will permit use as a natural area or for parking. Final determination of the

adequacy of the remediation and engineered controls based on the intended future use of Parcel B as a park will be obtained in conjunction with the MDEQ as part of the DDCC process described in the Plan. The City should assume that Parcel B will be limited to a natural area and it is possible that it will not be open to the public as part of the adjacent park.

2. A key issue for the City will be the long-term due care obligations for the O&M of Parcel B after redevelopment of Parcel A. O&M responsibilities are anticipated to start immediately following installation of engineered controls, which is anticipated to take up to 7 years. Parcel B will be separately owned and operated, and the controls proposed for Parcel B will require inspection, operation, and maintenance in order to meet due care requirements. The Plan includes \$900,000 for 30 years of that operation and maintenance. If this expense is administered on a reimbursement basis, then reimbursement would extend beyond the statutory 30 year limit for a Brownfield Plan. As such a mechanism for capture and reimbursement of this expense over the next 37 years should be developed and a mechanism for operation and maintenance beyond that period should be considered.
3. The schedule for remediation in Parcel B appears to be based on available reimbursements under the Plan (“...funded by tax increment revenue stream that will then be available...” (Section 2.3.4)), with no specified start date (“a date for commencement...on the eastern Parcel B cannot be estimated at this time” (Section 2.3)). Because this is the most contaminated portion of the Property, the RHBRA may want to consider a more defined schedule for implementing the proposed remedies on Parcel B.
4. The RHBRA should provide a final decision on this Project for the following policy items;
  - Has the applicant provided sufficient documentation to determine that interest is an eligible expense as requested in the policy guidance?

Please contact me if you have any questions, or need additional information.



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