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September 21, 2007

VIA FEDERAL EXPRESS

Kelly Lewandowski
Chief, Site Control Section
New York State Dept. of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233

Re: **Pierce Arrow Development Project
Brownfield Cleanup Program Application
Site ID: C915220**

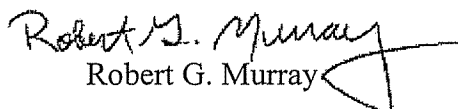
Dear Kelly:

Enclosed please find additional materials related to the Brownfield Cleanup Program Application by Pierce Arrow Development, LLC with respect to the former Pierce Arrow manufacturing site located in Buffalo, New York. These materials are being sent to you as a follow up to a meeting I had with DEC Region 9 staff on September 13, 2007.

Should you have any questions or concerns, please feel free to call me at 716-200-5180.

Very truly yours,

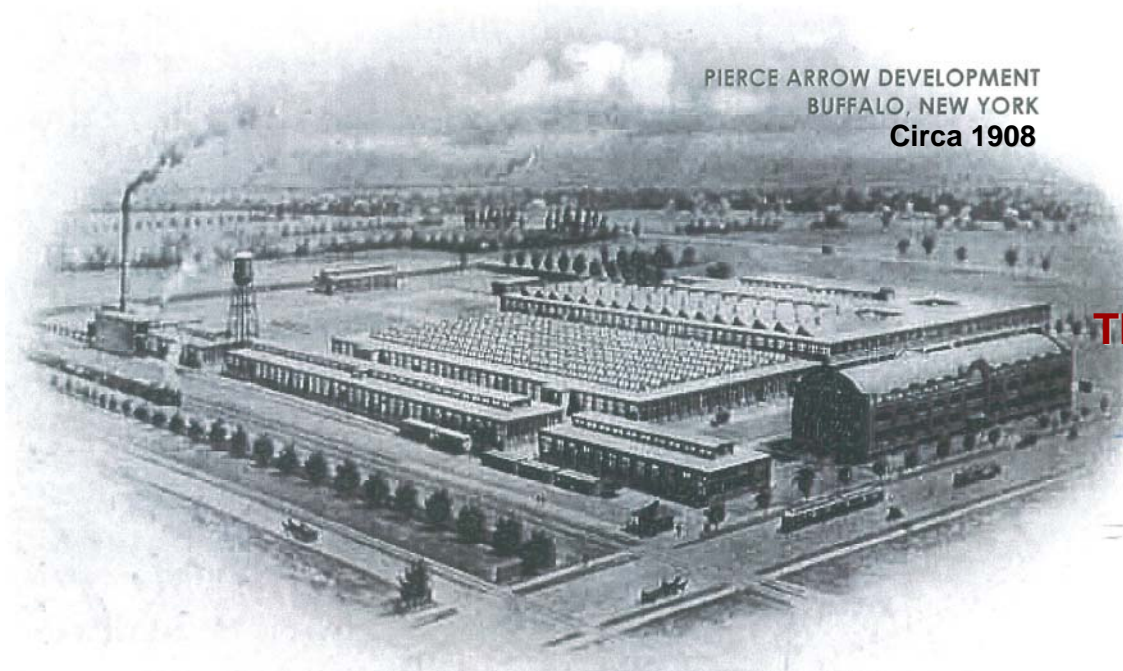
Harris Beach PLLC


Robert G. Murray

RGM:kd

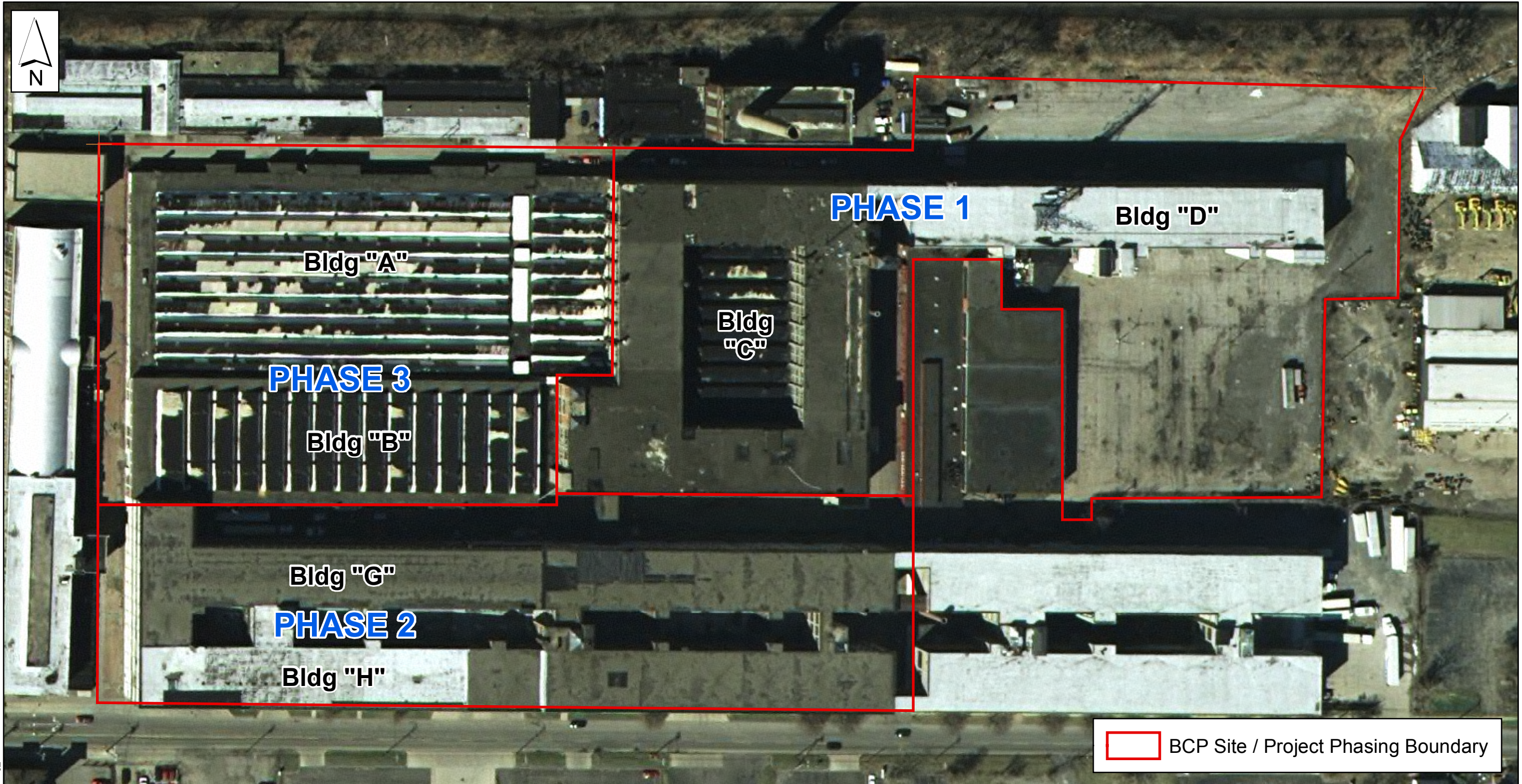
cc: Martin Doster

Exhibit 1
Supplement to:
Application to NYS Brownfield Cleanup Program
Former Pierce Arrow Manufacturing Site
255 Great Arrow Way, Buffalo, New York



The Past





**MALCOLM
PIRNIE**

**SITE AERIAL VIEW
FORMER PIERCE ARROW MANUFACTURING SITE
BUFFALO, NEW YORK**

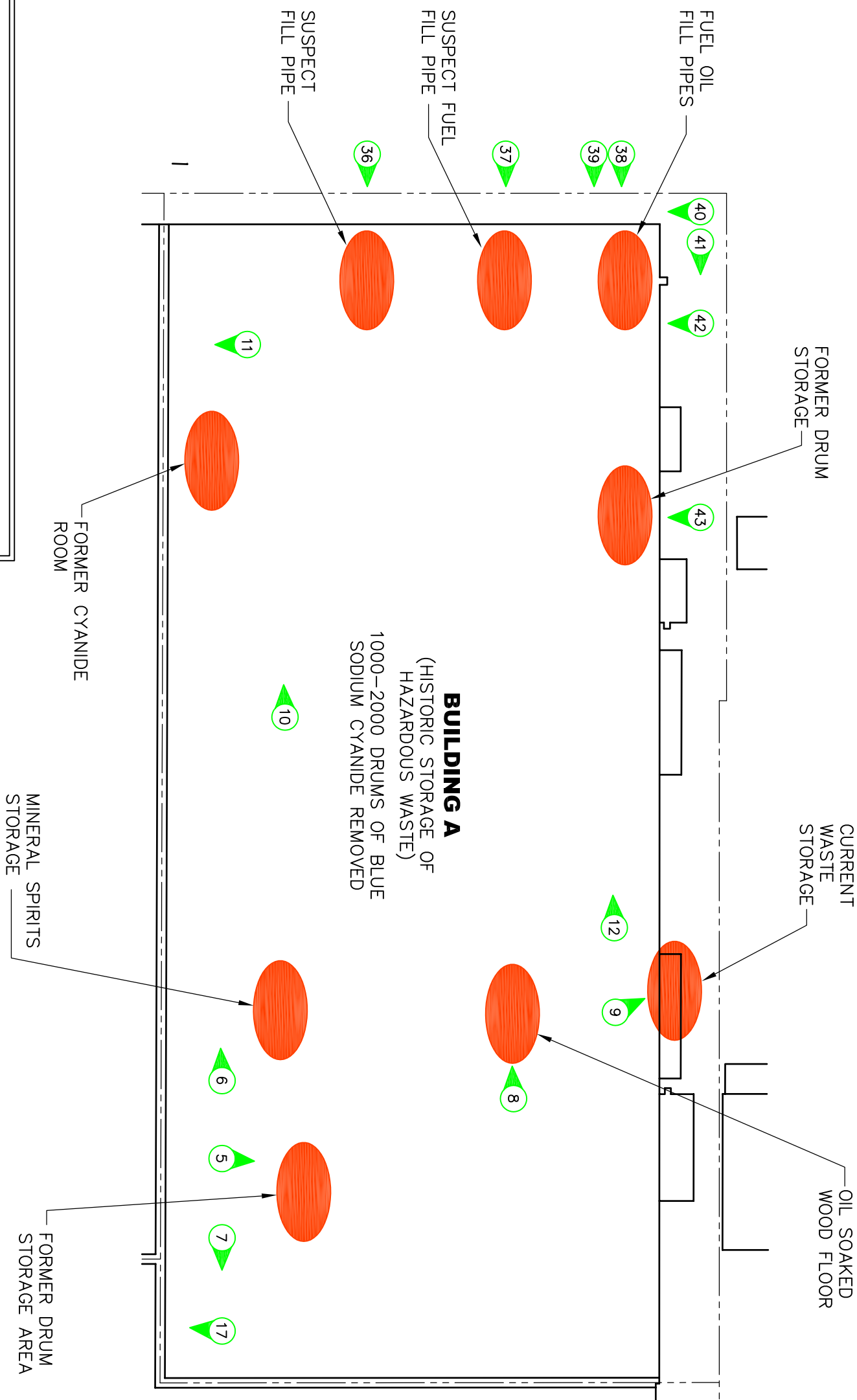


PROPOSED PROJECT PHASING

UNITED DEVELOPMENT CORP.
 CHAINTREUIL | JENSEN | STARK Architects
 MALCOM PERNIE

PIERCE ARROW DEVELOPMENT PROJECT
 BUFFALO, NEW YORK





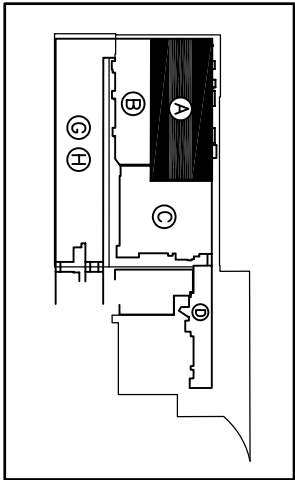
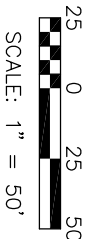
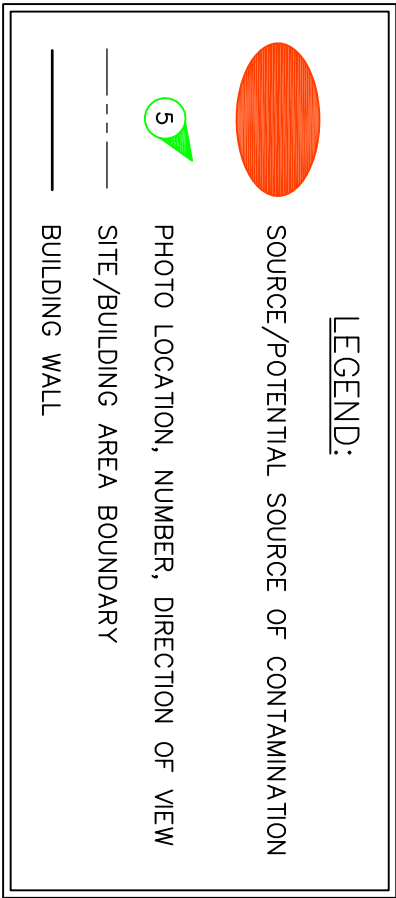
BUILDING "A"

YEAR BUILT: 1907

FORMER USE: HEAVY MANUFACTURING
PIERCE ARROW MOTOR
CARS

CURRENT USE: VACANT AND IN DISREPAIR

PROPOSED USE: HOTEL



KEY PLAN

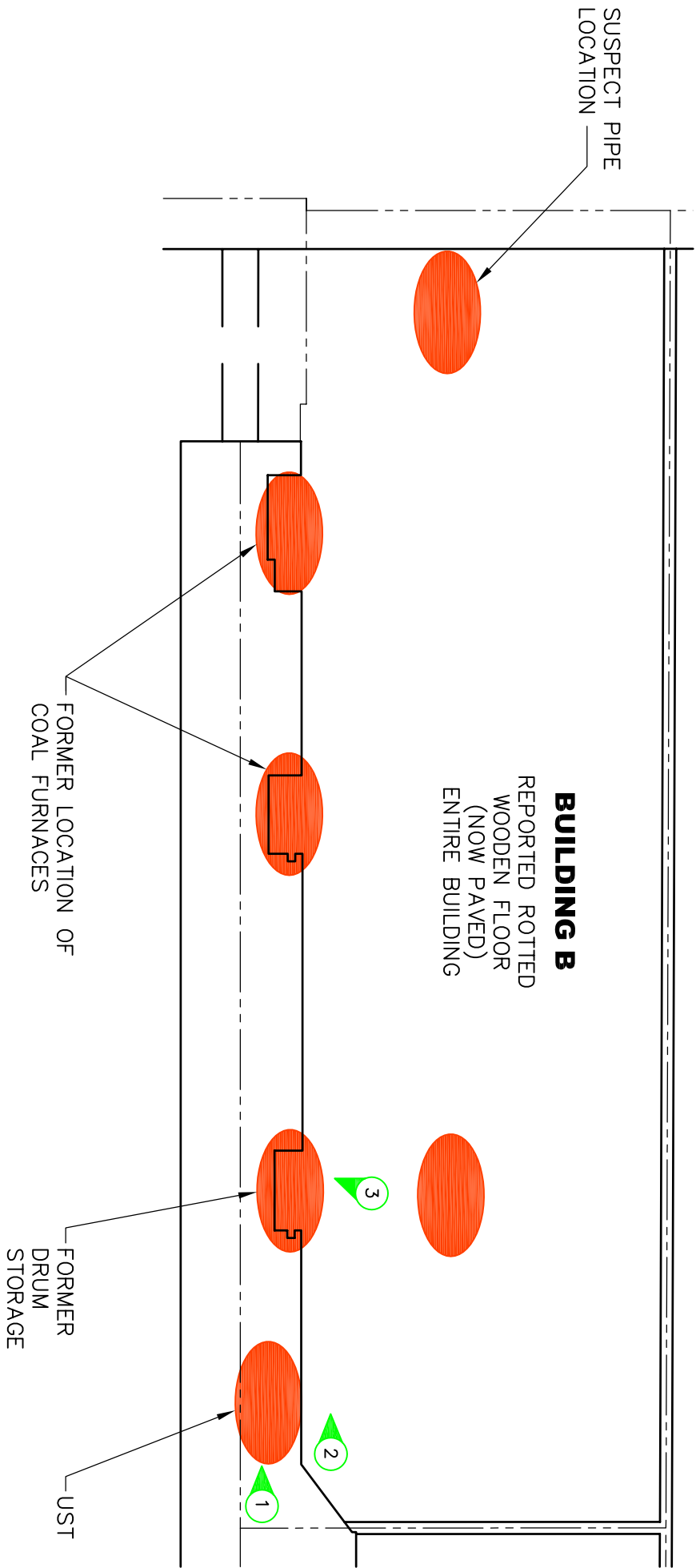
**MALCOLM
PIRNIÉ**

PIERCE ARROW DEVELOPMENT, LLC
255 GREAT ARROW WAY
PIERCE ARROW REDEVELOPMENT PROJECT

PIERCE ARROW REDEVELOPMENT SITE SUMMARY OF ENVIRONMENTAL CONDITIONS BUILDING A AREA

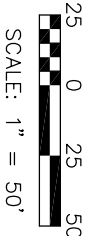
MALCOLM PIRNIE, INC.
SEPTEMBER 2007
FIGURE

6062F001







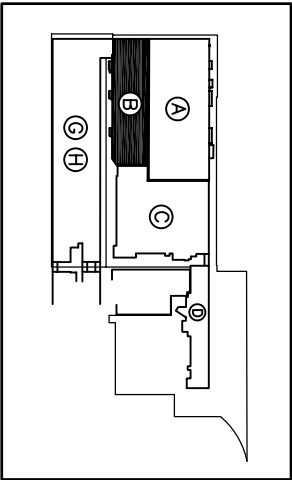
BUILDING "B"

YEAR BUILT:	1907
FORMER USE:	HEAVY MANUFACTURING PIERCE ARROW
CURRENT USE:	LIMITED VEHICLE STORAGE-NOW IN DISREPAIR
PROPOSED USE:	HOTEL



LEGEND:

-  SOURCE/POTENTIAL SOURCE OF CONTAMINATION
-  PHOTO LOCATION, NUMBER, DIRECTION OF VIEW
-  SITE/BUILDING AREA BOUNDARY
-  BUILDING WALL



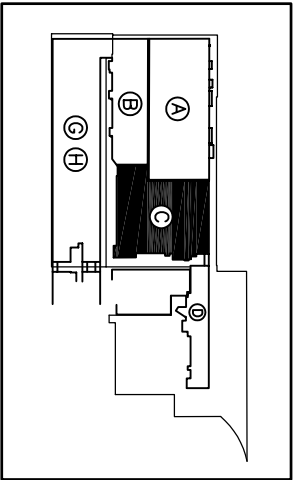
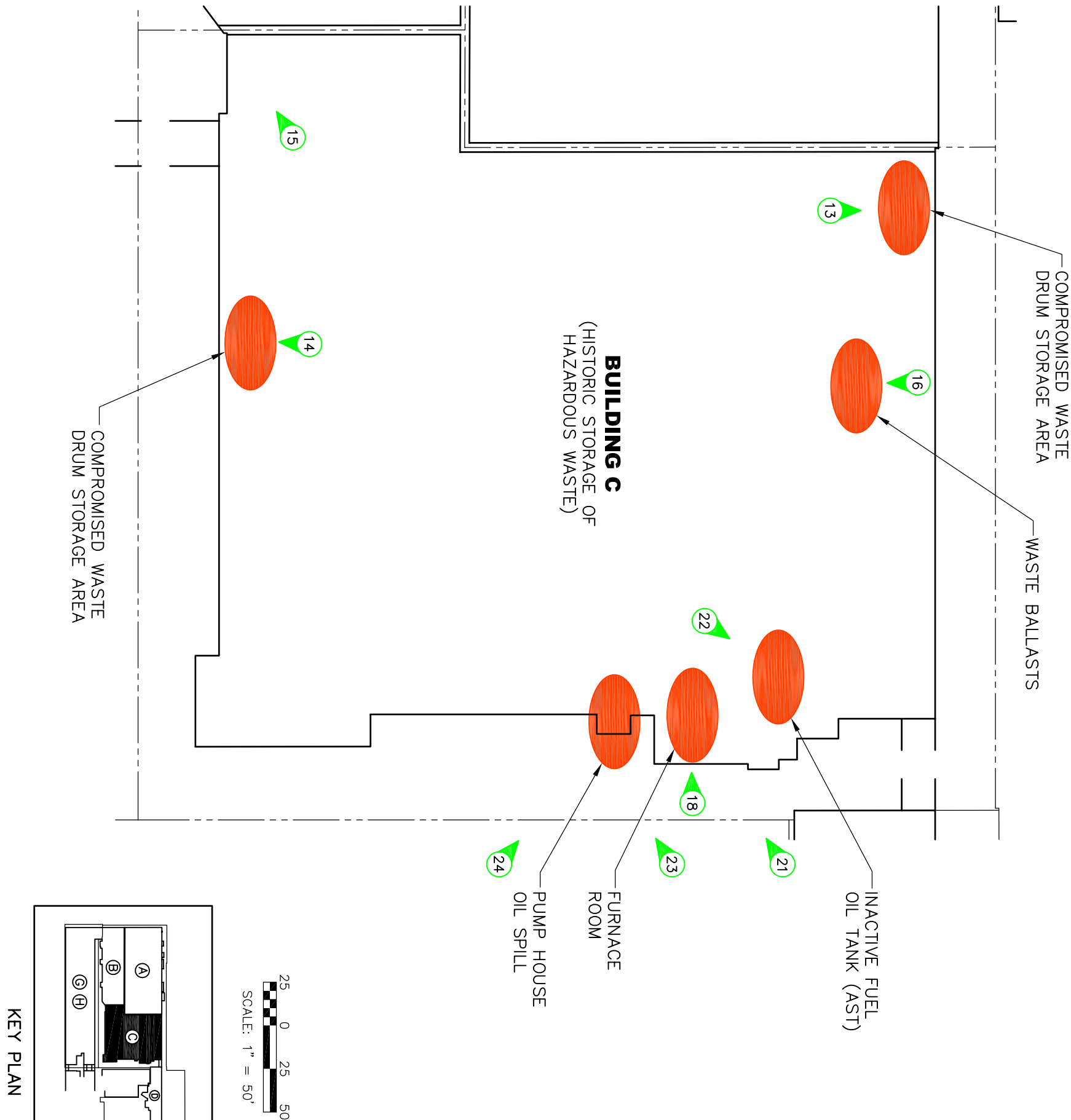
KEY PLAN

**MALCOLM
PIRNIE**

PIERCE ARROW DEVELOPMENT, LLC
255 GREAT ARROW WAY
PIERCE ARROW REDEVELOPMENT PROJECT

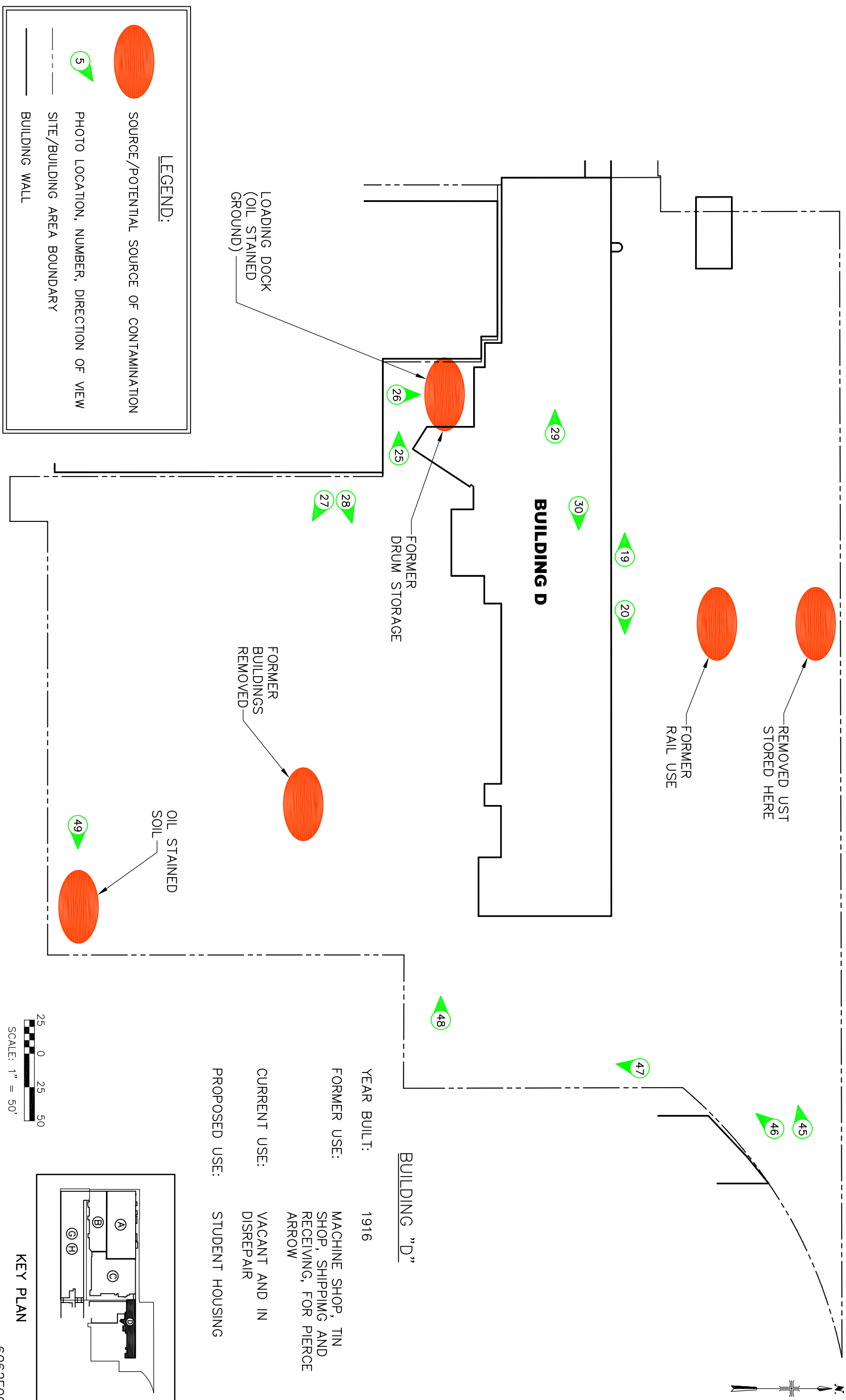
PIERCE ARROW REDEVELOPMENT SITE
SUMMARY OF ENVIRONMENTAL CONDITIONS
BUILDING B AREA

6062F002
SEPTEMBER 2007
FIGURE



KEY PLAN

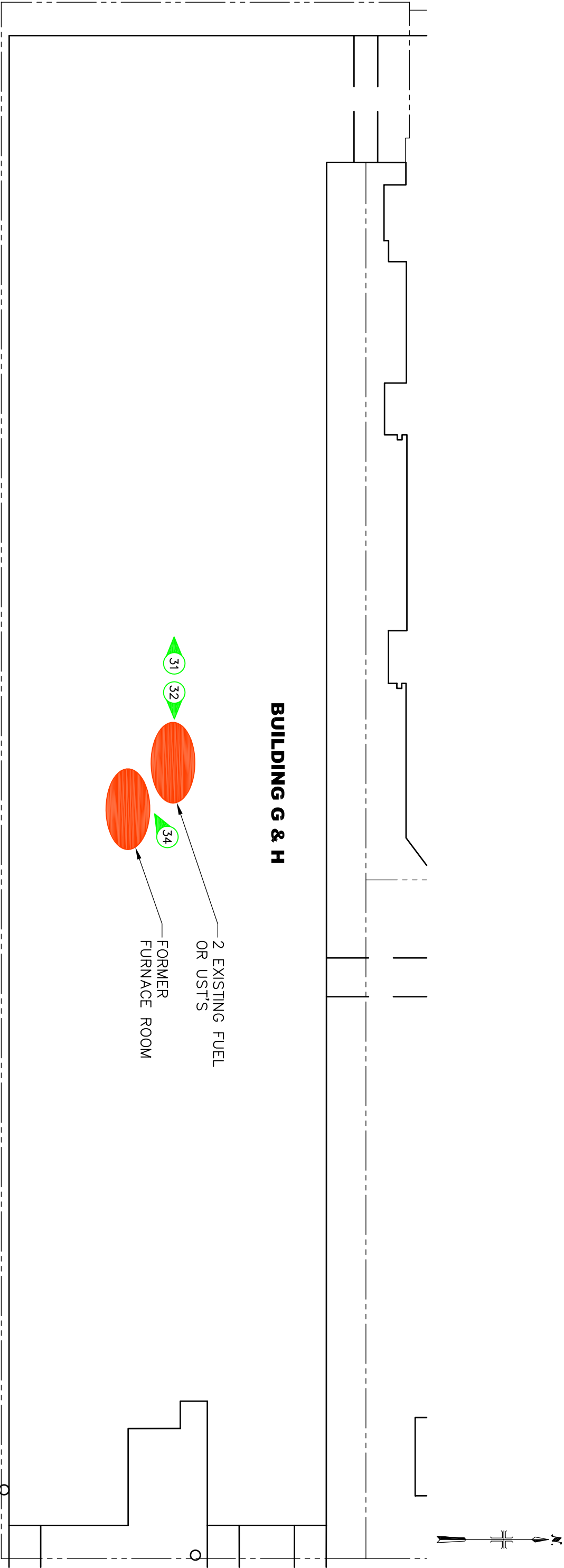
25 0 25 50
SCALE: 1" = 50'



PIERCE ARROW DEVELOPMENT, LLC
255 GREAT ARROW WAY
PIERCE ARROW REDEVELOPMENT PROJECT

PIERCE ARROW REDEVELOPMENT SITE SUMMARY OF ENVIRONMENTAL CONDITIONS BUILDING D AREA

MALCOLM PIRNIE, INC.
SEPTEMBER 2007
FIGURE



BUILDING G & H

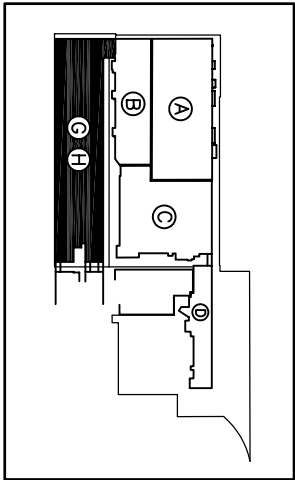
HISTORICAL UST
LOCATION

HISTORICAL UST
LOCATION

BUILDING "G & H"

YEAR BUILT:	1907
FORMER USE:	OFFICES/STORAGE
CURRENT USE:	COMMERCIAL OFFICES/COMMERCIAL STORAGE
PROPOSED USE:	MIXED RESIDENTIAL AND COMMERCIAL

KEY PLAN



25 0 25 50
SCALE: 1" = 50'

**MALCOLM
PIRNIE**

PIERCE ARROW DEVELOPMENT, LLC
255 GREAT ARROW WAY
PIERCE ARROW REDEVELOPMENT PROJECT


PIERCE ARROW REDEVELOPMENT SITE
SUMMARY OF ENVIRONMENTAL CONDITIONS
BUILDING G & H AREA

MALCOLM PIRNIE, INC.
SEPTEMBER 2007
FIGURE

6062F005

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 1	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building B – South outer wall of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 2	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building B – Inside south wall.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 3	Date: 9/18/2007		
Direction Photo Taken: Southwest			
Description: Building B – Rotting wood flooring of drum storage site south wall of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 4	Date: 9/18/2007		
Direction Photo Taken: Southwest			
Description: Building B – Suspect pipe on floor at west wall.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 5	Date: 9/18/2007		
Direction Photo Taken: North			
Description: Building A – Mineral spirits storage area.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 6	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building A – South side walls inside building.			


Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 7	Date: 9/18/2007		
Direction Photo Taken: East			
Description: Building A – Rotting wood floor at southeast corner of building.			


Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 8	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building A – Rotting, oil-soaked wood block floor at east end of building.			


Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 9	Date: 9/18/2007		
Direction Photo Taken: Northwest			
Description: Building A – Open compromised bags containing unknown black substance.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 10	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building A – Southwest floor with green moss.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 11	Date: 9/18/2007		
Direction Photo Taken: South			
Description: Building A – Red door of former cyanide room.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 12	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building A – Inside north wall.			


Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 17	Date: 9/18/2007		
Direction Photo Taken: South			
Description: Building A – Oily stained floor and 5 gallon bucket of penetrating oil in building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 36	Date: 9/18/2007		
Direction Photo Taken: East			
Description: Building A – Tank fill pipe – center of west wall.			


Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 37	Date: 9/18/2007		
Direction Photo Taken: East			
Description: Building A – Tank fill pipe north of center of west wall.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 38	Date: 9/18/2007		
Direction Photo Taken: East			
Description: Building A – 2 pipes – 1 fuel oil fill pipe northwest corner.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 39	Date: 9/18/2007		
Direction Photo Taken: East			
Description: Building A – Close up of northwest fill pipe.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 40	Date: 9/18/2007		
Direction Photo Taken: South			
Description: Building A – View of west side of site.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 42	Date: 9/18/2007		
Direction Photo Taken: South			
Description: Building A – Fuel fill pipe and possible excavation backfill on north wall of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 43	Date: 9/18/2007		
Direction Photo Taken: South			
Description: Building A – Old furnace on outside north wall of building.			

Project:

Former Pierce Arrow Manufacturing Site

Location:

Buffalo, NY

Project No.

6062-001


Photo No.
41**Date:**
9/18/2007**Direction Photo Taken:**

East


Description:Building A – View of north
side of site.

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 13	Date: 9/18/2007		
Direction Photo Taken: North			
Description: Building C – Compromise waste drum storage area.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 14	Date: 9/18/2007		
Direction Photo Taken: South			
Description: Building C – Compromise waste drum storage area.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 15	Date: 9/18/2007		
Direction Photo Taken: Southwest			
Description: Building C – Southwest corner of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 16	Date: 9/18/2007		
Direction Photo Taken: South			
Description: Building C – Crate of fluorescent light ballasts in north area of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 18	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building C – Boiler room - asbestos coating on boiler.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 21	Date: 9/18/2007		
Direction Photo Taken: Southwest			
Description: Building C – Outside wall of east side of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 22	Date: 9/18/2007		
Direction Photo Taken: Northeast			
Description: Building C – Empty UST for boiler.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 23	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building C – Fuel pump room – buckets of oil and staining.			

Project:

Former Pierce Arrow Manufacturing Site

Location:

Buffalo, NY

Project No.

6062-001

Photo No.
24**Date:**
9/18/2007**Direction Photo Taken:**

South

Description:Building C – Fuel pump
room – oil soaked floor.

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 19	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building D – North side of site.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 20	Date: 9/18/2007		
Direction Photo Taken: East			
Description: Building D – North side of site.			


Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 25	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building D – Loading dock at southwest corner of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 26	Date: 9/18/2007		
Direction Photo Taken: North			
Description: Building D – Loading dock at southwest corner of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 27	Date: 9/18/2007		
Direction Photo Taken: Southeast			
Description: Building D – Southeast corner of site.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 28	Date: 9/18/2007		
Direction Photo Taken: Northeast			
Description: Building D – View of southeast corner of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 29	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building D – Inside view of west half of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 30	Date: 9/18/2007		
Direction Photo Taken: East			
Description: Building D – Inside view of east half of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 45	Date: 9/18/2007		
Direction Photo Taken: Southwest			
Description: Building D – View of northeast corner of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 46	Date: 9/18/2007		
Direction Photo Taken: Southwest			
Description: Building D – View of northeast corner of building.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 47	Date: 9/18/2007		
Direction Photo Taken: South			
Description: Building D – Western area of property.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 48	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building D – Exterior of south side of building.			

Project:

Former Pierce Arrow Manufacturing Site

Location:

Buffalo, NY

Project No.


6062-001

Photo No.
49**Date:**
9/18/2007**Direction Photo Taken:**

East

Description:Building D – Oily stained
soil at east end of site.

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 31	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building G & H – West tank fill-port in courtyard with suspected UST.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 32	Date: 9/18/2007		
Direction Photo Taken: East			
Description: Building G & H – Courtyard between building with suspected UST.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 34	Date: 9/18/2007		
Direction Photo Taken: West			
Description: Building G & H – Furnace room of building courtyard containing unknown debris.			

Project: Former Pierce Arrow Manufacturing Site		Location: Buffalo, NY	Project No. 6062-001
Photo No. 55	Date: 9/18/2007		
Direction Photo Taken: North			
Description: Building G & H – Front of building adjacent to historic UST locations.			