NARRATIVE INFORMATION SHEET

1. **APPLICANT IDENTIFICATION:**
   St. Clair County, Michigan
   200 Grand River Avenue,
   Suite 203
   Port Huron, Michigan 48060

2. **FUNDING REQUESTED**
   a. **ASSESSMENT GRANT TYPE:**
      Community-wide
   b. **FEDERAL FUNDS REQUESTED:**
      i. $400,000
      ii. N/A

3. **LOCATION:**
   St. Clair County, Michigan

4. **TARGET AREA AND PRIORITY SITE/PROPERTY INFORMATION:**
   Target Area: 25-Mile St. Clair River Corridor
   - **Priority Site 1. Domtar Corporation,** 1700 Washington Avenue,
     Port Huron, MI 48060 (CT6250 and CT6260)
   - **Priority Site 2. Anchor Recycling,** 2829 Goulden Street, Port Huron
     Township, MI 48060 (CT6360)
   - **Priority Site 3. Eddy and Gearing Schools,** 301 N. 9th Street and
     200 N. Carney Drive, St. Clair, MI 48079 (CT6420)
   - **Priority Site 4. St. Clair Power Plant,** 4877 M-29, East China
     Township, MI 48054 (CT6430)
   - **Priority Site 5. 610 South Main Street,** Marine City, MI 48039
     (CT6440)

5. **CONTACTS**
   a. **PROJECT DIRECTOR:**
      Geoffrey E. Donaldson,
      Senior Planner
      (810) 989-6950
      gdonaldson@stclaircounty.org
      200 Grand River Avenue,
      Suite 202
      Port Huron, Michigan 48060
b. CHIEF EXECUTIVE/HIGHEST ADMINISTRATOR RANKING Elected OFFICIAL:

Karry A. Hepting, County
(810) 989-6900
khepting@stclairecounty.org
200 Grand River Avenue,
Suite 203
Port Huron, Michigan 48060

6. POPULATION:

St. Clair County, 159,247
City of Port Huron, 29,025
Port Huron Township, 10,380
City of St. Clair, 5,464
East China Township, 3,723
Marine City, 4,102

7. OTHER FACTORS:

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>2</td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>N/A</td>
</tr>
<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, 2, 3, 4, 5, 6</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>1, 4</td>
</tr>
<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, 10</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>
</tr>
<tr>
<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>2, 3, 4, 6</td>
</tr>
</tbody>
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8. LETTER FROM THE STATE OR TRIBAL ENVIRONMENTAL AUTHORITY (Attached)

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

Mr. Geoffrey Donaldson  
Senior Planner  
St. Clair County Metropolitan Planning Commission  
200 Grand River Avenue, Suite 202  
Port Huron, Michigan 48060

Dear Mr. Donaldson:


Thank you for your notice and request for a letter of acknowledgment for St. Clair 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.

St. Clair County is applying for a $400,000 Community-wide Brownfield Assessment Grant. As a general-purpose unit of local government, St. Clair County is an eligible grant applicant.

Should the U.S. EPA award a brownfield grant to St. Clair 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 St. Clair 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. Michelle Bakun, EGLE
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields
1.a.i. Background and Description of Target Area

St. Clair County (population 159,247) represents the easternmost point of Michigan and is one of five counties that make up the “thumb” region. The county consists of 8 cities, 2 villages, and 23 townships, most of which are rural. The 58-mile eastern border of the county separates Michigan from Canada and is primarily defined by the St. Clair River, which links Lake Huron to Lake St. Clair, a major shipping channel connecting the upper and lower Great Lakes. The county’s massive watershed of mostly agricultural land is drained by 149 miles of rivers and 810 miles of tributaries.

The county is the cornerstone of the Blue Water Area, known for the Blue Water Bridge, the second busiest international crossing to Canada (Ontario) due to its proximity to large economic and population centers (it is 60 miles north of Detroit and 180 miles southwest of Toronto). Historically, this waterway and eventually the bridge attracted commerce, which brought a convergence of industry, rail, and major transportation routes (I-69 and I-94) to the City of Port Huron (county seat) and farther south along the St. Clair River to the City of Marine City, which represents our target area. The river became a resource for water, shipping, and waste disposal. Coal and aggregate docks, fueling depots, power plants, paper mills, and other sources of contamination were concentrated along and within one mile of the river. At the turn of the 20th century, the automotive industry exploded in the county, but this boom ended when Michigan entered its “one-state recession” during the first decade of the 21st century. According to the Bureau of Economic Analysis, Michigan is still 8% below the national average in per capita income. This decline has left industrial buildings and infrastructure throughout the county vacant, abandoned, and underutilized and property impacted with petroleum, metals, solvents, and other chemicals. Further, due to decades of pollution from the U.S. and Canada’s “Chemical Valley” across the river, the beautiful St. Clair River was designated a Great Lakes Area of Concern (AOC). Since 2012, the AOC has received $21 million of Great Lakes Restoration Initiative funding to remove 8 of the 10 Beneficial Use Impairments (BUIs) through various restoration projects along the river (usepa.gov). The two remaining BUIs include restrictions on fish and wildlife consumption and drinking water consumption. The fish consumption restrictions impact low-income local populations that rely on fish for food. The drinking water restriction is in place due to the occurrences of spills from chemical plants and industry along the river, but fortunately, drinking water is treated by the communities along the river.

Although this application is intended to be community-wide, the primary target area for our assessment and reuse efforts will be the River Corridor, an approximately 25-mile-by-one-mile corridor along the St. Clair River stretching from the City of Port Huron, through Port Huron Township, the City of Marysville, the City of St. Clair, East China Township, Marine City, and the townships in between. There are over 600 known sites of hazardous and petroleum contamination countywide, with 74% of these sites concentrated in the River Corridor (michigan.gov/EGLE). This target area represents the greatest concentration of existing and historical industrial activity and contaminated sites in the county.

1.a.ii. Description of the Priority Brownfield Site(s)

The 25-mile River Corridor target area stretches from the City of Port Huron at the northern end to Marine City at the southern end. The St. Clair River was historically a resource for industrial activity (e.g., water, waste disposal, shipping, and transportation). Within the county, 74% (444 sites) of the known sites of contamination and 70% (196 sites) of the known Leaking Underground Storage Tank sites are concentrated in this River Corridor. Many areas immediately adjacent to the St. Clair River along the Corridor are Federally Designated Flood Plains, including all our priority sites with the exception of the Anchor Recycling site. This is a community-wide assessment grant, and the following priority sites demonstrate the large challenges these small communities face.

1. Domtar Corporation: At the northern end of the River Corridor in the City of Port Huron (population 29,025) is the Domtar paper mill, which closed its doors in 2020 (eliminating 200 jobs in the community) and is currently for sale. This heavily industrialized, 29-acre site sits along the Black River, which empties into the St. Clair River, and is bordered to the north and east by low-
income residential neighborhoods (CT6250 and CT6260). The site was developed as a sulfite paper mill in 1888. During its 132 years of operation, the mill used petroleum and solvent-based inks, use/storage of petroleum lubricants and fuels, and coal for power generation. Limited investigations over the years have identified mercury in soil and PFAS in groundwater, but it is anticipated that additional assessment will reveal historical contamination that has been potentially impacting the adjacent residents in CT6250, where 38.1% live in poverty and 18.9% are minority, and CT6260, where 24% live in poverty and 12% are minority. Assessing, cleaning up, and reusing the site is a priority not only to ensure the health and safety of nearby residents, but also to protect the adjacent Black River, which is receiving PFAS-contaminated water from the site.

2. **Anchor Recycling:** Immediately adjacent to the City of Port Huron is Port Huron Township (population 10,380), where several brownfield sites continue to impact low-income, minority residents located in CT6360, where 28.2% live in poverty and 27% are minority. **Anchor Recycling** (former Blue Water Recycling) is a 10-acre site that historically included numerous underground storage tanks (USTs), a maintenance facility, and a dump reportedly used for draining oils containing polychlorinated biphenyls (PCBs) from transformers. Recycled cardboard, plastics, and other materials now lie in discarded piles at this underutilized “recycling facility”. Vagrants, frequent fires, and diesel exhaust and dust from truck traffic from operations plague area residents, including the Our Lady of Guadalupe Hispanic Mission and a residential neighborhood directly across the street, as well as the St. Clair County Health Department, which abuts one end of the property. Assessing, cleaning up, and reusing the site is a priority because it will eliminate the potential exposure risks to the adjacent residents and improve the quality of life for this low-income, minority neighborhood.

3. **Eddy and Gearing Schools:** Further south along the River Corridor is the City of St. Clair (population 5,464), where 31% of the residents live below the Asset Limited, Income Constrained, Employed (ALICE) threshold. Due to the county’s decline in population and manufacturing jobs, there are fewer school-age children in the area, resulting in schools (such as **Eddy and Gearing**) being closed. As Eddy and Gearing are older buildings, there is asbestos and lead-based paint present. Abatement and further assessment are required to support a plan for affordable housing.

4. **St. Clair (Coal-Fired) Power Plant:** South of the City of St. Clair is East China Township (population 3,723), home to two coal power plants: the Belle River Power Plant slated to close in 2028 and the **St. Clair Power Plant**, closing in 2022 and eliminating 300 jobs. Historic coal storage, fly ash, petroleum storage tanks, and chemical use, likely contributing polynuclear aromatics, arsenic, lead, and mercury, will require extensive assessment to support reuse attracting investment and jobs.

5. **610 S. Main St.:** Marine City (population 4,102), located at the south end of the River Corridor, was a former ship building community now known for its historic buildings, waterfront, and performing arts. The **610 S. Main Street** site and adjacent parcels have been identified for a marina, which will bring renewal to this area of the Belle River, increase the number of visitors to the downtown, and provide a safe harbor for recreational boats. Assessing properties for extensive unknown fill materials, asbestos and lead in old structures, old foundation areas, and potentially sediment contaminated with arsenic, lead, benzene, and other chemicals will support reuse plans.

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

1.b.i. **Reuse Strategy and Alignment with Revitalization Plans**

While developing the county’s Master Plan, the St. Clair County Metropolitan Planning Commission received input from its citizens, who identified Redevelopment and Renewal Areas as a priority. These areas have apparent decline with rundown houses, designated brownfields, and sites that are perceived to be contaminated due to previous industrial or commercial uses. Recommended actions included obtaining funding, encouraging home improvement, brownfield restoration, and site cleanup. Additionally, the Master Plan identified aggressive use of the St. Clair County Land Bank Authority, which can secure and control property, and the Brownfield Redevelopment Authority, which can provide funding with a tax increment financing Brownfield Plan tool. Plans for the five identified priority sites align with the county’s Master Plan and the local communities’ Master Plans.
1. **Domtar Corporation:** In the City of Port Huron, the 132-year-old mill has closed. Numerous legacy environmental issues remain, and an “all hands-on deck” approach is required to support a reuse that eliminates or manages the environmental risks. Reuse plans that are less hard-industry intensive, complement the river and area residents, and create good jobs are being pursued. An EPA Grant will support the reuse of the property similarly to how our previous grants supported the large Marysville Power Plant project by providing environmental data to inform reuse plans.

2. **Anchor Recycling:** This site lowers living conditions and nearby property values and increases the potential for health effects caused by the debris, contamination, lead paint, asbestos, and other wastes. It is an environmental injustice that residents in this neighborhood are disproportionately affected by the risks and socio-economic impacts related to this site. Assessment and cleanup will support reuse plans for new, energy-efficient, affordable housing and possible green space that will raise the quality of life in this neighborhood.

3. **Eddy and Gearing Schools:** As part of a unique plan for more attainable/affordable housing, the Land Bank acquired the two schools and vacant land between the schools. The Land Bank is working with a developer to reuse Eddy and Gearing for senior housing and nonprofit community space. The vacant land is slated for energy-efficient, single- or multi-family affordable/attainable housing. The Land Bank in concert with the Authority will ensure that environmental issues are addressed, and the site is used for affordable housing. This new model is intended to be repeated with other closed schools.

4. **St. Clair (Coal-Fired) Power Plant:** East China Township is working with the power company to develop a reuse strategy that fits the township’s Master Plan and addresses/manages contamination at the site while encouraging a reuse that helps replace lost jobs, attracts investment, and returns access to the river, possibly filling a gap in the Bridge to Bay Trail. The priority site will require several years of decommissioning and assessment to be available for redevelopment. The county will use EPA Grant funds to assist with this effort, similar to the assistance that was provided on the closed (2011) coal-fired Marysville Power Plant closure and reuse plans.

5. **610 S. Main St.:** As a Master Plan goal, Marine City is working with Six Rivers Land Conservancy to identify and acquire property along the Belle River to develop a public marina that will attract boating visitors and connect the St. Clair River to downtown. Assessing and conducting cleanup planning on these priority sites will help to reuse and rejuvenate a tired area along the Belle River.

1.b.ii. **Outcomes and Benefits of Reuse Strategy**

The Authority intends to assess as many sites of known or perceived contamination as possible, as demonstrated by utilizing 87% of the grant funds for Phase I (22 sites) and II (12 sites) Environmental Site Assessments. Many communities in our target area are **Disadvantaged Communities** including the City of Port Huron and Marine City, which are also state-designated “**Eligible Distressed Areas**” that share common attributes including negative population growth, lower property values, disproportionate environmental stressor burdens and cumulative impacts, and higher poverty rates. In the City of Port Huron, 56% of its population is below the Asset Limited, Income Constrained, Employed (ALICE) or poverty threshold; this is especially apparent in CT6250 and CT6260, which respectively have 38.1% and 24% of residents living in poverty and a 18.9% and 12% minority population. Port Huron Township’s CT6360 has a 10% unemployment rate, 28.2% of residents living in poverty, and a 27% minority population (U.S. Census).

Focusing on contaminated brownfield sites in urban, low-income areas will accomplish three major goals: (1) begin eliminating the sites and conditions that may be contributing to the degradation of susceptible populations, (2) eliminate blight and provide opportunities for energy-efficient, affordable, clean housing or clean areas for recreation or community gardens, and (3) encourage additional investment and revenue generation, creating jobs and business opportunities. By accomplishing goals 1 and 2, investors and entrepreneurs will recognize the benefits of reinvesting in these communities, reusing infrastructure, and providing opportunities for hardest hit areas. Without assessing sites, it is difficult to understand the additional funding or resources that will be necessary to prepare the site for reuse. The EPA Grant provides the impetus for attracting and leveraging both
public and private investment on brownfield sites including state grants and loans, bank financing, private funding, tax increment financing through a Brownfield Plan, etc.

The 2019 St. Clair County Trail Plan envisions a 54-mile Bridge to Bay Trail that connects the communities along the River Corridor. 26 miles have been constructed, and another 28 miles are planned. The coal-fired St. Clair Power Plant priority site is well suited for part of the trail once assessed and decommissioned. The trail provides connectivity and access to all residents and visitors regardless of their socio-economic status and offers opportunities for an active, healthy lifestyle.

1.c. Strategy for Leveraging Resources
1.c.i. Resources Needed for Site Reuse
Michigan’s Brownfield Laws allow the Authority to develop Brownfield Plans for eligible project sites. These plans capture future tax increment from new investment on the property to pay for Phase I and II Environmental Site Assessments, Baseline Environmental Assessments, Due Care Plans, demolition, soil and groundwater cleanup, and lead and asbestos abatement. Also, in the cities of Port Huron and Marine City or when the Land Bank is utilized, Brownfield Plans can pay for site preparation and infrastructure costs to support the reuse plan for a site. The EPA Grant can be used to develop Brownfield Plans; the Authority can then use the tax increment capture from projects to reimburse eligible brownfield activities and, once the developer is fully reimbursed, capture another five years. This fund (Local Brownfield Revolving Fund) is locally controlled and can only be used for eligible activities on other brownfield sites in a Brownfield Plan. Thus, the grant monies would truly act as seed money to leverage future brownfield redevelopment activities. The Authority has adopted and successfully implemented 10 Brownfield Plans to-date, which will capture millions of dollars in tax increment to reimburse developers for cleanup, demolition, due care activities, site preparation and infrastructure, and some of the Authority’s previous EPA Grant funds that were used on these projects. To-date, the Authority has recaptured approximately $61,000 of grant funds that will be or is being used on other sites. While these programs are valuable, they do not provide advance funding for assessment and cleanup, especially for lower income entrepreneurs who may not have access to financial capital.

The Authority will pursue State 128a Brownfield Assessment funds to conduct free assessments on brownfield sites. Additionally, the Authority has experience accessing and implementing Michigan Department of Environment, Great Lakes, and Energy (EGLE) Brownfield Redevelopment Grants and Loans for projects that need funding for site investigation, cleanup, demolition, etc. EGLE has $10 million in hazardous site grant funds and $5 million in petroleum grant funds available in FY2022. To-date, the Authority has been successful in using our previous EPA Grants to leverage over $2 million in EGLE grants and loans. These grants will continue to be pursued to assist with cleaning up sites that have been assessed using our EPA Assessment Grant funds.

The City of Port Huron has designated over $400,000 in Community Development Block Grant funds in response to the pandemic to assist with housing, meal programs, and business aid. It is anticipated that additional funding will be made available to our communities through the state from federal COVID-19 Relief Funds to address the long-term economic and social impacts of the virus including affordable housing, brownfield cleanup, and business support.

1.c.ii. Use of Existing Infrastructure
The entire River Corridor target area and the priority sites are served by existing municipal utilities. In our Core Communities of Port Huron and Marine City or when we utilize the Land Bank, infrastructure improvements are eligible brownfield activities that can be reimbursed through tax increment financing in a Brownfield Plan. Further, communities continue to upgrade and improve utilities in the target area by pursuing grant funds for various activities including road improvements. For example, the City of St. Clair is receiving $1.3 million to rebuild Carney Drive, supporting future redevelopment of the Eddy and Gearing Schools priority site. Additionally, the St. Clair County Master Plan is addressing climate change vulnerability along the St. Clair River which links Lake Huron to Lake Erie. Vulnerability could include flooding along the River Corridor and managing stormwater especially in Federally Designated Flood Plains located in our target areas. The
Authority used its previous EPA Grant funds to assess property for the County Drain Commissioner which was incorporated into areas for flood storage. The Authority will continue to support this effort. The Blue Water Area Transit Commission (BWATC) recently added new electric buses to its fleet, the first in Michigan. The BWATC also has the state’s largest fleet of natural gas fueled buses. The River Corridor is served by this clean source of transportation, which will not add additional contamination, diesel exhaust, or particulates to neighborhoods.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
2.a. Community Need
2.a.i. The Community’s Need for Funding
The Authority is seeking an EPA County-wide Brownfield Assessment Grant because we do not have the financial wherewithal to address the large number of sites in the county with similar economic, social, and environmental challenges as those of the River Corridor target area that are also in need of assessment help. Although conditions in Michigan and St. Clair County have improved significantly over the last several years, this area is still recovering from the crash of the automotive industry, including plant closings, job loss, etc. From August of 2011 until August of 2021, Michigan had a meager 5% nonfarm job gain, while the country enjoyed 11.6% growth according to the U.S. Department of Labor’s Bureau of Labor Statistics. Over the past two years, St. Clair County has lost 1,000 jobs due to plant closings in our target River Corridor communities of Port Huron and Marysville (WARN: Michigan Department of Technology, Management, and Budget).

As a result of job losses, plant closings, etc., the county has experienced population loss for years and most recently a decline of 2.4% from 2010 to 2019 (U.S. Census Quick Facts – St. Clair County). As people leave to find jobs, property values, tax revenues, and personal incomes drop. This is evident throughout the River Corridor but especially in the target neighborhoods CT6250 and CT6260 in the City of Port Huron. The target neighborhoods surround the closed Domtar Paper Mill and other adjacent industries west of downtown along the Black River. The median household income in this area is $32,266 and $42,632, respectively, nearly half of the U.S. average of $62,843. Many in the target neighborhoods have low-wage, service-oriented jobs, which have been severely affected by COVID-19 through layoffs and closures of restaurants and other businesses. 24.4% of Port Huron families live below the poverty line, much higher than the U.S. average of 13.4%; the rate is even higher in CT6250 at 38.1% (U.S. Census, 2019 ACS 5-Year Estimates). All the census tracts in the target area have a higher percentage of their populations in poverty or considered Asset Limited, Income Constrained, Employed (ALICE) than Michigan’s average of 26%. Over 48% of children under 18 in the county are insured by Medicaid (kidscount.org). Since 2019, the Land Bank has tax foreclosed on 137 homes in the county, another indicator that residents are struggling to financially meet their cost of living. Perceived and/or real environmental issues which limit interest in brownfield sites in our target area will continue to depress property values without resources to identify sites, assess conditions, and provide solutions for safe reuse, cleanup, and management. In addition to a reduction in tax revenue, contaminated, vacant industrial properties do not produce jobs or income.

2.a.ii. Threats to Sensitive Populations
2.a.ii.(1) Health or Welfare of Sensitive Populations
The Blue Water Community Action Agency’s 2020 Community Needs Assessment (CNA20) identified significant variations in the lived experience in St. Clair County. These variations are affected by social and institutional inequities and living conditions, ultimately resulting in certain negative health outcomes. The sensitive populations (i.e., minority population, women of childbearing age, and elderly; see table below) in our target neighborhoods within the River Corridor are impacted by poverty and minority status. Overwhelmingly, the social and institutional inequities that cause poverty, especially in minority communities like our target City of Port Huron and Port Huron Township neighborhoods (CT6250/60 and CT6360), drive health outcomes that are significantly worse than for wealthier, non-minority populations. These outcomes are exacerbated by environmental contamination, which weakens immune systems and causes asthma, cancer, and other diseases. Generationally, these young and old minority residents lived where they were able to buy...
homes, which to their detriment were located next to factories on contaminated land. There are a significant number of occupied housing units built before 1979 along the River Corridor; in particular, high rates of these older homes are located in the City of Marine City (80.9%), City of Port Huron (82.9%), CT6250 (93.1%), and CT6260 (82.1%). These rates show a high percentage of occupants potentially exposed to lead-based paint and asbestos. Through this EPA Grant, the River Corridor and target neighborhoods have an opportunity to assess, understand, and manage the environmental risks present in their communities. Knowledge of environmental risks is also necessary in order to leverage additional funding to address and clean up the risks.

<table>
<thead>
<tr>
<th>Sensitive Populations</th>
<th>Women of Childbearing Age (20–44)</th>
<th>Elderly (&gt; 65 years of age)</th>
<th>Poverty Rate</th>
<th>% Minority</th>
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<td>6.9%</td>
<td>38.1%</td>
<td>18.9%</td>
</tr>
<tr>
<td>Port Huron CT6260</td>
<td>38.1%</td>
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<td>Port Huron Twp. CT6360</td>
<td>35.1%</td>
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<td>St. Clair County</td>
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<td>16.1%</td>
<td>18.8%</td>
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<tr>
<td>Michigan</td>
<td>15.6%</td>
<td>16.3%</td>
<td>15.0%</td>
<td>21.5%</td>
</tr>
</tbody>
</table>

2.a.ii.(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

According to EPA, being exposed to environmental contamination has been linked to different human diseases and conditions. There are many opportunities for residents in the River Corridor target area to be exposed to contaminated soil, groundwater, surface water, and air borne contamination that increase the potential to contract a disease or adverse health condition. Industrial sites, power plants, old buildings and schools, old housing, and Canada’s “Chemical Valley” directly across the river from the River Corridor provide a concentration of sources that can impact our disadvantaged and disproportionately affected residents. Evaluating the EJSSCREEN Tool for our industrial areas associated with the City of Port Huron (CT6250/6260) and Port Huron Township (CT6360) revealed that 10 of the 11 indexes exceeded the 70th percentile and 9 of the 11 indexes exceeded the 80th percentile, respectively. This data is supported in the 2019 Community Health Improvement Plan for St. Clair County (CHIP19), where St. Clair County adults have a lower life expectancy rate (men and women) and higher age-adjusted mortality rates than adults across the state and nation. Death rates from cancer, heart disease, chronic lower respiratory disease, and diabetes are also higher in St. Clair County than Michigan and the U.S. The CHIP19 additionally indicated that county lifetime rates for asthma (24.4%), current asthma (15.4%), and COPD (10.2%) are all higher than state/U.S. rates.

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). These chemicals are present across our priority sites. According to the National Institute of Health, if our sensitive population of women of childbearing age are exposed to environmental contaminants (synthetic and metals) especially during critical and sensitive periods in development, it can have effects on all aspects of future reproductive health from conception to adult health. An EPA Brownfield Grant will allow the Authority to identify, assess, and evaluate the risks associated with these contaminated sites, ultimately developing cleanup plans that can create more equitable and healthy living conditions for local residents.

2.a.ii.(3) Promoting Environmental Justice

Brownfield sites lower living conditions and property values and increase the potential for health effects caused by contamination, lead paint, asbestos, and other wastes. It is an environmental injustice that the residents in the River Corridor target neighborhoods are disproportionately affected by the risks and socio-economic impacts that brownfields sites have on our community. Minority and low-income populations as represented by the City of Port Huron (CT6250/6260) and Port Huron Township (CT6360) are forced to live in areas that they can afford, which tend to be in substandard housing adjacent to industrial areas. These areas tend to have either legacy pollution or are currently
emitting pollutants that can impact the residents. The EPA Grant will be used to conduct Phase I and II Environmental Assessments of vacant, blighted buildings or substandard housing throughout our target area and disadvantaged communities, identifying brownfield conditions that need cleanup, exposure mitigation, asbestos or lead abatement, and improved infrastructure. The Authority 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

<table>
<thead>
<tr>
<th>Organization</th>
<th>Point of Contact</th>
<th>Involvement in the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blue Water Area Chamber of Commerce</td>
<td>Thelma Costillo, (810) 985-7101, <a href="mailto:tcastillo@bluewaterchamber.com">tcastillo@bluewaterchamber.com</a></td>
<td>Inform the business community about brownfields and benefits/incentives</td>
</tr>
<tr>
<td>St. Clair Economic Development Alliance</td>
<td>Dan Casey, (810) 982-9511, <a href="mailto:dcasey@edascc.com">dcasey@edascc.com</a></td>
<td>Regional economic development organization; provide support on redevelopment and reuse</td>
</tr>
<tr>
<td>Community Foundation of St. Clair County</td>
<td>Randy Maiers, (810) 984-4761, <a href="mailto:randy@stclairfoundation.org">randy@stclairfoundation.org</a></td>
<td>Provide expertise in leveraging grant funds</td>
</tr>
<tr>
<td>Council on Aging, Inc.</td>
<td>Scott Crawford, (810) 987-8811, <a href="mailto:info@thecouncilonaging.org">info@thecouncilonaging.org</a></td>
<td>Act as informational conduit to our elderly sensitive population</td>
</tr>
<tr>
<td>Friends of the St. Clair River Watershed</td>
<td>Sheri J. Faust, (810) 730-5998, <a href="mailto:info@scriver.org">info@scriver.org</a></td>
<td>Help identify brownfield sites in River Corridor target area</td>
</tr>
<tr>
<td>Blue Water Habitat for Humanity</td>
<td>Ernest Werth-Toward, (810) 985-9080, <a href="mailto:ernest@bwhabitat.org">ernest@bwhabitat.org</a></td>
<td>Identify brownfield sites for affordable housing</td>
</tr>
<tr>
<td>Blue Water Community Action Agency</td>
<td>Sherry Archibald, (810) 982-8541, <a href="mailto:sarchibald@bwcaa.org">sarchibald@bwcaa.org</a></td>
<td>Identify brownfield sites in low-income areas they serve</td>
</tr>
<tr>
<td>Port Huron Housing Commission</td>
<td>James A. Dewey, (810) 984-3173, <a href="mailto:info@phhousing.org">info@phhousing.org</a></td>
<td>Collaborate resources for affordable housing</td>
</tr>
<tr>
<td>Hispanic Council of St. Clair County</td>
<td>Jose Pena, (810) 985-4589 (No email available)</td>
<td>Communication with the Hispanic/Latino community</td>
</tr>
</tbody>
</table>

2.b.iii. Incorporating Community Input

At the early stages of the EPA Grant, the Authority will convene several community open houses, likely via Zoom due to COVID-19, to present a draft updated site inventory and new information about the Authority’s programs and available tools and resources. The site inventory will be located on Google Earth for remote access. Feedback and a solicitation for any new sites will be requested prior to the meetings and added to the inventory for circulation to the community. During the Authority’s previous EPA Assessment Grants, the Authority held several successful events where the lending, developer, and realtor communities were invited to learn about the various brownfield programs and tools available. Similar events will be scheduled during the term of this grant. The Authority can conduct these meetings and events via Zoom or in person. Efforts will be made to inform and notify residents and businesses in the target communities and countywide through our partners, mailings, or posting information at local retail/restaurant establishments, churches, community centers, and convenience stores. It will be critical to identify opportunities to interact with disadvantaged community members in the county and target area during times they can meet, which may not be during normal business hours due to their work schedules. We also publicize programs, minutes, applications, and successes through the county website and our community-based project partners’ websites. The Authority will utilize social media platforms including Facebook, LinkedIn, and Twitter, allowing broad community access. Factsheets, brochures, and performance dashboards will continue to be used and distributed; materials will also be disseminated in Spanish. The COVID-19 pandemic has serious implications with respect to our normal means of gathering, which may require meeting in smaller groups with social distancing, utilization of Zoom for those that have internet access, and outside events when the weather allows.
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.

<table>
<thead>
<tr>
<th>Task 1: Phase I Environmental Site Assessments</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation</td>
</tr>
<tr>
<td>▪ 13 Phase I assessments on priority sites in target communities.</td>
</tr>
<tr>
<td>▪ 9 Phase I assessments on non-priority sites countywide as determined by the Authority.</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: complete 12 priority sites by 2nd quarter FY2023; complete 1 to 2 Phase I assessments every quarter at priority/non-priority sites.</td>
</tr>
<tr>
<td>iii. Task/Activity Lead: Qualified Environmental Professional, Applicant oversight</td>
</tr>
<tr>
<td>iv. Outputs: 22 Phase I eligibility demonstrations, site access agreements, All Appropriate Inquiry compliant reports, ACRES updates</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 2: Phase II Environmental Site Assessments</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation</td>
</tr>
<tr>
<td>▪ Completion of Quality Assurance Project Plan (QAPP); completion of Sampling Plans and Health and Safety Plans for each Phase II.</td>
</tr>
<tr>
<td>▪ 6 Phase II assessments on priority sites in target communities.</td>
</tr>
<tr>
<td>▪ 6 Phase II assessments on priority/non-priority sites countywide as determined by the Authority, with community input.</td>
</tr>
<tr>
<td>▪ For contaminated sites (estimated 10), completion of Baseline Environmental Assessments for liability protection and Due Care Plans to address “continuing obligations.”</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: complete 7 Phase II/Baseline Environmental Assessments/Due Care Plans at target community priority sites by 2nd quarter FY2023; for remaining 5 priority/non-priority sites, we estimate 1 Phase II completed every 2 to 3 quarters.</td>
</tr>
<tr>
<td>iii. Task/Activity Lead: Qualified Environmental Professional, Applicant oversight</td>
</tr>
<tr>
<td>iv. Outputs: 1 QAPP; 12 Phase IIs and Sampling and Analysis Plans/Health and Safety Plans; 10 Baseline Environmental Assessments/Due Care Plans, ACRES updates</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 3: Brownfield Plans and Cleanup Planning</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation</td>
</tr>
<tr>
<td>▪ 4 Brownfield Plans (estimate) to use tax increment financing to leverage grant funds on priority sites. Will be reviewed by the Authority/local unit of government and approved by County Commissioners at a public hearing. Estimated that 2 priority sites will require Act 381 Work Plans (Cleanup Plans) for state tax support, which requires state approval.</td>
</tr>
<tr>
<td>▪ 2 Brownfield Plans and 1 Act 381 Work Plan (estimates) on priority/non-priority sites countywide as determined by the Authority, with community input; all subject to the same review procedures outlined above.</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: complete 3 Brownfield Plans and 2 Act 381 Work Plans at target community priority sites by 4th quarter FY2023; remaining 3 Brownfield Plans and 1 Act 381 Work Plans at priority/non-priority sites estimated to be completed by the end of grant.</td>
</tr>
<tr>
<td>iii. Task/Activity Lead: Qualified Environmental Professional, Applicant oversight</td>
</tr>
<tr>
<td>iv. Outputs: 6 Brownfield Plans, 3 Act 381 Work Plans, 6 Local Resolutions, 6 Public Hearings, 3 State Regulatory reviews, ACRES updates</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 4: Community Outreach, Programmatic, Travel and Supplies</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation</td>
</tr>
<tr>
<td>Activities include procuring Qualified Environmental Professional; preparation of Grant Work Plan; prepare, attend, and participate in public hearings; municipal and Authority meetings; create and disseminate brochures/flyers/web pages about the grant; educate and inform community groups and stakeholders, virtual and in-person community outreach events; attend the National Brownfield Conference; prepare EPA quarterly/financial/performance reports.</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: Community outreach efforts will be intense at the outset of the grant and will include 2 virtual (or in-person) community open houses by 2nd quarter of FY2023</td>
</tr>
</tbody>
</table>
and 2 additional outreach events by midway through the grant or 1st quarter of FY2024; Authority monthly meetings and outreach efforts will continue throughout the grant term.

### iii. Task/Activity Lead: Applicant and Qualified Environmental Professional

### iv. Outputs: Procurement of 1 Qualified Environmental Professional; 4 community open house/education events; 36 monthly Authority meetings; 12 Quarterly Reports; 24 project evaluation meetings; numerous educational materials and outreach events; 1 trip to National Brownfield Conference for 3 Authority members and the Director.

#### 3.b. Cost Estimates

- **Task 1, Contractual**: 22 Phase I site assessments at average cost of $3,000 = **$66,000 total**.
- **Task 2, Contractual**: 12 Phase II site assessments at average cost of $20,000 = $240,000; 10 Baseline Environmental Assessments/Due Care Plans at average cost of $4,000 = $40,000; **$280,000 total**.
- **Task 3, Contractual**: 6 Brownfield Plans at average cost of $4,000 = $24,000; 3 Cleanup Plans (Act 381 Work Plans) at average cost of $4,000 = $12,000; **$36,000 total**.
- **Task 4**: **$18,000 total** as follows: Personnel: in-kind; Travel: travel for Director and 3 members including airfare, lodging, food, and expenses at an average cost of $1,500 per person = $6,000; Contractual: 12 quarterly reports at average cost of $600 = $7,200; preparation for 4 community open houses at average cost of $600 per event = $2,400; 24 project evaluation meetings at average cost of $100 per meeting = $2,400; $12,000 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>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travel</td>
<td></td>
<td></td>
<td></td>
<td>$6,000</td>
<td>$6,000</td>
</tr>
<tr>
<td>Contractual</td>
<td>$66,000</td>
<td>$280,000</td>
<td>$36,000</td>
<td>$12,000</td>
<td>$394,000</td>
</tr>
<tr>
<td>Total Direct Costs</td>
<td>$66,000</td>
<td>$280,000</td>
<td>$36,000</td>
<td>$18,000</td>
<td>$400,000</td>
</tr>
<tr>
<td>Total Budget</td>
<td>$66,000</td>
<td>$280,000</td>
<td>$36,000</td>
<td>$18,000</td>
<td>$400,000</td>
</tr>
</tbody>
</table>

* 87% of the Assessment Grant Budget is designated for Phase I and II Environmental Assessments.

#### 3.c. Measuring Environmental Results

The Authority, 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 grant—will be documented in ACRES; grant Quarterly Reports and a Dashboard will be created, as we did for our previous U.S. EPA Assessment Grant. 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 area and priority sites. The Dashboard, available on the Authority's website, is distributed at meetings/events regularly. The Authority 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 Authority, working with the various partners, will track and evaluate long-term **outcomes**, such as affordable housing units secured, improved property values, and health outcomes for our sensitive populations, especially those in our **target area** and near our priority sites.

#### 4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

#### 4.a. Programmatic Capability

4.a.i—4.a.iii. Organizational Capacity, Organization Structure, and Description of Key Staff

The Authority will utilize the St. Clair County Metropolitan Planning Commission’s (SCCMPC) dedicated and knowledgeable staff, who will be directly responsible for implementation and management of the Assessment Grant. Our staff includes the Project Director, Geoffrey Donaldson, Senior Planner for the SCCMPC, who has managed many grants, including two previous EPA Assessment Grants, over the last 21 years at the Planning Commission, with extensive experience in all aspects of grant implementation, funding, reporting, and compliance. Mr. Donaldson is also...
Director of the County Land Bank Authority, providing continuity in utilizing the Land Bank and Brownfield Authority together to support brownfield redevelopment projects, including the creation of energy-efficient, affordable housing. Mr. Donaldson will be supported by other team members, as needed, including support staff, legal counsel, and administrative staff. Marsha Adamkiewicz, the county’s Staff Accountant, keeps track of all the grants for St. Clair County and ensures that proper guidelines for all grants are met (i.e., board approval, single audit requirements, etc.). To ensure continuity should staff turnover occur, David Struck, Executive Director of the Planning Commission, attends Authority meetings and is actively engaged in all discussions, meetings, and functions. Our Board is made up of up to nine individuals, including a representative from each County Board of Commissioner District, representing a broad cross-section of the county, and the director/designee of the Metropolitan Planning Commission and the St. Clair EDA. These members include local unit of government representatives, businesses, realtors, private citizens, etc. The Authority meets monthly and at special request if needed, allowing timely and successful use of funds. Project applications are reviewed by the Authority at their publicly noticed meetings, allowing municipal and citizen input. The Authority has been very active in creating policies, applications, guidance, informational pieces, etc. intended to streamline the process of redeveloping brownfield sites while maximizing the benefit to the local community, ensuring the timely expenditure of grant funds.

4.a.iv. Acquiring Additional Resources
A Qualified Consultant will be appropriately procured by the Authority, 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, assist with community outreach efforts, reporting, and timely updates to ACRES required by the Cooperative Agreement. We will seek assistance from the Michigan Department of Environment, Great Lakes, and Energy (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
St. Clair County has received two EPA Coalition Hazardous Substances and Petroleum Assessment Grants over the years, the most recent being the FY2017 grants ($200,000 each) slated to end December 31, 2021, and a FY2010 grant ($1,000,000). Both grants were administered by the Authority, on behalf of the county. The combined Assessment Grants’ outputs are/were accurately reflected in ACRES. Our Dashboard ultimately tracked 46 Phase I and 30 Phase II Environmental Site Assessments, 20 Baseline Environmental Assessments and Due Care Evaluations, 10 Brownfield Plans, and 42 grant-related outreach activities, ultimately assessing or cleaning up 64 sites. These outputs resulted in outcomes including over $213 million in leveraged project investment and approximately 2,061 new jobs. Projects were completed in 11 different communities.

4.b.i.(2) Compliance with Grant Requirements
The Authority has consistently met the requirements for Work Plan development, Quality Assurance Project Plan development, eligibility demonstrations, Sampling Plans, Health and Safety Plans, Quarterly Reports, ACRES reporting, MBE/WBE and Financial Status Reports, and community notification. The most recent FY2017 Coalition Assessment Grant spent over 72% of the grant funds on Phase I and II Site Assessments including Brownfield Plans; cleanup planning increases this to 89%. The Authority continues to report on grant progress by timely filing of quarterly reports and inputting information into ACRES. The open FY2017 Coalition Assessment Grant started October 1, 2017 and will end December 31, 2021. Due to the COVID-19 pandemic and a resulting shutdown in activities as required by the State of Michigan, two extensions were granted. There is approximately $9,000 remaining in unobligated funds which will be used to conduct cleanup planning associated with the county’s Economic Development Alliance’s new business center project, which is being supported with a $3.3 million Economic Development Administration Grant. The closed FY2010 Coalition Assessment Grant was fully expended at grant closing.
Threshold Criteria
1. **APPLICANT ELIGIBILITY** – St. Clair 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** – The St. Clair County Brownfield Redevelopment Authority (Authority) is made up of up to nine individuals who include a representative from each County Board of Commissioner District, representing a broad cross-section of the county, and the director/designee of the Metropolitan Planning Commission and the St. Clair EDA. These members include local unit of government representatives, business, realtor, private citizens, etc. The Authority meets monthly and at special request if needed, allowing timely and successful use of funds. Project applications are reviewed by the Authority at their publicly noticed meetings, allowing municipal and citizen input. The Authority has been very active in creating policies, applications, guidance, informational pieces, etc., intended to streamline the process of redeveloping brownfield sites while maximizing the benefit to the local community, ensuring the timely expenditure of grant funds.

At the early stages of the EPA Grant, the Authority will convene several community open houses, likely via Zoom due to COVID-19, to present a draft updated site inventory and new information about the Authority’s programs and available tools and resources. The site inventory will be located on Google Earth for remote access. Feedback and a solicitation for any new sites will be requested prior to the meetings and added to the inventory for circulation to the community. During the Authority’s previous EPA Assessment Grants, the Authority held several successful events where the lending, developer, and realtor communities were invited to learn about the various brownfield programs and tools available. Similar events will be scheduled during the term of this grant. The Authority can conduct these meetings and events via Zoom or in person. Efforts will be made to inform and notify residents and businesses in the target communities and countywide through our partners, mailings, or posting information at local retail/restaurant establishments, churches, community centers, and convenience stores. It will be critical to identify opportunities to interact with disadvantaged community members in the county and target area during times they can meet, which may not be during normal business hours due to their work schedules. We also publicize programs, minutes, applications, and successes through the county website and our community-based project partners’ websites. The Authority will utilize social media platforms including Facebook, LinkedIn, and Twitter, allowing broad community access. Factsheets, brochures, and performance dashboards will continue to be used and distributed; materials will also be disseminated in Spanish. The COVID-19 pandemic has serious implications with respect to our normal means of gathering, which may require meeting in smaller groups with social distancing, utilization of Zoom for those that have internet access, and outside events when the weather allows.

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Authority's website, is distributed at meetings/events regularly. The Authority 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 Authority, working with the various partners, will track and evaluate long-term outcomes, such as affordable housing units built, improved property values, and health outcomes for our sensitive populations, especially those in our target area and near our priority sites.

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 – St. Clair County has an open Brownfield Assessment Coalition Hazardous and Petroleum Grant which was initiated October 1, 2017, and will end December 31, 2021. The attached Automated Standard Application for Payments (ASAP) Account Balance Inquiry confirms that $367,652.41 of the total $400,000 or 92% of grant funds has been drawn down. The remaining $32,347.59 is assigned to projects that will utilize all funds by the end of December 2021.