

## S T A T E O F M I C H I G A N

## BOARD OF COMMISSIONERS OF THE COUNTY OF ALLEGAN

**BROWNFIELD AUTHORITY--APPLY/ACCEPT FY2021 ENVIRONMENTAL PROTECTION AGENCY BROWNFIELDS COMMUNITY-WIDE ASSESSEMENT GRANT**

**BE IT RESOLVED THAT** the Allegan County Board of Commissioners hereby approves the request from the Allegan County Brownfield Authority, to apply for and accept when awarded, the Brownfields Community-Wide Assessment grant offered through the Environmental Protection Agency FY2021, in the amount of \$300,000 to assess sites with contamination by hazardous substance and/or petroleum; and

**BE IT FURTHER RESOLVED** that the Board Chairperson and/or the County Administrator are authorized to make any final revisions to text prior to submission and sign the necessary documents on behalf of the County and that the Executive Director of Finance is authorized to make the necessary budget adjustments to complete this action.

# Allegan County Grants

## Request for Action (RFA) Form - Application

### Section I - General Information

Name of Grant	Grant Period / Term
<b>EPA Brownfields County-Wide Assessment Grant</b>	FY 2021 - 2023
Source of Grant Funding - Agency Name	Federal, State, Local
ENVIRONMENTAL PROTECTION AGENCY (EPA)	Federal
Submitted by and/or Program Manager	Service Area Requesting
Dan Wedge, Executive Director	Brownfield Authority
Brief summary of Grant program	Requesting continued funding for Regular Service, Specialized Services, Job Access, Mobility Management, and Capital.

### Section II - Application

Request Type	New Grant	Work Order No.	195-178
Specific Action Requested	BOC Resolution Needed	Request Date	9/24/2020
Request Submission Deadline (Date)	10/28/2020	Approval Date	
Grant request approved by BOC with Budget			
Signatures Needed	BOC Chairperson		
<b>Funding Sources</b>	<b>Estimated amounts approved with Grant Renewal list</b>	<b>Application Amount</b>	
Grant Funding		\$	300,000.00
Required Local Match		\$	-
County Funding		\$	-
<b>TOTAL</b>	\$ -	\$	300,000.00

#### Notes or Additional Information

### Metrics and Measurements at Application - Identify Goals and Purpose

Complete assessment work in the communities identified to enable development	Collaborate locally and regionally
Environmental assessments funded by the grant will stimulate the cleanup and redevelopment of the targeted priority sites.	Collaborate locally and regionally

### Section III - Acceptance

Specific Action Requested		Work Order No.	
Request Submission Deadline Date		Request Date	
Signatures Needed		Approval Date	
<b>Funding Sources</b>	<b>Actual Award</b>		
Grant Funding	\$	-	

Required Local Match	\$	-	
County Funding	\$	-	
<b>TOTAL</b>	\$	-	

**Notes or Additional Information**

**Section IV - Closeout**

<b>Funding Sources</b>	<b>Actual Expenditures</b>	<b>Actual Funding/Revenues</b>
Grant Funding	\$ -	\$ -
Required Local Match	\$ -	\$ -
County Funding	\$ -	\$ -
<b>TOTAL</b>	\$ -	\$ -

**Notes or Additional Information**

**Metrics and Measurements at Completion - Evaluate Performance and Success**

< insert Metric or Measurement #1 >	< insert Performance Data for Metric or Measurement #1 >
< insert Metric or Measurement #2 >	< insert Performance Data for Metric or Measurement #2 >
< insert Metric or Measurement #3 >	< insert Performance Data for Metric or Measurement #3 >
< insert Metric or Measurement #4 >	< insert Performance Data for Metric or Measurement #4 >

**Notes or Additional Information**

**Amendment(s)**

Specific Action Requested		Work Order No.	
Request Submission Deadline Date		Request Date	
Signatures Needed		Approval Date	
<b>Funding Sources</b>	<b>Proposed Funding</b>		
Grant Funding	\$ -		
Required Local Match	\$ -		
County Funding	\$ -		
<b>TOTAL</b>	\$ -		

**Notes or Additional Information**

# APPLICATION FOR FY21 USEPA BROWNFIELDS COMMUNITY-WIDE ASSESSMENT GRANT

## ALLEGAN COUNTY, MICHIGAN

### 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

#### 1a. Target Area and Brownfields

1a.i Background and Description of Target Area: Allegan County (County), located on the west coast of Michigan's Lower Peninsula, is approximately 150 miles west-northwest of the City of Detroit and 100 miles northeast of Chicago. The County is rural in nature except for the cities located along the M-89/40 corridor which bisects the entire length of the County. This transportation corridor closely parallels the Kalamazoo River and provides the primary connection for industrial and pharmaceutical supply chains and agricultural product delivery between the city of Kalamazoo and the Interstate 94 corridor with the tri-city area of Holland-Grand Rapids-Muskegon (port). The corridor including the riverfront (the Corridor) is also home to a number of priority brownfield sites in the County as described in this application. These sites pose a serious impediment to a clean and healthy environment, strong economic conditions, and an improved quality of life.

The County has a diverse economy that includes farming on rich agricultural land that surrounds the city centers, tourism, and recreation along 30 miles of Lake Michigan shoreline, including a port, and manufacturing in the central and eastern half of the County. Historically manufacturing within the County was centered on the paper industry which was the main economic driver in the 20<sup>th</sup> century. While some of these facilities are still present, most are now functionally obsolete and provide little economic value in their current state. Many have left a legacy of environmental contamination that has created financial risk and disincentive for developers and health risks to the communities. Recent health concerns raised by local citizens have mobilized County communities to request soil, groundwater and surface water testing for PCBs, dioxins/furans and PFAS at and near the former papermills. The Target Areas consists of 5 communities along the Corridor that have several of these obsolete papermills as well as businesses that once supported the paper industry. It is expected that a majority of the assessment activities will be performed in these communities as well as at connection points associated with the Corridor in between these cities.

A Superfund site designation for the Kalamazoo River has addressed a majority of the PCB contamination in the river. However, the inclusion of the river on the NPL in the 1990's has severely diminished redevelopment activities at prime brownfield sites along or in close proximity of the river and within the Corridor. Additionally, the recent identification of potential health issues associated with dioxins/furans and polyfluorinated alkyl substances (PFAS) in communities along the Corridor have raised additional concerns associated with many of the old industrial sites (see Section 1.a.ii below). **Note: No sites to be assessed as part of this grant project are associated with the Kalamazoo River Superfund Site.**

The County recognizes that future economic development and growth is dependent on redevelopment of the Corridor as the economic driver. It serves as the common link between some of Michigan's largest cities as well as the County's largest cities where most of their manufacturing sector is based. It is also the tourism and recreation hub connecting the Kalamazoo River to Lake Michigan. In establishing the Corridor as the overall Targeted Area, the County is taking the lead to identify and assess sites in these key areas and is working to incorporate brownfield redevelopment and place-making principles as the drivers for achieving their economic development planning goals.

1.a.ii Description of Priority Brownfield Sites: There are number of catalyst brownfield sites within the Targeted Area that have the potential to invigorate redevelopment. At least one catalyst brownfield site has been identified in each of the targeted priority areas for assessment and/or cleanup planning activities. Redevelopment of these catalyst sites will also spur other brownfield redevelopment projects in adjacent areas. The catalyst sites include a former plating facility, which was once one of the County's largest employers, and surrounding brownfield sites; two abandoned paper mills; and a junkyard along a mill race of the river. In addition to these key sites, there is a strong desire to develop linear greenspace as park areas along the river to provide connectivity and place-making opportunities between the communities.

<b>Targeted Priority Areas</b>	<b>Site Description</b>	<b>Potential Contaminants</b>	<b>Why Targeted</b>
<b>City of Plainwell</b>	Vacant 6-acre former junkyard owned by the City. Adjacent to low-income, minority residential neighborhood and Kalamazoo River.	VOCs, PAHs, and metals	Community need along the Corridor; sensitive residential receptors
	Lumberyard. Serviced by rail lines. Located on M-89 corridor near downtown Plainwell.	Petroleum, PAHs, and metals	Community need; existing infrastructure
<b>City of Otsego and Otsego Twps.</b>	53 acres of vacant industrial properties located along the Kalamazoo River and 1 block from downtown Otsego and M-89 corridor. Area consist of 2 former papermills, a plating facility, and shoe factory. Buildings to be demolished by the County in advance of assessment activities.	VOCs, PAHs, metals, dioxins and furans, and PFAS	Key redevelopment area to connect City commercial district with target area and riverfront along the Corridor; sensitive receptors
	Abandoned school with bus maintenance garage that is a building safety hazard along the M-89 corridor.	Asbestos, petroleum, and metals	Prime reuse opportunity and developer interest; asbestos/petrol. hazard
<b>City of Douglas</b>	75 acres of planned commercial and residential redevelopment surrounding former plating facility, contaminated orchard, and migrating chlorinated solvent plume to the Kalamazoo River and Lake Michigan.	Chlorinated solvents, PCBs, arsenic and lead	Existing development agreement requires assessment/cleanup planning in advance of vapor mitigation/cleanup; sensitive populations
<b>City of Allegan and Allegan Twps.</b>	Former industrial sites along M-89 corridor including bulk fuel storage and fueling/transport facilities with USTs and junkyard.	VOCs, PAHs, metals,	Along the Corridor, existing infrastructure
<b>City of Holland</b>	Former UST sites.	Petroleum, lead, PFAS	Prime reuse opportunity; sensitive populations

### **1b. Revitalization of the Target Area**

1b.i.Reuse Strategy and Alignment with Revitalization Plans: The County has identified five specific Target Areas along their key transportation and river corridor (Corridor) as priorities for assessment, based on their deteriorated condition, the severity of threats posed to nearby sensitive receptors, their site-specific redevelopment potential, recreational opportunities along the Kalamazoo River, and their potential to catalyze larger area-wide revitalization. Communities within the Target Areas identified these sites and their projected redevelopment as key components of their revitalization plans.

- The City of Otsego is seeking the redevelopment of two former papermills, a former plating facility, a former shoe factory and an abandoned school building. The industrial properties are located immediately across the river from the downtown area and redevelopment would provide a natural connection for mixed commercial and residential uses as well as further connection of a linear park/trail along the Kalamazoo River which is compatible with the surrounding property uses. The abandoned school building is becoming a safety hazard and could become an air quality hazard if asbestos fibers are released to the atmosphere (it is unknown if asbestos exists in the building).
- The City of Douglas is seeking the re-use of a multi-parcel area adjacent to a former plating facility. The plating facility is owned by the Douglas Brownfield Redevelopment Authority (DBRA). An agreement is in place for a developer to purchase the former plating facility from the DBRA for commercial development in exchange for property adjacent to the former plating facility. The DBRA is seeking to redevelop the adjacent exchanged property as a community recreation facility and park as well as housing on other adjacent parcels that will be supported by the commercial and recreational development. The developer is planning to clean up the plating

facility (source area) with private or leveraged funds while the recreational and housing properties will need to be assessed using this grant to determine the impact of a chlorinated solvent plume that is migrating from the source area.

- The City of Plainwell is seeking re-use of a former 6-acre junkyard that is adjacent to a residential neighborhood and the Kalamazoo River. The City is looking to provide senior housing that would be close to the downtown area and meet one of their Master Plan priorities. A second site is a lumberyard in the eastern commercial downtown district and along the M-89 Corridor. This property is serviced by a rail line and is adjacent to the City's industrial park.
- The City of Holland is seeking to assess a number of commercial/industrial facilities that may have petroleum releases from USTs or releases of hazardous substances. Three potential brownfields have been identified at the terminus of the Corridor in the Holland/Allegan County industrial area. A PFAS release has recently been identified at one of the priority sites.
- The City of Allegan and Allegan Township is seeking to assess multiple commercial/industrial facilities along the Corridor. A former bulk fuel site as well as a number of commercial/industrial facilities with on-site fueling operations along the Corridor are underutilized or have been abandoned.

1.b.ii. Outcomes and Benefits of Reuse Strategy: Environmental assessments funded by the grant will stimulate the cleanup and redevelopment of the targeted priority sites. The targeted former industrial sites in each Target Area are planned for industrial or mixed commercial and residential use based on the existing infrastructure and the communities' master plans for these areas. The sustainable reuse of these properties is considered strategic to the Target Areas as a whole. Redevelopment of the priority properties will also serve as a catalyst for other nearby properties creating additional jobs and further improving the economy of the communities.

The target sites in Otsego, Plainwell and Douglas are planned for mixed residential, commercial and recreation uses consistent with the community's plans for revitalizing this area. These developments will create construction jobs and permanent jobs and will improve each City's tax base. These redevelopments will also eliminate or contain persistent contaminants and help stabilize and improve the livability of the surrounding areas and will be major steps to the overall revitalization of these communities. The location of these sites would also contribute significant park areas and greenways along the river and connections to existing linear parks. The target sites in Allegan and Holland are planned for industrial or commercial uses and will also contribute to the creation of jobs and improvements to the tax base.

### 1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: The County will leverage other public and private funds for the completion of the planned assessment activities. These activities, as well as cleanup activities, may be paid for using TIF via the County's Brownfield Redevelopment Authority. In addition, the County will leverage the following private investment and/or public funds to complete the assessment and cleanup of targeted brownfields:

**Municipal Brownfield Redevelopment Authority Tax Increment Financing.** Allows reimbursement of investigation/cleanup costs using State and local incremental tax revenues generated by the redevelopment.

**EGLE Brownfield Redevelopment Grants and Loans.** Provides grants and loans to local units of government for response activities at brownfields where a new economic development has been identified.

#### **Other Sources of funding may include:**

- US Economic Development Authority (EDA) – infrastructure
- Michigan Economic Development Corporation (MEDC) – infrastructure, site development
- US EPA Cleanup Grants and Revolving Loan Fund Grants
- US/Michigan Transportation Grants

Allegan County and the ACBRA will contribute in-kind services to accomplish the goals of the grant. Allegan County is seeking State and local funds on the amount of \$400,000-\$1,200,000 for the demolition of buildings at the former Rock-Tenn papermill site. Demolition of the buildings will facilitate the completion of a Phase II ESA

beneath the building slabs. Additionally, ACBRA members will contribute in-kind meeting time hours, estimated to be \$5,000 over the three-year grant period. Additional in-kind hours will be contributed by ACBRA members during contractor selection, grant reporting, and regional and national brownfields meetings and conference. Additionally, the contracted environmental consultant will contribute an estimated \$10,000 over the course of the 3 years via the completion of meeting attendance, marketing activities, developer education, development of project procedures and forms, assisting communities with site nominations, and project redevelopment goals.

1.c.ii. Use of Existing Infrastructure: The County and local communities are dedicated to the promotion of green and sustainable development. In many cases, the ability to reuse the existing infrastructure, such as along the targeted transportation corridors, is a key incentive to attract new development. Where demolition is required, the reuse of materials is planned. In the case of the papermill demolition, the County will reuse and recycle building materials to offset demolition costs and limit the import of backfill materials.

## **2.COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **2a. Community Need**

2.a.i. The Communities Need for Funding: The large tax revenue shortfall for the County and its municipalities as a result of plant closures and reduced local government revenue sharing by the State of Michigan has limited their ability to respond to the deterioration of properties in their communities. Municipal budgets have dropped by an average of 30% and communities are in critical need of funding for assessments and cleanup of brownfields. One of the primary financial needs is the lack of employment opportunities within the County. Many residents need to seek employment outside the County because local jobs have been lost with numerous plant closures forcing residents to seek employment in the larger cities outside the County. According to Michigan Works and other sources, plant closures and layoffs within the County has resulted in over 800 lost jobs since 2000, primarily with the closure of papermills in Otsego and Plainwell and the plating facility in Douglas. The County also recognizes that 4 of the 5 Target Areas are in communities with populations of less than 6,000 and do not have the economic ability nor the available staff to address brownfields on their own.

Even greater than the financial needs of the communities with targeted brownfields is the health and welfare sensitive populations due to legacy industrial contamination issues such as chlorinated solvents, PCBs, furans, dioxins and PFAS (see 2.a.ii.1 below). Potential, as well as confirmed health impacts have been identified at several of the priority brownfield sites/areas within the Otsego and Plainwell Target Areas. Within the City of Douglas Target Area, historical industrial operations (metal plating) at the site have impacted the groundwater, the down-gradient properties, and surface waters tributary to Lake Michigan. Currently, MDHHS has identified offsite properties with the potential for elevated TCE in indoor air and EGLE has identified TCE migrating to the River. Given the volatility of these compounds, they have a high vapor intrusion potential which poses a significant threat to indoor air quality within the current site building and in existing and future basements of planned downgradient residential and commercial structures. The contaminated plume migrating down-gradient continues to pose a significant health risk to the City's residents, especially sensitive populations.

### **2.a.ii. Threats to Sensitive Populations**

2.a.ii.1 Health or Welfare of Sensitive Populations: In 2018, an Otsego citizen brought forward information suggesting that there is a higher than expected rate of cancers in women, and in particular pregnant women for the Otsego-Plainwell Target Areas. The information was generated through a survey via social media that focused on the occurrences of reproductive, cancer, and autoimmune disease in this area. As a result of the information, which received over 400 responses, the MDHHS, EGLE, Agency for Toxic Substance and Disease Registry (ATSDR), EPA, and the Allegan County Health Department (ACHD) held a town hall meeting in response to community concerns regarding water quality and industrial waste disposal practices in the area and the possible connection with cancer occurrences. An outcome from that meeting was that EGLE committed to sampling groundwater, soil and surface water for industrial waste products.

In 2019, EGLE implemented a sampling plan of private wells in the area as part of the \$200,000 State funding commitment and soil sampling as part of a \$500,000 State funding commitment. Sampling included the testing

of an extensive list of potential contaminants based on paper sludge by-product discharge that includes dioxins, polychlorinated biphenyls (PCBs) and per and poly-fluorinated alkyl substances (PFAS). Dioxins and furans as well as the “forever chemical” PFAS, can cause birth defects and reproductive/developmental problems, damage to the immune system, and potential increases in cancer rates as well as other health related issues. Results indicated 16 wells in and around Otsego and Plainwell were found to have dioxins/furans, which prompted the ACHD to recommend those households seek an alternative water supply. Also, as part of the sampling, in 12 residential drinking water wells, 2 groundwater samples and 6 surface water samples. This resulted in the confirmation of 2 PFAS sites along with two PFAS sites of interest in the Corridor. Three of these 4 sites are located in the Otsego papermill area along the Corridor while one is in the City of Holland along the Corridor. Based on the EGLE sampling results, the MDHHS implemented an Incident Command Structure to manage the contaminant issues and established a hotline to respond to community and media questions and concerns. A website<sup>1</sup> was also implemented which provides press releases, FAQs, past agency presentations and other useful information. EGLE has also implemented additional sampling of the PFAS sites with possible connections to alternate water supplies. Assessments completed in the Cities of Otsego, Plainwell and Holland Target Areas as part of this grant will confirm whether PFAS, dioxins and furans are present at high priority sites and lay the groundwork for how adverse health effects can be eliminated or reduced, especially for pregnant women.

In the Douglas Target Area, chlorinated VOCs are known carcinogens and have acute effects on the respiratory and central nervous systems and have also been associated with toxic effects in the liver and kidney. Acute exposure to TCE and its derivatives can cause cardiac arrhythmias, emphysema, pulmonary fibrosis, and eventually fatal respiratory failure. Continuous exposure, for vinyl chloride in particular, has prompted The U.S. Agency for Toxic Substances and Disease Registry (ATSDR) to categorize vinyl chloride as a mutagen, which affects chromosomal structure, a Group 1 human carcinogen that poses elevated risks of brain, lung, liver and lymphatic tumors, as well as causing major reproductive defects, birth defects and miscarriages (*“Pocket Guide to Chemical Hazards” U.S. Department of Health and Human Services, 1997*). With respect to the adverse health effects these compounds are known to cause, children, the elderly, and pregnant women are generally more at risk. With the City’s median age suggesting an aging population, the contamination may have a targeted impact, causing an increase of COPD and Asthma cases within the elderly population. The potential health risks to children and pregnant women will discourage new, younger residents from moving into the community. In addition, occupational health hazards may exist for the workforce where TCE contamination potentially exists. Assessments and cleanup planning in this Target Area will reduce the threats and adverse health conditions of children, the elderly and pregnant women by identifying areas of the Target Area where residential development should be minimized, where vapor mitigation strategies can be incorporated into the reuse plan and where soil and groundwater cleanup activities can best be utilized given the economic constraints of the developer(s).

2.a.ii.2 Greater Than Normal Incidence of Disease and Adverse Health Conditions: Based on research by the MDHHS in 2018, the number of all cancer cases and breast, lung and bronchus cancers in the 49078 (includes the Cities of Otsego and Plainwell) and 49080 zip codes, just east of the City, are greater than 10% above the State average (see table below).

<b>CANCER INCIDENCE REVIEW - Residents of zip codes 49078 &amp; 49080 comparison to Allegan County Residents 1990-2014 (Source MDHHS Study – 2018)</b>				
<b>Cancer Site</b>	<b>Observed</b>	<b>Expected</b>	<b>SIR</b>	<b>95% CI</b>
All Sites	2945	2730.83	1.08	(1.05, 1.11)
Breast	431	406.30	1.06	(0.98, 1.15)
Lung and Bronchus	429	385.98	1.11	(1.02, 1.20)

Standardized Incidence Ratio (SIR) = Observed diagnoses/expected diagnoses: >1= higher cancer rates than expected.

<sup>1</sup> <http://cms.allegancounty.org/sites/Office/Health/EH/GI/SitePages/Otsego.aspx>.



2.a.ii.3 Economically Impoverished/Disproportionately Impacted Populations: Household incomes<sup>1</sup> of the Otsego community are lower than the State average as shown below. This outcome is primarily the result of the elimination of paper manufacturing jobs at RockTenn and other area paper mills:

- Median Household Income: Otsego: \$44,930 State: \$52,668
  - Per Capita Income: Otsego: \$23,521 State: \$28,938
  - Families in Poverty: Otsego: 11.3% State: 10.9%
- American Fact Finder: Census Bureau 2017 estimates; Data Bases DP03 and DP05

**2.b. Community Engagement:** The ACBRA will engage active community groups at both the local and county levels that have a vested interest of the condition of their community. These stakeholder groups will assist the ACBRA by identifying and prioritizing brownfield sites serve as the voice of the County’s residents and provide input during redevelopment and cleanup planning efforts. The County will conduct similar public outreach tools that have been successful during the recent dissemination of health-related information forums regarding EPA’s cleanup of the river and the discovery of dioxins, furans and PFAS in the Corridor. They include newsletters, electronic and internet publications, updates through social media, educational sessions, and regularly scheduled progress meetings that will be open to the public, with the minutes of these meetings will be available on-line to all of the stakeholders and attendees. These public meetings will include City Council meetings in the Target Areas and regularly held ACBRA meetings. Linking community outreach activities with town hall meetings associated with the MDHHS and Allegan County Health Department health initiatives will be a key priority. Finally, once the condition of sites in the Target Areas are known, community outreach activities also will be used to assist the County in the preparation of reuse plans and the identification of feasible cleanup alternatives required to support a phased approach to those plans. Because of COVID-19, the ACBRA and the Target Area communities have the ability to hold any of these public meetings remotely.

2.b.i. Project Involvement: The community involvement plan for the County and Target Areas and other stakeholders in the planning and implementation of the Assessment Grant project began with a request to communities from the ACBRA to provide a list of priority sites and areas where they would like to see increased redevelopment opportunities and activities. The result of this activity was the identification of priority brownfield sites and Target Areas. Many of these sites were discussed in Section 1.A.iii. Additionally, there are numerous stakeholder groups have similar planning and implementation goals that have mature community outreach programs that the ACBRA is connecting to on a regular basis (see table below). Members of the ACBRA are planning to regularly attend these stakeholder meetings in order to integrate and collaborate on similar needs throughout the County.

2.b.ii. Project Roles: Community involvement that began over health issues in 2018 will continue under this grant. Local community partners have been identified from previous public meetings who have participated in discussions regarding potential health issues in the community. These partnerships will continue and expand as discussions center around redevelopment/revitalization planning, health and environmental assessments, cleanup and redevelopment implementation within the Target Areas. Developers will play an important role in this process by presenting viable redevelopment plans to the community for brownfield properties within the Target Areas. Included below is a list of local project partners and their potential roles in the project.

Partner Name	Point of contact (name, email and phone)	Specific role in the project
Outdoor Discovery Network (ODN)	David Nyitray, 616-393-9453 <a href="mailto:david@outdoordiscovery.org">david@outdoordiscovery.org</a>	Connect Project with 2018 Kalamazoo River Greenway Plan completed by ODN and youth educational programs
Allegan County Health Department	Angelique Joynes, 269-673-5411 <a href="mailto:ajoynes@allegancounty.org">ajoynes@allegancounty.org</a>	Connect Assessments on priority sites with County Health Initiatives Underway

Kalamazoo River Community Awareness Group	Pam McQueer 269-998-6347 <a href="mailto:jaguars1@chartermi.net">jaguars1@chartermi.net</a>	Community Involvement Coordination with the Michigan PFAS Action Response Team (MPART)
Kalamazoo River Watershed Council	Ken Kornheiser, 269-447-1580 <a href="mailto:krwc@kalamazooriver.org">krwc@kalamazooriver.org</a>	Connect Assessments and Cleanup Planning with Status of Kalamazoo River Superfund Cleanup Activities
Lakeshore Advantage	Amanda Murray, 616-772-5226 ex302 <a href="mailto:amanda.murray@lakeshoreadvantage.com">amanda.murray@lakeshoreadvantage.com</a>	Assist communities with identifying brownfield sites and connecting these sites with Developers and Economic Development Opportunities

2.c.iii. Incorporating Community Input: The ACBRA will conduct 2 community outreach meetings to present the Grant project. The ACBRA will inform the public of these meetings by publishing a notice in local newspapers, post the notice on the County’s website and announce the meeting dates/times at local city council and township meetings. The ACBRA will also attempt to use social media such as twitter and LinkedIn to disseminate information. During community meetings, the public will be informed on how to nominate or comment on sites to be assessed and a nomination form with scoring guidelines will be presented by the County’s contractor. Individual communities will submit their nomination forms to the ACBRA, and the community will present their case to the ACBRA for funding approval. Approved sites will be added to an inventory list of sites to be assessed. This inventory list will be maintained by the ACBRA on the County’s website. Responses for sites not accepted on the inventory list will be communicated back to the communities. Assessment and cleanup planning results will be shared with the affected Target Community by the ACBRA’s environmental consultant.

### 3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

#### 3.a. Description of Tasks/Activities and Outputs

3.a.i. Project Implementation: Five Target Areas and seven sites have been targeted as priorities for assessment based on their deteriorated condition and historical pasts, the threats posed to nearby sensitive receptors and their redevelopment potential. While these areas/sites are targeted, it is anticipated that additional sites will be nominated by the Target Area communities as well as smaller member communities. The site nomination process is designed to gain upfront information without the use of grant funds to evaluate the potential success of the project. To nominate a site, a community will present a site profile to the ACBRA for consideration, including the priority sites. The profile will include: (1) site location, (2) municipal, county and state records, (3) previous environmental reports, (4) potential environmental concerns, (5) potential for redevelopment, (7) planned capital investment and economic impact, (8) property ownership, and (9) property access. Access agreements will be required for all projects. Nominations from community-based organizations will also be welcomed. The ACBRA will approve sites for funding based on their overall merits, with an emphasis on sustainable redevelopment plans and job creation.

The redevelopment plan for these areas represents opportunities to incorporate a sustainable mix of affordable housing, community recreation, commercial and clean industrial development, and green infrastructure to support community needs. Redevelopment of brownfield sites in each of the five Target Areas sites described in Section 1.A.iii. and surrounding areas aligns with the Community’s master plans along the river to align with the long term redevelopment vision of the County. Revitalization efforts are intended to take advantage of the growing need for redevelopment in proximity to the river and along the M-89/M-40 corridor. These opportunities represent the Community’s highest percentage to successfully achieve their economic development objectives. The ACBRA plans to use the grant to conduct environmental assessments at the five Target Area sites and additional brownfield sites nominated by communities throughout the life of the grant. Planned activities are described in the following tasks:

Task 1 – Community Outreach (Amanda Murray, Lakeshore Advantage) – Throughout Project: This task will begin with the community notification of the award. A kick-off event will be conducted that will include key stakeholders, cities, villages and township point contacts and other interested parties from the community, and

local and federal government officials. Quarterly meetings to discuss priority sites, newly identified sites for consideration and the status of each approved project with the ACBRA will continue throughout the duration of the grant program. Additionally, with the initiation of each project a kickoff meeting along with periodical status reports, either written or given at a meeting will be given in the project's Target Area to inform the affected communities of the brownfield assessment activities funded by the grant and planned redevelopment activities.

Task 2 – Phase I and II Environmental Site Assessments (QEP) – Throughout Project: Qualified environmental consultants will evaluate selected priority sites through the completion of Phase I and II ESAs. Phase I ESAs will be completed to identify potential areas/sources of contamination at the sites and will meet EPA requirements for All Appropriate Inquiry (AAI) and the ASTM E1527-13 standard. Phase II ESAs may include geophysical surveys to assess for abandoned USTs, soil and groundwater sampling, soil gas sampling to assess potential vapor intrusion issues and laboratory analysis to characterize contamination that may be present based on the Phase I ESA results. The Phase II ESA data will be used to determine cleanup requirements and redevelopment options. The Phase II ESAs will be conducted using procedures to protect future users of the property, surrounding properties and nearby residents, and the environment. Phase II ESAs will be conducted using procedures specified in an EPA approved Quality Assurance Plan (QAPP) and will be consistent with EPA and EGLE requirements. In addition, site-specific Sampling and Analysis Plans (SAPs) and Health & Safety Plans (HASPs) will be prepared and submitted to EPA for approval before initiating field activities.

Task 4 – Baseline Environmental Assessments (BEAs), Due Care Analyses and Cleanup Planning (QEP) – Throughout Project: BEAs will be prepared to obtain Michigan environmental cleanup liability protection for new owners/operators of contaminated sites based on Phase II investigations. Due care analyses will be completed to demonstrate that the planned site use is protective of human health. Response Activity Plans and Documentation of Due Care Compliance Documents will outline required due care activities and document how the required due care activities are met. Knowledge of the environmental conditions and redevelopment plans will provide a basis for identifying potential cleanup alternatives within a catalyst brownfield area. Due care and cleanup alternatives will be formulated and shared with the public and with developers as part of an Analysis of Brownfield Cleanup Alternatives (ABCA), which will form the basis of future reuse plans.

Task 5 – Programmatic Activities (Dan Wedge, ACBRA) – Throughout Project: The ACBRA is responsible for oversight of the project and compliance with all state and federal requirements. Subtasks include the selection of a QEP as required by federal regulations, quarterly reports, the Assessment, Cleanup and Redevelopment Exchange System (ACRES) reporting system and documentation of compliance with the approved Cooperative Agreement.

The County will submit progress reports to the EPA project officer within 30 days after each reporting period. These reports will cover work status, work progress, difficulties encountered, an accounting of financial expenditures, preliminary data results, anticipated activities, and any changes of the key personnel involved with the project. Additionally, the County will report site-specific accomplishments electronically through the EPA's ACRES reporting system. At the end of the cooperative agreement, a final project report will be prepared and submitted. The final report will summarize accomplishments, expenditures, outcomes, outputs, lessons learned, and any other resources leveraged during the project and how they were used. The County's budget for programmatic activities is based on the following assumptions:

3.a.ii. Anticipated Project Schedule: The ACBRA, the assessment grant administrator for the County, has successfully managed one previous EPA brownfield grant and hired the expertise necessary to conduct assessment projects. The ACBRA has an established contractor procurement process. Solicitations for qualified environmental consultants, review of proposals and consultant selection will be completed as soon as possible after the grant award. It is expected that the environmental consultant or consultants will be in place within 90 days of the signing of the Cooperative Agreement. As the results of a known number of high priority sites and associated developer interest, it is anticipated that the sites will be quickly nominated and selected for assessment and funds will be fully utilized within the three-year grant period.

The anticipated assessment tasks under this grant include community outreach, Phase I and Phase II ESAs, and cleanup planning, all of which will be implemented by the selected environmental consultant. Existing community outreach networks will be expanded immediately upon grant award and assessment and cleanup planning activities will begin immediately after EPA approval has been given for the Quality Assurance Project Plan (QAPP). The QAPP is expected to be completed and submitted for EPA approval within 30 days of the County’s procurement of an environmental consultant.

Because of the active developer interest and redevelopment activity associated with the City of Douglas former metal plating facility, the Otsego papermill sites and the City of Otsego former school, community outreach, environmental assessments and cleanup planning will largely begin in the first 6 months of the grant program. It is expected that the other priority sites within target areas and newly identified priority sites based on community nominations will be completed later in year 1 and 2.

**3.b. Cost Estimates and Outputs:** The County plans to use the grant to conduct environmental assessments at 15-25 brownfield sites. Over 70% of the grant will be used for site assessment activities. Cost estimates for the planned activities are as follows:

Task 1 – Community Outreach: The County will conduct at least 5 community outreach meetings and various other community outreach activities. The \$12,000 budgeted for community outreach includes costs for the publication of public notices in the local newspaper, printing, mailing, publication costs and consultant costs. Any additional costs will be considered as in-kind services.

Task 2 – Phase I and II ESAs: The County anticipates completing up to 15 Phase I ESAs at an average cost of \$3,000 per Phase I ESA and up to 8 Phase II ESAs at an average cost of \$15,000 and two at larger sites with more complex environmental issues at \$22,500 each. A QAPP will be completed for \$2,000.

Task 3 – Asbestos and Hazardous Materials Surveys: The County anticipates completing up to 2 hazardous materials surveys at larger facilities at a cost of \$10,000 per survey.

Task 4 – BEAs/ Due Care/Cleanup Plans: The County anticipates completing 4 BEAs/Due Care Plans at an average cost of \$5,000 per BEA/Due Care Plans and 2 cleanup plans at a cost of \$10,000 per Cleanup Plan.

Task 5 – Eligible Programmatic Expenses: The County will conduct various programmatic activities integral to implementing the grant and achieving its objectives as outlined in Section 3a. The budgeted programmatic expenses include direct and indirect costs (\$10,000), travel costs to attend EPA Brownfields activities (\$1,000), contractual services for quarterly grant reporting (\$5,000), and supplies (\$2,000).

The following table identifies the tasks that will be performed under the grant and the budget for each task:

	<b>Task1: Community Outreach</b>	<b>Task 2: Phase I’s, Phase II’s ESAs</b>	<b>Task 3: Hazardous Materials Surveys</b>	<b>Task 4: BEAs/Due Care, Cleanup Planning</b>	<b>Task 5: Programmatic Activities</b>	<b>Totals</b>
<b>Personnel</b>						\$0.00
<b>Fringe Benefits</b>						\$0.00
<b>Travel</b>					\$1,000	\$1,000
<b>Equipment</b>						\$0.00
<b>Supplies</b>	\$2,000					\$2,000
<b>Contractual</b>	\$10,000	\$212,000	\$20,000	\$40,000	\$5,000	\$287,000
<b>Other</b>					\$10,000	\$10,000
<b>Subtotals</b>	<b>\$12,000</b>	<b>\$212,000</b>	<b>\$20,000</b>	<b>\$40,000</b>	<b>\$16,000</b>	<b>\$300,000</b>

**3.c. Measuring Environmental Results:** The County will create a grant-specific Excel-based sheet for tracking the status of each project funded its EPA Assessment Grant. This tracking sheet will be used for this grant to monitor the progress of the assessment activities to ensure grant funds are spent in a timely and efficient manner and to track grant outputs and project outcomes relative to the grant objectives. The sheet will track specific

project outputs, such as Phase I and II ESAs, as well as outcomes, such as the anticipated number of jobs created/retained, total investment and funds leveraged. The sheet will also list the schedule and allocated budget for each project, providing an easy tool to monitor project progress. This information will provide information in the EPA quarterly reports and updates the information in ACRES.

#### **4.PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

##### **4.a. Programmatic Capability**

4.a.i. Organizational Structure: The ACBRA will administer the grant program. In administering the project, the County's management team will include Dan Wedge, Allegan County's Executive Director of Services, Lorna Nenciarini, the County's Executive Director of Finance (Grants Coordinator) and Amanda Murry, Vice President for Lakeshore Advantage, the County Economic Development firm (Community Outreach). Mr. Wedge was responsible for completion of the \$400,000 EPA Brownfield Community-wide Assessment Grant awarded to the County in 2009.

4.a.ii. Description of Key Staff: Mr. Wedge is also the County representative to the ACBRA and will serve as the overall Project Manager to ensure the project's outputs, outcomes, and schedule are met in accordance with the EPA approved work plan. The Grants Coordinator will manage all financial requirements of the project and be responsible for tracking the progress of the grant project to ensure completion of the identified objectives and tasks identified in the work plan. The Grants Coordinator is charged with managing a number of grants for the County in this fashion. The Grants Coordinator will also be responsible for ensuring the project is conducted in compliance with the terms and conditions of the Cooperative Agreement (CA) and the approved work plan to include quarterly reports and any other reporting requirements under the CA. The Grants Coordinator will maintain detailed accounting records and source documentation pertaining to EPA grant expenditures for 3 years after submission of the Final Report to verify the amount and percentage of grant funds expended for eligible programmatic costs, and ensure that the County complies with Office of Management and Budget (OMB) 2 CFR, Part 200 when charging costs.

4.a.iii.Acquiring Additional Resources: The brownfields project coordinator will be supported by the ACBRA. The ACBRA will procure its consultant in accordance with applicable requirements of 40CFR Parts 30 and 31. When the County is awarded an EPA grant, a Request for Proposal (RFP) is prepared for environmental consulting services. An ad with the RFP is placed in selected newspapers and on the County's web page. Efforts are made to provide small and disadvantaged businesses opportunities to compete. Members of the ACBRA reads and reviews the submitted proposals. A scoring system is used to provide an equitable approach of ranking each proposal.

##### **4.b. Past Performance and Accomplishments**

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: The County has received and successfully managed an EPA Brownfields Community-wide Assessment Grant consisting of a Hazardous Substances Assessment Grant (\$200,000) and a Petroleum Grant (\$200,000) from 2009 through 2014.

4.b.i.1 Accomplishments: Implementation of the 2009 Hazardous Substances and Petroleum Assessment Grants resulted in the completion of 13 Phase I ESAs, 14 Phase II ESAs/Baseline Environmental Assessments and 6 Cleanup Plans. Developer interest has been generated not only for the catalyst brownfield sites in the Targeted Areas, but also other nearby priority brownfields in each of the identified areas within this grant request. Property profiles/ACRES database entries were submitted to EPA in a timely fashion and reflect these outputs and outcomes in the County.

4.b.i.2 Compliance with Grant Requirements: The County maintained compliance with the work plan, schedule and terms and conditions of the previous grant. The County applied and was granted time extensions to the both the Hazardous Substances and Petroleum Grants in order to most effectively use the funds on key sites. The Hazardous Substances Grant was completely expended and closed in July 2013 while the Petroleum Grant was completely expended and closed in February 2014. All quarterly and technical reporting were completed in a timely manner and completed projects were documented in ACRES.