



COUNTY OF ST. CLAIR

Office of the Administrator/Controller



Karry Hepting, CPA
Administrator/Controller
kahepting@stclaircounty.org
Phone: 810-989-6900

Jennifer Posey
Administrative Services Manager
jposey@stclaircounty.org
Phone: 810-989-6900

Dena S. Alderdyce, CGFM
Finance Director
dalderdyce@stclaircounty.org
Phone: 810-989-6324

Office Address:
200 Grand River Avenue
Suite 203
Port Huron, MI 48060
Phone: 810-989-6900
Fax: 810-985-3463
www.stclaircounty.org

NARRATIVE INFORMATION SHEET

1. **Applicant Identification:** St. Clair County, Michigan
200 Grand River Avenue, Suite 203
Port Huron, Michigan 48060
2. **Funding Requested**
 - a. Assessment Grant Type: Community-wide
 - b. Federal Funds Requested: \$500,000
3. **Location:** St. Clair County, Michigan
4. **Target Area and Priority Site Information:**
Target Area: 25-Mile St. Clair River Corridor (part of Census Tracts 26147625000, 26147626000, 26147628000, 26147636000, 26147642000, 26147643000, and 26147644000)
 - o *Priority Site 1: Dunn Paper*, 218 Riverview Street, Port Huron, MI (CT26147628000)
 - o *Priority Site 2: Domtar Corporation*, 1700 Washington Avenue, Port Huron, MI 48060 (CT26147625000 and CT26147626000)
 - o *Priority Site 3: Anchor Recycling*, 2829 Goulden Street, Port Huron Township, MI 48060 (CT26147636000)
 - o *Priority Site 4: St. Clair Power Plant*, 4877 M-29, East China Township, MI 48054 (CT26147643000)
5. **Contacts**
 - a. Project Director: Geoffrey E. Donaldson
Senior Planner
(810) 989-6950
gdonaldson@stclaircounty.org
200 Grand River Avenue, Suite 202
Port Huron, Michigan 48060
 - b. Chief Executive/Highest Ranking Elected Official: Karry A. Hepting
County Administrator
(810) 989-6900
khepting@stclaircounty.org
200 Grand River Avenue, Suite 203
Port Huron, Michigan 48060



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6. Population:

St. Clair County, 160,053
City of Port Huron, 28,983
Port Huron Township, 10,792
East China Township, 3,704

7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	2
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water.	1, 2, 3, 4, 5, 6
The priority site(s) is in a federally designated flood plain.	1, 5
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	3, 10
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	4, 5
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 (2013 or later) or is closing.	2, 3, 4, 6

8. Letter from the State or Tribal Environmental Authority (Attached)

9. Releasing Copies of Applications: N/A



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 26, 2023

VIA EMAIL

Karry Hepting
St. Clair County Administrator
200 Grand River Avenue, Suite 203
Port Huron, Michigan 48060-4017

Dear Karry Hepting:

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 St. Clair 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.

St. Clair County is applying for a \$500,000 Community-wide Brownfield Assessment Grant. As a general-purpose unit of local government, St. Clair County is an eligible grant applicant.

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

Sincerely,

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

cc: Michelle Bakun

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 Area

St. Clair County (**geographic area**) is the cornerstone of Michigan’s Blue Water Area and is known for the Blue Water Bridge, the second busiest international crossing to Canada (Ontario) due to its proximity to large economic and population centers (it is 60 miles north of Detroit and 180 miles southwest of Toronto). Historically, the St. Clair River and Blue Water Bridge attracted commerce, which brought a convergence of industry, rail, and major transportation routes from the City of Port Huron (county seat) to farther south along the river to the City of Marine City. The river became a resource for water, shipping, and waste disposal. Coal and aggregate docks, fueling depots, power plants, paper mills, and other sources of contamination were concentrated along and within 1 mile of the river. At the turn of the 20th century, the automotive industry exploded in the county, but this boom ended when Michigan entered its “one-state recession” during the first decade of the 21st century. According to the Bureau of Economic Analysis, Michigan is still below the national average in per capita income. This decline has left industrial buildings, associated support businesses (e.g., gas stations), micro-industrial shops, and infrastructure throughout the county vacant, abandoned, and underutilized. Numerous properties along the corridor of the St. Clair River are impacted with petroleum, metals, solvents, and other chemicals. Further, due to decades of pollution from the U.S. and Canada’s “Chemical Valley” across the river, the beautiful St. Clair River has been designated a Great Lakes Area of Concern (AOC). Since 2012, the AOC has received \$21 million of Great Lakes Restoration Initiative funding to remove 8 of the 10 Beneficial Use Impairments (BUIs) through various restoration projects along the river (usepa.gov). The two remaining BUIs include restrictions on fish and wildlife consumption and drinking water consumption. The fish consumption restrictions impact low-income local populations that rely on fish for food. The drinking water restriction is in place due to the occurrences of spills from chemical plants and industry along the river.

Although this application is intended to be community-wide throughout St. Clair County, the primary **target area** for our assessment and reuse efforts will be the **River Corridor**, an approximately 25-mile corridor along the St. Clair River extending from the City of Port Huron, south through Port Huron Township, the City of Marysville, the City of St. Clair, East China Township, Marine City, and the townships in between. There are over 500 known sites of hazardous and petroleum contamination countywide, with 66% of these sites concentrated in the River Corridor target area (michigan.gov/EGLE). This target area represents the greatest concentration of existing and historical industrial activity and contaminated sites in St. Clair County. Contaminated sites within the target area have the potential to negatively impact adjacent, low-income, underserved residents, which is anticipated to be exacerbated by climate change. Impacts include chronic and acute diseases or ailments, reduced property values, blight, and increased crime due to vacancies and disinvestment, which perpetuates a cycle of poverty. This EPA Grant will act as a catalyst for reuse and redevelopment of these sites by providing funds for Phase I and II environmental assessments, hazardous material building surveys including lead and asbestos surveys, due care, and cleanup planning, including planning for climate mitigation strategies. Without upfront funding to determine the potential environmental risks associated with these properties, they will remain stalled in a legacy of uncertainty. Knowledge is key to turning this legacy around and helping emerging entrepreneurs reinvest in their communities, breaking the cycle of neglect, blight, and unaddressed contamination. The information gained from assessing a site will also help to attract additional funding from local, state, and federal sources.

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

The 25-mile River Corridor target area stretches from the City of Port Huron at the northern end to Marine City at the southern end. The St. Clair River was historically a resource for industrial activity (e.g., water, waste disposal, shipping, and transportation) and many now-closed supporting businesses (gas stations, auto/truck repair shops, waste hauling, etc.). 66% (333 sites) of the known sites of contamination in the county and nearly 54% (86 sites) of the known Leaking Underground Storage Tank sites are concentrated in this River Corridor (michigan.gov/EGLE). Many areas immediately adjacent to the St. Clair River along the corridor are **Federally Designated Flood Plains**, including all our priority sites with the exception of the Anchor Recycling site. The following priority sites demonstrate the large environmental and economic challenges faced by these small communities.

1. **Dunn Paper (BiOrigin Specialty Products):** At the northern end of the River Corridor in the City of Port Huron (population 28,983) is the **Dunn Paper** mill, located in Census Tract (CT) 6280, which

is disadvantaged based on the Climate and Economic Justice Screening Tool (CEJST). The Mill began manufacturing specialty paper to the food and medical industries in 1924 and officially ceased operations in mid-October of 2022. The mill consists of six parcels (12.3 acres) with numerous vacant structures and represents over \$1 million of taxable value; its closure eliminated over 125 jobs (Milmi.org/WARN). Although it is certain that various chemicals including petroleum lubricants and fuels, inks, and potentially per- and polyfluoroalkyl substances (PFAS)/perfluorooctane sulfonic acid (PFOS) have been used at the site, it is uncertain what environmental impacts nearly 100 years of papermaking has left at this location, the adjacent neighborhoods, and the St. Clair River. With the closure of **Dunn Paper**, it will be important to assess and address contamination that remains and likely continues to enter the river and impact area residents. A future that celebrates the riverfront and eliminates potential environmental stressors to adjacent residents is a priority for the city.

2. **Domtar Corporation:** In the City of Port Huron, just 2 miles southwest of **Dunn Paper**, is the **Domtar Corporation** paper mill, which closed its doors in 2020, eliminating 200 jobs. This heavily industrialized, 29-acre site with numerous vacant structures is along the Black River, which empties into the St. Clair River, and is bordered to the north and east by low-income residential neighborhoods (CEJST Disadvantaged CT6250 and 6260). During its 132 years of operation, the mill used petroleum and solvent-based inks, petroleum lubricants and fuels, and coal for power generation. Limited investigations over the years have identified mercury in soil and PFAS in groundwater, but it is anticipated that additional assessment will reveal historical contamination that has been potentially impacting the adjacent residents in CT6250, which is in the 94th percentile for poverty and 21% are a minority, and CT6260, which is in the 81st percentile for poverty and 17% are a minority (MI EJScreen). The State of Michigan filed a lawsuit against Domtar in 2022 related to offsite disposal of paper sludge containing hazardous and toxic PFAS chemicals, which has contaminated soil, surface water, and groundwater supplies. Assessing, cleaning up, and reusing the site is a priority not only to ensure the health and safety of nearby residents, but also to protect the adjacent Black River, which is receiving PFAS-contaminated water from the site.
3. **Anchor Recycling:** Immediately adjacent to the City of Port Huron is Port Huron Township (population 10,792), where several brownfield sites continue to impact low-income, minority residents located in CEJST Disadvantaged CT6360, which is in the 87th percentile for poverty and 32% are a minority. **Anchor Recycling** (former Blue Water Recycling) is a 10-acre site that historically included numerous underground storage tanks, a maintenance facility, and a dump reportedly used for draining oils containing polychlorinated biphenyls from transformers. Recycled cardboard, plastics, and other materials now lie in discarded piles at this underutilized “recycling facility.” Vagrants, frequent fires, and diesel exhaust and dust from truck traffic from operations plague area residents, including a residential neighborhood directly across the street; the 2Gen Learning Center, which provides developmental childcare to children who are newborns to three years old while mothers study for their GED tests; and the St. Clair County Health Department, which abuts one end of the property. Assessing, cleaning up, and reusing the site is a priority because it will eliminate the potential exposure risks to the adjacent residents and small children, as well as improve the quality of life for the low-income, minority neighborhood.
4. **St. Clair (Coal-Fired) Power Plant:** South of the City of St. Clair is East China Township (population 3,704), home to two coal power plants: the Belle River Power Plant slated to close in 2028, which employs 200 people, and the **St. Clair Power Plant**, which closed in May of 2022 and eliminated 300 jobs. Historical coal storage, fly ash, petroleum storage tanks, and chemical use—likely contributing polynuclear aromatics, arsenic, lead, and mercury—will require extensive assessment to support reuse and attract investment and jobs. These contaminants are similar to what was found at the former DTE Marysville Coal Power Plant that closed in 2011 in the River Corridor target area, eliminating 250 jobs. Further investigation will allow for reuse vision planning to occur that will return access to the river and a safe reuse.

1.a.iii. Identifying Additional Sites

Outside of the River Corridor target area, as you move west away from the St. Clair River, there is a more rural and agricultural landscape that contains pockets of low-income, distressed neighborhoods with blighted properties, substandard housing, and disproportionate environmental stressors including abandoned industrial properties and closed gas stations/auto repair shops with solvents, petroleum, and metals contamination. The St. Clair County Brownfield Redevelopment Authority will solicit sites through educational outreach efforts and its community partners. Using its existing application process

and in concert with underserved/disadvantaged communities (CEKJST), it will evaluate and determine if grant support to a particular site is needed to understand potential or existing risks to the community and help encourage/assist with the safe redevelopment of a site.

1.b. Revitalization of the Target Area

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

While developing the county's Master Plan, the St. Clair County Metropolitan Planning Commission received input from its citizens, who identified Redevelopment and Renewal Areas as a priority within the Urban and General Services District (UGSD), which includes the target area along the St. Clair River. These areas have apparent decline with rundown houses, designated brownfields, and sites that are perceived to be contaminated due to previous industrial or commercial uses. Recommended actions included obtaining funding, encouraging home improvement, brownfield restoration, and site cleanup. Additionally, the Master Plan identified aggressive use of the St. Clair County Brownfield Redevelopment Authority (Authority), which will implement the grant and can provide funding with a tax increment financing Brownfield Plan tool, and the St. Clair County Land Bank Authority, which can secure and control property as a priority. Plans for the four identified priority sites align with the county's Master Plan and the local communities' Master Plans.

1. **Dunn Paper:** Closed in October of 2022, this 98-year-old paper mill is likely contaminated with various chemicals including petroleum, inks, and potentially PFAS/PFOS and will need environmental assessment to support reuse of the site. With residential neighborhoods to the west, the St. Clair River to the east, and a U.S. Coast Guard Station and recreational park to the north, the city desires to end the industrial legacy of this site. The EPA Grant would support residential and recreational land uses for this property which has been identified as a priority by the local residents.
2. **Domtar Corporation:** In the City of Port Huron, this 132-year-old mill has closed. Numerous legacy environmental issues remain, and an "all hands on deck" approach is required to support a reuse that eliminates or manages the environmental risks. Reuse plans that are less hard-industry intensive, complement the river and area residents, and create good jobs are being pursued. The EPA Grant will support the reuse of the property similarly to how our previous grants supported the large Marysville Power Plant project by providing environmental data to inform reuse plans.
3. **Anchor Recycling:** This site currently lowers living conditions and nearby property values and increases the potential for health effects caused by the debris, contamination, lead paint, asbestos, and other wastes. It is an environmental injustice that residents in this neighborhood are disproportionately affected by the risks and socio-economic impacts related to this site. Assessment and cleanup will support reuse plans for new, energy-efficient, affordable housing and possible green space that will raise the quality of life in this neighborhood.
4. **St. Clair (Coal-Fired) Power Plant:** East China Township is working with the power company to develop a reuse strategy that fits the township's Master Plan and addresses/manages contamination at the site while encouraging a reuse that helps replace lost jobs, attracts investment, and returns access to the river, possibly filling a gap in the Bridge to Bay Trail. This priority site will require several years of decommissioning and assessment to be available for redevelopment which could be supported by an EPA grant.

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

Over nine communities in our target area are **Disadvantaged Communities** including the cities of Port Huron and Marine City, which are also state-designated "**Eligible Distressed Areas**" that share common attributes including negative population growth, lower property values, disproportionate environmental stressor burdens and cumulative impacts, and higher poverty rates. In the City of Port Huron, 55% of its population is below the Asset Limited, Income Constrained, Employed (ALICE) or poverty threshold; this is especially apparent in CT6250 and CT6260 (near the **Domtar Paper** site), which respectively are in the 94th and 81st percentiles for residents living in poverty and 21% and 17% are minorities. In Port Huron Township, 50% of its population is below the ALICE or poverty threshold, and CT6360 (near the **Anchor Recycling** site) has a 10% unemployment rate, 87th percentile for residents living in poverty, and a 32% minority population (MI EJSscreen and CEJST).

Focusing on contaminated brownfield sites in urban, low-income areas will accomplish three major goals: (1) begin eliminating the sites and conditions that may be contributing to the degradation of susceptible populations in our underserved communities; (2) eliminate blight and provide opportunities for energy-efficient, affordable, clean housing or clean areas for recreation or community gardens; and (3) encourage additional investment and revenue generation, creating jobs and business opportunities.

Without assessing sites, it is difficult to understand the additional funding or resources necessary to prepare a site for reuse. The EPA Grant provides the impetus for attracting and leveraging both public and private investment on brownfield sites including state grants and loans, bank financing, private funding, tax increment financing through a Brownfield Plan, etc.

The 2019 St. Clair County Trail Plan envisions a 54-mile Bridge to Bay Trail that connects the communities along the River Corridor. 28 miles has been constructed, and another 18 miles is planned. The **Dunn Paper** site is just over a five-minute walk from the Blue Water Bridge Plaza trailhead for the Port Huron section of the trail and is well suited to connect the trailhead to the Lighthouse Park and Beach, directly adjacent to the site. St. Clair County and the City of Port Huron, in partnership with the Southeast Michigan Council of Governments (SEMCOG), have created concept designs for green infrastructure for coastal resilience along Lake Huron, including a bioretention area within Lighthouse Park. The coal-fired **St. Clair Power Plant** priority site is well suited for part of the trail once assessed and decommissioned. The trail provides connectivity and access to all residents and visitors regardless of their socio-economic status and offers opportunities for an active, healthy lifestyle.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse

Michigan's brownfield laws allow the St. Clair County Brownfield Redevelopment Authority (Authority) to develop Brownfield Plans for eligible project sites. These plans capture future tax increment from new investment on the property to pay for Phase I and II Site Assessments, Baseline Environmental Assessments, Due Care Plans, demolition, soil and groundwater cleanup, and lead and asbestos abatement. In the cities of Port Huron and Marine City, when the Land Bank is utilized, or when a project involves affordable housing, Brownfield Plans can pay for preparing a site, installation of infrastructure, and housing cost gaps to support a site reuse plan. The EPA Grant can be used to develop Brownfield Plans; the Authority can then use the tax increment capture from projects to reimburse eligible brownfield activities and, once the developer is reimbursed, capture another five years. This Brownfield Revolving Fund is locally controlled and can only be used for eligible activities on other known or perceived brownfield sites. Thus, the grant monies would truly act as seed money to leverage future brownfield redevelopment activities. The Authority has adopted and successfully implemented 11 Brownfield Plans to-date, which will capture millions of dollars in tax increment to reimburse developers for cleanup, demolition, due care activities, site preparation and infrastructure, and some of the Authority's previous EPA Grant funds that were used on these projects. To-date, the Authority has recaptured approximately \$61,000 in their revolving fund to support an EPA grant.

The Authority will pursue State 128a Brownfield Assessment funds to conduct free assessments on brownfield sites. The Authority also has experience accessing and implementing Michigan Department of Environment, Great Lakes, and Energy (EGLE) Brownfield Redevelopment Grants and Loans to fund site investigation, cleanup, demolition, etc. on projects. It is anticipated that EGLE will have \$15 million in grant funds available in FY2024. To-date, the Authority has been successful in using our previous EPA Grants to leverage over \$2 million in EGLE grants and loans. These grants will continue to be pursued to assist with cleaning up sites assessed using this EPA Grant.

In 2021, the Economic Development Alliance of St. Clair County was awarded a \$3.4 million Economic Development Administration grant to construct an 11,000-square-foot headquarters building in the River Corridor on a contaminated former industrial complex along the St. Clair River. The grant will be matched with \$734,421 in local funds and over \$3.3 million in state funds, as well as a \$750,000 EGLE grant to address risk-exposure from contamination. It is expected to help create 125 jobs and generate \$5.1 million in private investment in the City of Port Huron. The project will elevate the region's entrepreneurial resources to attract entrepreneurs, innovators, early and second-stage businesses, and assist with workforce development (voiceneWS).

1.c.ii. Use of Existing Infrastructure

The entire River Corridor target area and the priority sites are served by existing municipal utilities. In our Core Communities of Port Huron and Marine City, when we utilize the Land Bank, or when a project involves affordable housing, infrastructure improvements are eligible activities that can be reimbursed through tax increment financing in a Brownfield Plan. Communities continue to upgrade and improve utilities in the target area by pursuing grant funds for various activities including road improvements. For example, the City of St. Clair was awarded a \$1.45M State grant to rebuild Carney Drive, supporting future redevelopment of the Eddy and Gearing Schools senior housing project, which was supported by our FY2017 EPA Grant. Additionally, the St. Clair County Master Plan is addressing

climate change vulnerability along the St. Clair River which links Lake Huron to Lake Erie. Vulnerability could include flooding along the River Corridor and managing storm water, especially in **Federally Designated Flood Plains** in our target area. The Authority used its previous EPA Grant funds to assess property for the County Drain Commissioner, which was incorporated into areas for flood storage. The Authority will continue to support this effort. The Blue Water Area Transit Commission (BWATC) recently added electric buses to its fleet, the first in Michigan. The BWATC also has the state's largest fleet of natural gas fueled buses. The River Corridor is served by this clean source of transportation, which will not add additional contamination, diesel exhaust, or particulates to neighborhoods.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community's Need for Funding

St. Clair County is seeking an EPA Community-wide Brownfield Assessment Grant because we do not have the financial wherewithal to address the large number of sites in the county that need assessment support; many of these communities experience similar economic, social, and environmental challenges as those of the **River Corridor target area**. Although conditions in Michigan and St. Clair County have improved significantly over the last several years, this area is still recovering from the crash of the automotive industry, including plant closings, job loss, etc., and from the effects of the pandemic. From August 2011 through August 2021, Michigan had a meager 5% nonfarm job gain, while the country enjoyed 11.6% growth according to the U.S. Department of Labor's Bureau of Labor Statistics. Since 2020, St. Clair County has lost 1,175 jobs due to plant closings in our **target River Corridor** communities of Port Huron and Marysville (WARN).

As a result of job losses, plant closings, etc., the county has experienced population loss for years (1.78% from 2010 to 2022; U.S. Census Quick Facts). As people leave to find jobs, property values, tax revenues, and personal incomes drop. This is evident throughout the **River Corridor**, but especially in the target neighborhoods CT6250 and 6260 in the City of Port Huron. The target neighborhoods surround the closed **Dunn Paper** mill, **Domtar Corporation** paper mill, and other adjacent industries west of downtown along the Black River. The median household income in these areas is \$32,266 and \$42,632, respectively, nearly half of the U.S. average of \$63,202. Many in the target neighborhoods have low-wage, service-oriented jobs, which have been severely affected by COVID-19 through layoffs and closures of restaurants and other businesses. 20% of Port Huron families live below the poverty line, much higher than the U.S. average of 13%; the rate is even higher in CT6250 and 6260 at 38.1% and 24% respectively (U.S. Census, 2019 ACS 5-Year Estimates). Nearly all the census tracts in the target area have a higher percentage of their populations in poverty or considered Asset Limited, Income Constrained, Employed (ALICE) than Michigan's average of 39%—Port Huron (55%), Port Huron Township (50%), Marysville (42%), and Marine City (45%). Over 49% of children under 18 in the county are insured by Medicaid (kidscount.org). Since 2019, the county has tax foreclosed on 202 parcels in the county, another indicator that residents are struggling to financially meet their cost of living. Perceived and/or real environmental issues which limit interest in brownfield sites in our target area will continue to depress property values without resources to identify sites, assess conditions, and provide solutions for safe reuse, cleanup, and management. In addition to a reduction in tax revenue, contaminated, vacant industrial properties do not produce jobs or income.

St. Clair County has a large housing gap, including our target areas of the City of Port Huron and Port Huron Township, which together include a housing stock of 0% vacant owner-occupied housing, 0% vacant rental options, and 0.1% vacant seasonal housing. CT6250 and 6260 are in the 80th and 77th percentile for housing burden, which reflects housing costs of more than 30% of income. This is especially apparent for renters, where 56% of households are considered overburdened, exemplifying a clear need for attainable and affordable housing (2023 MSHDA Partnership H).

2.a.ii. Threats to Sensitive Populations

2.a.ii.(1) Health or Welfare of Sensitive Populations

The Blue Water Community Action Agency's 2020 Community Needs Assessment (CNA20) identified significant variations in the lived experience in St. Clair County. These variations are affected by social and institutional inequities and living conditions, ultimately resulting in certain negative health outcomes. The sensitive populations in our target area neighborhoods (i.e., minority population, women of childbearing age, and young populations; see table below) are impacted by poverty and minority status. Overwhelmingly, the social and institutional inequities that cause poverty, especially in minority

communities like our target City of Port Huron (CT6250/CT6260) and Port Huron Township neighborhoods (CT6360), drive health outcomes that are significantly worse than for wealthier, non-minority populations. These outcomes are exacerbated by environmental contamination, which weakens immune systems and causes asthma, cancer, and other diseases. Generationally, these young minority residents lived where they were able to buy homes, which to their detriment was located next to factories on contaminated land. Additionally, there are a significant number of occupied housing units built before 1979 along the River Corridor; in particular, high rates of these older homes are located in the City of Marine City (80.3%) and City of Port Huron (78.2%), especially in CT6250 (94%) and CT6260 (82.8%). These rates show a high percentage of occupants potentially exposed to lead-based paint and asbestos. Through this EPA Grant, the River Corridor and target neighborhoods have an opportunity to assess, understand, and manage the environmental risks present in their communities, which is also necessary to leverage additional funding to address and clean up the risks.

Sensitive Populations	Women of Childbearing Age (20–44)	Young Population (Age 5–19)	Poverty Rate	% Minority
Port Huron CT6250	47.4%	26.2%	36.7%	17.4%
Port Huron CT6260	34.9%	25.7%	21.9%	13.5%
Port Huron Twp. CT6360	36.3%	29.1%	25.2%	24.4%
St. Clair County	27.8%	23.6%	13.3%	11.2%
Michigan	30.7%	24.8%	15%	27.6%

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

According to the EPA, being exposed to environmental contamination has been linked to different human diseases and conditions. There are many opportunities for residents in the River Corridor target area to be exposed to contaminated soil, groundwater, surface water, and airborne contamination that increase the potential to contract a disease or adverse health condition. Industrial sites, power plants, old buildings and schools, old housing, and Canada’s “Chemical Valley” directly across the river from the River Corridor provide a concentration of sources that can impact our disadvantaged and disproportionately affected residents. Evaluating the EJScreen tool for our industrial areas associated with the City of Port Huron (CT6250/CT6260) and Port Huron Township (CT6360) revealed that 15, 11, and 10 of the 22 indexes exceeded the 75th percentile, respectively. This data is supported in the 2019 Community Health Improvement Plan for St. Clair County (CHIP19), where St. Clair County adults have a lower life expectancy rate (men and women) and higher age-adjusted mortality rate than adults across the state and nation. Death rates from cancer, heart disease, chronic lower respiratory disease, and diabetes are also higher in St. Clair County than Michigan and the U.S. The CHIP19 additionally indicated that county lifetime rates for asthma (24.4%), current asthma (15.4%), and COPD (10.2%) are all higher than state/U.S. rates.

According to the CEJST, nine census tracts are identified as disadvantaged within the River Corridor target area, eight of which identify health burdens as a primary indicator, with heart diseases as high as the 99th percentile, asthma as high as the 98th percentile, low life expectancy as high as the 99th percentile, and diabetes as high as the 97th percentile. Other main factors include low-income population, population 15 or older not enrolled in secondary education, and low workforce development. Some of these indicators, such as asthma, can be directly related to the heavy industry located along the St. Clair River. In fact, St. Clair County has two coal power plants which rank as the 3rd and 4th most polluting power plants in Michigan. The Belle River Plant, with its oldest unit dating back to the 1950s, was ranked 74th on the U.S. list of dirtiest power plants in terms of sulfur dioxide emissions per megawatt-hour of electrical energy produced in 2011 (publicinterestnetwork.org). Coal-fired power plants are known to emit pollutants associated with adverse health effects, including increased asthma attacks, asthma-related ED visits, and hospitalizations. The **St. Clair Power Plant** closed in 2022, which eliminated 300 jobs, and the Belle River plant is scheduled to close by 2028.

According to the National Institute of Health, if our sensitive population of women of childbearing age are exposed to environmental contaminants (synthetic and metals) especially during critical and sensitive periods in development, it can affect all aspects of future reproductive health from conception to adult health. Young people exposed to particulate matter originating from coal power plants, truck traffic, and other emissions can also suffer from respiratory illnesses, chronic inflammation, diabetes, and cardiovascular problems (parentingscience.com/the-effects-of-air-pollution-on-children). Children are especially vulnerable since they breathe more air than adults and their bodies are still developing.

The EPA Brownfield Grant will allow the St. Clair County Brownfield Redevelopment Authority (Authority) to identify, assess, and evaluate the risks associated with the priority and other contaminated sites, ultimately creating more equitable and healthy living conditions for local residents.

2.a.ii.(3) Environmental Justice

2.a.ii.(3)(a) Identification of Environmental Justice Issues

Brownfield sites lower living conditions and property values and increase the potential for health effects caused by contamination, lead paint, asbestos, and other wastes. A person’s well-being should not be determined by their race, location, or income. It is an environmental injustice that residents in the River Corridor target neighborhoods are disproportionately affected by the risks and socio-economic impacts brownfield sites have on their community. According to the CEJST, nine census tracts within the River Corridor target area are disadvantaged (three priority sites are in disadvantaged census tracts), including CT6250, 6260, and 6360, which are in the 91st, 79th, and 91st percentiles for low income, respectively. Overwhelmingly, the social and institutional inequities that cause poverty, especially in minority communities, drive health outcomes that are significantly worse than for wealthier, non-minority populations. Minority and low-income populations as represented by the City of Port Huron (CT6250/CT6260) and Port Huron Township (CT6360) are forced to live in areas they can afford, which tend to be in substandard housing adjacent to industrial areas including our priority sites **Domtar** and **Anchor Recycling**, respectively. Over 57% of the housing in the county was built prior to 1975 (US Census); this housing presents an extreme risk for childhood lead poisoning as it may contain lead-based paint, asbestos, and lead water pipes. In addition, these areas tend to have either legacy pollution or are currently emitting pollutants that can impact the residents. Social service agencies tend to locate near the populations they serve. In Port Huron Township (CT6360), the 2Gen Learning Center provides developmental childcare to children who are newborns to three years old while mothers study for their GED tests trying to improve their life path. It is sad and ironic that these children are having to be cared for in some of the worst brownfield areas of the county, continuing their potential exposure risk.

2.a.ii.(3)(b) Advancing Environmental Justice

An EPA Grant can be a catalyst for making changes to these young lives and their families by conducting Phase I and II Environmental Assessments of vacant, blighted buildings or substandard housing throughout our target area and underserved communities, identifying brownfield conditions and risks that need cleanup, exposure mitigation, asbestos or lead abatement, and improved infrastructure. Many properties including our priority sites (**Domtar**, **Dunn**, **Anchor Recycling**, and **St. Clair Power Plant**) remain vacant or poorly utilized. The Authority, Land Bank, and our community partners can bring resources to these communities to safely reuse sites for the construction of affordable housing, create new opportunities and jobs for building generational wealth, improve residents’ well-being by mitigating environmental risks, and support the reuse of once vacant buildings and lands.

2.b. Community Engagement

2.b.i.–2.b.ii. Project Involvement and Project Roles

Organization	Point of Contact	Involvement in the Project
Economic Development Alliance (EDA) of St. Clair County	Dan Casey dcasey@edascc.com	Regional economic development organization; provide financial guidance and mentoring for emerging entrepreneurs encouraging redevelopment of priority sites
Friends of the St. Clair River Watershed	Sheri J. Faust info@scriver.org	Help identify brownfield sites in River Corridor target area for assessment
Blue Water Habitat for Humanity	Ernest Werth-Toward ernest@bwhabitat.org	Build two affordable houses on or near priority sites in disadvantaged areas
S.O.N.S. (Save Our Neighborhoods and Streets)	Tyrone Burrell tyrone.burrell@sonsoutreach.org	Connection to low-income and minority families/youth in target communities; create Our Vision Team for teens to provide input on priority site reuse, especially regarding the Domtar priority site which is opposite their new headquarters

2Gen Learning Center	Michael Hinkley mhinkley@literacyandbeyond.org	Literacy/education program for women seeking their GED; facilities are immediately across from the Anchor Recycling priority site. Solicit input for reuse strategy/desires for this location and neighborhood.
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2.b.iii. Incorporating Community Input

At the early stages of the EPA Grant, the Authority will convene several in-person community open houses, offering remote access options. At these meetings, a draft updated site inventory and new information about the Authority’s programs and available resources will be presented. The site inventory will be located on Google Earth for remote access and provided to our outreach partners. Feedback and a solicitation for any new sites will be requested prior to the meetings and added to the inventory for circulation to the community. These open houses will allow residents in our target communities to provide input on the issues, concerns, and potential reuse strategies for the priority sites and other sites in their neighborhoods. Additionally, the Authority will work with the SONS Our Vision Team and the 2Gen Learning Center staff and clients to provide input on reuse strategies. Authority staff and/or their brownfield consultant will respond to this input, ensuring meaningful discourse and action. Efforts will be made to inform and notify residents and businesses in the target communities and countywide through our partners, mailings, or posting information at local retail/restaurant establishments, churches, community centers, and convenience stores. It will be critical to identify opportunities to interact with underserved community members in the county and target areas during times they can meet, which may not be during normal business hours due to their work schedules. We also publicize programs, minutes, applications, and successes through the county website and our community-based project partners’ websites. The Authority will utilize social media platforms including Facebook, LinkedIn, and Twitter, allowing broad community access and input. Factsheets, brochures, and performance dashboards will continue to be used and distributed.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs

Implementation schedule will meet 35% within 18-month spend rate.

Task 1: Phase I Environmental Site Assessments
<i>i. Project Implementation:</i> 12 Phase I assessments on priority sites in target communities and 9 Phase I assessments on non-priority sites countywide as determined by the Authority.
<i>ii. Anticipated Schedule:</i> complete 12 priority sites by 4th quarter FY2026; complete 1 to 2 Phase I assessments every quarter at priority/non-priority sites.
<i>iii. Task Lead:</i> Qualified Environmental Professional, Applicant oversight
<i>iv. Outputs:</i> 21 Phase I eligibility demonstrations, site access agreements, All Appropriate Inquiry compliant reports, ACRES updates
Task 2: Phase II Environmental Site Assessments
<i>i. Project Implementation:</i> completion of Quality Assurance Project Plan (QAPP); Sampling and Analysis Plans and Health and Safety Plans for each Phase II; 8 Phase II assessments on priority sites in target communities; 6 Phase II assessments on priority/non-priority sites countywide as determined by the Authority, with community input; for contaminated sites (estimated 10), completion of Baseline Environmental Assessments for liability protection and Due Care Plans to address “continuing obligations.”
<i>ii. Anticipated Schedule:</i> complete 8 Phase II/Baseline Environmental Assessments/Due Care Plans at target community priority sites by 4th quarter FY2026; for remaining 6 priority/non-priority sites, we estimate 1 Phase II completed every 2 to 3 quarters.
<i>iii. Task Lead:</i> Qualified Environmental Professional, Applicant oversight
<i>iv. Outputs:</i> 1 QAPP, 14 Phase IIs and Sampling and Analysis Plans/Health and Safety Plans, 10 Baseline Environmental Assessments/Due Care Plans, ACRES updates
Task 3: Brownfield Plans and Cleanup Planning
<i>i. Project Implementation:</i> 5 Brownfield Plans (estimate) to use tax increment financing to leverage grant funds on priority sites, which will be reviewed by the Authority/local unit of government and approved by County Commissioners at a public hearing; estimated that 2 priority sites will require Act 381 Work Plans (Cleanup Plans) for state tax support, which requires state approval; 3

Brownfield Plans and 2 Act 381 Work Plans (estimates) on priority/non-priority sites countywide as determined by the Authority, with community input (all subject to the above review procedures).
<i>ii. Anticipated Schedule:</i> complete 5 Brownfield Plans and 2 Act 381 Work Plans at target community priority sites by 4th quarter FY2026; remaining 3 Brownfield Plans and 2 Act 381 Work Plans at priority/non-priority sites estimated to be completed by the end of grant.
<i>iii. Task Lead:</i> Qualified Environmental Professional, Applicant oversight
<i>iv. Outputs:</i> 8 Brownfield Plans, 4 Act 381 Work Plans, 8 Local Resolutions, 8 Public Hearings, 4 State Regulatory reviews, ACRES updates
Task 4: Community Outreach, Programmatic, Travel, and Supplies
<i>i. Project Implementation:</i> Procure Qualified Environmental Professional; prepare Grant Work Plan; prepare, attend, and participate in public hearings; municipal and Authority meetings; create and disseminate brochures/flyers/web pages about the grant; educate and inform community groups and stakeholders; virtual and in-person community outreach events; attend the National Brownfield Conference; prepare EPA quarterly/financial/performance reports.
<i>ii. Anticipated Schedule:</i> Community outreach efforts will be intense at the outset of the grant and will include 2 in-person (offering remote access) community open houses by 2nd quarter of FY2025 and 2 additional outreach events by midway through the grant or 1st quarter of FY2026; Authority monthly meetings and outreach efforts will continue throughout the grant term.
<i>iii. Task Lead:</i> Applicant and Qualified Environmental Professional
<i>iv. Outputs:</i> Procurement of 1 Qualified Environmental Professional, 4 community open house/education events, 48 monthly Authority meetings, 16 Quarterly Reports, 17 project evaluation meetings, numerous educational materials and outreach events, 1 trip to National Brownfield Conference for 3 Authority members and the Director

3.b. Cost Estimates

Budget Categories	Task 1: Phase I Assessments	Task 2: Phase II Assessments	Task 3: Brownfield Plans	Task 4: Community Outreach/ Programmatic	Total
Travel				\$6,000	\$6,000
Contractual	\$73,500	\$362,000	\$48,000	\$10,500	\$494,000
Total Direct Costs	\$73,500	\$362,000	\$48,000	\$16,500	
Total Budget	\$73,500	\$362,000	\$48,000	\$16,500	\$500,000

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

- **Task 1, Contractual:** 21 Phase I site assessments at average cost of \$3,500 = **\$73,500 total.**
- **Task 2, Contractual:** 14 Phase II site assessments at average cost of \$23,000 = \$322,000; 10 Baseline Environmental Assessments/Due Care Plans at average cost of \$4,000 = \$40,000; **\$362,000 total.**
- **Task 3, Contractual:** 8 Brownfield Plans at average cost of \$4,000 = \$32,000; 4 Cleanup Plans (Act 381 Work Plans) at average cost of \$4,000 = \$16,000; **\$48,000 total.**
- **Task 4: \$16,500 total** as follows: **Personnel:** in-kind; **Travel:** travel for Director and 3 Authority members including airfare, lodging, food, and expenses at an average cost of \$1,500 per person = \$6,000; **Contractual:** 16 quarterly reports at average cost of \$400 = \$6,400; preparation for 4 community open houses at average cost of \$600 per event = \$2,400; 17 project evaluation meetings at average cost of \$100 per meeting = \$1,700; \$10,500 total.

3.c. Plan to Measure and Evaluate Environmental Progress and Results

The Authority, on behalf of the county, will track, measure, and evaluate progress in achieving outputs and outcomes throughout the grant program. Assessment information (**outputs**)—including number of Phase I and II Assessments, Baseline Environmental Assessments, Due Care Plans, Brownfield Plans, and Cleanup Plans (Act 381 Work Plans), or the number of grant-related outreach activities funded by the grant—will be documented in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES); grant Quarterly Reports and a Dashboard will be created, as we did for our previous EPA Assessment Grants. The Dashboard documents the **outputs** and **outcomes**, project investment leveraged, jobs created (or planned), jobs retained, and grant-funded projects per local unit of government, including our target area and priority sites. The Dashboard, available on the Authority's website, is distributed at meetings/events regularly. The Authority will track the number of sites/acres prepared for reuse (including sites that have been cleaned up, had blight removed, and had exposure

concerns removed or minimized) and sites that can be considered "safe" for reuse. The Authority, working with the various partners, will track and evaluate long-term outcomes, such as energy-efficient, affordable housing units secured, improved property values, and health outcomes for our sensitive populations, especially those in our target area and near our priority sites.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

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

The Authority will utilize the St. Clair County Metropolitan Planning Commission's (SCCMPC's) knowledgeable staff to implement and manage the Assessment Grant. The Project Director, Geoffrey Donaldson, Senior Planner for the SCCMPC, has managed many grants, including two previous EPA Assessment Grants, over the last 25 years at the Planning Commission, with extensive experience in all aspects of grant implementation, funding, reporting, and compliance. Mr. Donaldson is also Director of the County Land Bank Authority, providing continuity in utilizing the Land Bank and Brownfield Authority together to support brownfield redevelopment projects. Mr. Donaldson will be supported by other team members, as needed, including support staff, legal counsel, and administrative staff. Marsha Adamkiewicz, the county's Staff Accountant, keeps financial track of all the grants for St. Clair County and ensures that proper guidelines for all grants are met (i.e., board approval, single audit requirements, etc.). To ensure continuity should staff turnover occur, the Executive Director of the Planning Commission attends Authority meetings and is actively engaged in all discussions, meetings, and functions. The Authority Board is made up of up to nine individuals, including a representative from each County Board of Commissioner District, representing a broad cross-section of the county, and the director/designee of the Metropolitan Planning Commission and the St. Clair EDA. These members include local units of government, businesses, realtors, private citizens, etc. Project applications are reviewed by the Authority at their publicly noticed monthly meetings, allowing municipal and citizen input. The Authority has created policies, applications, guidance, informational pieces, etc. intended to streamline the process of redeveloping brownfield sites while maximizing the benefit to the local community, ensuring the timely expenditure of grant funds.

4.a.iv. Acquiring Additional Resources

A Qualified Consultant will be appropriately procured by the Authority to assist with the grant tasks as outlined above. We will seek assistance from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) on cleanup efforts and funding; other free services from local, regional, and state offices; and EPA's Technical Assistance to Brownfields (TAB) Communities Program. We will work with the St. Clair EDA to identify and link target area residents with jobs that result from businesses or activities supported by the EPA grant.

4.b. Past Performance and Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant

4.b.i.(1) Accomplishments

St. Clair County received two EPA Coalition Hazardous Substances and Petroleum Assessment Grants over the years: the most recent FY2017 grants (\$200,000 each), which closed December 31, 2021, and a FY2010 grant (\$1,000,000). Both grants were administered by the Authority, on behalf of the county. The combined Assessment Grants' outputs were accurately reflected in ACRES. Our Dashboard ultimately tracked 46 Phase I and 30 Phase II Environmental Site Assessments, 20 Baseline Environmental Assessments and Due Care Evaluations, 10 Brownfield Plans, and 42 grant-related outreach activities, ultimately assessing or cleaning up 64 sites. These outputs resulted in outcomes including over \$213 million in leveraged project investment and approximately 2,061 new jobs. Projects were completed in 11 different communities.

4.b.i.(2) Compliance with Grant Requirements

The Authority has consistently met the requirements for Work Plan development, Quality Assurance Project Plan development, eligibility demonstrations, Sampling Plans, Health and Safety Plans, Quarterly Reports, ACRES reporting, MBE/WBE and Financial Status Reports, and community notification. The most recent FY2017 Coalition Assessment Grant spent over 72% of the grant funds on Phase I and II Site Assessments including Brownfield Plans; cleanup planning increases this to 89%. The FY2017 Coalition Assessment Grant started October 1, 2017, and ended December 31, 2021. Due to the COVID-19 pandemic and a resulting shutdown in activities as required by the State of Michigan, two extensions were granted. The closed FY2010 and FY2017 Coalition Assessment Grants were fully expended at grant closing.

THRESHOLD CRITERIA RESPONSE ST. CLAIR COUNTY, MICHIGAN

1. Applicant Eligibility –

a. St. Clair County is a Michigan General Purpose Local Unit of Government and is eligible to receive funding through the U. S. EPA Brownfield Assessment Grant program.

b. N/A

2. Community Involvement – The St. Clair County Brownfield Redevelopment Authority (Authority) is made up of up to nine individuals who include a representative from each County Board of Commissioner District, representing a broad cross-section of the county, and the director/designee of the Metropolitan Planning Commission and the St. Clair County EDA. These members include local unit of government representatives, businesses, realtors, private citizens, etc. The Authority meets monthly and at special request if needed, allowing timely and successful use of funds. Project applications are reviewed by the Authority at their publicly noticed meetings, allowing municipal and citizen input. The Authority has been very active in creating policies, applications, guidance, informational pieces, etc. intended to streamline the process of redeveloping brownfield sites, encouraging access to the programs while maximizing the benefit to the local community, ensuring the timely expenditure of grant funds.

At the early stages of the EPA Grant, the Authority will convene several in-person community open houses, offering remote access options. At these meetings, a draft updated site inventory and new information about the Authority's programs and available resources will be presented. The site inventory will be located on Google Earth for remote access and provided to our outreach partners. Feedback and a solicitation for any new sites will be requested prior to the meetings and added to the inventory for circulation to the community. These open houses will allow residents in our target communities to provide input on the issues, concerns, and potential reuse strategies for the priority sites and other sites in their neighborhoods. Additionally, the Authority will work with the SONS Our Vision Team and the 2Gen Learning Center staff and clients to provide input on reuse strategies. Authority staff and/or their brownfield consultant will respond to this input, ensuring meaningful discourse and action. Efforts will be made to inform and notify residents and businesses in the target communities and countywide through our partners, mailings, or posting information at local retail/restaurant establishments, churches, community centers, and convenience stores. It will be critical to identify opportunities to interact with underserved community members in the county and target areas during times they can meet, which may not be during normal business hours due to their work schedules. We also publicize programs, minutes, applications, and successes through the county website and our community-based project partners' websites. The Authority will utilize social media platforms including Facebook, LinkedIn, and Twitter, allowing broad community access and input. Factsheets, brochures, and performance dashboards will continue to be used and distributed.

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values, and health outcomes for our sensitive populations, especially those in our target area and near our priority sites.

3. Expenditure of Existing Grant Funds – St. Clair County does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

4. Contractors and Named Subrecipients – N/A, a contractor/subrecipient has not been procured or named.