

## Narrative Information Sheet

### IV.D.1. Applicant Identification

The Michiana Area Council of Governments (MACOG) is the applicant for this Community-wide Assessment Grant Application. The mailing address and DUNS number for MACOG are provided below:

Michiana Area Council of Governments (MACOG)  
227 West Jefferson Boulevard  
1120 County-City Building  
South Bend, IN 46601  
Applicant DUNS Number: 179378658000

### IV.D.2. Funding Requested

- a. Assessment Grant Type: MACOG is applying for a Community-wide Assessment Grant
- b. Federal Funds Requested:
  - i. MACOG is requesting \$500,000.
  - ii. No, this waiver request does not apply.

### IV.D.3. Location

MACOG is a regional planning organization representing a four county region in north central Indiana. MACOG defines the community the grant funding would serve as the four county jurisdiction including St. Joseph County, Elkhart County, Kosciusko County, and Marshall County, and the communities therein. MACOG proposes to focus the use of grant funding in target areas in the City of South Bend in St. Joseph County, Indiana and the City of Elkhart in Elkhart County, Indiana.

### IV.D.4. Target Area and Priority Site/Property Information

#### Community-Wide Assessment Grant Target Areas:

1. City of South Bend, St. Joseph County, Indiana
  - a. Near West Side Neighborhood / Kennedy Park Neighborhood
    - i. Census Tract 21, Tract 002100
    - ii. Priority Site Address:  
1510 W Washington St, South Bend, IN 46628
2. City of Elkhart, Elkhart County, Indiana
  - a. Downtown TIF District & Downtown
    - i. Census Tract 26, Tract 002900
    - ii. Priority Site Address: 613 Dr. King Drive, Elkhart, IN 46516

### IV.D.5. Contacts

- a. Project Director:  
Leah Thill, Senior Environmental Planner, MACOG  
lthill@macog.com, (574) 287-1829 ext. 801  
227 West Jefferson Boulevard

1120 County-City Building  
 South Bend, IN 46601

b. Chief Executive:

Mr. James Turnwald, Executive Director, MACOG  
 jturnwald@macog.com, (574) 287-1829 ext. 111  
 227 West Jefferson Boulevard  
 1120 County-City Building  
 South Bend, IN 46601

**IV.D.6. Population**

MACOG is a regional organization. The proposed target areas are within the cities of South Bend and Elkhart. Municipal population is from Census.gov, April 1, 2020:

- City of South Bend – 103,453
- City of Elkhart – 52,358

**IV.D.7. Other Factors Checklist:**

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal	3,4
The reuse of the priority site(s) will incorporate energy efficiency measures	4
30% or more of the overall project budget will be spent on eligible reuse/area-wide planning, as described in Section I.A., for priority site(s) within the target area.	
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.	

**IV.D.8. Letter from the State or Tribal Environmental Authority**

The state letter is provided as an attachment.

**IV.D.9. Releasing Copies of Applications**

The application may be made public by EPA without further notice. There is no confidential, privileged, or sensitive information contained within the application (N/A).

## Letter from the State

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Eric J. Holcomb  
*Governor*

Bruno L. Pigott  
*Commissioner*

December 1, 2021

Mr. James Turnwald  
Executive Director  
Michiana Area Council of Governments  
227 West Jefferson St., 1120 County City Building  
South Bend, Indiana 46601

Re: IDEM Acknowledgement Letter  
U.S. EPA Brownfields Grant Proposal  
Community-wide Assessment  
Michiana Area Council of Governments  
(MACOG)  
Indiana

Dear Mr. Turnwald:

This letter is provided in support of the Michiana Area Council of Governments (MACOG which consists of the Counties of St. Joseph, Elkhart, Marshall, and Kosciusko) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community-wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that MACOG is applying for \$500,000 for community outreach generally and its assessment initiative specifically, for expanded brownfields inventory/prioritization (beyond the 80 sites identified based on strong developer commitment, reuse of existing infrastructure, leveraged funds, and projects that encourage commercial/industrial and entrepreneurial investment), for Phase I (up to 18) and Phase II (up to 13) environmental site assessments on highest priority sites, and for Remedial Action Plans (up to 8) and/or Human Health and Ecological Risk Assessments, as well as Site-Specific Reuse Plans to guide the cleanup and/or redevelopment process.

IDEM believes that the MACOG has demonstrated its commitment to redeveloping brownfields by having taken advantage of financial and technical assistance offered by U.S. EPA (e.g., grantee experience) and by the Indiana Brownfields Program (e.g., active Program participant). This assessment grant funding will help MACOG continue its efforts to address inventoried brownfields especially within its target industrial, urban areas of South Bend and Elkhart where environmental justice impacts are most pronounced and with the greatest potential for quality job creation consistent with community

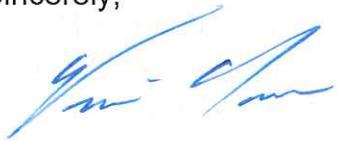
IDEM Acknowledgement Letter  
U.S. EPA Brownfields Grant Proposal  
December 1, 2021  
Page 2 of 2

redevelopment plans (e.g., affordable mid-density senior housing, retail, and a performing arts school) in order to facilitate improved quality of life.

Should an opportunity arise for MACOG to need petroleum eligibility determinations or cleanup/closure or liability assistance at any of the sites investigated with this grant funding, IDEM realizes that MACOG continues to be committed to working with the Indiana Brownfields Program for technical oversight of grant-funded site activities as necessary. Furthermore, IDEM is aware of MACOG intentionally working to share with IDEM any assessment documents from past U.S. EPA grants to individual communities in its region that were not transmitted by consultants to IDEM.

Based on experience and the information submitted, IDEM considers MACOG an excellent candidate to receive U.S. EPA grant funding again to continue its brownfield redevelopment efforts, which support Indiana's brownfield initiative. IDEM is pleased to assist and looks forward to continuing its partnership with MACOG. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program directly at (317) 234-0235 or at [moertel@ifa.in.gov](mailto:moertel@ifa.in.gov).

Sincerely,



Kevin Davis, Chief  
Remediation Services Branch  
Office of Land Quality

*KD/mmo*

cc: *(via electronic transmission)*  
Leah Thill, MACOG

# Narrative Proposal

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#### **IV.E.1.ai. Project Area Description and Plans for Revitalization: Background & Description of Target Area**

The Michiana Area Council of Governments (MACOG), a regional planning organization and designated Regional Economic Development District (EDD) by the U.S. Economic Development Administration (EDA), will lead this community-wide grant in two target area cities South Bend and Elkhart, with access to funds in the regional jurisdiction of St. Joseph, Elkhart, Kosciusko, and Marshall counties. The region (population 606,294)<sup>1</sup> covers these 4 counties and 35 cities and towns in Indiana, 60 miles east of Chicago near the Michigan border. Our regional economy has relied heavily on manufacturing, including factories that produced musical instruments, recreational vehicles (RVs), metals, chemicals and more, connected by a dense rail network, rivers, and the I-80/90 Toll Road (“Midwest Main Street”). Two cities, South Bend (once known for Studebaker Cars) and Elkhart (RV Capital of the World), are known nationally for their manufacturing prominence. Since the 1960s, many manufacturers such as Studebaker and their supply chain clusters closed due to outsourcing and automation, leaving hundreds of brownfields behind. Environmental hazards at shuttered old factories, rail, coal, and bulk oil yards pose an immediate threat to our region’s sensitive populations: minorities (Black and Hispanic), the impoverished, and children. Our region is economically and culturally dependent on ample water and land for agriculture, rivers and lakes for tourism, and groundwater aquifers. Development pressure consumes agricultural and undeveloped land because of brownfield stigma and risks resulting in sprawl and new infrastructure that strains public budgets, instead of infill. While South Bend and Elkhart’s downtown cores celebrate revitalization, target areas in the first ring of neighborhoods outside of downtowns have been slowest to receive investment in the economic upturn after the Great Recession, due in part to ripple effects from concentrated blight. In the South Bend target area alone, 243 parcels (19.9% of parcels) were tax delinquent in 2021 with \$2.6M in unpaid taxes and an additional 5% of parcels city-owned vacant lots generating no revenue. This creates a vicious cycle of environmental health hazards, disadvantaged citizens, resource strapped governments, and decaying neighborhoods. Under MACOG’s current assessment grant, the Regional Brownfields Coalition Working Group (WG) of local government staff has met 23 times in 2.5 years to prioritize existing brownfield inventories and develop a pipeline of 80 priority sites. The greater challenge has not been quantifying the entire scope of the brownfields burden, though hundreds of brownfields have been identified in South Bend and Elkhart, but in judiciously allocating scarce funding for assessment, cleanup, and reuse. With over 90% of current funding allocated, the WG evaluated unmet needs and selected environmental justice (EJ) areas within the two cities with the highest density of brownfields: South Bend and Elkhart. Target areas were selected by weighing synergy with local and regional plans and proximity to sensitive populations: 1) The City of South Bend (pop. 103,453, St. Joseph County) target area is Census Tract 21 (pop. 1,256)<sup>1</sup> which straddles the first two neighborhoods west of downtown, Near West Side and Kennedy Park. From prominent historic homes near downtown (Oliver Mansion), the target area quickly hollows out towards the former industrial area predominated by overgrown vacant lots, dilapidated homes, and crumbling industrial buildings. Its industrial legacy is reflected by the convergence of rail lines, which cuts the area off from the south creating an eerie feeling of being forgotten just over a mile from the heart of downtown. It also hosts important assets for minority communities concentrated on the west side: Civil Rights Heritage Center, Martin Luther King Jr. (MLK) Community Center, and a rich diversity of churches. Brownfields reuse is an opportunity to address housing shortages and benefit low-income and minority populations through affordable housing and trail access. 2) The City of Elkhart (pop. 53,358, Elkhart County) target area is defined as the Downtown Tax Increment Financing (TIF) district (1 sq. mi.) and a 1.5 mile radius from downtown (7 sq. mi.), with a priority site in Census Tract 26 (pop. 5,022)<sup>1</sup> in the Tolson area neighborhood across the rail lines from downtown, converging to the 2,500 acre Conrail Yard. Downtown marks the confluence of the St. Joseph and Elkhart rivers impaired with PCBs. Rail access and rivers, a source of power and waste disposal, attracted manufacturers and left behind contamination and associated health hazards near EJ populations. It is a priority due to a high percentage of

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<sup>1</sup> U.S. Census Bureau, 2020 Census Population, [www.census.gov](http://www.census.gov)

low-income, minority, and youth populations, and carless households (3 housing authority projects), and the \$11M expansion underway at Tolson Community & Youth Center. Other brownfields in the target area in need of further assessment and planning (cleanup/reuse) prior to reuse are 1101 E Beardsley, 700 S Main St, 2101 S Main St, 1701 Sterling Ave, 511 Division St, and other sites to be identified in 2022 in the implementation of the *Elkhart 2040 Plan* (1,000 units workforce housing). The grant will fund Phase I & II environmental site assessments (ESAs) for at least 10 sites (1/county, 2/target area), and site-specific and area-wide plans. Sites outside target areas will be prioritized by the WG.

**IV.E.1.a.ii. Description of the Priority Brownfield Site(s)** [*Both priority sites not assessed under current grant*]

**South Bend:** Eligible priority site former *Oil Express* at 1510 W Washington Street (2.6 acres, zoned industrial, city-owned) is the largest buildable cleared vacant site in either Kennedy Park or Near West Side Neighborhoods, straddling their boundary. Two abandoned industrial sites are to the west/south, with residential areas and churches to the east/north. *Oil Express* hosted coal, lumber, and auto yards before a bulk oil storage facility (1970s-2000), when now deceased owners removed underground storage tanks (USTs) from which known petroleum impacts must be addressed. No broad sampling has been done, thus a greater risk and barrier to residential reuse is uncertainty about other past uses on-site and adjacent former industrial sites. It shares a 500 ft. fenced border with a 24 acre complex (Hurwhich Iron), a former lead smelter (1950s - 1990s) with a 40,000 sq. ft. rusted industrial building that still has 14 visible storage tanks. It was proposed for listing on the National Priorities List (2010) with lead in soil over excavation levels (up to 13,000 ppm), lead deposition risk at nearby residences, and County Health Department reporting elevated blood lead levels in nearby children, but off-site data was inconclusive. A 3-story brick building (South Bend Metal Processing 1908-1980s) is an imposing presence to the south, contributing to heavy metal (lead) risk at *Oil Express*. Other contaminants of concern (COCs) include volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs) from rail/coal, and polychlorinated biphenyls (PCBs). It is also a priority as the MLK Center, 2 blocks away, will be rebuilt with \$11.1M in the city's 2022 budget.

**Elkhart:** Until the 1950s, the eligible priority site *Roundhouse* (15.9 acres, zoned industrial) was a locomotive repair facility. The large overgrown lot has been owned by the city since the 1970s, when all structures were demolished. Past uses nearby pose environmental risks: a dry cleaner, machine shop, trucking depot, and gas station. The city sought only recreational closure, and an Environmental Restrictive Covenant (2013) documents COCs (petroleum, VOCs, and heavy metals exceeding residential levels) in both soil and groundwater. Just 0.5 mi from downtown, it is a priority for further assessment including for emerging contaminants (PFAS) and planning (cleanup and reuse) due to known health risks and proximity to vulnerable populations (public housing). A housing shortage and lack of other large developable sites has brought the *Roundhouse* forward as a potential site for mixed-income workforce housing per the *Elkhart 2040 Plan*.

**IV.E.1.b.i. Revitalization of the Target Area: Reuse Strategy & Alignment with Revitalization Plans:** Assessment, cleanup and reuse of these sites is in alignment with existing area redevelopment plans. As EDD, MACOG implements its *Regional Comprehensive Economic Development Strategy* (CEDS, 2020) to enhance quality of life, increase density and walkability, and create affordable safe housing via brownfield revitalization and smart growth principles. The regional *Disaster Recovery & Economic Resilience Plan* (pending approval) commissioned by MACOG after the COVID-19 pandemic found that new workforce housing is a key priority for housing affordability, with 3% annual regional wage but rents rising 10-16%. The South Bend-Elkhart Regional Partnership (SBERP)'s \$50M proposal to the state *Regional Economic Acceleration and Development Initiative* (READI) reported a severe housing shortage with over 40% of renters cost-burdened (30% of income on housing), and workforce housing as highest regional economic priority overall.

**South Bend:** A strategy of infill development of vacant lots with new housing aligns both with neighborhood plans under development, and local and regional revitalization and economic development plans and studies. The "Vacant & Abandoned Properties Task Force" led to "1000 Homes in 1000 Days" and 1,500 homes demolished or repaired (about half each, 2013–2018). While residential blight was reduced, the result is hundreds of vacant lots, concentrated on the city's west side, with the highest densities of tax delinquent parcels in Kennedy Park just blocks from the target site. In 2020, the city took a major stride to address the complex zoning code's role in limiting redevelopment, adopting an

entirely new zoning code to remove barriers to infill development and encourage multi-family housing, winning the 2021 Richard H. Driehaus Form-Based Code Award. The 2020 Census revealed that South Bend, long contending with a shrinking population, had the largest increase in population in 50 years (1960 census) and now faces increased demand for limited or aging housing stock. A 2018 housing study of neighborhoods west of downtown found 62% of households below 30% of area median income preferred multi-family rental housing.<sup>2</sup> In 2020, Near West Side Neighborhood Plan visioning sessions have prioritized medium density housing for *Oil Express*. Since acquisition, the Great Recession, a focus on redevelopment downtown, and environmental unknowns stymied redevelopment attempts. The affordable housing non-profit South Bend Heritage Foundation (SBHF) failed to secure re-zoning of the property (2019) from industrial to allow residential use for a Permanent Supportive Housing project for chronically unhoused people. In a contentious city council meeting lasting past midnight, nearly every council member specifically mentioned a lack of information about environmental conditions and a need to engage the community. Since then, the city has initiated a neighborhood planning process with both neighborhoods around *Oil Express*, with 6 community meetings both in-person and virtual. Community engagement is currently focused on refining priorities through workshops, surveys (bilingual), and an interactive comment map. Comments have specifically mentioned including both green space and solar energy. The 2 neighborhood plans, expected to be finalized in early 2022, will inform both reuse of *Oil Express* and broader infrastructure priorities in the area. SBHF is now interested in creating 22 income-qualified rental units (up to \$6M, multi-family apartment, duplexes) with greenspace amenities (picnic shelter), pending city and public input. In MACOG's *Regional Active Transportation Plan* (2016), access to active transportation is a key factor for achieving quality of life and public health goals, especially for this underserved area. It lists the Coal Line trail (Phase 2 now under construction), with Phase 3 extending past the MLK Center along the abandoned rail easement bordering *Oil Express*.

**Elkhart:** Quality of life and housing supply and affordability are integral to Elkhart's economic development strategy. Mixed-income housing for the target area is a core part of the *Elkhart 2040 Implementation Plan*. The READI proposal's *Tolson Neighborhood Opportunity Hub* project targets "strategically located workforce housing" near *Roundhouse*. The *Elkhart Housing Strategy (2020)* revealed housing demand downtown for 431 rental units and 55 for sale, and convened a committee of financial institutions and non-profit affordable housing developers (La Casa of Elkhart County). Housing aligns with land use plans, as the *Downtown TIF Plan* and *Elkhart Comprehensive Plan (2015)* also highlight blighted conditions and the need for safe, stable neighborhoods downtown by increasing residential population with diverse socioeconomic status, and removing industrial zoning near downtown which reuse of *Roundhouse* with housing would achieve. About 1/3 of a nearby neighborhood is in a flood plain and the city is implementing a *Flood Mitigation Plan*, demolishing homes to restore natural park land by the river which further reduces housing. The 2018 *Elkhart Economic Diversification Study*<sup>3</sup> calls for diverse housing options to attract skilled workers. For economic development goals, the *2040 Plan's* microeconomic focus in the priority site neighborhood is to support 5 entrepreneurs with new businesses, and at the macroeconomic level to repurpose brownfields to diversify manufacturing in clusters unrelated to RVs for resilience to economic downturns. Creation of new jobs is a rarely cited metric, rather plans focus on diversifying jobs (small businesses, distribution, information technology) and attracting workers. With sufficient jobs available, attracting and retaining talent is more important. With an unemployment rate of 2.0% in 2018 and 2.4% in September 2021, and unemployment spikes in economic downturns (20.6% in 2009)<sup>4</sup> due to reliance on base industries (34% of all employment) related to a luxury good (RVs), the metropolitan area is ranked last nationally in industry diversity.<sup>4</sup> Brownfields reuse can also reverse the low rates of industrial vacancy (1.1%) and leasable office space (15%).<sup>3</sup>

**IV.E.1.b.ii. Outcomes and Benefits of Reuse Strategy:** Revitalization of target areas will mitigate known health hazards (*Oil Express, Roundhouse*), reuse over 18 acres of vacant land, promote physical activity with access to green space (add 1

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<sup>2</sup> An Analysis of Residential Market Potential, City of South Bend. 2018. Zimmerman/Volk Associates.

<sup>3</sup> Elkhart 2040 Diversification Plan, 2018. <https://elkhart2040.com/research-studies-and-reports>

<sup>4</sup> Bureau of Labor Statistics, Elkhart-Goshen, [https://www.bls.gov/eag/eag.in\\_elkhart\\_msa.htm](https://www.bls.gov/eag/eag.in_elkhart_msa.htm)

mile to the Coal Line Trail, pocket park), and increase affordable or mixed-income housing (22 units at *Oil Express*, many in Elkhart) to benefit identified EJ communities. Economic benefits include increased home values, job diversification, workforce talent attraction, and recouping tax revenue (\$2.6M in South Bend). *Elkhart 2040 Plan* targets 9,200 acres of underutilized industrial and commercial land to add over 1,000 workforce housing units in specific neighborhoods to realize \$526M in public-private investment, increasing resilience to automation and economic downturns. SBHF’s project may lead to 20 temporary construction jobs and 1.5 full-time equivalent positions for operations and maintenance. Reuse of multiple brownfields sites with housing reverses “greenfield” development pressure to achieve workforce housing and affordability goals while protecting agriculture. SBHF and La Casa of Elkhart County both have included solar energy and green spaces in affordable housing projects. Solar arrays (2, 25 kW each) would reduce energy burden and carbon emissions, offsetting 4,351 gallons of gasoline and 111,316 miles driven by a car annually according to EPA’s GHG Equivalencies Calculator. New housing stock will be more energy efficient than older housing (windows, HVAC, etc.). The grant will cover Phase I/II non-profit developers could not afford, benefiting vulnerable populations served.

**IV.E.1.c.i. Strategy for Leveraging Resources: Resources Needed for Site Reuse:** MACOG and partners will need to pursue funding for remediation, demolition, site acquisition, and reuse. Non-profit developers are eligible for resources listed below for affordable or mixed-income housing. With due diligence, non-profit partners may be eligible for EPA Cleanup Grants with cost share from cities. Using EDA funds for staff time, MACOG will continue grant writing for state/federal funds for cleanup/reuse. Other resources include community foundations, SJC Housing Consortium, American Rescue Plan (ARP), “CreatINg Places” crowdfunding match from IHCDCA which SBHF used for a pocket park (\$40,000, 2017). South Bend has invested about \$200,000 in River West TIF funds in *Oil Express* (sidewalk, acquisition, demolition) and can leverage more TIF funds for cleanup if needed. South Bend’s 2022 budget includes \$500,000 for blight demolition, \$500,000 for vacant building rehab, and \$10,000 grants for non-profit solar projects. Likewise, Elkhart acquired and cleared *Roundhouse* and earmarked the Downtown TIF (up to 90%) to support housing.

Program	Agency	When/How Used	Amount (Eligible/Previous)
Housing Trust Fund/ Tax Credits - Rental Housing	Indiana Housing Community & Development Authority (IHCDCA)	Site Acquisition, Construction, Operations	SBHF awarded \$6M tax credits (30 units, 2016)
TIF District Funds	Redevelopment Commissions	Water/Sewer upgrades, cleanup, before reuse	\$50,000 each (Elkhart & South Bend)
READI Program	Indiana Economic Development Corporation	Workforce Housing in Elkhart target area	SBERP’s \$50M regional proposal submitted 9/2021
Energy Grant	IN Office of Energy Development	Solar Panels (~25 kW)	\$50,000 (annual; no match)

**IV.E.1.c.ii. Use of Existing Infrastructure:** Both priority sites are in infrastructure-efficient, location-efficient areas, 1 mile or less from respective downtowns and utilizing existing roads, sidewalks, sewer, water, phone service, internet, and gas and electric utilities. While the existing buildings at *Oil Express* and *Roundhouse* were demolished, within the larger target areas, the South Bend Metal Processing building could be repurposed, as *Oil Express* reuse and the MLK Center expansion builds momentum in the neighborhood. The 5-story concrete building at 1701 Sterling Avenue (Elkhart) has developer interest for senior housing. All target areas are supported by public transit, and the region is undergoing a decennial Comprehensive Operational Analysis to optimize transit access for South Bend Transpo and the Interurban Trolley (operated by MACOG) which connects Elkhart to South Bend. *Oil Express* is 2 blocks from two bus lines (#4, #10), with direct access (no connections) to the South Bend International Airport, Amtrak Train, jobs, schools, health center, library and grocery stores. In Elkhart, *Roundhouse* is on the Green bus line and the 5 Interurban Trolley lines intersect in downtown nearby. MACOG already upgraded the bus shelter 1 block away. Elkhart would use TIF to upgrade water/sewer or sidewalks and road, while South Bend could upgrade water/sewer with TIF if needed.

**IV.E.2.a.i. Community Need and Community Engagement: The Community's Need for Funding:** MACOG is positioned as the applicant for both South Bend and Elkhart to address their priority sites with low overhead, while preserving access to funding for the rest of the region. Municipal capacity is too stretched to secure and manage EPA grants, with staff responding to the pandemic, implementing ARP projects, and focused on putting brownfields back to

productive use. Target area staff capacity is a strong concern, as South Bend's brownfields coordinator has multiple titles and Elkhart's staff member is involved in all projects in all city TIF districts. Elkhart's Downtown TIF district is currently depleted (90% bonded/earmarked for debt or to support housing). On top of COVID-19 budget impacts, municipalities operate under the 2008 "Circuit Breaker" state law that instituted property tax caps after which budgets were pared down to necessities. At the neighborhood level, blighted and potentially contaminated sites have a distinct correlation to lower home prices in the target areas. Current home values average \$65,000 (30 homes) near *Oil Express* compared to \$146,000 in South Bend according to Zillow (*Roundhouse* is bordered by public housing). Blight and vacancy increases the burden on public funds through demolition costs and a declining tax base. The 2015 *Elkhart Comprehensive Plan* found high residential vacancy near downtown (20-25%) with only 49% of the houses in good condition, compared to 90% in good condition in neighborhoods farther from downtown. However, residents struggle to maintain their homes and cover basic needs. *Elkhart County Housing Needs Assessment* found 32% of homeowners were cost burdened.<sup>5</sup> The South Bend and Elkhart census tracts are low income, as 80% and 63% of households with children under 18 years rely on supplemental security income, cash assistance, or SNAP compared to 53% in Indiana and 50% nationwide.<sup>6</sup>

**IV.E.2.a.ii. Threats to Sensitive Populations:** 1) Health Welfare of Sensitive Populations: Toxic pollution of land and water from brownfields and active industrial sites put forth an extreme burden for our sensitive populations, particularly children and pregnant mothers, minorities, and low-income people, as improper environmental practices have long run rampant in the region. According to EJSCREEN, South Bend Census Tract 21 has 94% people of color (21% IN, 39% U.S.), 77% of which are Black compared to 15% in St. Joseph County<sup>6</sup>, while 32% of the tract has less than a high school education (11% IN, 13% U.S.), and 72% are low income (30% IN, 33% U.S.). The most sensitive populations to lead exposure are pregnant mothers and children under 5, which make up 7% of South Bend Census Tract 21. *Indiana Lead Census Tract Risk Map* ranks the tract at highest risk, with over 20% of children tested with elevated blood lead levels.<sup>7</sup> Tract 21 is at or above the 90<sup>th</sup> percentile (%le) in Indiana for all of the 11 EJ Indexes from EJSCREEN and all EJ Indexes in EPA Region 5 are above the 88<sup>th</sup> %le. Notably, the Lead Paint Indicator is 96<sup>th</sup> %ile in the U.S. for housing built before 1960, compounding the lead risk from the target area sites which the grant will address. Elkhart Tract 26 has significant sensitive populations with 13% under age 5 (6% IN and U.S.), 73% people of color, with 36.9% Hispanic<sup>6</sup>, and 67% low income (EJSCREEN). The grant will identify and facilitate the reduction of the health threats these populations face from one of the highest concentrations of Superfund, brownfield, and active industrial sites in the U.S. 2) Greater than Normal Incidence of Disease / Adverse Health Conditions: PAHs affect skin, liver, and the immune system; VOCs, TCE, and PCBs are carcinogens (kidney, non-Hodgkin lymphoma) and neurotoxins; lead and arsenic affect almost every organ system and are carcinogenic, while several COCs are associated with childhood asthma.<sup>8</sup> Exposure to these hazardous chemicals is also linked to infant abnormalities and mortality, notably lead which harms fetal growth and children's brain development.<sup>8</sup> Elkhart and St. Joseph Counties are ranked #4 and #5 in infant deaths in Indiana, with mortality rates of 8.7 and 7.8 (deaths per 1,000 live births), compared to 7.3 in Indiana.<sup>9</sup> People of color have worse outcomes, with a cancer death rate (per 100,000) for Black and Hispanic people in St. Joseph and Elkhart counties (215 and 220) much higher than the state (186) and national (174) rates.<sup>10</sup> Kidney cancer rates are 17.6 and 16.9 in St. Joseph and Elkhart counties (17.1 national). The Non-Hodgkin Lymphoma rate in Blacks in St. Joseph County is 17.3 per 100,000 people compared to 13.3 in Indiana.<sup>10</sup> Black children and children living in poverty have blood lead levels 13% higher than the U.S. average.<sup>11</sup> People of color face higher levels of other adverse health conditions, with higher rates of obesity (48% Black, 45% Hispanic) compared to Non-Hispanic Whites (37%)<sup>12</sup> while Black and Hispanic people are 60% and 70% more

<sup>5</sup> Elkhart County Housing Needs Assessment, 2014. [www.elkhartindiana.org/egov/documents/1450892047\\_97272.pdf](http://www.elkhartindiana.org/egov/documents/1450892047_97272.pdf)

<sup>6</sup> American Community Survey 5-Year Data (ACS), 2019. U.S. Census Bureau. [www.census.gov](http://www.census.gov)

<sup>7</sup> Indiana Department of Health, Lead Census Tract Risks, [www.in.gov/health/public-health-protection-and-laboratory-services](http://www.in.gov/health/public-health-protection-and-laboratory-services)

<sup>8</sup> Agency for Toxic Substances and Disease Registry (ASTDR), Center for Disease Control, 2021. <https://www.atsdr.cdc.gov>

<sup>9</sup> Indiana Mortality Report. Indiana State Department of Health, 2017. <https://www.in.gov/isdh/19096.htm>

<sup>10</sup> State Cancer Profiles, 2014-2018. National Cancer Institute. [www.statecancerprofiles.gov](http://www.statecancerprofiles.gov)

<sup>11</sup> America's Children and the Environment, EPA, 2016. [www.epa.gov/americaschildrenenvironment/ace-biomonitoring-lead](http://www.epa.gov/americaschildrenenvironment/ace-biomonitoring-lead) <sup>12</sup> Healthy People 2020. Office of Disease Prevention and Health Promotion. U.S. HHS. [www.healthypeople.gov](http://www.healthypeople.gov)

likely to be diagnosed with diabetes than Whites and twice as likely to die from it.<sup>13</sup> Blacks had the lowest rates of physical activity, 19.9% compared to white adults (25.7%).<sup>13</sup> Asthma mortality rates are 2.4 times higher for Blacks (23.9/million) than Whites (9.9/million).<sup>14</sup> 3) Promoting Environmental Justice: Target areas have significant EJ issues. Low-income and minority communities and children near these sites face disproportionate health risks, with documented lead contamination near *Oil Express* and soil and groundwater contamination at *Roundhouse*. The EPA Toxic Release Inventory (TRI, 2020) reports our region has 20.3% of TRI facilities despite representing 9% of the state population, while Indiana is the #3 state for releases per square mile. Elkhart County had 92 TRI facilities or 10% of those in Indiana, with 50 in the City of Elkhart alone. Out of 40 Superfund sites in Indiana, 10 are in our region, and 5 are in City of Elkhart. All these releases directly expose residents in our target areas dealing with economic stressors, and threaten public water supply and residential wells. Protecting the environment in our region is crucial due to the reliance on the St. Joseph Soul Source Aquifer, which covers much of South Bend and Elkhart, accounts for over 50% of drinking water, has no reasonable alternatives, and is highly susceptible to groundwater contamination per St. Joseph County Health Department. MACOG’s Michiana Equity Analysis<sup>15</sup> identified higher than average *indicators of potential disadvantage* beyond EJSCREEN, including Limited English Proficiency (LEP), Disability, and Carless Households in the target areas. Block Group 1 in Elkhart Census Tract 26 has 22% LEP which is well above average regionally (4.4%). Households with persons with disabilities is 70% and 72% for Elkhart and South Bend tracts, well above the 34% regional average. Elkhart Tract 26 has 20% carless households and low access to fresh food according to USDA Food Access Atlas, at ½ mile without a vehicle. These populations are less educated and live in blight riddled neighborhoods and substandard or public housing. This grant will help to identify and subsequently reduce suspected health hazards in our target areas. Affordable housing, trails, and greenspace reuses envisioned will directly benefit EJ populations, while prioritizing sites nearby will reduce brownfield impacts on health and economic distress, improve job security, and protect water resources.

**IV.E.2.bi. Community Engagement: Project Involvement & IV.E.2.bii. Project Roles:** With staff embedded in the project team, target area cities (own 7 target area sites listed) will be engaged by hosting meetings and leveraging existing engagement to inform priorities. Community partners include local stakeholders in South Bend, Elkhart, and region-wide.

Name of entity, organization	Point of Contact	Specific Involvement in Project /Assistance
South Bend Elkhart Regional Partnership ( <i>economic development</i> )	Regina Emberton CEO, 574-400-5432, <a href="mailto:remberton@southbendelkhart.org">remberton@southbendelkhart.org</a>	Outreach to potential developers, site identification, allocate READI investments
Bike Michiana Coalition	Chris Vanden Bossche, ED, 574-234-1035, <a href="mailto:cvandenb@nd.edu">cvandenb@nd.edu</a>	Advocate for bike/ped infrastructure in reuse, assist in local match, region-wide
La Casa de Amistad ( <i>regional Latinx non-profit community center</i> )	Juan Constantino, ED, 574-233-2120, <a href="mailto:juan@lacasadeamistad.org">juan@lacasadeamistad.org</a>	Spanish language translation and interpreters available for community events; outreach
Near West Side Neighborhood	Anne Mannix, President, 574-288-4369 [REDACTED]	Input on reuse in target area, outreach and education (South Bend target area)
Kennedy Park Neighborhood Association	Viola Sims, President, 574-204-3407, <a href="mailto:violatsims@aol.com">violatsims@aol.com</a>	Input on reuse in target area, outreach and education (South Bend target area)
South Bend Heritage Foundation ( <i>non-profit developer</i> )	Marco Mariani, ED, 574-289-1066 <a href="mailto:marcomariani@sbheritage.org">marcomariani@sbheritage.org</a>	Affordable housing developer, potential purchaser of <i>Oil Express</i> in South Bend
Vibrant Communities ( <i>grassroots initiative, Elkhart County</i> )	Arvis Dawson, Co-Chair, 574-262-8161, [REDACTED]	Share project updates; Partner on public event (Elkhart) to gather input for plans.
Tolson Community Center ( <i>independent non-profit organization</i> )	Jason Shenk, Board Member, 574-238-8317, [REDACTED]	Outreach & engagement, and host public meetings, serves south-central Elkhart
LaCasa of Elkhart County ( <i>affordable housing nonprofit</i> )	Brad Hunsberger, V.P., 574- 533-4450, <a href="mailto:brad.hunsberger@lacasainc.net">brad.hunsberger@lacasainc.net</a>	Exploring development of affordable housing projects on remediated brownfields in Elkhart.

<sup>13</sup> Office of Minority Health. U.S. HHS. [www.minorityhealth.hhs.gov/omh/browse.aspx?lvl=4&lvlid=18](http://www.minorityhealth.hhs.gov/omh/browse.aspx?lvl=4&lvlid=18)

<sup>14</sup> Asthma Data Visualizations. 2019. Centers for Disease Control and Prevention.

<sup>15</sup> Michiana Equity Analysis, 2019. Michiana Area Council of Governments (MACOG). [www.macog.com/title\\_vi.html](http://www.macog.com/title_vi.html)

Greater Elkhart Chamber of Commerce	Kay House-Clark, 574-293-1531, kay@elkhart.org	Engage through Chamber Environmental Council, outreach to members, developers
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**IV.E.2.b.iii. Incorporating Community Input:** In light of COVID-19, MACOG will solicit input through a variety of mechanisms: Facebook, a project web page, and paper/online surveys, public meetings (City Council & Redevelopment Commissions, MACOG Policy Board), and news releases at key points (award, before public meetings). The WG and city and community partners will use newsletters, social media, and/or flyers to inform on reports and engage in planning. To reach Hispanic residents especially in South Bend and Elkhart, MACOG has a relationship with La Casa de Amistad for translation services (interpreters, written materials). MACOG will provide both meaningful virtual and in-person options in target cities, rather than MACOG’s office, on evenings and weekends when more working people are available in ADA accessible locations (public libraries, Chambers of Commerce). Virtual tools used include Zoom, JamBoard, Poll Everywhere, etc. Going to where people are is often more effective than public meetings, therefore MACOG may conduct pop-ups at local outdoor events (festivals, farmers markets, etc.) as relevant and appropriate given COVID-19. MACOG has used these successful community engagement methods (last 5 yrs) for Comprehensive Plans (6), Parking Studies (3), Park Master Plans (2), Marshall County Regional Development Plan, Public Engagement Plan, 2045 Long Range Transportation Plan, Regional CEDS, and plans underway (Economic Resiliency, Transit, Freight). The WG will evaluate feedback at quarterly meetings to incorporate into prioritization and deliverables, responding by local channels (i.e. Listservs, newsletters, target area social media) to follow up on the outcome of the public and stakeholders’ input.

**IV.E.3.a.Task Descriptions, Cost Estimates, and Measuring Progress: Description of Tasks/Activities & Outputs**

<b>Budget Table: Project Tasks (\$) [Programmatic Costs Only, No Indirect Costs, No Other Costs]</b>							
<b>Budget Categories</b>		<b>1. Program Management</b>	<b>2. Inventory, Engagement</b>	<b>3. Phase I ESAs</b>	<b>4. Phase II ESAs/ FSI</b>	<b>5. Cleanup &amp; Reuse Planning</b>	<b>Total</b>
Direct Costs	Personnel	\$4,669.50	\$6,692.95				\$11,362.45
	Fringe	\$3,250.91	\$4,659.63				\$7,910.54
	Travel	\$5,899.00	\$560.00				\$6,459.00
	Equipment						
	Supplies		\$4,268.01				\$4,268.01
	Contractual	\$15,000.00	\$20,000.00	\$60,000.00	\$300,000.00	\$75,000.00	\$470,000.00
<b>Total Costs (all direct)</b>		<b>\$28,819.41</b>	<b>\$36,180.59</b>	<b>\$60,000.00</b>	<b>\$300,000.00</b>	<b>\$75,000.00</b>	<b>\$500,000.00</b>

In the Budget Table, Phase I/II ESAs (Tasks 3 & 4) are 72% of the budget and planning (Task 5) is 15%, with no indirect or other costs. Personnel/Fringe costs (3.9%) are for programmatic tasks per CERCLA 104(k)(5), as described below:

<b>Task 1 Program Management</b>
<p><b>i. Project Implementation / ii. Anticipated Schedule:</b> Immediately upon selection, MACOG will work with EPA Project Manager (PM) to finalize an EPA-approved Work Plan (WP) and Cooperative Agreement (CA). In the first quarter (Q1), MACOG will contract with a Qualified Environmental Provider (QEP) via a competitive Request for Proposals, update the existing Memorandum of Agreement (MOA) with target area cities and all 4 counties, and confirm site access for priority sites. MACOG will be responsible for day-to-day grant operations, distributing information to communities, Quarterly Progress Reports (QPRs), annual financial reporting, managing project the WP, CA and field oversight. Once funds are available, MACOG will utilize the federal ASAP system. The project team (MACOG, QEP, target area staff) will meet twice a month initially then monthly, and the WG will meet at least quarterly. It is a high priority to implement successful brownfields redevelopment by learning from other communities and experts at trainings and conferences. In Year 1, staff from MACOG, South Bend, and Elkhart (3 people) will attend a state brownfields workshop and the National Brownfields Conference in Year 2. MACOG will track progress over 3 years in monthly reports including completion of tasks, staff changes, challenges, financial expenditures, preliminary data, and upcoming activities. MACOG will cover additional staff time with federal (i.e. EDA, \$20,400/year budgeted for brownfields redevelopment), local, or other sources. Municipalities will provide staff time, meeting space, and can provide clearance of debris in-kind. Final QEP invoices received by end Q11.</p> <p><b>iii. Task/Activity Lead:</b> MACOG (Leah Thill, Project Manager) with support from QEP</p>

iv. <u>Outputs:</u> 1 MOA, 1 CA, Contract with QEP, 1 WP, 12 QPRs/ACRES, 3 annual FFRs (Federal Financial Reports) and Disadvantaged Business Enterprise (DBE) reports, 1 Final Report, 36+ monthly project team and 12 quarterly WG meetings
<b>Task 2: Community Outreach, Inventory Management and Prioritization</b>
i. <u>Project Implementation / ii. Anticipated Schedule:</u> In Q1, MACOG will promote the GIS Brownfields Portal to solicit sites of interest in target areas and the region, update the existing project webpage, and issue a press release. In Q2, MACOG and target area staff will host 4 community meetings for target areas, supported by the QEP. MACOG will be the lead for any community meetings outside the target areas. MACOG and the WG will update selection criteria, re-rank all inventory sites, and review community input. MACOG will hold follow-up meetings for cleanup/reuse plans (at least 4 meetings, Year 2-3)
iii. <u>Task/Activity Lead:</u> MACOG to oversee. Target area cities may lead meetings if desired, or MACOG may facilitate.
iv. <u>Outputs:</u> 8 public meetings, 1 updated Brownfields Data Portal, updated prioritized inventory
<b>Task 3. Phase I ESAs</b>
i. <u>Project Implementation:</u> QEP will request eligibility determinations and conduct Phase I Environmental Site Assessments (ESAs) under the appropriate ASTM and EPA’s “All Appropriate Inquiry” standards, and review past reports and data. MACOG will update Property Profile Forms in ACRES. Target area cities will contact property owners in their jurisdiction to secure site access with MACOG’s standardized form and MACOG will manage site access outside target areas. Counties have the authority to gain access via health and building codes or through use of Indiana Code IC 6-1.1-25-4(i) if necessary.
ii. <u>Anticipated Schedule:</u> Phase I ESAs will begin in Q1, after QEP contract and any eligibility determinations (IDEM has issued determination for <i>Oil Express</i> , brownfields letter for <i>Roundhouse</i> ). Assess mostly target area sites through Q4 (2 per target area). Funding available to sites outside target areas as prioritized by the WG, led by MACOG, for viable revitalization projects in small communities (<10,000) or areas with no recent EPA grant (5 years), at least 10 total and 1/county by Q11.
iii. <u>Task/Activity Lead:</u> MACOG (QEP produces deliverables under MACOG direction after site approval by WG)
iv. <u>Outputs:</u> up to 18 Phase I ESAs (including eligibility determinations, Property Profile Forms in ACRES)
<b>Task 4. Phase II ESAs/FSI</b>
i. <u>Project Implementation/ ii. Anticipated Schedule:</u> QEP will prepare the Quality Assurance Project Plan (QAPP) for MACOG to submit to EPA in Q1. Site-specific Sampling and Analysis Plans (SAP) and Health and Safety Plans (HASP) prepared by the QEP will be approved by EPA, to begin Phase II ESAs and Further Site Investigations (FSIs) in Q2. As under the current grant, MACOG will draw down over 35% of funds in 18 months. Municipalities will confirm site access.
iii. <u>Task/Activity Lead:</u> MACOG for all tasks and activities (QEP produces deliverables under MACOG direction)
iv. <u>Outputs:</u> 1 QAPP, up to 13 Phase II ESAs/FSIs (including PFAS where relevant), 2 asbestos/lead-based paint surveys
<b>Task 5. Cleanup and Reuse Planning</b>
i. <u>Project Implementation:</u> QEP will conduct cleanup planning, prepare Remedial Work Plans (RWP), secure comfort letters and Environmental Restrictive Covenants, as necessary, and prepare eligible site-specific reuse plans and area-wide reuse plans around multiple brownfields sites as needed for the target areas. MACOG will assure deliverables align with plans.
ii. <u>Anticipated Schedule:</u> Community input and reuse planning conducted Q1 through Q11, beginning immediately
iii. <u>Task/Activity Lead:</u> MACOG, direct all activities (QEP produces deliverables under MACOG direction)
iv. <u>Outputs:</u> 4 RWPs, 4 Site-Specific Reuse Plans, 4 Comfort/Site Status Letters, and 2 Soil Management Plans
<b>IV. E. 3.b. Cost Estimates      Task 1 – Program Management: Total Budget = \$28,819.41</b>
<u>Personnel + Fringe Costs:</u> \$7,920.41 are budgeted for personnel and fringe expenses for 150 hours at combined rate \$52.80/hr for the MACOG project manager to manage the brownfields program, including procurement of QEP, WP, oversight of the QAPP development, on-going project meetings and ACRES, QPRs, annual reporting, and QA/QC support in reviewing deliverables. (Personnel rate is \$31.13/hr, fringe is 69.62% as approved by Indiana Department of Transportation).
<u>Travel costs:</u> \$5,899 are budgeted for 3 people (MACOG project manager, one municipal staff person from each target city - South Bend & Elkhart) to attend 1 National Brownfields Conference and 1 state workshop. Costs for the national conference are estimated at \$1,617/person based on 2019 conference costs of approximately \$150 hotel, \$75 per diem each for 4 nights,

\$200 registration, \$500 airfare, and \$50 ground transport for the group. The 2-day state workshop cost is estimated at \$350/ person (\$50 for workshop fees, per diem, and hotel costs for 1 night for 3 people, carpool travel of 400 miles at \$0.56/mi). <u>Contractual:</u> \$15,000 for QEP (150 hrs @ \$100/hr) QA/QC, QAPP, invoicing, project team / WG meetings.
<b>Task 2 – Community Engagement, Inventory = \$36,180.59</b>
<u>Personnel + Fringe Costs:</u> \$11,352.58 for personnel and fringe expenses (215 hours @ \$52.80/hr) for MACOG project manager to oversee community engagement strategy including updating the GIS Brownfields Portal. <u>Travel:</u> \$560 for 1,000 miles (\$.56/mi) around the region to community and stakeholder meetings <u>Supplies:</u> \$4,268.01 is budgeted for supplies, based on current grant expenses and strategy of mailing postcards for targeted outreach near priority sites. Supplies also includes printing of meeting materials and visuals, input activities, and room rental. <u>Contractual:</u> \$20,000 for QEP (200 hrs @ \$100/hr) for developing materials, facilitating public and stakeholder engagement
<b>Task 3 – Phase I ESAs: Total = \$60,000 or 12%</b>
<u>Contractual:</u> \$60,000 for QEP for Phase I (18 at ~\$3,333) including eligibility, based on Phase I average in current grant
<b>Task 4 – Phase II ESAs, FSIs: Total = \$300,000 or 60%</b>
<u>Contractual:</u> \$300,000 for QEP for Phase II (13 at \$22,000), asbestos/lead-based paint survey (2 at \$7,000), current avg. cost
<b>Task 5 – Site-Specific Cleanup and Reuse Planning: Total = \$75,000 or 15%</b>
<u>Contractual:</u> \$75,000 for Planning for cleanup and reuse including Remedial Work Plans (4 @ \$7,500 each), Comfort/ Site Status Letters (4 @ \$500 each); Site-Specific Reuse Plans (4 at \$9,500 each), Soil Management Plans (2 @ \$2,500 each).

**IV.E.3.c. Measuring Environmental Results:** MACOG will assess progress by comparing outputs, outcomes, and funds expended against WP benchmarks. MACOG will continue to track, share, and evaluate short / long-term outputs and outcomes with the project team monthly and WG quarterly in the collaborative Google Drive folder, based on targets and timelines in the WP, QPRs, and Grant Closeout Report measured by these outputs and success measures: public/ stakeholder meetings (# attendees, meetings); QAPP, reporting (timely submittal of ACRES/QPR/DBE/FFR reports) brownfield inventory (# sites, # reuse plans and implementation), # Phase I/II ESAs, FSI, RWP. Outcomes include: reduced health risks (# sites remediated), creation of trails/ greenspace (# miles/acres), increase in employment (# quality jobs created), leveraged funding (\$), increase in commercial development (# businesses opened), expanded quality housing (# units, # low-moderate units). MACOG will discuss significant WP deviations with the EPA PM to develop corrective actions, and MACOG will update ACRES after the project end date to ensure outcomes are captured.

**IV.E.4.a.i, ii, iii. Programmatic Capability & Past Performance: Organizational Structure, Capacity, Key Staff:** MACOG has strong relationships with local governments as the regional planning organization and EDD to implement this project, and the administrative and financial systems and procedures in place to manage all tasks as demonstrated by successful management of similar assessment and other grants. MACOG manages a \$7.2M budget (FY22) and \$12M in transportation projects annually from the Federal Highway Administration. MACOG’s 4 Sustainability and Community & Economic Development staff are currently directly managing \$1.2M in open state and federal grants, and in the last 2 years have secured additional funding for \$4.1M for clean transportation and economic development projects (IDEM, IN OED, EPA, Office of Community & Rural Affairs (OCRA), and USDA). To build internal and regional capacity for brownfields revitalization, MACOG held a training (2019) for the WG with IBP. Long tenure of key staff listed below distinguish MACOG’s capacity to complete a successful project in 3 years, effectively and in a timely manner:

Name	Title – MACOG Key Staff	Tenure	Role
Leah Thill	Senior Environmental Planner	4 years	Project manager (PM), QA/QC
Donny Ritsema	Senior Community Development Planner	6 years	Assist with Community Engagement
Deborah Gardner	Fiscal Accounting Manager	20 years	Reporting, Financial
Russ Ragimbekov	IT Manager	18 years	Technical support, GIS
James Tumwald	Executive Director (ED)	13 years	Oversight, Authorized Representative

Project Manager: Leah Thill, Senior Environmental Planner (Master’s Degrees in Environmental Science, Public Affairs; Bachelor’s in Chemistry) has programmatic knowledge from the current brownfields assessment grant, building on demonstrated success to coordinate all activities with the team (QEP, MACOG and target area staff, WG). Leah will

track and report progress in ACRES, prepare QPRs, review and communicate the Phase I/II ESAs and other deliverables and coordinate planning (cleanup/reuse) with target area staff, QEP, and community stakeholders. Leah will continue to convene the WG to seek consensus on how funds can best reach grant outcomes and achieve regional quality of life and economic resilience goals at key decision points: prioritizing sites, planning public meetings, and evaluating progress.

Support Staff: Donny Ritsema, Community Development Planner, certified by American Institute of Certified Planners (AICP), is well equipped to assist in effective public outreach and community engagement. Russ Ragimbekov, IT Manager, will continue to provide in-house technical support for the GIS Brownfields Portal. The project management team is augmented by the Accounting Department for finances and procurement. Fiscal Accounting Manager Deborah Gardner is experienced with financial and administrative requirements (Federal Reporting Systems ECHO, TRAMS, NTD, ASAP, Grants Online) and will establish project tracking systems through Grant Management Systems (GMS), process invoices, and fulfill reporting requirements in conformance with 2 CFR 200.317-326. MACOG ED James Turnwald, chair of Indiana Association of Regional Councils, is experienced in managing federal and state-funded projects. He is responsible for public relations, operational functions, and personnel including a contingency plan for Donny to be cross-trained to replace Leah. Target Area Municipal Staff will continue to serve as liaison to communities for effective engagement: Chris Dressel (AICP, City of South Bend - 20 yrs), Brownfields Coordinator, was lead for the South Bend Brownfields Coalition (FY2014); Adam Fann, (City of Elkhart - 23 yrs) TIF Infrastructure Project Manager, has assisted with field work oversight and staffs the Redevelopment Commission, overseeing city-owned brownfields.

**IV.E.4.a.iv. Acquiring Additional Resources:** For technical tasks requiring special qualifications (Phase I/II ESAs, cleanup planning, infrastructure evaluation, etc.), MACOG will contract with a QEP. Within 90 days of award, MACOG will convene a selection committee including target area staff and open to other WG members, to competitively select a QEP under federal procurement regulations including 2 CFR Part 200 and MACOG Procurement Policy. The QEP will be able to start immediately, finish in 3 years, with a proven successful track record with EPA grants, ACRES, and IBP. MACOG will utilize the guidance of IBP and EPA PM to assist in RFP development and technical oversight.

**IV.E.4.b. Past Performance and Accomplishments: IV.E.4.b.i. Currently Has an EPA Brownfields Grant:**

(1) Accomplishments: MACOG has 1 open FY19 Coalition Assessment grant (BF00E02717-0, \$600,000, 10/1/2019 – 9/30/2022). **Outputs:** After year 2 of 3, MACOG is meeting or exceeding the schedule for outputs: assessed 16 sites with 27 reports (13 Phase Is (goal 20); 14 Phase II/FSIs (exceeding goal of 9)), conducted cleanup or reuse planning at 6 sites (goal 10) including comfort letters (3), held 5 meetings (goal 8), 1 QAPP, and the QEP is a Minority Owned Business (MBE) (50% of procurement to MBE/WBE). ACRES reflects the completion of all deliverables as of the time of submission. The community engagement schedule was initially delayed 6 months due to the COVID-19 pandemic, but MACOG pivoted to increase the budget and mailed 8,800 postcards for targeted outreach for meetings (in-person and virtual). **Outcomes:** The grant has catalyzed securing \$15.8M in leveraged funds in a 26:1 ratio: \$1.1M for cleanup (private, local, federal), \$14.7M for redevelopment (private, local, state), including \$1.1M from IHEDA and \$12M from Real America LLC for affordable housing (60 units), \$500,000 from IDEM (cleanup, RLF) and \$500,000 from City of Warsaw re-allocating State Revolving Loan (demolition, cleanup), \$300,000 in TIF from South Bend, \$615,000 for 3 affordable single-family homes (bid phase), and renovation underway at a 56,000 sq. ft. entrepreneurial center (not including \$3M pending loan). (2) Compliance with Grant Requirements: MACOG submitted all quarterly (ACRES) and annual reports (2 FFRs) on time and is in compliance with all grant requirements (WP, terms and conditions). The remaining balance is \$94,450.50 (11/5/2021). 57% has been spent on direct assessment (Phase I/II), with planning (10%), outreach (13%), program management (3.8%), and 16% remaining and obligated for FSIs underway or reserved for remaining Phase Is and planning in 2022 to meet expected results. In consultation with the EPA PM and WG, the WP was updated to shift \$60,000 from Planning for Phase IIs after other funding was secured (\$30,000, local) for an Area-Wide Reuse Vision in Warsaw, and COVID-19 economic impacts delayed funding to implement one in Plymouth.

**IV.E.4.b.ii. & iii.:** Not applicable for both.

## **Threshold Criteria Response**

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## **SECTION III – ELIGIBILITY INFORMATION AND THRESHOLD CRITERIA**

### **III.B. Threshold Criteria for Assessment Grants**

#### **1. Applicant Eligibility**

Michiana Area Council of Governments (MACOG) is a regional planning organization formed under interlocal cooperative agreement created by State Statute (Indiana Code 36-1-7, see *Attachment A*). MACOG operates under the direct order of the Commissioners of each County and has been recognized and certified by a Certificate of Approval by the Attorney General of the State of Indiana, a copy of which can be found in *Attachment A*. Therefore, MACOG is eligible for funding as a “Regional Council or group of General Purpose Units of Local Government.” MACOG defines the community for the Community-wide Assessment grant as the region within its jurisdiction: the four counties and the communities therein. Each County (Elkhart, Kosciusko, Marshall, and St. Joseph) is a general purpose unit of local government as defined under 2 CFR 200 and are eligible entities, as are the municipalities within which the target areas and sites are located (City of South Bend, City of Elkhart).

The Resolution in *Attachment B* from MACOG’s governing board (Policy Board) demonstrates support for the proposed project.

#### **2. Community Involvement**

The MACOG Regional Brownfield Working Group formed under the open Assessment Grant will continue to guide the prioritization of sites under the proposed Community-Wide Assessment Grant. The Working Group is comprised of local government staff from all four member counties and cities in the region. The Working Group members will continue to work collaboratively to increase our regional capacity for public involvement in target areas and all other communities. The target area cities of South Bend and Elkhart will also be encouraged to participate in contractor selection, site selection and project scopes, obtaining site access, and public meetings in their geographic area. MACOG will continue to invite our partners and the populations they serve to our public community meetings and monthly public MACOG Policy Board meetings, so that all of our citizens will have the opportunity to provide input on site selection and prioritization as well as reuse and cleanup planning. Each community partner can reach out to their targeted community in the way that they deem most effective, such as handing out fliers at meetings, email, or displays on their public bulletin board. MACOG will also continue to conduct a concerted outreach program using print, social media (Facebook), and other media to request involvement in the brownfields initiative and report progress, such as distributing a Brownfields Fact sheet in both Spanish and English. We will announce awarded funds through a press release to local newspapers and radio stations and communicate project progress through this method, as the newspaper and radio are the most widely consumed sources of communication in our population. Additionally, MACOG will maintain the brownfields web page ([www.macog.com/brownfields.html](http://www.macog.com/brownfields.html)) with meeting information and recordings, progress updates, and to invite submissions of the site of interest form for the inventory and share the GIS Brownfields Data Portal. Following the initial announcement, we will attend public meetings in South Bend and Elkhart to discuss the next steps of the project and participate in community meetings in each target area to discuss next steps. We will listen to public input when selecting sites and take their requests into consideration when prioritizing them for assessment. As clean-up and/or redevelopment planning is initiated for a site, more intensive involvement activities

will be implemented, such as public meetings to explain plans and rationales and solicit feedback. At the close of the Project, MACOG will hold a final public meeting to notify the community of the successes and challenges faced during the Project and request comments regarding the interest in pursuing additional grants. English is our primary language of communication, but translators, sign language interpreters, and translated documents will be made available upon request to assist non-English speaking or hearing-impaired residents, which will ensure full participation in the Region's brownfields project.

### **3. Named Subcontractors and Subrecipients**

N/A - MACOG has not identified any contractors or subrecipients for the proposed project, and will not be extending the contract with the environmental consultants procured under the open Assessment Grant (Metric Environmental). MACOG will instead release another Request for Proposals to competitively select environmental professionals to assist in the successful implementation of the proposed project. Neither Metric Environmental nor any other environmental contractors have been involved in the drafting of this grant application.

### **4. Expenditure of Assessment Grant Funds**

MACOG has one active EPA Assessment Grant. *Attachment C* documents that the available balance on the open Assessment Grant BF00E02717-0 was at least 70.00% by October 1, 2021. MACOG does not have an open Multipurpose Grant.

### **III.C. Additional Threshold Criteria for Site-Specific Proposals Only**

Does Not Apply.

### **III.D. Additional Threshold Criteria for Community-wide Assessment Grants for States and Tribes Only**

Does Not Apply.