



Crawford County

NARRATIVE INFORMATION SHEET Crawford County, MI FY2024 EPA Assessment Grant

1. Applicant Identification:
Crawford County
200 West Michigan Avenue
Grayling, Michigan 49738
2. Funding Requested:
 - a) Assessment Grant Type: Community-wide
 - b) Federal Funds Requested: \$300,000
3. Location: Crawford County, Michigan
4. Target Area and Priority Site Information:
 - a) The I-75 Business Corridor (census tract 260399960300)
 - i. Priority Site: Former Bear Archery Plant, 5671 M-72 West, Grayling, Michigan
 - ii. Priority Site: Knight #70 and Grayling Citgo Gas Stations, 206 and 208 North James Street, Grayling Michigan
 - b) The Grayling Industrial Park (260399960300)
 - i. Priority Site: Former Grayling Dump, No Address, Parcel ID 070-017-015-020-00
5. Contacts:
 - a) Project Director:
Mr. Paul Compo, Crawford County Controller
200 West Michigan Avenue, Grayling, Michigan 49738
Phone: (989) 344-3202
E-mail: pcompo@crawfordco.org
 - b) Chief Executive/Highest Ranking Elected Official:
Ms. Laurie Jamison, Chair of the Crawford County Board of Commissioners
200 West Michigan Avenue, Grayling, Michigan 49738
Phone (989) 344-3202
E-mail: ljamison@crawfordco.org

6. Population The target areas and priority sites are in the City of Grayling (pop. 1,969) in Crawford County (pop. 13,904) (*U.S. Census Bureau [2020]*)
7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority brownfield site(s) is impacted by mine-scarred land.	N/A
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).	1 and 2
The priority site(s) is in a federally designated flood plain.	1 and 2
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The reuse strategy or project reuse of the priority site(s) considered climate adaptation and/or mitigation measures.	3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority site(s) within the target area(s).	N/A
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	N/A

8. Letter from State or Tribal Environmental Authority: A letter from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) is attached.
9. Releasing Copies of Applications: Not applicable.



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 26, 2023

VIA EMAIL

Paul Compo, Controller
Crawford County
200 West Michigan Avenue
Grayling, Michigan 49738

Dear Paul Compo:

SUBJECT: Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Acknowledgment of a United States Environmental Protection Agency
(U.S. EPA) Brownfield Grant Proposal for 2024

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

Crawford County is applying for a \$300,000 Community-wide Brownfield Assessment Grant. As a general-purpose unit of local government, Crawford County is an eligible grant applicant.

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

Sincerely,

Ronald L. Smedley
Brownfield Coordinator
Brownfield Assessment and Redevelopment
Section
517-242-9048

cc: Julie Lowe, EGLE

FY 2024 U.S. EPA BROWNFIELDS ASSESSMENT GRANT APPLICATION
SUBMITTED BY CRAWFORD COUNTY, MICHIGAN

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields: *1.a.i. Overview of Brownfield Challenges and Description of Target Areas:*

The geographic boundary where eligible activities will be conducted under the grant is Crawford County Michigan (the County). Located in the northern portion Michigan's Lower Peninsula it covers 576 square miles. Over 55% of its population is concentrated in the City of Grayling (2 square miles) and the adjoining Grayling Township (174 square miles). These two municipalities only make up 25% of the land area in the County. The remaining 75% of land is primarily woods associated with AuSable State and Huron Manistee National Forests. Residents in these areas are dispersed across the five other rural townships. The County is strategically located in Michigan, with three major Michigan roadways - I-75, M72, and US-127 - crisscrossing through the area, providing accessibility to both tourists and commerce. However, Crawford County bears the scars of its history, which are creating brownfield challenges affecting environmental and community health, housing, and economic development. Historically this land was dominated by white pine and cedar forests, that were clear-cut during the early days of the timber industry. The County's establishment in 1840 was closely tied to this boom, as it became a vital economic support system for burgeoning regional logging operations. The Au Sable River played a pivotal role in transporting timber to mill towns that established along its banks, with the City of Grayling emerging as a central hub. Sawmills and lumber treatment plants dotted the landscape and railroads traversed the County to allow lumber to be moved to larger urban areas like Grand Rapids, Lansing, Saginaw, and Detroit.

However, the timber industry peaked around 1900, after which the industry began to decline. Left were vast tracts of barren, tax-reverted land, and the County's fortunes began to drop. In 1913 about 13,000 acres of deforested land was donated to the State of Michigan by a local lumber baron and designated for military training. The section of land became Camp Grayling and was developed as a U.S. National Guard training center. With 75% of land in the County owned by the State of Michigan, United States Forest Service or Department of Military Affairs it limited the amount of economic growth after the timber boom. Today, Crawford County's economic landscape remains heavily reliant on tourism, forestry, and military industries, and it is grappling with the legacy of its industrial past. Despite the efforts of various community and government groups to restore the damaged ecosystems and reclaim the land, a critical funding gap persists. Vacant, blighted, and contaminated sites, associated with sawmills, lumber treatment yards, and manufacturing plants still remain in Grayling and along the Au Sable Riverfront.

The County has limited resources for assessment of brownfield sites and is requesting U.S. EPA Brownfield Assessment Grant funding to evaluate critical brownfield sites in the County. The County will focus grant funds in the two following specific target areas: **1) I-75 Business Corridor (Census Tract 260399960300):** Stretching over 6.5 miles along the I-75 Business Loop, this area encompasses the heart of downtown Grayling. This area is a mix of residential neighborhoods with commercial and industrial operations along the main transportation routes of Michigan Highway 72 (M-72) and the I-75 business loop. The target area is also bisected by the Au Sable River, which is in the federal flood plain. **2) Grayling Industrial Park (Census Tract 260399960300):** Covering 3 square miles east of downtown Grayling, this industrial zone has been the heart of industrial activity for the last 100 years. It houses a steel industrial plant, a former lumber treatment yard, a railroad, a wastewater treatment plant, and an abandoned dump. Notably, it also includes the Beal Tree Plantation, North America's oldest tree plantation, offering a nature trail attraction for tourists and locals alike. Adjacent to this area is a youth summer camp facility, adding to its potential for redevelopment and community enhancement.

1.a.ii. Description of the Priority Brownfield Sites: According to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) there are at least 40 known brownfield sites located in the target areas. These sites range from 1-acre former gasoline stations, dry cleaners, manufacturing operations, to a 13,000 acre military base that has contaminated the local drinking

water source with per- and polyfluoroalkyl substances (PFAS). The County has identified 3 priority sites in the target areas that it will target for assessment with Grant funds. **1) I-75 Business Corridor - Bear Archery priority site** (5671 W M-72, 31 acres), once a manufacturer of bows and arrows for the hunting industry and operated in the County from 1947 to 1978, prior to its relocation to Florida. After 1978, portions of the site saw sporadic use as warehouse space, with reports of chemical waste dumping and burial. Contaminants like polynuclear aromatic hydrocarbons (PAHs), heavy metals (mercury and hexavalent chromium), asbestos, and lead-based paint present concerns for the County. The extent of contamination is unclear and further assessment is required. The County identified Bear Archery as a priority site because of concerns that contaminants are impacting the AuSable River and it has great redevelopment potential with its existing infrastructure. **2) I-75 Business Corridor - Knight#70/Grayling Citgo priority site** (206 N. James St., 0.72 acres) is occupied by two former gasoline service stations. The priority site is the gateway into downtown Grayling's commercial district and is within 150 feet of the Au Sable River. The County is not sure if underground storage tanks (USTs) remain at the site and is concerned that gasoline contamination is present in soil and groundwater. This contamination may be impacting residents by petroleum vapors entering their homes or contamination is migrating into the AuSable River. The County identified **Knight#70/Grayling Citgo** as a priority site because of its need of assessment due to concern about resident's safety living near the site or encountering contamination as they use public parks and the River downgradient of the site. **3) Grayling Industrial Park – Grayling Dump priority site** (Industrial Street, 41.5 acres) is in the south portion of the Grayling Industrial Park and adjacent to the existing wastewater treatment plant. This area is home to most of the industrial operations in the County, from sawmills to wood treatment plants and manufacturing facilities. Known contaminants include VOCs, SVOCs, and heavy metals. The Grayling Dump priority site was a borrow pit during the 1950s construction of I-75 and was converted to an unlicensed landfill for municipal and industrial waste from the 1950s to the 1980s. When the site was closed there was no proper lining, monitoring, or capping. The **Grayling Dump** was identified as a priority site and in need of assessment because the County is concerned about contamination from the site impacting adjoining properties, specifically the summer youth camp to the northeast of the dump. The County also recognizes the redevelopment potential of the 41.5-acre parcel but needs to better understand the environmental issues associated with the site.

1.a.iii. Identifying Additional Sites: If grant funds remain after assessing the priority sites, the County will work with local governments, community organizations, health officials, and citizens to identify additional eligible sites. The County will prioritize non-priority sites based on the following: 1) sites identified that pose an imminent threat to public health and welfare; 2) sites that will be redeveloped with attainable housing; 3) sites have a strong potential for job creation, attraction/retention of businesses, and enhancing the quality of life within the community. When additional non-priority sites are nominated for grant funds, the County will determine if the site is in an underserved community and/or a disadvantaged census tract.

1.b. Revitalization of Target Areas: Crawford County's Master Plan was developed with city and township agreement. The Plans key objectives are: 1) promote economic development opportunities in existing commercial and industrial centers, 2) preserve and enhance natural resources, and 3) encourage development of all types of housing (low income, care facilities, multi-family) near community facilities and shopping areas.

1.b.i. Reuse Strategy and Alignment with Revitalization Plans: Through collaborative efforts, the County and City of Grayling are focused on redeveloping the **Bear Archery** and **Knight#70/Grayling Citgo** priority sites to align with Grayling's revitalization plan. These sites are only 0.6 miles apart and are connected by the Au Sable River. The goal is to attract quality retail, restaurants, and affordable housing while promoting walkability (tying into the Grayling Bicycle Turnpike) and incorporating natural areas. Reuse strategies for these sites include riverfront villas, retail spaces, outdoor dining areas, and interactive natural spaces. Grayling also plans to expand the existing boardwalk in City Park to connect these sites, enhancing downtown walkability and creating unique opportunities for outdoor experience, for both residents and

tourists. These redevelopments provide opportunities to residents for better paying jobs and better qualities of life while incorporating modern, energy-efficient building systems and renewable energy sources, such as solar panels or biomass heaters, which aligns with the Master Plan's objectives for economic growth, housing, greenspace, and climate change mitigation.

As for the **Grayling Dump** priority site, two potential reuse options are being considered. The first option involves preparing the site for warehousing or industrial development to complement the surrounding area and leverage the nearby railroad. Alternatively, given its proximity to Grayling's wastewater treatment plant, the site could support a green energy utility/infrastructure business, such as a solar field. Both options align with the Master Plan's goals of preserving natural resources, promoting economic development in industrial areas, and seizing green opportunities to address climate change regionally.

1.b.ii Outcomes and Benefits of Reuse Strategy: Reinvestment in the **I-75 Business Corridor** and **Grayling Industrial Park** will result in expanded tax base, employment opportunities, modern amenities for local residents, and continue to enhance Grayling, while preserving the natural resources that the County is dependent on. Outcomes associated with redevelopment of the **Bear Archery** site include blight removal and construction of mixed-use development including 49 affordable residential units, shops, and office space. The redevelopment will directly connect to downtown Grayling and will expand the existing Grayling Bicycle Turnpike. Redevelopment activities adjacent to the Au Sable River also allow for land use planning, protection of residents, and adaptation of new buildings that will anticipate potential changes due to climate change in the County. The benefits associated with redevelopment of the **Knight#70/Grayling Citgo** priority site will include expansion of parks and green space adjacent to the Au Sable River, which also allows for planning to ensure safe use and protection of businesses and residents near the river through implementation of mitigation measures to better deal with future flooding. Redevelopment of the former gasoline station sites along the **I-75 Business Corridor** as you enter downtown Grayling will also spur economic growth redevelopment in the main downtown area. The outcomes and benefits associated with redevelopment of the **Grayling Dump** priority site will be removal of contamination to allow for a new warehousing or industrial redevelopment that will create 200 temporary construction jobs and 100 permanent jobs and will bring \$50 million in private investment into the County. Alternatively, the priority site may be redeveloped to support a green energy utility/infrastructure business, such as a solar field. This will bring in \$15 million in private investment and create 75 temporary construction jobs and 5 to 10 permanent jobs.

1.c. Strategy for Leveraging Resources: 1.c.i. Resources Needed for Site Reuse: Crawford County and the City of Grayling have a track record of successfully leveraging resources for site revitalization. To date, they've secured over \$2.2 million from state and federal agencies for environmental assessments, demolition, and cleanup in the **I-75 Business Corridor** and **Grayling Industrial Park** target areas.

Table 1. Key Resources

Source	Description	Eligibility	Potential Funding Use
Michigan Department of Environment, Great Lakes and Energy (EGLE) grants and loans	Grants/loans of up to \$1M for projects that promote economic development and reuse of brownfields	Local units of government can apply	Assessment, due care and remedial activities, demolition, and lead/asbestos abatement. Abatement, demolition, exposure barriers/mitigation systems on the Bear Archery and Knight #70/Grayling Citgo priority sites. Cleanup and monitoring of the Grayling Dump priority site.
Michigan Natural Resources Trust Fund (MNRTF)	Grants that support development and improvement of	Local units of government can apply	Inclusion of brownfields into trails/greenways/ parks/rec facilities. Support development of green space/ trail area <i>along the Au Sable</i>

	public outdoor recreation opportunities		<i>River on the Bear Archery and Knight #70/Grayling Citgo sites.</i>
Community Development Block Grants (CDBG)	Funding for improvements in low-moderate income areas (both target areas)	The County can apply for CDBG funds for Grayling and other townships	Rehabilitation of structures on brownfields and redevelopment of brownfields into public-use facilities. Support affordable residential redevelopment on <i>Bear Archery</i> priority site and other non-priority sites within the target areas.

Additionally, the County’s Brownfield Redevelopment Authority enables capture of incremental taxes (TIF) on projects, reimbursing eligible costs for assessment, remediation, and redevelopment. US. EPA support will amplify these efforts.

1.c.ii. Use of Existing Infrastructure: Infrastructure is in place in the target areas, including power, broadband, water, natural gas, and sanitary sewer systems. Recent upgrades to Grayling’s sanitary sewer infrastructure support redevelopment efforts within the city limits and along the I-75 Business Corridor, eliminating the need for additional infrastructure funds at the priority sites. Grant funds will be used to assess brownfields in these areas, encouraging the reuse of sites with existing infrastructure.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need: 2.a.i. The Community’s Need for Funding: The County’s financial challenges are evident due to a land base that is predominantly state and federally owned (75%¹). Property taxes from the towns and townships in the area make up only 55%² of the County’s revenue due to its population, which is 13,904. Despite servicing a large geography of 576 square miles, the County operates on a budget of only \$9 million². Most of the budget is being spent on general services, including maintenance of existing buildings, salaries for municipal employees, the local jail, and department of public works. Funds are not available to assist with evaluation or remediation of contaminated sites or to provide funding for development / redevelopment activities. The target area in Grayling (population 1,969) is also a low-income community with 30% of families living below the national poverty level and the median household income (\$38,147.00) at almost half the national rate (\$64,994.00). Tax revenues generated from residents and property taxes are being used to meet the current basic needs of the community and additional funds are not available to assess brownfields or assist with redevelopment activities.

2.a.ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: Vulnerable groups in the County, such as seniors (25%), children (18%), and single mothers (20%)¹, grapple with elevated poverty rates and unemployment, compounded by the detrimental effects of brownfield exposures, leading to heightened health concerns, including cancer and low birth weights. The County experiences an unemployment rate of 7.4%¹, which is higher than the state and national rates (6.5% and 5.5%)¹. In our target areas, the poverty rate is a staggering 19.6%¹, over 1.5 times higher than the U.S. rate (12.8%)¹. These areas are home to residents who lack access to adequate year-round, sustainable job opportunities and struggle to relocate due to financial constraints. The impact of these challenges is evident in statistics like the fact that 34.3% of children, 13% of seniors, and 56% of single mothers in the target areas live below the poverty level. Food stamp/SNAP benefit use stands at 18%¹, and the median household income is only \$38,147, nearly half the U.S. median (\$64,994)¹. At the County level, elevated rates of free/reduce price school lunch eligibility (60.3%)² and children aged 0-4 who received women, infant, and children benefits (62.9%)² are present. Residents of **I-75 Business Corridor** target area also struggle with access to clean drinking water due to a migrating PFAS groundwater plume that has contaminated over 100 private drinking water wells. A separate source of PFAS contamination was identified in the Grayling Industrial Park target area in 2020 is currently

¹ 2021 American Community Survey
² 2022 Kids Count in Michigan – Crawford County

under State evaluation. The cancer rates (Table 2) for Crawford County exceed the state and national rates and are potentially tied to PFAS contamination in the target area. An additional threat to sensitive populations is aged and dangerous housing. Moreover, nearly 75% of homes in our target areas were constructed before 1980³, exposing residents to lead-based paint and asbestos hazards. These conditions adversely affect the health and welfare of our sensitive populations. The County’s grant-funded assessments will identify the nature and extent of contamination, allowing it to implement cleanup plans that limit exposures, reduce blight, and remove contamination, ultimately stimulating reinvestment, redevelopment, and improved health and welfare in our target areas. This grant will identify, control, and remove contamination, improving the health and well-being of the community.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions. Table 2 summarizes mortality rates the County disproportionately struggles with in comparison to the State and Country. Health statistics are not available for the target area.

Table 2. Mortality Rates – Chronic Disease

Health Condition	US ²	Michigan ¹	Crawford County ¹
Heart Disease	173.8	266.3.0	269.9
Cancer	146.6	159.0	198.7
Chronic Lower Respiratory Disease	34.7	123.8	223.8

¹ mdch.state.mi.us; select chronic disease, cases per 100,000 population ² NCHS data brief December 2022, age-adjusted death rate for the 10 leading causes of death in 2021.

The County is in the lower half of Michigan’s overall health rankings³ and the presence of brownfields in the County, especially in the target areas where most of the population resides, is likely a driver. Brownfields in these areas negatively impact residents, especially sensitive populations (the elderly, impoverished children, and destitute single mothers) by exposing them to numerous contaminants via direct contact, ingestion, airborne particulate inhalation, and vapor intrusion pathways. The leading cause of death in the County is heart disease. Exposure to various contaminants known and suspected at priority sites and other brownfield sites within the target areas may be contributing to the premature death from heart disease, cancer, and chronic lower respiratory disease. Brownfields health threats to these sensitive populations will be identified by completing assessments that will identify the hazardous substances to which residents may be exposed. These exposures can be reduced through remediation and/or installing controls during redevelopment.

(3) Environmental Justice: a. Identification of Environmental Justice Issues: The target area and the priority sites are in a disadvantaged census tract as defined by the White House Council on Environmental Quality in the Environmental Justice Screening and Mapping Tool (EJSCREEN) and the CEJST. The **Bear Archery, Knight#70/Grayling Citgo, and Grayling Dump priority sites** are in low-income communities (73rd percentile). The residents and sensitive populations in this area are also using more of their income to pay for energy cost (95th percentile), which is taking more of their income away from items like food and clothing. Another disparity impacting residents and sensitive populations is heart disease (90th percentile), which may be due to issues associated with brownfields in the target area. The screening tools also show community vulnerability to several environmental risks including lead paint exposure (50th percentile), flooding (70th percentile), and wildfire occurrence (81st percentile). In fact, in 2023, approximately 7,500 acres of forest land located south of Grayling in the County was ravaged by a wildfire.

b. Advancing Environmental Justice: This grant will be used to improve and enhance the target area and Crawford County by redeveloping blighted commercial and industrial sites into mixed-use developments with mixed-income residential housing, retail, and office space. Through development of the **Grayling Dump** site as a solar farm, the City of Grayling will be assisting disadvantaged residents by reducing energy costs. The focused redevelopment in the target areas

³ 2022 County Health Rankings

will minimize the displacement of existing residents or business in the disadvantaged census tract. The County is focused on enhancing residents’ lives, improving the economy of the county, and protecting the natural resources that are so important to residents and visitors to Crawford County.

2.b. Community Engagement

2.b.i-2.b.ii. Project Involvement and Project Roles: The following community partners will be involved in the project.

Table 3. Public Involvement and Project Roles

Partner Name	Point of Contact	Specific Role in the Project
<p>Huron Pines Nonprofit whose mission is to conserve and restore Northern Michigan’s natural resources to ensure healthy water, protected places, and vibrant communities.</p>	<p>Abigail Ertel Community Program Lead abby@huronpines.org</p>	<p>Provide input regarding ecological components in the redevelopment of the riverfront sites including the <i>Bear Archery</i> and <i>Knight#70/Grayling Citgo</i> priority sites and help identify non-priority sites that are impacting the County’s natural resources.</p>
<p>Grayling Main Street Economic development program that uses community collaboration in downtown Grayling to promote artisan and outdoor recreation uses.</p>	<p>Jillian Tremonti Executive Director Downtowngrayling@gmail.com</p>	<p>Promote the Grant and assist with outreach to residents and businesses in the target area. Provide grants to assist with the redevelopments of the <i>Bear Archery</i> and <i>Knight#70/Grayling Citgo</i> priority sites</p>
<p>Grayling Regional Chamber of Commerce (GRCC) Business and economic development arm in the County. Focused on protecting and advancing economic and business development, community image, natural resources, and quality of life in the County.</p>	<p>Hayley Strohpaal Executive Director hayley@graylingchamber.com</p>	<p>The GRCC will have a key role with helping the County communicate the award of the Grant to the local business community. GRCC will also initiate seminars and workshops to educate community leaders about the opportunities the Grant creates for the County. They will also contribute to community outreach efforts for priority and non-priority sites and connect developers with market assessed sites ready for development.</p>

2.b.iii. Incorporating Community Input: The grant award will be announced through various channels, including press releases, County website, shared content for social media, radio, and direct communications. The County will engage with the business community, municipalities, and townships, ensuring residents are informed and involved. Key project partners identified in Table 3 will be notified and given information to distribute and place on their websites. The County will host two public kick-off meetings in the target area. The County will also work with local leaders, religious organizations, and Munson Healthcare (the local hospital) to reach underserved residents and groups directly affected by project work on the priority sites. At these meetings, residents will be asked to comment on the priority sites and proposed reuse as well as to identify additional sites they feel should be assessed. The County will work with its key project partners to acquaint the County at-large with the grant project. All the additional sites

identified at these meetings will be added to the County’s list of potential sites for funding and be prioritized as discussed in Section 1.a.iii. This step is needed to ensure that the public’s concerns are incorporated into the project. These meetings will include a virtual option using video conferencing software (e.g., Zoom or Teams).

As part of ongoing outreach as additional sites are selected for assessment, the County will present the reasoning for the selection on their internet forums and solicit public feedback as well as conduct stakeholder meetings/interviews. Public meetings will be held at readily identifiable and accessible public buildings in, or as close as possible to, the site to receive and discuss additional comments. As above, the meetings will have a virtual option. If health threats are identified, written notices will be sent to impacted citizens, and the Crawford County Health Department will be contacted. At project completion, a public meeting will be held to share outcomes and gather input for future initiatives. Presentation materials and minutes will be archived and made publicly available on the County’s website.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs: The County will use the grant to assess priority sites and other high-risk and developable non-priority sites during the 4-year grant period. No subawards or participant support costs are anticipated. These 4 tasks will accomplish the plan.

Task 1 – Programmatic and Outreach	
<i>i. Project Implementation</i>	<ul style="list-style-type: none"> • The County will prepare a Work Plan and secure the Cooperative Agreement (CA). Project and financial tracking will be initiated. • A Qualified Environmental Professional (QEP) will be retained following applicable federal procurement regulations. • Quarterly reports will be submitted using the Assessment, Cleanup, and Redevelopment Exchange System (ACRES); MBE/WBE/DBE reports; project closeout documentation will be submitted. • Staff will attend an EPA National Brownfields Conference. • The County will host a grant “kick-off” meeting for Grayling and the townships. • Community Outreach Activities: Press releases, site-specific meetings, and project updates will be posted to County and/or community partner websites/social media pages. Impacted residents will be notified of assessments. • Local health department assistance to identify/prioritize health risks at project sites.
<i>ii. Anticipated Schedule</i>	<ul style="list-style-type: none"> • The Work Plan will be prepared within 1 month of the grant award; CA will be executed by September 2024 CA compliance tracking and financial systems will be set up upon award of grant and maintained throughout the term of the grant. • A QEP will be retained within three months of the executed CA. • After the grant award, ACRES will be updated and quarterly reports will be submitted within 30 days of the end of the reporting period. Annually, ACRES will be updated with cleanup and redevelopment data. Annual MBE/WBE reports will be submitted. Project closeout documents will be submitted when the performance period ends. • Staff will attend the 2025 EPA National Brownfields Conference. • A project “kick-off” meeting will be held within 1 month of the grant award. Kick-off meetings will also be scheduled with Grayling and townships during the 1st quarter of 2025. • Community outreach will begin upon the grant award and will continue for the 4 year period.
<i>iii. Task/Activity Lead:</i>	The County is the lead for programmatic and outreach activities.
<i>iv. Outputs</i>	1 Work Plan, 1 CA, 16 quarterly reports; ACRES updates, 4 MBE/WBE reports, grant closeout documentation, and outreach meetings/materials.
Task 2 – Site Inventory	

<i>i. Project Implementation:</i> Solicit community input for non-priority site identification; interview stakeholders and visit sites to determine if projects meet eligibility and prioritization scoring criteria.
<i>ii. Anticipated Schedule:</i> Initiate upon grant award and continue through the performance period.
<i>iii. Task/Activity Lead:</i> The County will lead this task.
<i>iv. Outputs</i> Updates and reprioritization of the County’s brownfields inventory.
Task 3 – Site Assessment
<i>i. Project Implementation</i> <ul style="list-style-type: none"> • The QEP will prepare a Quality Assurance Project Plan (QAPP) for EPA approval. • The QEP will assess priority and non-priority sites based on inventory prioritization. • Priority and non-priority sites will be assessed after site access is secured through completion of Phase I and/or Phase II Environmental Site Assessments (ESAs) conducted in accordance with All Appropriate Inquiry (ASTM Standards E1527-21, E1903-19) and other ASTM standards. Hazardous Materials Assessments (HMAs) may also be conducted as part of site assessment. • The County and QEP will meet quarterly to ensure a satisfactory project schedule is fulfilled.
<i>ii. Anticipated Schedule</i> <ul style="list-style-type: none"> • Once sites are selected and access is secured, eligibility requests will be submitted for EPA approval. Phase I ESAs will begin in the 1st quarter 2025 and continue throughout the grant term. • Phase II ESAs and HMAs will begin once the QAPP receives EPA approval. This depends on EPA timing but is anticipated by April 2025. Assessments will continue throughout the 4-year performance period. • Quarterly progress meetings between the County and the QEP will begin upon selection of the QEP and will continue throughout the term of the grant.
<i>iii. Task/Activity Lead:</i> The QEP will lead this task.
<i>iv. Outputs</i> 1 QAPP, 3 QAPP update letters, 4 HMA, 10 Phase I ESA, 10 Phase II ESA reports, and 3 cleanup planning documents.
Task 4 – Cleanup Planning
<i>i. Project Implementation</i> Cleanup/redevelopment planning as required by various State of Michigan programs for priority and non-priority sites where redevelopment is imminent. This may include evaluation of cleanup and redevelopment alternatives and/or preparation of Remedial Action Plans, State brownfield cleanup grant/loan applications, or Brownfield Plans/Work Plans to support acquisition of tax increment financing (TIF).
<i>ii. Anticipated Schedule</i> Cleanup planning will be conducted at priority and non-priority sites after the completion of assessment activities and will continue throughout the life of the grant.
<i>iii. Task/Activity Lead:</i> The QEP will lead this task.
<i>iv. Outputs:</i> 3 cleanup planning documents.

3.b. Cost Estimates: Approximately 95% of the Assessment Grant budget will be used for site assessment and cleanup planning. This is the strategy that was used for the FY20 EPA Assessment Grant. The remaining 5% will be split between programmatic activities (3%) and inventory/prioritization of sites (2%).

Task 1 – Programmatic/Community Outreach: \$10,000

- **Personnel: \$3,000** for QEP selection/oversight, progress meetings, and reporting throughout term of the grant. 60 hours at an average rate of \$50/hour.
- **Travel: \$2,000** for one person to attend one U.S. EPA Brownfields Conference: registration-\$200, airfare-\$700, 4 nights hotel-\$740, 4 days per diem and incidentals-\$360.
- **Contractual: \$5,000** for QEP to compile ACRES quarterly reports, attend progress meetings, and outreach activities throughout term of the grant.

Task 2 - Site Inventory and Prioritization: \$6,000

- **Personnel: \$3,000** for stakeholder interviews, project site visits, and prioritization of sites throughout term of grant. 60 hours at average rate of \$50/hour.
- **Contractual: \$3,000** for QEP assistance on interviews, site visits, and eligibility determination requests throughout term of grant.

Task 3 – Site Assessment: \$269,000

- **Contractual: \$269,000** for QEP to conduct and prepare deliverables for:
 1 QAPP and updates = \$3,000 10 Phase I ESAs @ \$4,000 each = \$40,000
 4 HMAs @ \$6,500 = \$26,000 10 Phase II ESAs @ \$20,000 each = \$200,000

Task 4 – Cleanup Planning: \$15,000

- **Contractual: 3** cleanup planning documents at average cost of \$5,000

Table 4. EPA Brownfields Assessment Budget Request

Budget Categories		Program Tasks				Total Budget
		Task 1 Programmatic/ Outreach	Task 2 Site Inventory	Task 3 Site Assessment	Task 4 Cleanup Planning	
Direct Costs ¹	Personnel ²	\$3,000	\$3,000	---	---	\$6,000
	Travel	\$2,000	---	---	---	\$2,000
	Contractual	\$5,000	\$3,000	\$269,000	\$15,000	\$292,000
Total Budget		\$10,000	\$6,000	\$269,000	\$15,000	\$300,000

¹No indirect costs will be incurred, ²* staff time will be contributed for amounts over those accounted for under the personnel budget category

3.c. Plan to Measure and Evaluate Environmental Progress and Results: The County will track, measure outputs (e.g. Phase I and II ESAs, HMAs, meetings), and assess environmental impacts, tracking outputs (e.g. number of assessments, meetings) and outcomes (e.g. land area assessed, jobs created, revenue generated) in ACRES. Additional updates on meetings, staff training, and community outreach will be included in quarterly reports. Progress will be evaluated biannually, with any shortcomings addressed through discussions with the QEP and stakeholders to adjust the project approach.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability: 4.a.i. Organizational Capacity: Crawford County has the capacity to carry out the programmatic, administrative, and financial requirements for this Grant. The County will use the same organizational structure and team that resulted in utilization of the County’s 2020 EPA Assessment Grant one year ahead of schedule.

4.a.ii. – 4.a.iii Organizational Structure and Description of Key Staff: **Mr. Paul Compo** will act as the Project Director. He has 24 years of municipal management, financial management, and federal and non-federal grant management experience. **Mr. Compo** will provide overall grant management, program requirements, and payment requests. **Ms. Kate Wagner** will be the Assistant Project Director and will financially manage the project, including budget reviews and payment transfers through the Automated Standard Application for Payments (ASAP) system. **Ms. Wagner** has 23 years of financial management experience and will serve as the backup Project Director. The project team has proven through the 2020 EPA Assessment Grant that they have the programmatic and administrative experience necessary to reach project goals within a 4-year performance period.

4.a.iv. Acquiring Additional Resources: The County will retain a Qualified Environmental Professional (QEP) to execute site assessments. With an established procurement processes, the County has a track record of securing contractors for various state and federal grant projects, including assessment grants. Procurement procedures align with federal regulations (40 CFR §31.36) and include provisions to encourage the involvement of minority- and women-owned businesses whenever feasible. The County is also committed to strong hiring practices that include procurement of local firms or spurring connections between the local workforce and

firms to create employment opportunities for residents. This allows residents to be part of and take pride in enhancing their community. Upon approval of the Cooperative Agreement (CA), the County will initiate the Request for Qualifications process and supervise the procurement process. The selected QED(s) will bring extensive experience in managing U.S. EPA Assessment Grants, Michigan's Voluntary Cleanup Program, and Michigan's Brownfield Law (Act 381), ensuring a comprehensive understanding of all programmatic requirements.

4.b. Past Performance and Accomplishments: 4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: The County received a \$300,000 FY2020 EPA Brownfields Community-Wide Assessment Grant.

(1) Purpose and Accomplishments: Having successfully deployed the FY2020 grant funds one year ahead of schedule, the County's outputs, included engagement with the County's Brownfield Redevelopment Authority, 9 Phase I ESAs, 9 Phase II ESAs, and 5 Hazardous Materials Assessments. Also, 6 Baseline Environmental Site Assessment reports and 1 Plan to Comply with Due Care. Additionally, the County submitted an EGLE grant application for cleanup funding. These outputs translated directly into tangible outcomes. Notably, three brownfield sites were acquired by private entities, and the County successfully demolished seven blighted structures. Grant funds were the catalyst for redevelopment and rehabilitation of these sites, including the Hospitality House priority site. The economic impact of the FY2020 grant spurred nearly \$35 million in private investments, created over 100 temporary construction jobs, and 11 permanent positions. Most important the Grant facilitated the development of over 100 modern apartment units for local residents and increased the taxable base by at least \$2 million. At the time of this application submission, outputs and outcomes were accurately reflected in ACRES.

(2) Compliance with Grant Requirements: Crawford County was able to spend all the grant funds for the FY2020 Assessment Grant, which was closed on September 30, 2023 and managed it in compliance with grant requirements. Crawford County negotiated the Cooperative Agreement (CA) with the U.S. EPA and obtained approval for the Quality Assurance Project Plan (QAPP), along with all required updates. The County developed Sampling and Analysis Plans (SAPs) and Health and Safety Plans to support Phase II activities. The County adhered rigorously to the Work Plan and its associated schedules, terms, and conditions. Timely quarterly reports have been consistently submitted through ACRES, ensuring transparency and accountability.

**FY2024 USEPA BROWNFIELDS COMMUNITY-WIDE ASSESSMENT
GRANT PROPOSAL**

CRAWFORD COUNTY, MICHIGAN

RESPONSES TO THRESHOLD CRITERIA

1. Applicant Eligibility: Crawford County is a General Purpose Unit of Local Government in the State of Michigan.
2. Community Involvement: Crawford County believes it is important to provide its citizens and community organizations ample opportunity to become informed and provide input into all phases of the Project. Following the U.S. EPA Assessment Grant (the Grant) award notice, Crawford County will announce the award to the community through a press release to the local newspaper (the Crawford County Avalanche) and notices on the County website (www.crawfordco.org) and social media pages. Our community partners will assist with the notification process if needed, and we will capitalize on our relationships with the Crawford County Economic Development Partnership and the Grayling Regional Chamber of Commerce to gain exposure in the business community. Translations and translated documents will be made available upon request to assist non-English speaking residents to ensure full participation in the Grant. We will coordinate with the City of Grayling to disseminate information to their residents and businesses, particularly those within the target areas. Crawford County will also notify the six townships within the County of the grant award and encourage them to discuss the award in their respective council meetings and to promote the use of these funds through interactions with residents, businesses, and developers. Crawford County will include instructions on how to reach a pertinent Grant contact person in the initial press release campaign.

The primary post-award community input program will be focused on preparation of the grant Work Plan and final budget. The draft Work Plan will be made available to the public, and comments will be solicited. The document will be posted on the County's website. Hard copies will also be available at Crawford County, Grayling, and the six townships' municipal offices to ensure access for those without adequate information technology availability, knowledge, or experience. Public comments on the proposed project and allocation of grant funds will be accepted verbally, in writing, and publicly discussed during a public meeting. The draft Work Plan will be modified to better serve the community in response to comments and public comments/responses will be summarized in the final Work Plan.

Following approval of the Work Plan, the County will seek public input prior to conducting assessments at priority sites and when additional information regarding the Project is requested by citizens by attending community meetings. Activities at the sites will be discussed to familiarize stakeholders with what to expect during and after the assessment process. After assessment, local stakeholders will be made aware of assessment results and any health or environmental impacts will be explained. If health threats are identified, written notices will be sent to impacted citizens, and the Crawford County Health Department and the Michigan Department of Environment, Great Lakes, and Energy will be contacted. When cleanup and/or redevelopment planning is initiated, Crawford County will explain plans and rationales and solicit comments and feedback on

those plans, communicating with various community groups as outlined above. At the close of the project, the County will hold a final public meeting to present the outcomes of the project, and request comments regarding interest in pursuing additional grants. The presentation materials and minutes will be archived and made publicly available on the Crawford County website.

3. Expenditure of Assessment Grant Funds: Crawford County has no open Assessment or Multipurpose Grants.
4. Contractors and Subrecipients: N/A – Crawford County has not procured a contractor or named a subrecipient.