



R05-22-A-049

#### IV.D. Narrative Information Sheet

1. Applicant Identification:

City of Michigan City Sanitary District  
1100 E. 8th Street  
Michigan City, IN 46360

2. Funding Requested:

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested:
  - i. \$400,450
  - ii. We are not requesting a Site-specific Assessment Grant waiver of the \$200,000 limit.

3. Location:

- a. City of Michigan City
- b. LaPorte County
- c. Indiana

4. Target areas:

- **Northwest Corridor (NWC)** – NWC is a 0.38 mi<sup>2</sup> area (in portions of Census Tracts 401, 403) in the northwest portion of Michigan City and roughly centered on Huron Street. The NWC is located in a historically industrial portion of the City, in close proximity to nearby low-income neighborhoods.
- **South Gateway Corridor (SGC)** – SGC is a 0.9 mi<sup>2</sup> area (in portions of Census Tracts 404, 405, 414) centered roughly on the intersection of Franklin Street and Highway 20 on the south side of Michigan City. SGC is located in a predominantly mixed-use commercial district of the City, in close proximity to nearby low-income neighborhoods.
- **Priority Sites:**
  - Brandts**, 309 W. Michigan Blvd., Michigan City, IN
  - McKay Printing**, 500 Huron Street, Michigan City, IN
  - Ameriplex**, 321 E. Highway 20, Michigan City, IN
  - Marquette Mall**, 201 W. Highway 20, Michigan City, IN
  - Chair Factory**, 200 E. Highway 20, Michigan City, IN

5. Contacts:

a. Project Director:  
 Mr. Michael Kuss  
 General Manager  
 Michigan City Sanitary District  
 (219) 874-7799,  
[mkuss@mcsan.org](mailto:mkuss@mcsan.org)  
 1100 E 8th Street  
 Michigan City, IN 46360

b. Chief Executive:  
 Mr. Michael Kuss  
 General Manager  
 Michigan City Sanitary District  
 (219) 874-7799,  
[mkuss@mcsan.org](mailto:mkuss@mcsan.org)  
 1100 E 8th Street  
 Michigan City, IN 46360

6. Population: City of Michigan City – 32,075 (US 2020 Decennial Census)

7. Other Factors:

<b>Other Factors</b>	<b>Page#</b>
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 energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	Pg. 3
30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.	
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.	Pg. 6

8. Letter from the Indiana Department of Environmental Management, Indiana Brownfields Program (attached).

9. Releasing Copies of Applications: Not Applicable



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
*Governor*

Bruno L. Pigott  
*Commissioner*

December 1, 2021

Mr. Michael Kuss  
General Manager MCSD/ Grant Manager  
Michigan City Sanitary District (MCSD)  
1100 East 8<sup>th</sup> Street  
Michigan City, Indiana 46360

Re: IDEM Acknowledgement Letter  
U.S. EPA Brownfields Grant Proposal  
Community-wide Assessment  
Michigan City Sanitary District (MCSD)  
LaPorte County, Indiana

Dear Mr. Kuss:

This letter is provided in support of the Michigan City Sanitary District (MCSD) 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 the MCSD is requesting \$400,300 for hazardous substances and/or petroleum.

It is IDEM's understanding that this funding will be utilized to expand the existing brownfield inventory with an initial prioritization of identified brownfield sites on the basis of: 1) redevelopment potential, 2) environmental or human health impact and community environmental justice issues, and 3) community input. IDEM is aware that the MCSD has also identified two, key, disadvantaged corridors in Michigan City (Northwest Corridor (NWC)) and Highway 12 Corridor (H12C)) as focal points for at least five targeted sites for environmental assessments to be conducted based on need and mixed, large-scale redevelopment goals (e.g., residential/commercial reuse, enhanced property values, and new jobs).

IDEM believes that the MCSD has demonstrated its commitment to redeveloping brownfields by having taken advantage of financial and/or technical assistance offered by U.S. EPA (current grantee) and the Indiana Brownfields Program (Program participant with 18 enrolled sites). This Assessment grant funding will help the MCSD continue its efforts to address brownfields to facilitate future economic growth. Should an opportunity arise for the MCSD to need petroleum eligibility determinations or

IDEM Acknowledgement Letter  
U.S. EPA Brownfields Grant Proposal  
December 1, 2021  
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cleanup/closure assistance at any of the sites investigated with this grant funding, IDEM understands that the MCSD plans to enroll sites for closure via the Indiana Brownfields Program or the IDEM Voluntary Remediation Program.

Based on the information submitted, IDEM considers the MCSD 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 the MCSD. 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)*  
Len Hinrichs, BCA Environmental Consultants, LLC

**1 Project Area Description & Plans for Revitalization, a. Target Area & Brownfields, i. Background & Description of Target Area:**

The Michigan City Sanitary District (MCSD) encompasses the corporate limits of the City of Michigan City (City). Located in Northwest Indiana, Michigan City, pop. 32,075 (2020 Decennial), is the largest city in LaPorte County. Less than 40 miles from Chicago, Michigan City played a key role during the Industrial Revolution, as industry quickly took advantage of the Great Lakes resources as a water supply and as an asset for transportation/trade. A long history of manufacturing blossomed and thrived in our community. Railroads bisected the city to support the growing industry and commerce; developing separate neighborhoods and allowing residents to work and play near their homes. However, like many communities in the rust belt, Michigan City's manufacturing base began to decline in the early 1970's. Over the past several years, our city has experienced significant workforce losses. Large employers such as Federal Mogul, Boyd Casino, Prestige Maintenance, Consolidated Transport Systems, Pall Filter Specialists, Weil-McLain, and TRW Automotive have closed or downsized, laying off nearly 1,300 workers since 2011. Dwindling employment opportunities have led to a population declining from a peak of 36,369 during the industrial boom in 1970 to 32,075 in 2020 (a loss of more than 13%). Many industries that survived moved to "greenfields" on the periphery or into the county leaving our downtown and industrial/commercial corridors in a state of decay. Historic neighborhoods in and around these corridors were pulled down with this decline, leaving behind a community burdened with more than 100 brownfields. **However, there is an opportunity right now for revitalization of our city, offering new opportunities for access, connectivity, infrastructure investment, and residential neighborhood and downtown revitalization with a mix of public and private property investments.** The MCSD has historically taken the responsibility of managing and addressing contaminated properties in the City, so it is a natural step for us to systematically execute the community's brownfield redevelopment plans. We've selected two target areas where EPA Brownfield Assessment Grant funding will have the greatest impact and ability to capitalize on this opportunity:

**Northwest Corridor (NWC)** – is an approximately 1.2-mile long north-south corridor centered on Huron St. and bounded roughly by W. 4<sup>th</sup> St. to the north and Russell St. to the south (within portions of Census Tracts 401 and 403). This 0.38 mi<sup>2</sup> area in the northwest portion of the city is a combination of vacant, derelict, or underutilized commercial and and/or industrial properties located in low-income residential or mixed-use areas. Its high visibility due to its location adjoining Lighthouse Place Premium Outlets, which draws hundreds of thousands of visitors each year, make the NWC a focal point.

**South Gateway Corridor (SGC)** - bounded roughly by St. John Rd. to the north, Cleveland Ave. to the east, South Ct. to the south, and Ohio St. to the west (within portions of Census Tract 404, 405, & 414), this approximately 0.9 mi<sup>2</sup> area in the southern portion of our community is made up of commercial and industrial properties adjoining a low-income residential neighborhood around the intersection of Franklin St./SR-421 and SR- 20.

The residents living among brownfields in the NWC/SGC target areas experience low income (MHI less than half of US/IN), high poverty (230% higher in NWC / 50% higher in SGC than US/IN), and extremely high child poverty (over 300% higher in census tracts 401/403 (where NWC is located) and 28% higher in census tracts 404/405/414 (where SGC is located) than in the US and IN) (2019 ACS). The financial challenges experienced by our target area residents have perpetuated a cycle of low-quality jobs; inadequate affordable, owner-occupied housing; unhealthy nutritional choices; insufficient available park/recreational space; and minimal community walkability, resulting in significant social and economic constraints that threaten both their physical and financial wellbeing. We recognize the great redevelopment potential of our target areas and we are making a focused effort to invest in the NWC/SGC to address priority brownfields (1.a.ii) and leverage additional funding for these depressed areas of our community. Redeveloping the NWC/SGC will revitalize this portion of our community and reduce area crime, making it more attractive to new businesses, developers, visitors, and residents.

**1.a.ii. Description of the Priority Brownfield Site(s):** Our priority sites (Table 1) offer the greatest opportunity to trigger successful reuse/resurgence in our target areas. The historical/current uses of these sites, likely environmental issues, potential health effects to those exposed to these sites, and planned reuse are summarized below.

Table 1 – Priority Brownfield Sites and Impacts

Priority Site, Size, Proximity to Target Area Residents	Historic Use / Current Use & Condition / Planned Reuse (further discussed in Section 1.b.i.)	Suspected Contaminants*
<b>Brandts</b> , 309 W. Michigan Blvd. – 2.17 acres in NWC, adjacent to low-income neighborhood & active power plant	Pet food/supply store / Underutilized - buildings present / Mixed use redevelopment	Petroleum, asbestos, lead paint, metals, VOCs, PAHs
<b>McKay Printing</b> , 500 Huron St. – 6.4 acres in NWC, adjoins low-income neighborhood	Former printing company / Vacant - buildings present / Light industrial or mixed-use redevelopment	Petroleum, asbestos, lead paint, metals, VOCs, PAHs
<b>Ameriplex</b> , 321 E. Hwy 20 – 27 acres in SGC, near low-income neighborhood	Former industrial facility / Vacant / Commercial redevelopment	Petroleum, VOCs, PAHs, metals
<b>Marquette Mall</b> , 201 W. Hwy 20. – 62 acres in SGC, adjoins wooded land near low-income neighborhood	Former retail mall / Vacant - buildings present / Expand park, & greenspace, residential development	Petroleum, asbestos, lead paint, metals, VOCs, PAHs
<b>Chair Factory</b> , 200 E. Hwy 20 – 5.3 acres in SGC, near low-income neighborhood	Former furniture factory / Vacant – dilapidated building / Mixed use redevelopment	Petroleum, asbestos, lead paint, metals, VOCs, PAHs

*\*According to the Agency for Toxic Substances and Disease Registry (ATSDR), the contaminants listed in Table 1 pose a real threat to human health. Health threats include damage to: skin, liver, kidneys, heart, spleen; nervous, respiratory, hormonal, blood, & immune systems; may also cause neurological damage, birth defects and cancer ([www.atsdr.cdc.gov](http://www.atsdr.cdc.gov)).*

These sites are the City’s highest priorities because they will meet immediate needs in our community, align with our revitalization plans. The investment to redevelop downtown historic structures, residential/mixed-use commercial assets, and greenspace amenities on priority brownfield properties in the target areas and others throughout the City will serve as examples of success, triggering further investment. For example, the McKay Printing site in NWC potentially impacts adjoining neighborhoods with historical petroleum, solvents, or other industrial chemical releases. The City has plans to repurpose this site, removing the environmental and health threats, and transforming it into a much needed light industrial or mix-use commercial/residential development, connected to our growing parks system which residents and non-residents alike can utilize as specified in our Revitalization Plans below. **1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans:** Our 2018 Momentum: Michigan City 2040 Comprehensive Plan, 421 South Gateway Corridor Plan, and 2017-21 Parks & Recreation Master Plan (Revitalization Plans) specify that our community’s economic growth and development focuses on creating a vibrant, diverse, and thriving destination/gathering place, with quality employment, education, social equity, community health, cultural vitality, walkable/connected neighborhoods, and an enhanced role as a regional economic hub. Revitalization of NWC/SGC brownfields will help achieve these goals, by creating new community assets such as mixed-use development, new industry/commercial business, and greenspace/trail amenities that will in turn, improve the lives of surrounding residents, encourage new residents and businesses, and allow us to develop our community in a methodical, logical way that capitalizes on existing assets and infrastructure.

**MCSO is requesting \$400,450 in grant funding, which is essential to complete environmental assessments of NWC/SGC target area brownfields. The key to revitalization of our NWC/SGC target area and other portions of our community is brownfields reuse, for which this EPA brownfields grant is vital.** Increasing our stock of owner-occupied, moderate-income housing and mixed-use commercial/residential properties near our downtown/ commercial centers will alleviate our housing shortage and aligns with our goal to increase the walkability/connection of our downtown to area neighborhoods. Michigan City is working to create a multi-use trail system for bikes and pedestrians that will connect neighborhoods with the downtown, Trail Creek and lakeshore areas, entertainment, and retail areas, and work centers. The Marquette Mall in the SGC which is slated for reuse into a commercial or mixed-use commercial-residential redevelopment, would satisfy some our commercial & housing needs. The Brandts site in the NWC is planned for mixed commercial/residential or possible artspace redevelopment and the McKay Printing property in the NWC would be repurposed into either light industrial or mixed-use redevelopment. Finally, the Ameriplex property and Chair Factory in the SGC will be reused for mixed-use commercial and residential redevelopment. All the priority sites will be on or very near planned bike/pedestrian trails as part of the Michigan City trail system, promoting walkability and encouraging healthier lifestyles for residents per our Revitalization Plans.

EPA grant funding is needed to fuel these aggressive revitalization efforts creating needed jobs, affordable housing, and walkable greenspace within our target areas, improving our residents' quality of life. Significant resources have already been pledged for the reuse of NWC/SGC properties (1.c.i), and with EPA funds to cover environmental costs, we will realize the outcomes and benefits outlined below.

**1.b.ii Outcomes & Benefits of Reuse Strategy:** Assessment and reuse of priority sites such as the former Chair Factory site will remove environmental threats, eliminate blight, reduce crime, and stimulate private sector investment in surrounding properties. This in turn will be linked to successful reuse outcomes, creating equitable, affordable housing; improving the economic competitiveness of our target areas; leveraging current and future investments; and creating unique, healthy, safe, and walkable neighborhoods, particularly in the NWC/SGC, where the largest number of our low-income, minority, and other sensitive populations reside, supporting environmental justice goals.

Reuse of brownfields will generate higher tax revenue for the City, and through increased investment, new jobs will be created, new residential units will be constructed, and property values will rise. **Reuse of all the priority sites listed in 1.a.ii, will create an estimated 2,700 construction jobs and 1,500 permanent jobs and will generate more than \$1.22M in annual income tax revenue.** Additionally, since the NWC/SGC sites are in designated Tax Increment Financing (TIF) districts, incremental increases in property taxes, retained for redevelopment purposes by the City, could generate up to \$4.1M in annual incremental tax revenue which will be reinvested in the NWC/SGC. Finally, one priority site (Brandt site) is located within our Opportunity Zone (OZ), increasing its attractiveness to investors for redevelopment.

During all phases of the revitalization process, we will promote/encourage the re-use of existing buildings and infrastructure, including implementing building codes that require or promote energy efficiency measures such as solar street lighting, energy efficient lighting, low-flow showers/toilets, geothermal heating/cooling, etc. Residents will benefit from increased property values or may seek housing with energy efficiency and less maintenance costs. Addressing priority sites in the NWC/SGC will create affordable and sustainable housing, workforce development (new jobs), and remediate/reduce legacy pollution in areas with high concentrations of minorities and low-income residents. **EPA's investment in brownfields in the NWC/SGC will help meet Justice40 goals by creating energy efficient, sustainable development, conserving and preserving greenfields, reducing carbon emissions by enhancing our trail network, encouraging green transportation, and turning idled brownfields into new hubs for the growth of our economy. These accomplishments will deliver justice to disadvantaged residents (due to low-income, high poverty, distressed neighborhoods, disproportionate exposure to environmental impacts from brownfields, etc.).**

**1.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse:** Our City has a history of leveraging investment in projects throughout the community. For example, a private developer will break ground on a new 200-unit apartment complex at 8<sup>th</sup> St. and Michigan Blvd. in early 2022. The project site is a former brownfield and the total investment will be \$35M. More investment is planned, focusing on the NWC/SGC. Without EPA funding for the initial high-risk environmental assessment of these sites, brownfield revitalization will stagnate. MCSDD will pursue many different funding sources from the state and federal levels, as well as the private sector to use as leveraging as outlined below.

- *Tax Increment Financing (TIF)* -- Property tax revenue used as a subsidy for redevelopment, infrastructure, and other improvements. Up to \$100K in TIF funding pledged by the City to aid in the redevelopment of brownfields.
- *Opportunity Zones (OZ)* – One of our priority sites is located within our federally-designated OZ (1.b.ii). We will market this site as an excellent tax shelter under OZ tax incentives, attracting private funds in this low-income area. We have identified 6 Opportunity Funds in Indiana and will engage them as brownfield revitalization progresses on this and other sites.
- *EPA* - Additional EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) to further the brownfield reuse goals of the City (\$300K-\$1M)
- *Federal Highway Administration* - Infrastructure improvements like streets & pedestrian/bicycle pathways (Est. \$5M+)

- *Indiana Economic Development Corp.* - Tax credits & other incentives to help communities create a climate where pressures from taxes, investment costs, & red tape are lower (Est. \$1M+)
- *Indiana Brownfields Program* - Low-interest/partially forgivable loans for brownfield investigation and cleanup through the EPA-funded Revolving Loan Fund (Est. \$1M)
- *Indiana Finance Authority* - SRF funding generated from an interest rate discount on wastewater improvement project loans. The savings realized through the rate reduction can be used to remediate brownfield sites (\$500K+)
- ***Indiana Brownfields Program (IBP)***: Petroleum Orphan Site Initiative (POSI) funding may be used to complete the investigation of sites identified and partially assessed in this Grant and other sites in the target area (Est. \$75K)
- ***Indiana Office of Community and Rural Affairs*** – Main Street Revitalization Program (Est. \$500K); Blight Clearance Program for demolition of unsafe structures (\$500K)
- *Excess Liability Trust Fund* - State insurance funding for investigating and remediating eligible petroleum contaminated sites with underground storage tanks (up to \$2M)
- *Liability Insurance Funding* - Indiana courts have ruled that historical general liability policies must cover assessment and remediation costs on sites known to be contaminated. Using EPA Assessment Grant funding to demonstrate the presence of contamination will help trigger viable liability insurance policies to fund cleanup of environmental damages. The City will make efforts to apply this funding source to all eligible sites, including privately and municipally owned property (often \$1-3M/site). Insurance coupled with EPA assessment funding has been used on brownfields in many communities in Indiana, commonly leveraging hundreds of thousands, or even millions in assessment and cleanup funding.

A detailed funding plan will be developed for brownfield sites/areas as assessment projects progress, and each site will have a unique funding plan due to individual status and eligibility.

**1.c.ii. Use of Existing Infrastructure:** Our Revitalization Plans' land use goals emphasize the build-out of existing parcels, and rehabilitation and infill development in our city's traditional core neighborhoods before additional land is considered for development. Modern utility infrastructure is present in all target areas (3-phase electricity, natural gas, city water and sewer, telephone and fiber optic service), providing connectivity to new development. It is robust enough to handle the added capacity required by any planned reuse and will utilize existing services and other infrastructure (roads, curb cuts, on/off-street parking, & nearby utilities) to attract new investment in area brownfields, reducing site reuse costs. With revitalization ranging from residential to industrial, existing infrastructure will allow for easy access for commercial/industrial development, enabling residents the opportunity to work and live in the same neighborhood, creating a walkable community. Traditional transportation infrastructure will be complemented by pedestrian connectivity, bicycle improvements, and universal accessibility. All priority sites in 1.a.ii adjoin or are near I-94 and/or IN Routes 12, 20, or 421, and revitalization will link them directly with other parts of the City and other communities. Additional funding for roads, trails, or other infrastructure necessary for planned reuse will be sought from the US DOT Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Grant program, the recently enacted Infrastructure and Jobs Act, local funds (when available), and CDBG funds.

**2. Community Need and Community Engagement, a. Community Need, i. The Community's Need for Funding:** Michigan City needs US EPA's financial assistance because we do not have the necessary funds in our general budget (\$13.7M) to address brownfields anywhere in our community, let alone in our target areas. Indicators of need in the NWC/SGC include key economic and demographic factors suffered by our target area residents, including low income, poverty, and crime. **MHI in the NWC/SGC is than half that in the US; poverty is 50% higher in SGC and 124% higher in NWC than the US and IN; and child poverty is 52% higher in CT 404, 405, 414 (where SGC is located) and 205% higher in CT 401 and 403 (where SGC is located) than in the US** (all stats from 2019 ACS unless otherwise noted). The large number of vacant buildings on Michigan City's brownfields has resulted in a twofold increase crime within the NWC/SGC (according to City officials), than in the City, further limiting local government resources, and priority brownfield sites listed in 1.a.ii add to the financial burden of target area residents by suppressing residential property values and adding to municipal

expenditures through reduced tax base, and additional public safety services to brownfield sites due to increased criminal activity. In addition, the loss of large, high paying employers (Federal Mogul, Boyd Casino, Prestige Maintenance, Consolidated Transport Systems, Pall Filter Specialists, Weil-McLain, and TRW Automotive) have closed or downsized, laying off nearly 1,300 workers since 2011. The drain of jobs adds substantially to economic challenges facing our city, diminishing local income and property tax revenues and increasing poverty in our target areas.

With a budget currently only able to provide essential services and needed infrastructure maintenance, we lack the discretionary funds necessary to complete the proactive assessment/planning activities that this grant will provide, including clarifying environmental issues on brownfield sites, encouraging developers to seek and invest in them, and eliminating the risk to the health and wellbeing of our residents and environment. Ultimately, this EPA grant will allow Michigan City to fulfill our revitalization needs for our target areas, creating unique, healthy, safe, and walkable neighborhoods.

**2.a.ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations:** Our community’s most sensitive populations (low-income residents, children and elderly living in poverty, and women who are pregnant or of childbearing age) live in and around the target areas (Table 2 below).

<b>Table 2</b>	US	IN	NWC	SGC
Median Household Income*	\$62,843	\$56,303	<b>\$21,810</b>	<b>\$27,700</b>
% Individuals Living in Poverty*	13.4%	13.4%	<b>30%</b>	<b>20%</b>
% Children Living in Poverty*	18.5%	18.5%	<b>56.4%</b>	<b>28.1%</b>
% Elderly Living in Poverty*	9.3%	7.6%	<b>14.7%</b>	<b>9.5%</b>

Note: All stats from 2019 ACS. \* Last 12 months

Brownfield sites are often unsecured and trespassers, including children, risk exposure to toxic chemicals, asbestos, and unsafe structures, causing soil and groundwater contamination. Contaminants such as metals, petroleum, VOCs, SVOCs, PAHs, PCBs, glycols, lead paint, and asbestos are potentially causing harm to our sensitive populations including children and women who are pregnant or who may become pregnant. 91% of houses in the NWC and 64% of those in the SGC are older than 1980, making them much more likely to contain lead-based paint, a significant threat to young children and pregnant women. **For example, the former Ameriplex site, adjoining a low-income neighborhood, is potentially impacted with petroleum, metals, VOCs, PAHs, and other contaminants that are known to cause various cancers which are experienced by Michigan City residents at high rates in Indiana, and much higher than the US rates (2.a.ii(2)).** The proximity of the large number of brownfields to low-income neighborhoods in our NWC/SGC drives down housing values, suppresses commercial investment, and limits residents’ access to adequate employment, resulting in a disadvantage for target area residents with no relief in sight.

An infusion of funding from this EPA grant will provide needed capital for the assessment of these blighted properties, clearing the way for remediation and revitalization of the NWC/SGC to include much needed affordable housing, increased greenspace, and connectivity through our growing trail system. The resulting resurgence of commerce will support new and revitalized local retail businesses which in turn will boost local employment with quality diversified jobs. Redeveloping our brownfields will increase tax revenues which will directly benefit Michigan City’s underserved and sensitive populations, including removal of blight, reduction in exposure to toxic chemicals, lower crime, safer neighborhoods, and access to better public services, ultimately improving the health of our community.

**2.a.ii(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:** Contaminants from target area priority sites (1.a.ii) are affecting our residents’ health. Many of the priority sites are believed to be impacted by PCBs, VOCs, petroleum, metals, asbestos, lead paint, etc. Studies on the health effects of exposure to these contaminants has been linked to higher incidences of cancer, thyroid conditions, and liver issues. As Table 3 below shows, **LaPorte County has extremely high incidences of cancers and deaths by heart disease, potentially linked to impact from nearby brownfields.** Though not available at the municipal level, this data is believed to be representative of our target areas due to the large number of economically vulnerable people living in them.

Table 3 – Health Indicators

State County Rank <sup>1</sup>	Disease/Health Condition <sup>2</sup>	LaPorte County Rate <sup>3</sup>	Indiana Rate <sup>3</sup>	Difference
10 <sup>th</sup>	Prostate Cancer (Males)	107.1	89.9	19% higher
10 <sup>th</sup>	Emergency Visits due to Asthma	61.9	49.7	25% higher
17 <sup>th</sup>	All Cancers	495.4	467.2	6% higher
13 <sup>th</sup>	Deaths – Diseases of the Heart	218.7	178.7	22% higher

<sup>1</sup> Out of 92 Counties <sup>2</sup> Source: 2019 IN State Dept. of Health Stats Explorer <sup>3</sup> Incidence per 100K Residents

Per the Urban Institute/Center on Society and Health (2015), children living in poverty are 4 times more likely to be in poor or fair health than children in high-income households, experiencing higher rates of asthma, heart conditions, hearing problems, digestive disorders, and elevated blood lead levels. Contaminants such as sulfur dioxide in the air from nearly 90 years of historic power generation at the Michigan City coal-fired power plant (scheduled to close 2025-2028), congestive highway traffic, and nearby heavy urban industry, have affected residents’ health. There are 608 Michigan City properties with environmental records on the IDEM Database, the cumulative effects of which likely contribute to the adverse health conditions impacting our residents. **Removal of the sources of environmental contaminants present at brownfields in our target areas will reduce the exposure of our disadvantaged populations to these materials, and in turn, reducing the disproportionate incidences of disease and other poor health outcomes that these residents are currently experiencing.**

***2.a.ii(3) Promoting Environmental Justice:*** The public health impact from our target area brownfields and industrial operations, and their proximity to our sensitive populations, including impoverished and minority residents, has disproportionately exposed them to environmental pollutants, resulting in an inability to maintain their health and wellbeing. EPA’s EJScreen tool indicates that the NWC/SGC residents are in the 83<sup>rd</sup> percentile for Ozone; 84<sup>th</sup> percentile for Lead Paint Exposure; 72<sup>nd</sup> percentile for Wastewater Discharge Exposure; and 79<sup>th</sup> percentile for RMP Proximity (potential for hazardous chemical releases) compared to the US. The extremely high poverty rate and low income in the NWC/SGC are significant when compared to US, State, and City figures (2.a.i). In addition, a large percentage of Michigan City’s minority population is concentrated in our target areas (44% in NWC and 35% in SGC) putting them at higher risk from the effects of contaminants from years of industrial activity. Per the Urban Institute/Center on Society and Health (2015), reduced access to and ability to pay for healthcare means that low-income and minority patients are less likely to receive adequate health care services, are more likely to experience negative health effects from exposure to brownfield contaminants, become sick more frequently and more quickly, and die at younger ages on average than those in more affluent communities. As such, it is easy to see that our impoverished and minority residents are at a distinct disadvantage, resulting in significant environmental justice concerns.

Brownfield assessment, cleanup, and reuse strategies will improve the welfare of our sensitive populations in the NWC/SGC by eliminating the health risks they pose, and this EPA grant will play a crucial role, reducing threats by funding environmental investigation work needed to trigger stalled cleanup and end disinvestment in the NWC/SGC. New jobs in the target area will create gainful employment for residents, reducing poverty and improving the state of our housing by redeveloping some sites as mixed-use residential-commercial, such as the Chair Factory which when complete, will add up to 100 housing units. Other federal programs (e.g. CDBG) will help to fund lead paint abatement and other residential improvement. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of the neighborhood, incentivizing investment in other area properties. New tax revenue will be generated and reinvested in the community. **Health indicators such as increased cancer and heart disease (2.a.ii(2)) will no longer be influenced by environmental impacts caused by target area brownfields. This will be accomplished in areas where low income and minority populations are concentrated, supporting environmental justice for all of Michigan City residents.**

***2.b. Community Engagement, i. Project Involvement & ii. Project Roles:*** Several project partners have

pledged supporting roles for our brownfields program and grant (Table 4). This diverse assemblage of community groups can engage the community and the general public at a grassroots level. They have regional influence and local ties, maximizing the benefits they bring to the project.

Table 4 – Project Partners

Partner Name	Point of Contact	Description of Project Role
Michigan City Economic Development Corp.	Clarence Hulse, Exec. Director <a href="mailto:chulse@edcmc.com">chulse@edcmc.com</a> 219-873-1211	Economic development organization - will serve on redevelopment boards/committees, provide input on inventory & prioritization, & will market sites for redevelopment investment
Michigan City Area Schools	Dr. Barbara Eason-Watkins, Superintendent 219-873-2000	Local public school corp. - will inform public of grant related activities, provide input into grant process, will aid in community outreach, and will provide meeting space
Unity Foundation	Maggi Spartz, President <a href="mailto:mspartz@uflc.net">mspartz@uflc.net</a> 219-879-0327	A grass roots community group - will provide meeting space and will disseminate information about the grant and redevelopment plan
Franciscan Health Hospital	Dean Mazzone, President & CEO 219-879-8511	Local hospital - will provide assistance to track aid to residents in brownfield areas and will help educate the residents about the health impacts of contaminants
Friends of Canada Park Neighborhood	Anna Radke [REDACTED] 219-221-0920	Grass roots community group - will provide input on inventory and prioritization, will disseminate information about the grant and redevelopment plans, and will participate in public meetings

**2.b.iii. Incorporating Community Input:** MCSD has a culture of community involvement that we will maintain throughout this grant. **A total of 6-9 public meetings will be held during the 3-year grant** to maintain stakeholder engagement and continue to gather input on site selection, prioritization, assessment needs, cleanup decisions, mitigation measures from the cleanup and redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA’s Office of Land and Emergency Management *Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). The community will be updated on progress throughout the grant and will have the opportunity to share input through comment opportunities on MCSD and partner websites. For residents with limited internet or cellular network access, paper surveys will be available at local businesses, enabling community input without access to digital resources. The MCSD has multi-lingual personnel available to advertise meetings, interpret presentations, or translate documents in Spanish or other languages as needed. We have already begun engaging target area residents, business owners, not for profits, churches, and other community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and a schedule for future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted through the MCSD, City, Planning Commission, and Chamber of Commerce to bring awareness of the redevelopment opportunities priority sites offer. When developers are identified, they will attend public meetings to describe their plans for reuse. As a project progresses, we will actively involve target area stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on site reuse. As stakeholder input is received, we will evaluate it against our development goals and available resources, adopting input that feasibly meets these criteria.

**3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities & Outputs:** MCSD will begin grant-related activities immediately upon award confirmation, working to prepare a Work Plan approved by the EPA PM/PO. After the Cooperative Agreement period begins, MCSD and its QEP will complete the following tasks:

**Task /Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization**

*i. Project Implementation:* MCSD staff will travel to the national brownfields conference, participate in calls, meetings, and correspondence between the MCSD, QEP, EPA, etc. to manage the grant's Cooperative Agreement. We will complete Quarterly, DBE, Annual reports, and ACRES database entries, and will carefully track contractor costs, comparing to the budget, expenditures, project progress, and milestones to ensure the timely expenditure of grant funds within the prescribed 3-year project period. The MCSD, with QEP support, will also update/prioritize the inventory. Inventoried sites will be prioritized based on the following criteria, in no particular order: 1) reuse potential, 2) potential for environmental or human health impact and environmental justice, and 3) community input.

*ii. Anticipated Project Schedule:* QEP will be selected through a competitive bidding process (compliant with federal procurement regulations - 2 CFR 200.317 - 200.326) before Cooperative Agreement period begins; correspondence will occur at least monthly (more frequently as specific project activities require) throughout the grant period; update and prioritize brownfield inventory the first 2 quarters, then as necessary for the remainder of the grant period; ACRES updates will be conducted at least quarterly throughout the grant period.

*iii. Task/activity Leads:* MCSD & QEP

*iv. Outputs:* Travel-MCSD staff to regional and national brownfields conferences/meetings; prioritized inventory; project performance reports: 12 Quarterly Reports, ACRES Entries, 3 DBE reports, 3 annual reports, etc.; calls, meetings, and correspondence between the MCSD, QEP, EPA, etc. to manage the grant's Cooperative Agreement.

**Task/Activity 2: Environmental Investigation:**

*i. Project Implementation:* Prior to applying for site eligibility under the grant, an access agreement will be prepared and executed for each site being considered. Eligibility determinations will be completed under this task and the QEP will complete Phase I ESA activities on sites selected by the MCSD. All Phase I ESAs will be conducted by/in accordance with the applicable ASTM standard (anticipated E1527-21) and the All Appropriate Inquiry (AAI) rule. Areas of focus will include those already determined in the inventories as priority sites listed in Table 1; The QEP will prepare a Quality Assurance Project Plan (as well as Sampling & Analysis Plans/Health & Safety Plans (SAPs/HASPs) for EPA approval. Once approved, the QEP, directed by the MCSD, will complete Phase II ESAs based on environmental conditions identified in the preceding Phase I ESAs.

*ii. Anticipated Project Schedule:* Obtain site access, request eligibility determinations & finalize site access to initial sites for investigation-early 2nd Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval-early 2nd Quarter; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 11th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted 45 days before end of grant period.

*iii. Task/activity Lead(s):* MCSD & QEP

*iv. Output(s):* 13 Phase I ESAs; QAPP and SAP/HASP, estimated 8-10 Phase II ESAs.

**Task/Activity 3: Clean-up Planning:**

*i. Project Implementation:* The QEP, directed by the MCSD, will prepare site specific clean-up plans/documents, including Analysis of Brownfield Cleanup Alternatives (ABCAs), remediation plans, site closure letter requests, and clean-up funding development (l.c.i).

*ii. Anticipated Project Schedule:* Prepared after Phase I and II ESAs are complete, contamination is present, and cleanup is even necessary. Task 3 activities will continue throughout the grant period.

*iii. Task/activity Lead(s):* MCSD & QEP

*iv. Output(s):* 5-10 cleanup planning documents

**Task/Activity 4: Community Outreach & Involvement:**

*i. Project Implementation:* 6-9 public meetings will be held during the grant period to update the community on ESA progress and seek public input/involvement. Print and mail material for project/site information and marketing documents may also be funded under this task. The MCSD will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program, and will attend/participate in outreach events. Social media outlets and other online media

will be developed/maintained, particularly during the COVID-19 pandemic, and outreach efforts will inform the public on the progress of brownfield investigation/cleanup planning activities and provide marketing resources for future development.

ii. Anticipated Project Schedule: 2-3 public meetings planned per year with the 1st planned for the 2nd Quarter of the grant period.

iii. Task/activity Lead(s): MCS D & QEP

iv. Output(s): 6-9 public meetings to update the community on the brownfield assessment progress and seek public input and involvement; supplies: printed flyers, advertising, postage, etc.

We will work diligently to assure startup activities are completed per the schedule above. The MCS D will allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the 3-year Cooperative Agreement contract. Extremely high demand for assessments and site access for some of the highest priority sites in 1.a.ii indicate funds will be spent prior to the end date. We are proactively communicating with representatives of privately-owned brownfields to gain access in anticipation of grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and reuse, and creates a positive dialog between property owners, local government, and impacted citizens.

**3.b. Cost Estimates:** The costs outlined in Table 5 were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1. MCS D will allocate \$341,250 to Phase I and II ESAs (or 85% of total grant funding assigned to ESAs).

Table 5 Budget	Budget Categories <sup>1</sup>	1. Program Mgmt, Training Support, Inv / Prioritization	2.Phase I / II ESAs	3. Clean-up / Reuse Planning	4. Community Outreach & Involvement	Budget Category Total
	Travel	\$3,000				\$3,000
	Supplies				\$200	\$200
	Contractual <sup>2</sup>	\$12,000	\$341,250	\$30,000	\$14,000	\$397,250
<b>TOTAL BUDGET</b>		<b>\$15,000</b>	<b>\$341,250</b>	<b>\$30,000</b>	<b>\$14,200</b>	<b>\$400,450</b>

<sup>1</sup>Table 5 only includes budget categories with costs. <sup>2</sup>In accordance with Federal, State, and local procurement regulations.

Grant tasks will be completed at the anticipated costs per unit with the following outputs/outcomes:

**1. Program Management & Training Support, Inventory/Prioritization:** \$15,000 – **Travel:** Attend National Brownfield Conf.: airfare x 2 @ \$1,000, 2 rooms, 3 nights lodging @ \$1,400, meals @ \$450, ground transportation @ \$150 = \$3,000, **Contractual:** total \$12,000, includes approximately 75 hrs. \$80/hr. = \$6,000 for inventory update, & approximately 75 hours \$80/hr. = \$6,000 for program mgmt.

**2. Environmental Investigation:** \$341,250 – **Contractual:** 13 Phase I ESAs at an average cost of \$3,750 each = \$48,750, & 8-10 Phase II ESAs at an estimated cost of \$25,000-\$45,000 (depending on site complexity/environmental conditions) = \$292,500 (@ \$32,500 average cost). Though our budget will support 13 Phase I's and 8-10 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in 1.a.ii.

**3. Clean-up & Reuse Planning:** \$30,000 – **Contractual:** 5-10 ABCAs/clean-up plans expected to cost \$3,000-\$6,000 each = \$30,000.

**4. Community Outreach & Involvement:** \$14,200 – **Supplies:** printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = \$200, **Contractual:** approx. 175 hours at an estimated \$80/hr. = \$14,000.

**3.c. Measuring Environmental Results:** We will track, measure, and evaluate progress through meeting minutes, Quarterly and Annual Financial Reports, quarterly review/analysis of grant performance, ACRES entries, and completion of Work Plan tasks. If planned outputs/outcomes are not achieved or milestones/project schedule outlined in 3.a are not being met, we will create a corrective action plan to identify deficiencies and make appropriate adjustments to achieve anticipated outputs on schedule. The Assessment Grant will also have the following measurable outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels cleaned up/redeveloped, acreage made ready for greenspace/recreation, and leveraged monies. These and other statistics will be included in Quarterly Reports and ACRES submittals as data becomes available, which will allow the EPA to better evaluate and highlight the grant program success. At the close of the grant, MCS D will provide a final report to the EPA and our residents summarizing project outputs and outcomes. After evaluation of sites

is done, it is our best interest that redevelopment happens, and as such, close monitoring of subsequent actions will be done diligently. Outputs and outcomes following the close of the grant will be uploaded to EPA's ACRES page for continued monitoring of the program's success.

**4. Programmatic Capability & Past Performance, a. Programmatic Capacity, i. Organizational Capacity, ii. Organizational Structure and iii. Description of Key Staff:** The MCSD Brownfield Team (MCBT) is comprised of representatives from several government entities will cooperatively manage this grant. Together, these organizations have previously managed two EPA Assessment Grants (FY08 and FY18) and many other economic development resources valued at well over \$400M over the past 10 years. The MCBT has the technical, financial, and administrative ability in place to implement this grant project successfully. Michael Kuss, General Manager, MCSD, and as with the FY18 grant, will serve as Project Manager. Kuss has been with the MCSD for 8 years and has been integral to the successful development of the Michigan City Brownfield Program. He will manage the day to day grant administration tasks, will serve as the direct contact for the EPA and QEP, and will be responsible for the technical and reporting requirements of the grant. He will be assisted by Skyler York, Director, Michigan City Planning & Redevelopment Department. York will provide site prioritization expertise, serve as the brownfield land reuse expert, and will direct TIF funding investments to be leveraged with the grant. Mr. Clarence Hulse, Executive Director of the Economic Development Corporation of Michigan City will also provide assistance in administering the grant. Mr. Hulse is an expert in business and workforce development, economic development, and brownfield redevelopment. He has successfully provided his expertise in these tasks in Michigan City, IN as well as in North Carolina and Florida. Kuss, York, and Hulse will work to efficiently manage the grant, effectively expend the funding, and aggressively seek redevelopment opportunities for those sites without secured redevelopment contracts. Together, they have nearly 85 years of experience in economic development, city planning, contaminated property investigation and remediation project management, including the administrative tasks associated with grant management. Scott Kistler, Finance Manager for the MCSD will serve as the Grant Financial Manager and will be responsible for accounting and financial reporting. Kistler manages the daily financial needs associated with the \$14M annual budget of the MCSD and provided the same role for the FY18 grant. He will be assisted by the Michigan City Deputy Controller, Yvonne Hoffmaster who has provided these services on many other grant and loan programs benefiting the City. In the unlikely event that a member of the team leaves their job prior to the completion of grant tasks, the depth of the MCBT will allow for a seamless transition to other experienced members.

**4.a.iii. Acquiring Additional Resources:** MCSD, coordinating with City staff, has a history of working cooperatively with state and federal environmental agencies and procuring contractors including QEPs. Through a competitive bidding and procurement process, the MCSD will select a QEP/consulting firm experienced in administering EPA Brownfields Grants and working with Indiana Department of Environmental Management/Indiana Brownfields Program (IDEM/IBP). The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed 3-year project period. This team will be supported by other city departments including the Redevelopment Commission, planning, finance, utilities, engineering, legal department, and office of the Mayor. As appropriate, we will utilize visioning sessions and other assistance/advice offered by the Technical Assistance for Brownfields (Region 5 TAB program) to maximize the incorporation of community input.

**4.b. Past Performance & Accomplishments, i. Currently Has or Previously Received an EPA Brownfields Grant (1) Purpose & Accomplishments:** The MCSD previously received an FY18 EPA Coalition Brownfields Assessment Grant (BF00E02417) for \$600K. Skillful execution of the Work Plan thus far has resulted in inventorying and prioritizing over 50 properties and the completion of 21 Phase I and Phase II ESAs. At the time of this submission, all outputs and outcomes related to the grants have been met and are accurately reflected in the ACRES system.

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

#### **III.B.1 Applicant Eligibility**

The City of Michigan City meets the definition of a Local Government under 2 CFR 200.64 and is a political subdivision of Indiana. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

#### **III.B.2 Community Involvement**

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, and our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions and solutions. 6 to 9 outreach events (2-3 per yr.) will be held throughout the grant period to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, mitigation measures from cleanup/redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA's Office of Land and Emergency *Management Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

#### **III.B.3 Named Contractors and Subrecipients**

The City of Michigan City has not procured/named any contractors or subrecipients.

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

Michigan City received a FY2018 EPA Community Wide Brownfields Assessment Grant. Payment was received from EPA (drawn down) for over 70% of that Assessment Cooperative Agreement by October 1, 2021. Documentation is attached.

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

This criterion is not applicable for a U.S. EPA Community-wide Brownfields Assessment Grant application.

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

This criterion is not applicable because Michigan City is a local unit of government, not a State or Tribe.