



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

R05-22-A-016

**NARRATIVE INFORMATION SHEET**  
**Michigan Department of Environment, Great Lakes, and Energy**  
**Remediation and Redevelopment Division – Brownfield Program**  
**FY2022 EPA Assessment Grant**

**1. Applicant Identification:**

State of Michigan  
Michigan Department of Environment, Great Lakes, and Energy (EGLE)  
Remediation and Redevelopment Division (RRD)  
Constitution Hall, 525 West Allegan Street, Lansing, Michigan 48933

**2. Funding Requested:**

- a. **Assessment Grant Type:** Community-wide Assessment Grant for States and Tribes
- b. **Federal Funds Requested:** \$2,000,000

**3. Location:** State of Michigan

**4. Target Area and Priority Site/Property Information:**

- a. Target Area 1: City of Flint, Michigan
  - i. *Priority Site 1:* GTG Trail Corridor from Hemphill Rd to Kearsley St, Flint
  - ii. *Priority Site 2:* Clark Commons III, Scattered infill parcels, 1004 Avenue A, Flint
- b. Target Area 2: City of Detroit, Michigan
  - i. *Priority Site 3:* Packard Plant, 1580 E Grand Blvd, Detroit
- c. Target Area 3: City of Benton Harbor, Michigan
  - i. *Priority Site 4:* Riverview Drive, 655, 823, 875 Riverview Drive, Benton Harbor
- d. Target Area 4: City of Escanaba, Michigan
  - i. *Priority Site 5:* Delta County Jail, 111 N 3<sup>rd</sup> St., Escanaba

**5. Contacts:**

a. **Project Director:**

Mr. Ronald Smedley, Brownfield Coordinator  
PO Box 30426, Lansing, Michigan 48909-7926  
Phone: 517-242-9048, email: [SmedleyR@Michigan.gov](mailto:SmedleyR@Michigan.gov)

b. **Chief Executive:**

Liesl Eichler Clark, Director of EGLE  
PO Box 30473, Lansing, Michigan 48909-7973  
Phone: 517-284-6700, email: [ClarkL20@Michigan.gov](mailto:ClarkL20@Michigan.gov)

**6. Population:**

- a. *City of Flint:* 81,252
- b. *City of Detroit:* 639,111
- c. *City of Benton Harbor:* 9,103
- d. *City of Escanaba:* 12,450

**7. Other Factors:**

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	<b>5</b>
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	<b>1 and 8</b>
The priority site(s) is impacted by mine-scarred land.	<b>2</b>
The priority site(s) is adjacent to a body of water.	<b>1, 2, 3, 4, and 7</b>
The priority site(s) is in a federally designated flood plain.	<b>2</b>
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	<b>Unknown</b>
The reuse of the priority site(s) will incorporate energy efficiency measures.	<b>3 and 4</b>
30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.	<b>10</b>
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	<b>1 and 2</b>

**8. Letter from the State or Tribal Environmental Authority:**

Not applicable; State of Michigan – Environment Great Lakes and Energy is the applicant.

**9. Releasing Copies of Applications:**

Not Applicable

**PROJECT NARRATIVE**  
**Michigan Department of Environment Great Lakes and Energy (EGLE)**

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

**a. Target Area and Brownfields**

**i. Background and Description of Target Area**

Michigan's lead role in the industrial revolution gave rise to the state's current cities, towns, and in a particular way, its many brownfields. Cheap plentiful timber was transformed into charcoal (Kingsford), chemicals (Dow, Dupont), carriages and automobiles (GM, Ford), paper and furniture manufacturing (Herman Miller) and spawned countless other heavy industries along the way including mining, powerplants, and foundries. By the late 20<sup>th</sup> century Michigan (MI) was leading the industrial decline in America leaving a legacy of abandoned and contaminated properties across the state. Communities that developed around these industries slid into unemployment, persistent poverty, racial injustice, and collapsing infrastructure, problems that continue today. Four such communities will be the Target Areas (TA) for this grant: **TA 1 Flint** (mid-MI), **TA 2 Detroit** (southeast MI), **TA 3 Benton Harbor** (southwest MI), and **TA 4 Escanaba** (Upper Peninsula). Each TA except TA1 Flint are coastal communities proximate to the Great Lakes.

In 2020 the University of Michigan and Princeton University developed a nationwide [Index of Deep Disadvantage](#) that evaluated poverty, health, life expectancy, birth weight, and social mobility. The index identified **TA1 Flint** and **TA 2 Detroit** as the two most disadvantaged cities in the United States. The history and rates of disparity in **TA 3 Benton Harbor** mirror those of TA 1 and TA 2, although it was not included in the above study, likely because of its small size. These three TA cities, all located in Metropolitan Statistical Areas, were built around and relied solely on single industries, have lost approximately half their residents in recent decades (leaving behind predominately black populations living in persistent poverty), and are now known as three of the poorest cities in America. Lacking residents and industry, thousands of properties are abandoned, and tax reverted each year, decreasing property values/tax revenues, closing schools, and causing the loss of basic public and commercial services. Each city's finances and infrastructure have fallen into crisis, highlighted for the nation in 2013 when Detroit declared bankruptcy, in 2014 when lead was identified in Flint's drinking water, and the current challenges being experienced with the Benton Harbor municipal water system.

**TA 4 Escanaba** is a Non-Metropolitan Statistical Area in northern Michigan. The city was established on Lake Michigan as a shipping port for Upper Peninsula iron ore, copper, and lumber. The ore docks, coal docks, mills, and coal fired power plants have closed leaving behind several large, abandoned brownfields along the city waterfront. Approximately 20% of the population has left this rural community, leaving behind high rates of poverty and a municipality without the finances and capacity to address the environmental legacy.

Michigan is home to 12 federally recognized Indian **Tribes** and tribal owned properties will also be targeted as part of this project. ELGE has a dedicated [Tribal Relations office](#) as well as regional staff who work directory with the Tribes and meet regularly on environmental issues.

**ii. Description of the Priority Brownfield Sites**

EGLE's statewide database contains over 18,000 sites with known hazardous contamination (Haz) and 6,400 sites with open releases from USTs (Petro). EGLE databases show TA1 Flint includes 154 Haz/204 Petro sites of contamination. Over 300 commercial & industrial brownfield sites are

currently held by the County Land Bank. The city of Flint selected two priority sites, the **Grand Traverse Greenway (GTG) Trail** and **Phase III of Clark Commons (Clark Commons III)**. The **GTG Trail** is 3 miles and 42 acres of vacated rail line acquired by the City in 2020. Lead, arsenic and benzo(a)pyrene are present above direct contact criteria which halted the state and federally funded trail construction project requiring additional sampling and cleanup planning. The site is a priority as it is the key missing segment connecting regional and state-wide trails drawing people to downtown Flint and the proposed downtown Flint State Park along the Flint River. Priority site two, **Clark Commons III**, is a 96-unit 8-acre infill housing development near downtown Flint creating housing opportunities close to health, education, and employment. The site is a mixture of several former residential and commercial parcels contaminated with petroleum, VOCs, PNAs, metals, and asbestos from past commercial operations, gas stations, and fill material. The development will relocate residents from a severely blighted 1960s housing complex built in the 100-year flood plain which will be restored to public greenspace as part of the redevelopment.

TA2 Detroit includes over 1,073 Haz and 657 Petro contaminated sites/potential brownfields on EGLE's databases. The City's priority site is the **Packard Plant** a 54-acre property covered almost entirely by the vacant ruins of an automobile factory built in 1910. Now one of the largest most dangerous unaddressed industrial sites in Detroit, known to be impacted with VOCs, SVOCs, heavy metals and asbestos. Large industrial parcels near transportation routes are in high demand in Detroit where there is a workforce present to support reuse; however, a national developer recently cancelled plans to redevelop the Packard site due in part to assessment needed and the unknown environmental costs necessary for safe reuse.

TA3 Benton Harbor includes 122 Haz and 32 Petro known contaminated sites/potential brownfields on EGLE's databases. The priority **Riverview Site** is 15 acres of vacant blighted waterfront along the St. Joseph River proximate to Lake Michigan. Half the site is located within the 100-year floodplain. The site consists of a vacant industrial supply building, a vacant 3-story bank office, and a boarded-up condemned housing complex. Suspect asbestos is present each structure and must be evaluated prior to demolition. Due to the site location on a main throughfare and waterfront, assessment is necessary to evaluate the property commercial history and potential placement of unknown fill material. The site is proposed to be redeveloped for mixed-use commercial/residential to fulfill housing needs close to services and employment.

TA4 Escanaba has 28 Haz and 21 Petro sites/potential brownfields on EGLE's databases. The waterfront ore docks are shuttered and are considered mine scarred land. One of the two coal-fired powerplants in town recently closed. The priority site is the vacant 6-acre former **Delta County Jail** property. The downtown waterfront site on Bay de Noc/Lake Michigan is land that was filled with unknown materials, formerly operated as a gasoline and bulk petroleum station, and is known to be impacted with petroleum, SVOCs, metals, and asbestos. Characterization and cleanup planning for this high-profile site, are required before redevelopment can move forward.

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

### **i. Reuse Strategy and Alignment with Revitalization Plans**

Both Flint sites are direct implementation of [multiple comprehensive City planning efforts](#) including the 2013 Imagine Flint Master Plan for a sustainable Flint, 2018 South-Flint Community Transformation Plan, 2020 Critical Community Improvement Plan as well as input from thousands of citizens and stakeholders at over 300 events, meetings and workshops. Planning efforts led to

the **Clark Commons** development which include single-family duplexes, townhomes, apartments, and commercial space focused on the transformational and sustainable redevelopment of Flint. Completion of the 3-mile **GTG Trail** will connect to the planned State Park in downtown Flint, regional trails, and the state-wide Iron-Belle trail. This effort aligns with the forementioned plans and Genesee County Planning Commission Non-motorized trail priorities plan, the MI Department of Natural Resources Strategic plan to expand accessibility and park space in urban areas, the [Grand Traverse Greenway PlacePlan](#), and the most recent City Master Plan objectives for: Open Space and Parks; Mobility to establish a network of trails; and Public Health promoting exercise opportunities.

The **Packard Plant** will be prepared as a “shovel ready” site for manufacturing or modern logistics warehouse which is in accordance with the city planning and zoning and the [2021 Detroit Master Plan](#) which sets specific goals to focus industrial redevelopment and environmental remediation efforts at the former Packard Plant site. The project is a priority for the City which recently passed a recommendation to demolish the property in order to protect public safety.

The reuse strategy for the Benton Harbor **Riverview Site** includes an est. \$75M mixed use residential and commercial development with up to 300 market rate and affordable housing units in a safe location with walkable access to public services and employment centers. The reuse strategy proposed by the local economic development agencies grew out of community planning including the 2020 [Twin Cities Sustainable Harbor Plan](#), [Master Plan](#), and two recent real-estate market studies which identify the site as underutilized land and a desirable urban infill location. The market studies show the need for 650 new residential rental units in the area through 2024.

Escanaba’s **Delta County Jail** property is proposed for a \$18M mixed use retail, hotel, residential, and waterfront park development. The project is several years in the making and came out of a State of Michigan Technical Assistance Planning Grant and both the [Escanaba](#) and [Delta County](#) Master Plans, *Actions E3* and 3.1.1 to relocate the county jail off the downtown waterfront to stimulate private investment, jobs, and public access to the waterfront.

## ii. Outcomes and Benefits of Reuse Strategy

Based on past experience, EGLE expects the grant to assess up to 60 individual properties in disadvantaged communities, promoting the reuse of urban infrastructure, creating an est. 500 jobs, preserving at least 200 acres of farmland, developing 400 new housing units, generating \$250M in other investment, and creating millions of dollars in new annual tax revenues. Each of the priority site redevelopments will use modern energy efficient construction, increase walkability with the installation of additional and replaced sidewalks, trails, or parks, and mitigate flood hazards with the installation of modern on-site stormwater detention. The disadvantaged nature of the populations within the target cities and target site neighborhoods is summarized in Sect. 2 (Community Need).

The **GTG Trail** will leverage \$3.7M in other investment to create 3-miles and 42 acres of public non-motorized trail connecting 70+miles of regional trails and the Flint portion of the 2,000-mile statewide Iron Belle trail extending from Detroit to Ironwood, MI. Placemaking amenities, including three trail heads with parking and restrooms, will be installed using \$300,000 in funding from Flint’s [Choice Neighborhood Initiative](#) HUD grant. The new trail will run contiguous to several disadvantaged neighborhoods giving residences recreational opportunities, non-motorized access to downtown, local universities, and other parks causing an economic

ripple effect including stabilizing neighborhoods and increasing property values and drawing hiking and biking enthusiasts into Flint.

**Clark Commons III** is leveraging \$43.9M in investment creating 98 modern energy efficient affordable houses which have received the National Green Building Standard Silver Certification. The project will transfer 8 acres from the current public ownership with \$0 tax revenue to private ownership generating a payment in lieu of tax of 4% of rents and provide much needed housing for low income and vulnerable residents.

Redevelopment of the **Packard plant** will remove 50 acres of blighted public safety hazard, return 36 tax reverted parcels to the tax rolls, and establish green space/buffers to the surrounding residential areas. Based on a proposed Packard Plant redevelopment proforma and the actual redevelopment of a similar nearby Detroit industrial property earlier this year, it is anticipated that the site will leverage \$100M in capital investment, generating over \$10M annually in new tax revenue, and create an estimated 400 jobs with wages of \$15/hour or more.

**Riverview Drive** in Benton Harbor will redevelop 15 acres of blighted unoccupied land, demolish obsolete or condemned buildings, leverage \$75M capital investment, create at least 50 new jobs and construct up to 300 desperately needed market rate and affordable housing units.

Based on a submitted developer proforma, the **Delta County Jail** redevelopment will leverage \$18M of capital investment, result in the demolition of the jail building, create 35-50 jobs with an average wage of \$25/hr, increase the taxable property value from \$0 to \$7M (generating over \$600k in annual tax revenue), and create a public waterfront park and walkway.

### **c. Strategy for Leveraging Resources**

#### **i. Resources Needed for Site Reuse**

Michigan has one of most enterprising brownfield programs in the country with the ability to leverage additional resources for remediation, due care measures for site reuse and additional site assessment. Key funding programs include EGLE's Brownfield Grant/Loan Program (~\$14M annually) providing up to \$1M grant and \$1M loan per project for eligible environmental and demolition. Due to need in site assessment, EGLE created an assessment program diverting up to \$500k from the above grant/loan program a year, this EPA grant will allow the state funds to be put back to use as cleanup funding, facilitating more redevelopment. Michigan has state and local tax increment financing (TIF) which is designed to redevelop contaminated, blighted, obsolete, or historic properties. TIF repays the developer or a loan with the increased tax revenue for costs spent on eligible brownfield activities. EGLE also utilizes the Renew Michigan's Environment Fund (~20M/yr) and Refined Petroleum Fund (>\$70M total) to perform cleanup actions that protect human health and the environment as well as support brownfield redevelopment at haz and petro sites, respectively. The MI Economic Development Corporation (MEDC) provides Community Revitalization grant and loan funding for many brownfield activities including new construction costs up to 25% of the total investment to encourage redevelopment in downtowns and high-impact corridors. These as well as support from other state agencies and project partners ensure the State of Michigan is well positioned to support the completion of redevelopment activities at the project sites. The Flint GTG Trail and Clark Commons III already have construction and amenity funding secured from private sources, other state agencies, and HUD pending the environmental studies.

#### **ii. Use of Existing Infrastructure**

The priority sites in this application are infill redevelopment projects located in key transportation corridors already equipped with the required infrastructure which will be reused to support the proposed redevelopment. Each of the target areas are shrinking cities with radical population decline therefore consolidating assets around existing infrastructure. State and federal funding for infrastructure upgrades and repairs is already secured for the Flint GTG Trail and Clark Commons III developments. Other future projects can leverage the resources discussed above in 1.c.i for needed infrastructure improvements, which is an eligible expense under Michigan Brownfield TIF and the MEDC Community Revitalization programs.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need**

**i. The Community’s Need for Funding**

As shown in the table below, the target areas have suffered from decades of economic disinvestment, population decline, high rates of poverty, and historically unchecked pollution leading to vast quantities of brownfield sites. Dwindling property values result in decreasing tax revenues causing financial and capacity deficiencies in each target community, which is further exacerbated in Benton Harbor and Escanaba due to the small populations. The target areas have experienced dramatic population loss associated with the exodus of industrial employers. Flint is at its lowest population in [110 years](#). From their highs, housing values and tax revenues dropped over 50% in Flint, Detroit, and Benton Harbor leading to record numbers of tax foreclosures. For example, 25% of the city of Flint is owned by the County Land Bank and therefore does not pay taxes. Financial distress caused all three cities to be stripped of local governance and appointed emergency financial managers by the State. Detroit is the largest city in the country to have declared bankruptcy.

Michigan consistently ranks among the nation’s highest levels for unemployment which is magnified in the target areas. The Metropolitan Statistical Areas (MSAs) do not tell the story of the target cities’ unemployment rates. For example, according to an [Aug. 2021 UofM Study](#) the City of Detroit’s pre-pandemic unemployment rate was 11%, peaking in June 2020 at 48%, and now sits at ~25%, while the MSA is at 3.7%. The remaining target areas peaked last year with 20 to 30% unemployment. These factors, coupled with a long-term deficiency in municipal funding and capacity, and the inability of the communities to draw on other resources to complete project activities and attract new development, demonstrates the need for this project funding. All four cities are federally designated as economically distressed communities containing large tracts of Federal Opportunity Zones.

Census and BLS Data	Flint	Detroit	Benton Harbor	Escanaba	Michigan	National
Population 2021	81,252	639,111	9,103	12,450	10,077,331	331,449,281
Population Change 1960-2021	- 58.7%	- 61.7%	- 52.4%	- 19.1%	28.8%	77.5%
Population Change 2010-2021	- 20.6%	- 10.4%	- 9.3%	- 1.3%	1.9%	6.8%
MSA Unemployment Rate	8.2%	3.7%	5.8%	6.4%	4.7%	4.8%
Median household Income	\$28,834	\$30,894	\$21,916	\$35,813	\$57,144	\$62,843
Per Capita Income	\$17,086	\$18,621	\$14,197	\$23,440	\$31,713	\$34,103
Bachelor’s Degree or Higher	12.2%	15.3%	8.1%	21.5%	29.1%	32.1%

**ii. Threats to Sensitive Populations**

**1. Health or Welfare of Sensitive Populations**

The mixture of declining populations and growing number of brownfields has resulted in an increased threat of environmental exposure, especially to the low income and vulnerable residents in the target areas where many of these brownfield sites are located. The following tables show the percentage of sensitive and disadvantaged populations in the target areas and areas surrounding the priority sites.

Census Data	Flint	Detroit	Benton Harbor	Escanaba	MI	US
Percent Minority	60.9%	85.3%	87.8%	8.5%	20.8%	23.7%
Persons with Disability (< 65)	19.2%	15.3%	20.1%	18.3%	10.2%	8.6%
Poverty Rate:	38.8%	35.0%	45.4%	19.0%	13.0%	11.4%

The following summarizes demographics for the priority sites census tract(s) from EPA's EJ Screen:

Demographic Percentile in MI	Clark Coms	GTG Trail	Packard Plnt	Riverview Dr.	Delta Cty Jail
Demographic Index	95	84	98	98	74
People of Color	91	75	97	93	56
Low Income	96	91	96	97	85
Less than High School Education	92	83	92	95	48
Children under age 5	22	75	83	98	4

Another significant issue in Michigan has been exposure to lead which can occur through soil, older housing, and drinking water. Flint and Benton Harbor have experienced significant issues with lead in the municipal drinking water. Both cities and Detroit are currently undergoing major city-wide water line replacements diverting significant municipal resources to the effort, (local resources that will not be used for brownfields). The physical environment, access to health care, grocery, and other services, and the type and condition of housing has a significant impact on health and quality of life. The assessment and reuse planning conducted as part of this project will identify and assist with eliminating impacts to vulnerable populations and improve quality of life. This will be accomplished by facilitating the removal of identified contamination and old blighted structures, which will make way for the safe redevelopment of the assessed properties. Redevelopment of the priority sites involve the removal of vacant blighted buildings. Research published by the [American Public Health Association](#) and [PLOS.org](#) show that remediation of abandoned buildings significantly impacts community health reducing fear, stress, and anxiety, as well as community safety reducing firearm violence in the area by -39%.

## 2. Greater than Normal Incidence of Disease and Adverse Health Conditions

As shown in the following data provided by the Census, Michigan Department of Health and Human Services, and CDC, the target areas experience a greater incidence of disease and conditions that may be associated with exposure to hazardous substances.

	Flint	Detroit	Benton Harbor	Escanaba	MI	US
	2015-2019	2015-2019	2015-2019	2015-2019	2015-2019	2019
Percent Low Birthrate	15.1	14.5	12.9	7.1	8.6	8.3
Infant Mortality Rate	12.8	13.9	9.1	NA	6.6	5.5
Black Infant Mortality Rate	14.2	14.9	9.0	NA	13.5	10.4
White Infant Mortality Rate	9.2	10	0.0	NA	4.9	4.6
Life Expectancy	<b>2012-2016</b>	<b>2012-2016</b>	<b>2012-2016</b>	<b>2012-2016</b>	<b>2019</b>	<b>2019</b>
	71	72.1	68.8	75.7	78.1	78.8
Cancer Incidence per 100k	<b>2014-2018</b>	<b>2014-2018</b>	<b>2014-2018</b>	<b>2014-2018</b>	<b>2014-2018</b>	<b>2014-2018</b>
	466.5	454.7	522.2	476.7	449.7	448.6
Rate of Years of Potential Lost Life per 100K under 75	<b>2019</b>	<b>2019</b>	<b>2019</b>	<b>2019</b>	<b>2019</b>	<b>2019</b>
	14,776	14,007	14,861	9,305	7,737	7,350



This project will assess an estimated 60 brownfields identifying conditions potentially contributing to adverse health conditions in disadvantaged communities. An estimated 40 plans for the safe reuse of target properties will be developed, then state funding will be made available to sites undergoing redevelopment to implement the activities and controls necessary for the safe reuse, eliminating the exposure, and reducing future adverse health conditions in the community.

### 3. Promoting Environmental Justice

This project is targeting environmental justice, high poverty, and low-capacity communities. The following info from EPA’s EJ screen demonstrates the disparity of the target populations relative to all of Michigan, EPA Region V (R5) and the United States. The higher the percentile score the more susceptibility of the individuals in the area to environmental justice issues.

EPA EJ Screen Variable	Flint (City)			Detroit (City)			Benton Harbor (City)			Escanaba (Priority site census tract)		
	MI	R5	US	MI	R5	US	MI	R5	US	MI	R5	US
Index for PM2.5	87	85	73	94	92	82	96	94	86	74	74	59
Index for Ozone	88	86	75	93	91	82	98	97	91	74	74	59
Air Toxics Cancer Risk	87	85	71	94	91	79	96	93	82	74	74	59
Respiratory Hazard Index	87	84	70	94	91	77	96	92	80	74	74	58
Lead Paint Indicator	89	88	87	94	94	93	96	95	95	77	77	69
Superfund Proximity	83	83	73	90	88	79	98	98	97	73	73	58
Haz. Waste Proximity	86	82	75	94	88	83	98	94	90	73	73	58
Wastewater/Stream Toxics	99	99	99	95	92	91	95	92	91	87	84	80

Although Escanaba does not rank in the highest US EJ percentile, the rural community is also burdened with high poverty and low capacity. In addition, the grant may assist the tribal populations in the Escanaba area. Addressing brownfield issues at each of the priority sites is beyond each of the target communities’ finances and capacity to implement. The proposed work with this grant promotes EJ in each community including: relocating a contaminated jail off the downtown waterfront and opening the site for economic growth and public access in Escanaba; converting a contaminated blighted rail line into public space and assisting marginalized Flint residences move into modern energy efficient housing central to services; redeveloping 3 vacant and blighted properties into much needed housing and economic development on Benton Harbor’s waterfront; and addressing Detroit’s Packard Plant, one of the state’s largest blighted attractive nuisances.

Redevelopment of the priority sites will remove blight and promote the safe reuse of uncontrolled contaminated property; creating housing, jobs, new tax revenue, stabilizing surrounding neighborhoods, and addressing physical and health threats discussed in 2.a.ii.1. This grant will support the target areas and several other similar disadvantaged Michigan communities burdened by pollution. As described in b.iii, the project will target Michigan’s EJ communities by utilizing EPA’s and Michigan’s soon to be published MiEJScreen tool. MI’s tool combines environmental factors into a cumulative score showing synergistic effects and identifying areas that warrant further consideration, analysis, and targeted outreach. Further guidance and assistance targeting outreach will be provided by [EGLE’s Environmental Justice Public Advocate](#) which serves as an internal and external voice to ensure environmental justice throughout the state.

#### **b. Community Engagement**

##### **i. Project Involvement and ii. Project Roles**

Name of Entity	Point of Contact	Specific Involvement
MI Economic Development Corporation Rob Garza 517-897-3418 garzar8@michigan.org	Michigan’s main business attraction, growth, and economic development agency providing business assistance, site nominations, project gap financing and financial incentives.	
MI Land Bank Jeff Huntington 517-335-8430 huntington@michigan.gov	Owner of large portfolio of tax reverted properties throughout MI disadvantaged communities, assisting with outreach, nominating sites, and providing incentives for redevelopment.	
MI Housing Development Authority Karen Gagnon 517-241-3203 gagnonk@michigan.gov	Project partner on affordable housing, providing site nomination, outreach assistance, developer technical assistance, and financing.	
Genesee County Land Bank Christina Kelly 810-257-3088 ckelly@thelandbank.org	Owner of 25% of land in city of Flint, assist with identifying projects for assessment and lead agency providing guidance and local resources for regional BF projects.	
City of Flint – Suzanne Wilcox 810-766-7284 swilcox@cityofflint.com	Target community providing site nominations, assisting with outreach, and connecting project partners.	
City of Detroit- Brian Vosburg 313-237-4612 bvosburg@degc.org	Target community/BF Authority/local EDC providing site nominations, assisting with outreach, TIF funding, and connecting project partners.	
Cornerstone Alliance - Rob Cleveland 269.363.8910 rcleveland@cstonealliance.org	Benton Harbor economic development corp. (EDC) and business attraction agency identifying sites and leveraging local resources. Representing over 200+ community-based investors.	
City of Benton Harbor - Alex Little 269-927-8421 alittle@bhcity.us	Target community providing site nominations, assisting with outreach, and connecting project partners.	
Central UP Planning and Development Commission - Dotty Lajoie 906-786-9234 dlajoie@cupp.ad.org	Six county regional economic development agency and capacity assistance provider. Identify priority sites, assist with access, redevelopment visioning and planning, and leveraging local resources.	
City of Escanaba - James McNeil 906-789-7322 jmcneil@escanaba.org	Target community providing site nominations, assisting with outreach, and connecting project partners.	

Each target community is engaged in this grant and nominated the priority sites. The parties described above represent only a portion of the entities who are and will be involved during implementation of the grant. EGLE has [10 Brownfield Coordinators](#) whose job is focused on outreach and connecting communities to incentives to facilitate the redevelopment of brownfield sites. They have existing communication networks with communities, developers, consultants, as well as every EDC and Brownfield Redevelopment Authority in the State. Outreach will focus in the TAs and other Michigan disadvantaged communities. EGLE’s Tribal liaison regularly meets with all Tribes in Michigan and will assist with targeting tribal sites.

**ii. Incorporating Community Input**

EGLE’s existing Brownfield program is based on community input and implementing projects requested by municipalities that are in alignment with local plans and goals. Communicating the project progress starts with the existing relationships and engagement efforts of the EGLE regional Brownfield Coordinators who provide on-going weekly/monthly updates with local officials, organizations, developers, and the public where work is taking place. Upon notice of this award, EGLE will issue a press release, email listservs, post on our blog and social media pages, and host two webinars describing the grant and seeking input. All input is treated as valid, considered, responded to by EGLE and will help guide site selection. EGLE will create a grant specific tab on our [Brownfield Assessment Website](#) which will be updated quarterly and include contact information, a grant dashboard listing assessments, and funds remaining. A list of assessments including access to basic site information will be available on the dashboard, [MI Environmental Mapper](#) and/or

[RenewMI](#) website where the public can visually see and read about EGLE’s work throughout MI. When necessary to communicate information and solicit public input for reuse planning projects, EGLE will host public meetings with the ability to participate remotely for those who cannot attend in person. EGLE also [provides language translation](#) and accessibility services.

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

**a. Description of Tasks/Activities and Outputs**

<b>Task 1: Programmatic and Outreach</b>
<b>1 i. Project Implementation:</b> Conduct programmatic activities including the cooperative agreement, prepare a work plan, quarterly reports, ACRES updates, annual MBE/WBE and other required reports. Gather site information and review nominations against grant requirements and priorities, meet with communities, and maintain a site inventory. Community outreach/public input activities including two public outreach webinars, update EGLE website, blog post on EGLE’s <a href="#">MiEnvironment</a> , press release, Tweet and Facebook posts to announce funding and advertise work projects. Tracking project finances, outputs, outcomes, accomplishments and other metrics which will be updated in ACRES. Publish information and sites on EGLE’s Brownfield Assessment Website and/or RenewMI, or MI Environmental Mapper websites. Five EGLE staff will attend the National Brownfields Conference during grant period. EGLE staff time for implementation will be in-kind utilizing other state funding.
<b>1 ii. Schedule:</b> Work Plan will be prepared within month 1; Qualified Environmental Professionals (QEPs) will be retained by month 3; Programmatic/quarterly reporting/ACRES, website, and database updates/outreach will occur throughout the life of the project, estimated to be 4 years.
<b>1 iii. Task Lead:</b> EGLE
<b>1 iv. Outputs:</b> Work plan, cooperative agreement, quarterly reports, ACRES updates, final project closeout documentation, 5 staff attend EPA training conference, outreach materials, public meetings, 2 education and outreach webinars, press release, social media posts, quarterly assessment website updates, Estimated 60 RenewMI and/or Environmental Mapper website publications.
<b>Task 2: Site Assessment and Due Care Planning/Documentation</b>
<b>2 i. Project Implementation:</b> EGLE will prepare and annually update a QAPP for EPA approval, in-kind. A contractor will perform environmental assessments including data evaluations, asbestos/hazardous material surveys, ASTM AAI Phase I & Phase II ESAs, sampling plans, MI Baseline Environmental Assessments (BEAs), and plans for compliance with due care including response, cleanup, documentation, institutional controls, and management plans. EGLE will use a combination of contractors and internal staff to perform field work; our in-house certified laboratory will analyze most samples.
<b>2 ii. Schedule:</b> QAPP prepared in 1st quarter, assessment activities will continue throughout the grant.
<b>2 iii. Task Lead:</b> EGLE
<b>2 iv. Outputs:</b> 1 QAPP, multi-phased site assessments at an estimated 60 properties including SAPs, HASPs, Phase I, II, BEAs, Haz mat surveys, institutional controls, due care documents.
<b>Task 3: Reuse Planning</b>
<b>3 i. Project Implementation:</b> Reuse planning including a Land and Infrastructure Evaluation, Market Study, and Revitalization Plan will be conducted on three high profiles sites meeting the priority project metrics described below. This activity will be contracted through a QEP.
<b>3 ii. Schedule:</b> Reuse planning for the selected sites will begin by the end of year two to ensure completion during the grant period.
<b>3 iii. Task Lead:</b> EGLE
<b>3 iv. Outputs:</b> Three brownfield revitalization and reuse plans including asset and needs inventory, regulatory and site constraints, realistic market driven options, and stakeholder input.

**Identifying Additional Target Areas/Site**

In addition to the specific work in the TAs, additional sites will be identified through outreach to communities, developers, and consultants by the 10 EGLE-BF Coordinators. The coordinators make 2,000 connections with over 250 communities every year. EGLE’s direct outreach, webinars, website, social media and cross agency outreach targeted towards priority disadvantaged communities will result in numerous site nominations throughout the project period. Communities and project partners can propose sites to EGLE anytime during the project. The use of funding will be evaluated and prioritized towards the following communities and sites: 1) disadvantaged communities, particularly those with EJ issues typically in the 70<sup>th</sup> percentile or greater on the EPA EJ Screen or MiEJ Screen, 2) communities with sensitive populations including unemployment, poverty and adverse health conditions higher than state averages, 3) tribal communities, 4) communities with low capacity and that do not currently have access to other EPA assessment funds, and 5) sites within the above communities identified as high priority, with credible opportunity for redevelopment, and/or brownfield conditions that pose a threat to public health or environment.

**b. Cost Estimates**

**i. and ii. Development and Application of Cost Estimates**

99.5% of the grant fund request is for direct Assessment (88.25%) and Planning (11.25%) activities.

**Task 1 Programmatic and Outreach:** EGLE Personnel Costs provided in-kind with other state funding. Travel Costs: Five staff attend conference at \$2,000 each (\$850 airfare, \$550 hotel, \$350 incidentals, \$250 registration) = \$10,000.

**Task 2 Site Assessment and Due Care Planning/Documentation:** EGLE Personnel including QAPP development provided in-kind with other state funding. Due to wide range of sites, average contracted costs include 60 Phase Is at \$4,000, 50 SAPs at \$1,000, 50 Phase IIs at \$20,100, 40 BEAs at \$3,000, 30 Haz Mat surveys at \$5,000, and 40 Due Care Evaluations at \$5,000 = \$1,765,000. This includes \$500,000 for EGLE performed drilling and laboratory analysis (50 sites at \$10,000).

**Task 3 Site Planning:** Contract 3 Reuse Plans at \$75,000 each (Land & Infrastructure analysis at \$4,000 each, Market Study at \$25,000 each, and Revitalization plan \$46,000 each) = \$225,000.

**Grant Budget**

Budget Categories		Project Tasks			Total
		1 Prog/Outreach	2 Site Assmt.	3 Planning	
Direct	Personnel	In-kind	In-kind	In-kind	\$0
	Travel	\$10,000			\$10,000
	Contractual		\$1,265,000	\$225,000	\$1,490,000
	Other: EGLE drilling and lab		\$500,000		\$500,000
Indirect Costs					\$0
Total Budget		\$10,000	\$1,765,000	\$225,000	\$2,000,000

**c. Measuring Environmental Results**

EGLE will track, measure, and report outputs (number and type of assessments complete, contamination determined, institutional controls placed, webinars, public meetings, project summaries created, and social media posts) and outcomes (acres assessed and redeveloped, jobs created or retained, capital investment and other incentives leveraged, new tax revenue generated) in ACRES, and the quarterly/final reports. The outputs/outcomes will annually be compared to the estimates in 3.a, 3.b and the work plan and discussed with the EPA Grant Manager to determine if goals are being met. EGLE is very experienced with and has an established detailed metric tracking program for existing State and Federal brownfield funding.

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

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

##### **i. ii. and iii. Organizational Capacity, Structure and Description of Key Staff**

The grant will be managed by the EGLE Brownfield Assessment and Redevelopment Section (BARS). BARS manages a structured Brownfield Site Assessment (BSA) program that utilizes a combination of EPA 128a funds and State funds that have been diverted from BF cleanup grants. In 2021 EGLE's BSA program provided funding to assess 29 sites in 19 communities throughout Michigan, utilizing \$523k of state and \$367k of 128a funds for a total of \$890k. The demand for this program is high and the number of sites addressed is currently limited by available funding. EGLE will use a combination of qualified consultants and internal drilling crews to perform the assessments; our in-house certified laboratory will analyze most samples; our 10 regional Brownfield Coordinators will perform outreach, work with communities to identify perspective sites, and facilitate communication with regional partners; two BARS staff are designated to administer the EPA grant, manage budgets, work with EPA, and provide technical assistance to communities. EGLE will also use administrative/financial staff experienced in federal grant tracking and reporting.

**Ron Smedley**, EGLE's Federal Brownfield Program Specialist, will serve as the grant lead. Ron has over 20 years of experience with EGLE, much of that time working with EPA's Brownfield program and is a Certified Economic Developer. He manages EGLE's BSA program, the annual EPA 128a grant, and has managed seven EPA 104k grants including a \$1M RLF and most recently \$200,000 cleanup grants in 2018 (General Oil-Redford Township) and 2017 (Pullman Industries). Ron will be supported by **Janet Michaluk**, who has 15 years of environmental experience, including brownfield redevelopment, economic incentives, environmental due diligence, remediation, and quality assurance/quality control. Janet currently manages large assessment projects and is responsible for developing the QAPP for EGLE's BSA program. **Carrie Geyer**, EGLE's Brownfield Program manager, will provide general oversight of the grant and assure timely expenditure of funds and that all program staff are working to both promote the grant and identify potential sites for assessment. Carrie has over 25 years of environmental experience and manages one of the strongest brownfield programs in the nation, which in 2021 provided over \$27M in state brownfield incentives to 41 communities with an ROI of \$34 for every \$1 of state funding. She is currently the chair of the ASTSWMO Brownfield Focus Group where she works closely with other state program managers and EPA Headquarters staff on national emerging BF issues. **Anastasia Lundy**, EGLE-RRD's Finance Manager, has 25 years of experience overseeing budgets and expenditures and will oversee all financial reporting, accounting, and procurement.

##### **iv. Acquiring Additional Resources**

EGLE has the ability to acquire additional expertise and resources from internal and state partner agencies, including toxicologists, health specialists, financial managers, economic analysts, housing specialists, and legal experts. EGLE has internal technical support teams focused on solving unique issues in areas ranging from vapor intrusion to due care. When additional outside expertise is needed EGLE will either call upon the standing competitively bid contracts with technical

consultants or procure additional contractors. EGLE's extensive procurement experience and policies, existing RFP/qualifications package, and lists of experienced firms, will ensure efficient procurement that complies with 2 CFR 200.317 through 200.326. EGLE also has experience with and expects to partner with EPA's TAB provider, Targeted Brownfields Assessment program, and on-scene coordinators for response activities.

**b. Past Performances and Accomplishments**

**i. Currently Has or Previously Received an EPA Brownfields Grant**

**1. Accomplishments**

Since 2002, EGLE has been awarded and effectively managed, seven EPA 104k grants, including RLF and cleanup grants. EGLE also manages the annual EPA 128a grant. Recent awards include:

- **FY17 BF Cleanup Grant, Pullman Industries-Bloomington Township**, #BF00E02270-0, \$200k, Closed 1/2019. Outputs: Administrative record, ABCA, HASP, Work Plan, Greener Cleanup Evaluation, 7 Quarterly Reports, Final Report. Outcomes: Environmental risks on property were reduced through building/storage tank demo, lead and asbestos abatement, removal of 58,000 tons contaminated soil, 195,000 gallons contaminated water treated and discharged; and abandonment of 14 wells. Nearly \$2.65M of state cleanup funds were leveraged to help minimize exposure to hazardous substances on the 6-acre property. The site is currently used for equipment storage and open space.
- **FY18 Petroleum Cleanup grant, General Oil-Redford Township**, #BF00E02373, \$200k, Closed 12/2019. Outputs: Administrative record, ABCA, HASP, Work Plan, Greener Cleanup Evaluation, 5 Qtrly Rpts, Certificate of Substantial Completion, Final Report. Outcomes: Environmental risks on property were reduced through Building demo, removal of 2-USTs, and removal of 11k tons contaminated soil. Over \$600k of state clean up funds leveraged to help minimize exposure to hazardous substances on the 1.18-acre property, making it ready for reuse.
- **FY21 128a Grant**, \$812k. Outputs: 2- Semi-annual reports, Program Activity Levels (PALs) reporting, updated QAPP. BSA outputs included: 8 Phase 1 ESAs, 10 Sampling & Analysis Plans, 10 Geophysical / Phase II Equivalents, 1 BEA. 15 total BSA projects completed. Outcomes: Successful management of Michigan's Brownfield Program as evidenced by community relation building (BF coordinators made 2,000 outreach connections in 250 communities statewide) and financial support to brownfield projects (state funding of 63 brownfield projects in 41 communities, resulting in capital investment of \$27.3M, creation of 2,468 jobs, and an ROI of \$34:\$1).

**2. Compliance with Grant Requirements**

Through the successful management of numerous EPA grants EGLE has developed an excellent relationship with EPA Region 5 staff and works closely with them to assure compliance with all grant requirements. For both the FY17 and FY18 Cleanup grants described above, all reports and grant deliverables were submitted to the EPA on time and in accordance with the work plans and grant requirements. The FY17 and FY18 \$200k grants were both fully expended within the grant specified timeframes, leveraging an additional \$2.1M and \$600k in state funds, respectively. Data associated with both sites has been entered into the ACRES database, where they are designated as ready for reuse. EGLE also has a long history of successfully managing its annual 128a grant, expending all grant funds each year, fulfilling all reporting requirements, and entering all appropriate data into ACRES.



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

## THRESHOLD CRITERIA

Michigan Department of Environment, Great Lakes, and Energy  
Remediation and Redevelopment Division – Brownfield Program  
FY2022 EPA Assessment Grant

### 1. Applicant Eligibility:

The State of Michigan is an eligible applicant by definition. The Michigan Department of Environment, Great Lakes, and Energy is the state's designated lead agency for grant implementation.

#### Documentation of Applicant Eligibility:

Not applicable; Applicant is the State of Michigan – Environment, Great Lakes, and Energy.

### 2. Community Involvement:

EGLE's plan for community involvement involves both outreach to identify additional sites as well as communication of the project progress. EGLE's existing Brownfield program is based on community input and implementing projects requested by municipalities that are in alignment with local plans and goals. EGLE has [10 Brownfield Coordinators](#) whose job is focused on outreach and connecting communities to incentives to facilitate the redevelopment of brownfield sites. The coordinators have existing communication networks with communities, developers, consultants, as well as every Economic Development Corporation and Brownfield Redevelopment Authority in the State. The coordinators make 2,000 connections with over 250 Michigan communities every year.

Outreach by EGLE will begin within the named Target Areas to initiate the work on the priority sites and identify additional properties for assessment. Targeted outreach will also be conducted in other disadvantaged and environmental justice communities known by EGLE or identified utilizing EPA's and Michigan's EJScreen tools. MiEJScreen, soon to be released, combines demographic and environmental factors into a cumulative score showing synergistic effects and identifying areas that warrant further consideration, analysis, and targeted outreach. Further guidance and assistance targeting outreach will be provided by [EGLE's Environmental Justice Public Advocate](#) which serves as an internal and external voice to ensure environmental justice throughout the state and [EGLE's Tribal liaison](#) who regularly meets with all Tribes in Michigan and will assist with identifying priority tribal sites.

EGLE's targeted outreach to disadvantaged and environmental justice communities will result in numerous site nominations throughout the project period. Communities and project partners can provide input and propose sites to EGLE anytime during the project. All input is treated as valid, considered, responded to by EGLE and will help guide site selection.

When necessary to communicate information and solicit public input for reuse planning projects, EGLE will host public meetings with the ability to participate remotely for those who cannot attend in person. EGLE also provides language translation and accessibility services.

Communicating the project progress starts with the existing relationships and engagement efforts of the EGLE regional Brownfield Coordinators, who provide on-going weekly/monthly updates with local officials, organizations, developers, and the public where work is taking place.

Upon notice of this award, EGLE will announce and issue information about the grant via a press release, email listservs, post on our blog and social media pages, and will host two webinars describing the grant and seeking community input. EGLE will create a grant specific tab on our [Brownfield Assessment Website](#) which will include contact information and a grant dashboard listing assessments and funds remaining. EGLE meets regularly with other state agencies involved in development projects who will be made aware of the grant funding and will assist with identifying additional priority sites.

EGLE will update quarterly the Brownfield Assessment Website. A list of assessments including access to basic site information will be available on the website dashboard, [MI Environmental Mapper](#) and/or [RenewMI](#) website where the public can visually see and read about EGLE's work throughout Michigan.

### **3. Named Contractors and Subrecipients:**

No Contractors or Subrecipients have been procured or named.

### **4. Expenditure of Existing Grant Funds:**

EGLE does not have an open Assessment or Multipurpose Grant.

### **5. Number of Target Areas and Priority Sites:**

As shown below, EGLE's grant application includes four target areas and five priority sites, including at least one priority site in each target area.

- a. Target Area 1: City of Flint, Michigan
  - i. *Priority Site 1*: GTG Trail Corridor from Hemphill Rd to Kearsley St, Flint
  - ii. *Priority Site 2*: Clark Commons III, Scattered infill parcels, 1004 Avenue A, Flint
- b. Target Area 2: City of Detroit, Michigan
  - i. *Priority Site 3*: Packard Plant, 1580 E Grand Blvd, Detroit
- c. Target Area 3: City of Benton Harbor, Michigan
  - i. *Priority Site 4*: Riverview Drive, 655, 823, 875 Riverview Drive, Benton Harbor
- d. Target Area 4: City of Escanaba, Michigan
  - i. *Priority Site 5*: Delta County Jail, 111 N 3<sup>rd</sup> St., Escanaba