NARRATIVE INFORMATION SHEET

1. **APPLICANT IDENTIFICATION:** Leelanau County, Michigan
   8527 E. Government Center Drive
   Suttons Bay, MI 49682

2. **FUNDING REQUESTED**
   a. **ASSESSMENT GRANT TYPE:** Community-wide
   b. **FEDERAL FUNDS REQUESTED:**
      i. $250,000
      ii. N/A

3. **LOCATION:** Leelanau County, Michigan

4. **TARGET AREA AND PRIORITY SITE/PROPERTY INFORMATION:**
   **Target Area 1. Centerville Township** and **Cleveland Township, Census Tract 9705**
   - Former Sugarloaf Resort, 4500 S. Sugar Loaf Mountain Road, Centerville/Cleveland Townships, MI 49621

   **Target Area 2. Empire Village, Census Tract 9704**
   - Former Schoolhouse Building, 10017 W. Front Street, Empire, MI 49630
   - Former Lumberyard, 11738 S. Lake Street, Empire, MI 49630

   **Target Area 3. Cedar CDP, Census Tract 9705**
   - Former Auto-Service Repair/Gas Station, 9044 S. Kasson Street, Cedar, MI 49621
   - Former Auto-Service Repair/Gas Station, 9162 S. Kasson Street, Cedar, MI 49621
   - 1st Bank, 8995 S. Kasson Street, Cedar, MI 49621

5. **CONTACTS**
   a. **PROJECT DIRECTOR:** Ms. Trudy Galla, Planning Director
      and Director of the Brownfield Redevelopment Authority
      (231) 256-9812
tgalla@leelanau.gov
      8527 E. Government Center Drive
      Suttons Bay, MI 49682

   b. **CHIEF EXECUTIVE/HIGHEST RANKING ELECTED OFFICIAL:**
      Mr. Chet Janik, County Administrator
      (231)256-8100
      cjanik@co.leelanau.gov
      8527 E. Government Center Drive
      Suttons Bay, MI 49682
6. **POPULATION:**

   Leelanau County, 22,301 (2020)
   Centerville Township, 1,449 (2019)
   Cleveland Township, 1,197 (2019)
   Empire Village, 263 (2019)
   Cedar CDP, 106 (2019)

7. **OTHER FACTORS:**

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<th>Other Factors</th>
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<tr>
<td>Community population is 10,000 or less.</td>
<td>1, 2, 5</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>N/A</td>
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<tr>
<td>The priority site(s) is impacted by mine-scarred land.</td>
<td>N/A</td>
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<tr>
<td>The priority site(s) is adjacent to a body of water.</td>
<td>1, 3</td>
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<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>N/A</td>
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<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>N/A</td>
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<tr>
<td>The reuse of the priority site(s) will incorporate energy efficiency measures.</td>
<td>3, 5</td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority site(s) within the target area.</td>
<td>N/A</td>
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<td>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.</td>
<td>N/A</td>
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8. **LETTER FROM THE STATE OR TRIBAL ENVIRONMENTAL AUTHORITY** (Attached)

9. **RELEASING COPIES OF APPLICATIONS:** Not Applicable.
November 2, 2021

Ms. Trudy Galla  
Planning Director  
Leelanau County  
8527 East Government Center Drive  
Suttons Bay, Michigan 49682

Dear Ms. Galla:

SUBJECT: Michigan Department of Environment, Great Lakes, and Energy (EGLE)  
Acknowledgment of a United States Environmental Protection Agency (U.S. EPA)  
Brownfield Grant Proposal for 2022

Thank you for your notice and request for a letter of acknowledgment for Leelanau County’s proposal for a U.S. EPA Brownfield Grant. EGLE’s Remediation and Redevelopment Division (RRD), encourages and supports community-led environmental assessment and redevelopment efforts and recognizes the County’s need for funding.

Leelanau County is applying for a $250,000 Community-wide Brownfield Assessment Grant. As a general-purpose unit of local government, Leelanau County is an eligible grant applicant.

Should the U.S. EPA award a brownfield grant to Leelanau County, it would allow the County to conduct environmental investigations and promote economic development at brownfield sites. If you need further information about potential eligible sites in Leelanau County or assistance regarding EGLE’s brownfield programs, please feel free to contact me at the number below or by email at SmedleyR@Michigan.gov.

Sincerely,

Ronald L. Smedley  
Brownfield Redevelopment Coordinator  
Remediation and Redevelopment Division  
517-242-9048

cc: Ms. Brittney Nadler, U.S. EPA Region 5  
Ms. Sara Mae Andrews, EGLE
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area: Leelanau County, located in the northwest corner of the lower peninsula of Michigan, is unique in that it has the second-highest proportion of water area (86%) of any county in the United States. It is home to the Sleeping Bear Dunes National Lakeshore, which in 2011 was voted the “Most Beautiful Place in America” by Good Morning America. The county’s name, Leelanau, is a Native American word meaning “delight of life,” further highlighting the scenic beauty of the county. More than 90% of the county’s 22,301 residents live in small, rural communities (US Census, 2020). The county contains 11 townships, 3 villages, 9 communities, 6 Census-designated places (CDP), a Tribe, and a small part of Traverse City—each area having a population significantly less than 10,000. In pre-settlement days, several Native American tribes called Leelanau County home, and the Grand Traverse Band of Ottawa and Chippewa Indians currently resides in the county. In addition to the county’s beauty, natural resources such as timber and fishing attracted early settlers. Much of the first growth timber was stripped from the area and shipped via an interconnected rail system and steam ships. After the supply of lumber was exhausted, many of the related businesses and industries (e.g., lumber mills, iron works, and shipping hubs) from the boom-and-bust economy closed and left behind legacy brownfield sites. Today, the county’s economy is primarily supported by agriculture, tourism, and small businesses, and the gap between the “haves and have-nots” continues to increase. Maintaining the county’s rural character and protecting the natural environment, while balancing future development, has been identified as a major priority by county residents (Leelanau County 2019 General Plan).

As a result of the COVID-19 pandemic, Leelanau County has seen a surge of wealthy individuals and families with school-aged children seeking prime, view-scape properties and large parcels for construction of new homes. This threatens sensitive lands and habitats, breaks up century-old farms, and puts a strain on public services. The impact of this in-migration has also added an additional strain to the county’s existing housing crisis: there is a lack of affordable housing, which is desperately needed for the low-income workforce and seasonal workers that support the local tourism and recreational economy. Throughout the county, over 6% of the population is living in poverty (US Census, 2019 ACS 5-year estimates) and 43% of households are Asset Limited, Income Constrained, and Employed (ALICE); these residents do not qualify for assistance with housing and cannot afford a house in the area. For reference, the median value of owner-occupied housing units in the county is $268,400, nearly two times the state’s median value. The percent of owner-occupied units valued at $200,000 or more in the county is 70.1%, greater than the state (35.0%) and nation (53.7%) (US Census, 2019 ACS 5-year estimates). The housing crisis also impacts seasonal and low-income workers who are competing with short-term tourist rentals, which depletes affordable housing options. This segment of the county population represents a dispersed Disadvantaged Community due to low-income jobs, high poverty, a high housing cost burden, and lack of accessible transportation. Development pressures, fragmented development, 118 sites of known environmental contamination (egle.state.mi.us/RIDE), record-high Lake Michigan water levels, a lack of affordable housing, and limited year-long employment opportunities challenge the priorities listed in the county’s General Plan and the goals listed in local municipal plans.

It is critical that Leelanau County not only cleans up known contaminated sites throughout the county, but also that it ensures steps are taken to prevent the creation of new sites or sources of contamination. Leelanau County is surrounded by Lake Michigan, and nearly 60% of the land overlies sensitive aquifers that provide drinking water to all county residents. Only a few communities have a public water system, as most of the county is served by individual wells. It is imperative that contaminants from brownfield sites do not affect the water bodies (either surface water or groundwater) that sustain our economy, livelihood, and health.

The Leelanau County Brownfield Redevelopment Authority (LCBRA), whose mission is to “provide resources and expertise to investigate, cleanup, and return properties to productive use for the benefit of the county, communities and citizens,” will administer the EPA Assessment Grant. The LCBRA has identified the following target areas distributed throughout the county.

These target areas include Centerville Township (Pop. 1,449) and Cleveland Township (Pop. 1,197), two similar, sparsely populated, rural, agriculture-focused communities. The townships were once home to the largest employer in the county, Sugarloaf Ski Resort. Vacant for the past 20 years,
The former resort has become a major liability to the communities and has exposed area residents to a blighted, broken-down nuisance. Recently, a new private owner is investing millions of dollars to raze the former resort, removing the asbestos, blight, and other hazards that affected area residents. However, contamination from leaking underground storage tanks and former equipment maintenance remains, which potentially threatens groundwater and presents a vapor intrusion risk.

The **Empire Village** (Pop. 263) **target area** is located on Lake Michigan and was historically a booming lumber town with lumber mills, supporting businesses, docks, and a railroad. Once the timber supply was depleted in the early 1900s, so went the related jobs and businesses. Being in the heart of the Sleeping Bear Dunes National Lakeshore, Empire and the surrounding area receive over one million visitors each year, which provides a thriving tourism industry, but local residents have difficulty making a living year-round on seasonal jobs. The village has been studying the feasibility of a public sewer system and is talking with owners of shuttered businesses to try and coordinate a public/private arrangement. Lack of affordable housing, low-wage jobs, and inadequate infrastructure to support growth and redevelopment of contaminated sites continue to challenge this community.

The **Census-designated place (CDP)** and **target area of Cedar** (Pop. 106) has a small, two-block “downtown.” Like Empire, the town was historically a lumber town known for its cedar, thus its name. Cedar is famous for its Polish heritage and the annual Polka Fest, yet one festival does not make an economy. The residents continue to struggle with high unemployment (28.3%); lack of affordable housing; closed businesses including a bank/ATM, meat store, automotive store, restaurant, and winery; and too many contaminated brownfield sites for this little community.

1.a.ii. **Description of the Priority Brownfield Site(s):** Countywide, there are 118 known sites of contamination, which is significant for the second smallest county in the state by area. The LCBRA has identified the following priority sites in the target areas, with assistance from communities through outreach events, nomination forms, and community visits.

- **Sugarloaf Resort (Centerville Twp. and Cleveland Twp. target areas)** is a vacant, blighted former ski resort abandoned for over 20 years. The approximately 385-acre property contains a 124,000-square-foot resort building with numerous outbuildings and a large maintenance building. The maintenance building has three open leaking underground storage tank releases with contamination remaining and volatile organic contaminants in the soil that are anticipated to represent a vapor intrusion issue for the building. Only 30 feet away from the site is a townhome residential development, whose residents have been exposed for years to friable asbestos, asbestos-containing vermiculite insulation in the broken cement-block walls, lead-based paint, broken mercury switches and thermostats, and other hazards. Recently, a new private owner is investing millions of dollars to raze the former resort, removing the asbestos, blight, and other hazards that affected area residents. Sugarloaf Resort is a priority as it represents a tremendous risk to the community and environment and it is a burden on the local residents by attracting vandalism and destruction, devaluing adjacent housing. The LCBRA intends to use EPA Grant funds to leverage the private investment, assessing remaining issues that continue to inhibit reuse of the property and surrounding area.

- The **target area of Empire Village** has made multiple efforts to redevelop an old 8,000-square-foot, two-story former **Schoolhouse Building** on seven commercially zoned lots that has sat vacant since the 1960s, but all previous efforts have failed. Plans for badly needed housing to support the local workforce have been discussed, making this site a priority for the community. The site is complicated by asbestos, lead paint, lead, mercury, a deteriorating structure, and contaminants in the septic tank. Another priority site in Empire is a **Former Lumberyard** that comprises five buildings in various conditions for a total of 27,500 square feet. The site has been vacant for several years and has an open release from an underground petroleum storage tank. This site was slated for development of an event venue, which would bring new job opportunities to the area, but unless concerns related to the open release are addressed, the site will remain vacant. Additionally, the only grocery store in Empire (and for miles) closed in 2019 due to business challenges. The lack of a grocery store creates a food desert in this community, which further complicates the ability to cost effectively support a household due to the increased costs to access healthy food and fresh produce.

- The **target area of Cedar** is an extremely small CDP, with only 106 residents and a two-block downtown. The downtown contains **Two Former Auto-Service Repair/Gas Stations**, one being the former Dave’s Auto Service with a 2,400-square-foot steel structure, which has an unresolved release
of gasoline from the on-site underground storage tanks. This community has struggled with their private water supply wells and their on-site septic systems, which tend to fail due to a high water table. The addition of potential gasoline and auto-repair contaminants to this ongoing septic problem remains a concern for private water supplies, making this site a community priority. On the main corner of Cedar’s downtown is the 1,900-square-foot former 1st Bank. An unfinished excavation for a planned addition remains open and filled with unknown junk and potential contaminating materials, which inhibits interest in redeveloping the site, further degrading the downtown.

Throughout the county, there are many other sites that can be addressed with grant funds including abandoned, blighted, and tax-foreclosed homes with lead and asbestos, former gas stations and marinas with residual gasoline and oil contamination, a closed hospital with asbestos and lead-based paint, and a Superfund Site with residual soil and groundwater contamination (Grand Traverse Overall Supply Co., Greilickville, Michigan).

Some of the county’s communities, including the target area Empire Village, are located along the shores of Lake Michigan, which in 2019 and 2020 experienced the highest water levels since 1918—impacting all of Leelanau County’s shorelines, coastal parks, marinas, historic Fishtown in Leland, and infrastructure including roads (MSU Extension, Leelanau County 2019–2020 Annual Report). In August of 2019, a portion of the break wall at the Empire public beach collapsed due to high water and winds. In April of 2020, the high water decimated the Empire Beach boat ramp and public beach, and eroded the park and parking lot. Beaches and campground areas all around the county, as well as within the national lakeshore, were flooded with historically high water levels. These high water levels also pose problems for shoreline areas with brownfield sites. The LCBRA will coordinate with the MSU Extension Sea Grant program to educate lakeshore residents on known brownfield sites and how this EPA Grant can assist communities by assessing sites impacted by rising water levels and associated contaminants released to the Great Lakes. This information will allow cleanup or management of sites to occur, eliminating this risk.

1.b. Revitalization of the Target Area

1.b.1. Reuse Strategy and Alignment with Revitalization Plans: As documented in Leelanau County’s community-vetted 2019 General Plan (General Plan), Leelanau County’s priorities directly parallel EPA’s Strategic Plan Goal 1, “Creating a Cleaner, Healthier Environment,” and Objective 3, “Revitalize Land and Prevent Contamination.” The principal goal of the General Plan is “to establish a strategy for guiding growth that protects and, where possible, enhances the unique character of life in the county. The Plan focuses on balancing environmental protection, energy efficiency and renewable energy, resource management, and economic development to provide a foundation for a sustainable economy that permits long-term prosperity for all present and future residents. This Plan recognizes that a healthy economy depends on a healthy environment.” The redevelopment strategies and projected reuse for the properties that we assess under this grant will be filtered through our General Plan designed by Leelanau citizens and the goals and objectives of local community plans.

The former Sugarloaf Resort priority site benefited from several visioning sessions conducted through the Technical Assistance to Brownfield Communities (TAB) program. Two primary reuse strategies emerged from the community visioning sessions: reuse the site as 1) a full-service resort center similar to its previous use and 2) an area community center for recreation. Both uses would be in line with the General Plan, ensuring the development preserves the site’s scenic beauty, rural character, and high environmental quality with opportunities for year-round employment and affordable, energy-efficient housing. The site has benefited from assessment activities, such as removal of underground tanks, using previous EPA Grants. This EPA Grant will also leverage the Michigan Department of Environment, Great Lakes, and Energy’s commitment to conduct contaminated soil removal at one of the underground storage tank sites at the former resort. Revitalization and redevelopment of this large property will require additional resources, including further assessment, and soil remediation.

Assessing the priority sites in Empire and Cedar will support the following reuse strategy, which is embraced by the entire county: a) understand and eliminate contamination, asbestos, and lead-based paint, so residents, visitors, and the environment are not exposed further; b) reuse these sites to reduce strain on our natural resources, agricultural lands, and open space; c) prepare these
sites for redevelopment and eliminate the stigma which discourages reuse; and d) ready these sites for commercial entities to create jobs and affordable housing, which is desperately needed.

1.b.ii. Outcomes and Benefits of Reuse Strategy: When the Sugarloaf Resort closed, the largest employer in the county was eliminated. Although Leelanau County receives a significant influx of tourists each summer, the low-wage, seasonal jobs the industry supports make it difficult for low-income families to reside in the county. According to the General Plan, nearly 46% of the county’s labor force commutes outside the county for work that will support a family. Due to the limited availability of broadband internet throughout the county, working from home during the COVID-19 pandemic has been difficult for our residents, putting a greater strain on the local job market. This segment of the county population represents a dispersed Disadvantaged Community due to low-income jobs, high poverty, a high housing cost burden, and lack of accessible transportation. Assessing and cleaning up our target brownfield sites, such as the Sugarloaf Resort and priority sites in Empire and Cedar, will eliminate the environmental hazards that currently exist to our residents, land, and water bodies. Additionally, it allows for the reuse of infrastructure and/or historic buildings, reducing pressure on undeveloped lands. Once the stigma is gone, new businesses can utilize these locations and create livable-wage jobs. The LCBRA in cooperation with the County Land Bank Authority, will identify assessed properties that can be utilized for the development of affordable housing. The LCBRA and the Land Bank can offset financial gaps using a tax increment financing Brownfield Plan, which will ease the high housing cost burden affecting our disadvantaged residents. Additionally, working with the Leelanau Land Conservancy and Leelanau County Parks & Recreation Committee, portions of lands like Sugarloaf can be acquired and preserved for recreation and open space or returned to cherry orchards or timberlands, which is in line with the General Plan.

1.c. Strategy for Leveraging Resources
1.c.i. Resources Needed for Site Reuse: The county understands more resources are needed to ready sites for redevelopment. These resources can total hundreds of thousands to millions of dollars of leveraged funds, which ensure the success of projects and our program. We have the capacity and willingness to pursue funds, such as Community Development Block Grants (CDBG), USDA Rural Development, Historic Preservation, and HUD grants for Sustainable Communities (Regional Planning grants). The LCBRA worked with the Michigan Department of Environment, Great Lakes, and Energy (EGLE) on a prior project in Cedar to conduct community health monitoring and received $50,000 in state funds to add to the $15,000 in EPA assessment funds already leveraged. The community provided $20,000 of in-kind services. The LCBRA leveraged $1.2 million in Brownfield Redevelopment Loans from EGLE for a brownfield site in Leland, which paid for asbestos abatement, demolition, and site investigation. Through the Renew Michigan Fund, EGLE annually has $10 million available for brownfield grants and loans in addition to $5 million in grants from the Refined Petroleum Fund. We fully anticipate accessing these programs during the term of the EPA Grant. The county has also leveraged more than $1 million dollars over the last decade through its housing rehabilitation and new construction programs. The county is well versed and proficient in acquiring and leveraging resources to complete projects and will continue to do so with these assessment dollars. The LCBRA has also established a Local Brownfield Revolving Fund that will receive funds in the future from tax increment financed Brownfield Plans. These funds can be used for cleanup, demolition, asbestos abatement, and other brownfield-related activities.

1.c.ii. Use of Existing Infrastructure: One of the citizen benefits identified through implementation of the General Plan is that “infrastructure and public services will be incrementally provided in compact areas as needed, rather than spread widely across much of the county.” Thus, reuse of infrastructure where our priority brownfield sites are located, in some cases in the “compact areas” of the county (i.e., villages, towns, and CDPs), supports this benefit. As the former Sugarloaf Resort is demolished, plans include preserving the infrastructure that served this area including a wastewater treatment system, high production water wells and mountain-top water tank, high-pressure gas and electric lines, a concrete airstrip, and other features. In the downtown target area of Empire, redevelopment of our priority sites is hampered by the ability to install septic systems that meet code due to a high water table and small lot sizes. The Empire Village Council has created a Wastewater Feasibility Committee, which is studying the feasibility for a community system that will alleviate
current aging systems and allow reuse and growth to occur. Empire is seeking funding through USDA. Empire recently adopted a point-of-sale septic ordinance requiring septic inspections at the time of a sale or transfer of property ensuring on-site septic systems are working properly to minimize damage to the environment. In cooperation with the Land Bank Authority, the LCBRA can use a tax increment Brownfield Plan to reimburse the costs of improving or installing new public infrastructure. The LCBRA will use this tool to support the construction of affordable housing on brownfield sites in our target areas.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community’s Need for Funding: Leelanau County is a story of the “haves and have-nots.” The county has the most drastic income inequality in the state: the average income of the top 1% of earners is 32 times the average income of all other earners in the county (2019 Paul Oliver Memorial Hospital Community Health Needs Assessment [CHNA]). According to the 2019 Leelanau County Target Market Analysis (TMA), 31% of county homeowners fall in the low to extremely low-income bracket when compared to HUD’s low to moderate income thresholds, and 59% of county renters fall in the low to extremely low-income brackets. Almost 20% of children in the county live below the poverty level, a 66% increase since 2005 (Leelanau Christian Neighbors), and 42% of the county’s children are eligible for free or reduced-price lunch (Robert Wood Johnson Foundation 2020 County Health Rankings). The small county towns (all with populations less than 10,000) are dispersed Disadvantaged Communities which have very limited resources and have pockets of residents that are struggling, many having lost jobs due to the COVID-19 pandemic. The unemployment rate in the Cedar target area is 28.3%, significantly higher than the national average of 5.3% (US Census, 2019 ACS 5-year estimates). Throughout the county, 43% of households are either living below the poverty line or are Asset Limited, Income Constrained, Employed (ALICE, 2019).

With over 90% of residents classified as rural and nearly 46% of the labor force commuting outside the county to make ends meet, there is a concerted effort to attract resource and environmentally friendly industry and businesses that will enhance year-round employment opportunities. Additionally, as outlined in the General Plan, the county is working with local communities to review zoning, infrastructure needs, and other regulations that promote the reuse of existing downtown properties and allow for construction of energy-efficient, affordable housing and mixed-use developments. However, many of these communities do not have the resources to consider environmental implications and costs associated with redeveloping brownfield sites. An EPA Assessment Grant will allow Phase I and II Environmental Site Assessments to be completed, which will inform buyers of site conditions, provide a basis for liability protection, and determine how to safely reuse the site. In Michigan, investments on brownfield sites can be leveraged through a Brownfield or Cleanup Plan, which allows for the capture of the improved taxable value to reimburse developers for their eligible brownfield costs. Plans can be developed using EPA Assessment funds.

2.a.ii. Threats to Sensitive Populations

2.a.ii.(1) Health or Welfare of Sensitive Populations: Leelanau’s senior population is dramatically increasing. From 2010 to 2019, the county’s population of residents over the age of 65 rose from 4,740 (21.8% of total population) to 6,502 (30.0%), which is significantly higher than concurrent percentages in Michigan (16.7%) and the nation (15.6%) (US Census, 2019 ACS 5-year estimates). In our target areas of Centerville and Cleveland Townships and Empire Village, seniors represent a large percentage of the population at 24.5%, 32.2% and 42.2%, respectively. Senior citizens are one of the most economically vulnerable demographic groups in Michigan and the United States, as the vast majority over 65 are retired and on a fixed income. For most Michigan residents aged 65 and older, Social Security benefits are their primary source of income, and for about one-third of them, Social Security accounts for 90% to 100% of their income. Many seniors live alone or require additional help, so they may not be immediately aware of potential contamination problems in their community. With age, the immune system declines; hence, seniors are more susceptible to effects of contamination. These limitations place this sensitive group at a high risk for exposure and problems related to brownfield sites and the chemicals typically associated with these sites.
Leelanau County is in desperate need of jobs and affordable, safe, energy-efficient housing. Additional assessment funds can help by making sites safe and desirable for reuse. Our priority sites, such as the Schoolhouse Building and Former Lumberyard in Empire Village and the Two Former Auto-Service Repair/Gas Stations and the former 1st Bank in Cedar, could be ideal mixed-use projects. Assessment Grant funds will help reduce the environmental risks that our significant and growing senior population faces each day by assessing, evaluating, and providing relevant information from brownfield sites that can inform on the level of contamination, if any. This information will help direct reuse and cleanup.

With vacant, blighted brownfields sites, many questions and concerns exist regarding chemicals and/or compounds (oils, solvents, asbestos, and lead-based paint) that may be present. Due to abandonment of these sites (e.g., the Sugarloaf Resort), first responders may unknowingly find themselves unnecessarily exposed if responding to a hurt trespasser or a fire. The EPA Grant funds will help the LCBRA collaborate with first responders and share information on sites the LCBRA assesses through several educational sessions about brownfields and the potential hazards on sites.

2.a.ii.(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Leelanau County was evaluated using EPA’s EJSCREEN Tool, rather than evaluating the target areas due to the small population sizes, which reduce accuracy. Four EJ Indexes were above the state and regional 50th percentiles: NATA Diesel PM, Traffic Proximity, RMP Proximity, and Hazardous Waste Proximity. The sensitive population likely affected by these conditions are seniors. Approximately 30.0% of the county’s population is over 65 years of age, and that number is steadily growing. According to Germany’s environmental authority (Umweltbundesamt), “environmental risk factors are now thought to cause or at least influence age-related diseases such as Parkinson’s or Alzheimer’s disease.” These typically old-age neurological diseases have a common element: brain cell damage. Although the cause of these diseases is still not known, we do know that certain chemicals cause brain cell damage, including heavy metals such as lead and mercury, solvents such as toluene, and pesticides, among others (atsdr.cdc.gov). Our priority sites have lead-based paint, gasoline, oils, and various solvents that have contributed to soil, groundwater, surface water, and likely airborne contamination. These contaminants also cause other health effects and diseases including asthma; cancer; and liver, skin, heart, and development system problems. Currently, 54% of teens in Leelanau County have asthma (2017–2018 MI Profile for Healthy Youth). The three leading causes of death in the county are heart disease, cancer, and chronic lower respiratory disease (2019 Paul Oliver Hospital CHNA). Using EPA Grant funds to educate county residents about brownfields and their associated hazards will help address existing sites and identify new brownfield sites that can be assessed for potential risks. These risks can then be mitigated and reduced through proper reuse and/or cleanup.

2.a.ii.(3) Promoting Environmental Justice: The county has the most drastic income inequality in the state: the average income of the top 1% of earners is 32 times the average income of all other earners in the county (2019 Paul Oliver Memorial Hospital CHNA). The top 1% live in extravagant homes with beautiful views, while the seasonal, low-wage jobs that are available in the county make it difficult for residents to afford housing. 43.2% of the housing available in the county was built prior to 1980; this housing presents an extreme risk for childhood lead poisoning since it may contain lead-based paint. Many of the properties that are affordable are substandard. Further, the residents of this housing (primarily low-income families and seniors) are disproportionately affected by brownfield sites since many of them reside close to abandoned industrial or commercial areas and are in areas of lower property values. Therefore, low-income households in the county have a much higher exposure risk to chemicals like asbestos, lead-based paint, lead in soils, and solvents, translating to a higher risk of direct contact or inhalation, resulting in lead poisoning, respiratory problems/diseases, low birthweights/deformities, and cancer. The EPA Grant will be used to conduct Phase I and II Environmental Assessments of vacant, blighted buildings or substandard housing in our target areas and disadvantaged communities, identifying brownfield conditions that need cleanup, exposure mitigation, asbestos or lead abatement and improved infrastructure. The LCBRA and Land Bank can bring resources to these communities to reuse sites for the construction of affordable housing creating opportunities for building generational wealth and improved well-being.

2.b. Community Engagement
### 2.b.i.–2.b.ii. Project Involvement and Project Roles

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<tr>
<th>Organization</th>
<th>Point of Contact</th>
<th>Involvement in the project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Michigan Sea Grant</td>
<td>Mark Breederland, Extension Educator (231) 922-4628 <a href="mailto:breederl@msu.edu">breederl@msu.edu</a></td>
<td>Apply sustainable coastal development principles to brownfield sites affected by rising Great Lakes water levels</td>
</tr>
<tr>
<td>County Parks &amp; Recreation</td>
<td>Casey Noonan, Chairman (866) 256-9711</td>
<td>Provide input on brownfield sites that may be reused as parks/recreational assets</td>
</tr>
<tr>
<td>Commission</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Leelanau County Senior Services</td>
<td>April Missias, Director (231) 256-8121 <a href="mailto:seniorinfo@leelanau.gov">seniorinfo@leelanau.gov</a></td>
<td>Communicate with our sensitive population on the risks from brownfield sites</td>
</tr>
<tr>
<td>Networks Northwest</td>
<td>Matt McCauley (231) 929-5057 <a href="mailto:CEOmccauley@networksnorthwest.org">CEOmccauley@networksnorthwest.org</a></td>
<td>Public outreach/presentations, zoning/planning for projects, contacts for developers/funding</td>
</tr>
<tr>
<td>Leelanau Conservancy</td>
<td>Tom Nelson, Executive Director (231) 256-9665 <a href="mailto:tnelson@leelanauconservancy.org">tnelson@leelanauconservancy.org</a></td>
<td>Reuse of brownfields for open space, farmland and woodlands, and recreation</td>
</tr>
<tr>
<td>Housing North</td>
<td>Yarrow Brown, Executive Director (231) 335-1685 <a href="mailto:Yarrow@housingnorth.org">Yarrow@housingnorth.org</a></td>
<td>Reuse of brownfields for housing opportunities</td>
</tr>
<tr>
<td>Leelanau County Land Bank Authority</td>
<td>John Gallagher, Chairman (231) 256-9838 <a href="mailto:jgallagher@leelanau.gov">jgallagher@leelanau.gov</a></td>
<td>Opportunities to acquire tax-foreclosed properties for assessment and redevelopment</td>
</tr>
<tr>
<td>Leelanau County Veterans Affairs</td>
<td>Michael Roof, Director (231) 995-6070 <a href="mailto:mroof@grandtraverse.org">mroof@grandtraverse.org</a></td>
<td>Educate veterans, the majority of whom are seniors, about risks with brownfield sites</td>
</tr>
<tr>
<td>Habitat for Humanity Grand</td>
<td>Wendy Irvin, Executive Director (231) 941-4663 <a href="mailto:wendyi@habitatgtr.org">wendyi@habitatgtr.org</a></td>
<td>Convert brownfield sites to affordable housing assets</td>
</tr>
<tr>
<td>Traverse Region</td>
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</table>

2.b.iii. Incorporating Community Input: Leelanau County has strong experience in community outreach, demonstrated during development of the General Plan, previous assessment grants, the county website, and recycling programs. The LCBRA will conduct outreach events, especially in our target areas, with various stakeholders including community leaders, realtors, bankers, developers, and residents. We anticipate the events will be more intense at the beginning of the grant and include two virtual (or in-person) community open houses by the third quarter of FY23 and an additional outreach event midway through the grant. These events will educate and provide information on the LCBRA’s Brownfield Program and available tools, funding, and resources; help identify brownfield sites; and receive input and develop reuse visions and strategies. The LCBRA meets monthly, allowing additional opportunities to receive and respond to community input. With COVID-19 still prevalent, various resources will be utilized to inform county residents including Zoom meetings, the county website, email updates, social media, print media, brochures, flyers, and grant fact sheets. Many of our community partners will utilize their information distribution networks to help educate their constituencies, especially our sensitive senior populations. With our growing Hispanic population, notices and announcements will also be disseminated in Spanish, which we have done for past EPA Grants and housing programs. It will be critical to identify opportunities to interact with disadvantaged community members in the county and target areas during times they can meet which may not be during normal business hours due to their work schedules. Through several educational outreach sessions, the LCBRA will also collaborate with first responders regarding the potential environmental hazards associated with brownfield sites.

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

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

Implementation schedule will meet 35% within 18-month spend rate.
**Task 1: Phase I Environmental Site Assessments**

i. Project Implementation:
   - 6 Phase I assessments on priority sites in **target** communities.
   - 5 Phase I assessments on non-priority sites countywide as determined by LCBRA.

ii. Anticipated Schedule: complete 5 priority sites by 4th quarter FY23; complete 1 to 2 Phase I assessments every 2 to 3 quarters at priority/non-priority sites.

iii. Task/Activity Lead(s): Qualified Environmental Professional, Applicant oversight

iv. Output(s): 11 Phase I eligibility demonstrations, site access agreements, All Appropriate Inquiry compliant reports, ACRES updates

**Task 2: Phase II Environmental, Baseline Environmental Assessments/Due Care Plans**

i. Project Implementation:
   - Completion of Quality Assurance Project Plan (QAPP); completion of Sampling Plans and Health and Safety Plans for each Phase II.
   - 4 Phase II assessments on priority sites in **target** communities and 4 Phase II assessments on non-priority sites countywide (subject to input from community events and outreach).
   - For contaminated sites (estimated 4), completion of Baseline Environmental Assessments for liability protection and Due Care Plans to address “continuing obligations.”

ii. Anticipated Schedule: complete 3 Phase II/Baseline Environmental Assessments/Due Care Plans at **target** community priority sites by 4th quarter FY23; for remaining 5 non-priority sites, we estimate 1 Phase II completed every 2 to 3 quarters.

iii. Task/Activity Lead(s): Qualified Environmental Professional, Applicant oversight

iv. Output(s): 1 QAPP; 8 Phase IIs and Sampling and Analysis Plans/Health and Safety Plans; 4 Baseline Environmental Assessments/Due Care Plans, ACRES updates

**Task 3: Brownfield Plans and Cleanup Planning**

i. Project Implementation:
   - 2 Brownfield Plans (estimate) to utilize tax increment financing to leverage grant funds on priority sites. Plans will be reviewed by LCBRA and local unit of government and approved by County Commissioners at a public hearing. Estimated that 2 priority sites will require Act 381 Work Plans (i.e., Cleanup Plans) for state tax support, which requires state approval.
   - 2 Brownfield Plans and 1 Act 381 Work Plan (estimates) on non-priority sites countywide as determined by LCBRA, with community outreach event input; all subject to the same review procedures outlined above.

ii. Anticipated Schedule: complete 2 Brownfield Plans and 2 Act 381 Work Plans at **target** community priority sites by 4th quarter FY23; remaining 2 Brownfield Plans and 1 Act 381 Work Plans at non-priority sites estimated to be completed by the end of grant.

iii. Task/Activity Lead(s): Qualified Environmental Professional, Applicant oversight

iv. Output(s): 4 Brownfield Plans, 3 Act 381 Work Plans, 4 Local Resolutions, 4 Public Hearings, 3 State Regulatory reviews, ACRES updates

**Task 4: Community Outreach, Programmatic, Travel, and Supplies**

i. Project Implementation:
   - Activities include procuring Qualified Environmental Professional; preparation of Grant Work Plan; prepare, attend, and participate in public hearings; municipal and LCBRA meetings; create and disseminate brochures/flyers/web pages about the grant; educate and inform community groups and stakeholders, including first responders, about the grant and brownfields; virtual community outreach events; attend the National Brownfield Conference; prepare EPA quarterly/financial/performance reports. The LCBRA staff and the Qualified Environmental Professional will provide numerous in-kind hours to help with the program and outreach events.

ii. Anticipated Schedule: Immediately work with EPA to get grant up and running as soon as possible; community outreach efforts will be intense at the outset of the grant and will include 2 virtual community open houses by 3rd quarter of FY23 and an additional outreach event midway through the grant or 1st quarter of FY24; LCBRA monthly meetings and outreach efforts will continue throughout the grant term.

iii. Task/Activity Lead(s): Applicant and Qualified Environmental Professional
iv. Output(s): Procurement of 1 Qualified Environmental Professional; 3 community open house/education events; 36 monthly LCBRA meetings; 12 Quarterly Reports; numerous educational materials and outreach events; 1 trip to National Brownfield Conference for 1 LCBRA member and the Project Director.

3.b. Cost Estimates
- Task 1, Contractual Costs: 11 Phase I site assessments at average cost of $3,000 = $33,000 total.
- Task 2, Contractual Costs: 8 Phase II site assessments at average cost of $20,000 = $160,000; 4 Baseline Environmental Assessments/Due Care Plans at average cost of $4,000 = $16,000; $176,000 total.
- Task 3, Contractual Costs: 4 Brownfield Plans at average cost of $4,000 = $16,000; 3 Cleanup Plans (Act 381 Work Plans) at average cost of $4,000 = $12,000; $28,000 total.
- Task 4: $13,000 total as follows: Personnel Costs: grant coordination, outreach, budgeting, reporting for 100 hrs. at average rate of $40/hr. = $4,000; Travel Costs: travel for 1 member and the Project Director including airfare, lodging, food, and expenses at an average cost of $1,500 per person = $3,000; Contractual Costs: 12 quarterly reports at average cost of $400 = $4,800; preparation for 3 community open houses at average cost of $400 per event = $1,200; $6,000 total.

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1: Phase I Assessments</th>
<th>Task 2: Phase II Assessments</th>
<th>Task 3: Brownfield Plans</th>
<th>Task 4: Community Outreach/Programmatic</th>
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*84% of the Assessment Grant Budget is designated for Phase I and II Environmental Assessments.

3.c. Measuring Environmental Results: The LCBRA, on behalf of the county, will track, measure, and evaluate progress in achieving outputs and outcomes throughout the grant program. Assessment information (outputs)—including number of Phase I and II Assessments, Baseline Environmental Assessments, Due Care Plans, Brownfield Plans, and Cleanup Plans (Act 381 Work Plans) funded by the grants—will be documented in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES). Grant Quarterly Reports and a Dashboard will be created, as we did for our previous EPA Assessment Grants. The Dashboard documents the outcomes, or the number of grant-related outreach activities, project investment leveraged, jobs created (or planned), jobs retained, and grant-funded projects per local unit of government, including our target areas and priority sites. The Dashboard, available on the LCBRA’s website, is distributed at meetings/events regularly. The LCBRA will track the number of sites/acres prepared for reuse (including sites that have been cleaned up, had blight removed, and had exposure concerns removed or minimized) and sites that can be considered “safe” for reuse. The LCBRA, working with community partners, will track and evaluate long-term outcomes, such as affordable housing units built, jobs created, infrastructure reused, acres preserved for agriculture, open space, and improved habitats, improved property values, and health outcomes for our sensitive populations, especially those in our target areas and near our priority sites.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE
4.a. Programmatic Capability
4.a.i.–4.a.iii. Organizational Capacity, Organizational Structure, and Description of Key Staff: Leelanau County administers its Brownfield Program and grants through the LCBRA. The seven-member LCBRA board has experience in business, real estate, alternative energy, construction, contract negotiation, planning, and finance. The LCBRA has established Policies and Procedures, and a two-part application, that guides their evaluation of projects. The LCBRA meets monthly and at special request if needed, allowing timely and successful use of funds. Project applications are reviewed by the LCBRA at their publicly noticed meetings, allowing municipal and citizen input.
Ms. Trudy Galla will serve as Project Director for the grant through the county’s Planning & Community Development office and the LCBRA. Ms. Galla serves as the Director of both entities and will be responsible for all programmatic, administrative, and financial requirements of the project and grant. She has experience in brownfields, land bank properties, planning, zoning, housing, and historic preservation. Ms. Galla has successfully administered HUD funds with 15 federal housing grants through the Michigan State Housing Development Authority, a blight elimination grant, 5 EPA Brownfield Grants, EGLE Brownfield Grants and Loans, grants from the Tribe, and local and regional grants. The LCBRA has also worked with EPA on cleanup and reuse activities at a Superfund National Priority List site in Leelanau County. Ms. Galla was a member of the Brownfield Collaborative Stakeholder Initiative group organized through the state’s Brownfield Program and the Michigan Economic Development Corporation. She served as a member of the ATSDR National Brownfields/Land Reuse Health Initiative Steering Committee. Ms. Galla serves as Damage Assessment Leader for Emergency Operations and works daily with county officials, businesses, and local organizations. She will oversee all aspects of the grant including projects, community outreach, brownfield consultant procurement and oversight, quarterly reports, financial tracking, etc. Ms. Galla will receive support from the county’s Administrative Office including Chet Janik, County Administrator, who has been active with the county’s Brownfield Program since 2012.

4.a.iv. Acquiring Additional Resources: A Qualified Consultant will be selected by the LCBRA, following appropriate procurement requirements, to assist with the grant tasks as outlined above. The Consultant will conduct Phase I and II Site Assessments, Baseline Environmental Assessments, Brownfield Plans, and Cleanup Plans. The Consultant will assist the Project Director with community outreach efforts, reporting, and timely updates to ACRES required by the Cooperative Agreement. The county has made use of free EPA geophysical assistance services at several sites and will access this resource in the future. We will seek assistance from EGLE on cleanup efforts and funding; other free services from local, regional, and state offices; and TAB.

4.b. Past Performance and Accomplishments
4.b.i. Currently Has or Previously Received an EPA Brownfields Grant
4.b.i.(1) Accomplishments: Leelanau County has received several EPA Grants over the years, the most recent being the FY14 EPA Hazardous Substances and Petroleum Assessment Grants ($200,000 each) and a FY10 EPA Revolving Loan Fund (RLF) Grant ($1,000,000). The LCBRA administered the grants on behalf of the county. The combined Assessment Grants’ outputs were accurately reflected in ACRES and included 11 Phase I and II Environmental Assessments, 4 Brownfield Plans, and 23 grant-related outreach activities. Resulting outcomes included over $6 million in leveraged project investment, over 700 acres assessed, and approximately 115 new jobs. Projects were completed in 10 different communities.

The FY10 EPA RLF Grant capitalized one loan in the amount of $532,728 for the former Leelanau County Government Center, which is currently under construction for a new single-family residential development. RLF outputs included numerous grant-related outreach activities, marketing of the grant availability, development of loan documents and application forms, a Community Relations Plan for the project, an Analysis of Brownfield Cleanup Alternatives, public meetings, a Decision Document and Response to Public Comment, a Section 106 Review, an Act 381 Work Plan, and a QAPP Equivalency Memorandum. RLF outcomes included remediation of nearly 2,600 tons of contaminated soil and an approved Documentation of Due Care Compliance, which allowed unrestricted use of the site for the proposed residential development with an anticipated $4 million investment. All information was accurately documented in ACRES.

4.b.i.(2) Compliance with Grant Requirements: All grants were completed according to the EPA Cooperative Agreements, schedules, Work Plans, Quarterly Reporting, budgets, and ACRES reporting. The Assessment Grants and RLF Grant have been closed out with all funds expended from the Assessment Grants and $532,728 utilized of the $1,000,000 RLF grant. With respect to the RLF Grant, the LCBRA was not able to capitalize all of the $1,000,000 into loans primarily due to the recession that occurred in 2008–2010, which caused a delay and cancellation of several projects that were anticipated to occur. The LCBRA requested and received approval to extend the RLF Grant in order to complete the one project at the former Leelanau County Government Center site.
Threshold Criteria
1. APPLICANT ELIGIBILITY – Leelanau County is a Michigan General Purpose Local Unit of Government and is eligible to receive funding through the U. S. EPA Brownfield Assessment grant program.

2. COMMUNITY INVOLVEMENT – Leelanau County has strong experience in community outreach, demonstrated during development of the General Plan, previous assessment grants, the county website, and recycling programs. The Leelanau County Brownfield Redevelopment Authority (LCBRA) will conduct outreach events, especially in our target areas, with various stakeholders including community leaders, realtors, bankers, developers, and residents. We anticipate the events will be more intense at the beginning of the grant and include two virtual (or in-person) community open houses by the third quarter of FY23 and an additional outreach event midway through the grant. These events will educate and provide information on the LCBRA’s Brownfield Program and available tools, funding, and resources; help identify brownfield sites; and receive input and develop reuse visions and strategies.

The LCBRA has established Policies and Procedures and a two-part application that guides their evaluation of projects. The LCBRA meets monthly and at special request if needed, allowing timely and successful use of funds. Project applications are reviewed by the LCBRA at their publicly noticed meetings, allowing municipal and citizen input. The LCBRA meets monthly, allowing additional opportunities to receive and respond to community input. With COVID-19 still prevalent, various resources will be utilized to inform county residents including Zoom meetings, the county website, email updates, social media, print media, brochures, flyers, and grant fact sheets. Many of our community partners will utilize their information distribution networks to help educate their constituencies, especially our sensitive senior populations. With our growing Hispanic population, notices and announcements will also be disseminated in Spanish, which we have done for past EPA Grants and housing programs. It will be critical to identify opportunities to interact with disadvantaged community members in the county and target areas during times they can meet which may not be during normal business hours due to their work schedules. Through several educational outreach sessions, the LCBRA will also collaborate with first responders regarding the potential environmental hazards associated with brownfield sites.

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3. NAMED CONTRACTORS AND SUBRECIPIENTS – Not Applicable, a contractor or subrecipient has not been procured or named in this application.

4. EXPENDITURE OF EXISTING GRANT FUNDS – Leelanau County affirms that it does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.