



**Ionia County Administration**  
**Patrick Jordan, County Administrator**  
 Courthouse, 101 West Main Street, Ionia, MI 48846  
 616.527.5300 Fax: 616.527.5380  
 pjordan@ioniacounty.org

## NARRATIVE INFORMATION SHEET

1. **Applicant Identification:** Ionia County  
 101 W. Main Street  
 Ionia, MI 48846
  
2. **Funding Requested**
  - a. Assessment Grant Type: Community-wide
  - b. Federal Funds Requested: \$400,000
  
3. **Location:** Ionia County, Michigan
  
4. **Target Area and Priority Site Information:**  
**Target Area:** City of Ionia (Census Tract [CT] 26067031700 and 26067032100)
  - Priority Site 1: Former Deerfield Correctional Facility, 1755 Harwood Road, Ionia, MI (CT 26067032100)
  - Priority Site 2: Former Riverside Correctional Facility, 777 W. Riverside Drive Ionia, MI (CT 26067032100)**Target Area:** City of Belding (CT 26067030200 and 26067030300)
  - Priority Site 3: 302 Ashfield Street, Belding, MI (CT 26067030200)
  
5. **Contacts**
  - a. Project Director: Julianne Burns, Chairperson of Ionia County BRA  
 616.527.1829  
 101 W. Main Street  
 Ionia, MI 48846
  
  - b. Chief Executive/Highest Ranking Elected Official: Patrick Jordan, County Administrator  
 616.527.5300  
 pjordan@ioniacounty.org  
 101 W. Main Street  
 Ionia, MI 48846
  
6. **Population:** City of Ionia (population 11,655)  
 City of Belding (population 6,070)



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**7. Other Factors:**

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	N/A
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.	2, 3
The priority site(s) is in a federally designated flood plain.	N/A
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
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3, 4
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.	N/A

**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 20, 2023

VIA EMAIL

Patrick Jordan  
Ionia County Administrator  
101 West Main Street  
Ionia, Michigan 48846

Dear Patrick Jordan:

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 Ionia 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 Ionia County's need for funding.

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

Should the U.S. EPA award a brownfield grant to Ionia County, it would allow them to conduct environmental investigations and promote economic development at brownfield sites. If you need further information about potential eligible sites in Ionia 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](mailto:SmedleyR@Michigan.gov).

Sincerely,

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

cc: Andrea Ryswick, EGLE

# 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

Ionia County (the County) is located between the metropolitan areas of Lansing to the east and Grand Rapids to the west and consists of three cities, seven villages, and 16 townships with a total population of 66,564 (US Census). Major thoroughfares that traverse the County include I-96, which runs east-west and connects Lansing to Grand Rapids, and M-66, a north-south highway that bisects the County, connecting the City of Ionia (the County Seat) to I-96. The County's economy is driven by agriculture and manufacturing (20% of the County's workforce is manufacturing; [rightplace.org](http://rightplace.org)). Although the County is ranked fourth out of 83 counties in Michigan for total crops sold, there has been a 14% decline in the number of farms and 6% decrease in acres farmed in the County since 2012 (2017 Census of Agriculture). A contributing factor to the loss in farmland is urban sprawl brought about, in part, by the low vacancy rates of viable commercial and industrial buildings that exist in the market (ranging from 1–3%, Colliers Q2 2023 Market Report) and fear of repurposing urban brownfields. The low vacancy rates lead to new construction prospecting of rural farmland. Regional development initiatives also seek to attract industrial companies to communities where large tracts of farmland close to highways are appealing. Maintaining pace with this demand in a way that does not threaten the agricultural backbone of the County and redirects industrial growth to urban brownfields is a significant challenge. EPA Brownfield Assessment Grant funds will greatly assist the County in our efforts to reduce urban sprawl and repurpose brownfield properties, which will preserve farmland and promote urban economic growth opportunities that decrease health and environmental threats for the betterment of Ionia County residents.

Although this EPA Grant application is intended to be community-wide (throughout the County), the **primary target areas** for our assessment and reuse efforts will be the disadvantaged communities (as identified in the Climate and Economic Justice Screening Tool, or CEJST) of the **City of Ionia** (census tracts [CTs] 317 and 321; population of 11,655) and the **City of Belding** (CTs 302 and 303; population of 6,070). Ionia's CT 317 is in the 82nd percentile for low income, 88th percentile for poverty, and 72nd percentile for low median income, while CT 321 is in the 66th percentile for low income, 75th percentile for poverty, and 81st percentile for low median income. Belding's CT 302 is in the 75th percentile for low income, 63rd percentile for poverty, and 76th percentile for low median income, while CT 303 is in the 82nd percentile for low income, 75th percentile for poverty, and 87th percentile for low median income. Impacting these communities further, there are 67 known contaminated sites within the City of Ionia and 32 sites within the City of Belding (approximately 56% of the sites identified in the County) ([www.egle.state.mi.us/RIDE](http://www.egle.state.mi.us/RIDE)). These sites consist of manufacturers, former gasoline stations, and dry cleaners located near adjacent, low-income, underserved residents where chronic and acute diseases or ailments are prevalent and reduced property values, blight, and increased crime exist due to vacancies and disinvestment; this perpetuates a cycle of poverty.

The 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 adaptation strategies. Without upfront funding to evaluate 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 developers reinvest in the target area 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)

There are more than 166 known contaminated sites in Ionia County, with 67 sites in the City of Ionia target area and 32 sites in the City of Belding target area ([www.egle.state.mi.us/RIDE](http://www.egle.state.mi.us/RIDE)). Priority sites within these target areas, as identified during community-driven redevelopment planning efforts, are in census tracts where poverty rates significantly exceed county, state, and national levels and median

household incomes remain far below county, state, and national levels. This EPA Assessment Grant will be used to evaluate these priority contaminated sites and assist with the preparation of redevelopment and cleanup plans that provide the greatest potential to improve the environment, enhance quality of life, catalyze economic development, leverage additional resources, support equitable housing opportunities, and preserve natural resources.

In the target area of Ionia (CT 321), two key priority sites are the **former Deerfield Correctional Facility (DCF)** and the **former Riverside Correctional Facility (RCF)**, which are situated next to each other and adjacent to the Grand River in the northeast portion of Berlin Township. Each site is in an Act 425 section of Ionia City, with disadvantaged populations (CEJST) with high poverty (75th percentile), low median household income (\$47,137; 2021 ACS 5-year Estimates, U.S. Census), and high unemployment (93rd percentile). The former DCF is a 47-acre prison site built in the 1980s that has been vacant since its closure in March 2009. The RCF is a 105-acre prison site, originally built in 1883 and known as the Michigan Asylum for Insane Criminals (later named the Ionia State Hospital), which operated from its construction in 1883 until being closed in 2007. Underground storage tanks (USTs) were historically utilized and represent potential threats to future redevelopment. In 2023, the Michigan State Land Bank (SLB) gained ownership of these sites to help the City transition these properties to a new viable use. To aid in the transition, the Michigan Legislature secured \$21 million for site demolition, including the removal of numerous abandoned buildings containing lead paint and asbestos. It is anticipated that demolition activities will be completed by the end of 2023.

The City of Ionia, in a cooperative effort with the SLB, Michigan Economic Development Corporation (MEDC), and other local and state agencies, is now seeking developers to acquire these sites from the SLB for redevelopment. Potential redevelopment plans include a mix of uses, such as affordable housing, light industrial, technology centers, and an education component. Existing water and sewer infrastructure that supported past uses can be reused, which is a significant development cost savings. EPA Grant funds will help assess these properties to assist with their sale and redevelopment planning efforts, helping promote reuse. Returning these sites to viable uses will prevent vandalism and health and safety concerns related to former abandoned structures with lead paint and asbestos, address potential environmental risks relating to past use of USTs, increase tax revenue for the community, and create new job opportunities for a population struggling with unemployment. Redevelopment of the sites will provide new affordable housing options and encourage other development opportunities that do not require urban sprawl.

A key priority site identified in Belding (CT 302) is **302 Ashfield Street**, a vacant industrial property located just north of downtown Belding along the Flat River, which is listed for sale. The site maintains a building constructed in 1955 that consists of nearly 200,000 square feet of industrial space historically utilized for brass parts manufacturing. This site has more than 18 acres of land including over 5 acres of vacant property along the Flat River. The Michigan Department of Environment, Great Lakes, and Energy's (EGLE's) Remediation Information Data Exchange system ([www.egle.state.mi.us/RIDE](http://www.egle.state.mi.us/RIDE)) lists the site as a known petroleum contaminated site. It is unknown whether comprehensive assessment of the environmental conditions of this site have been completed. This site is located in a disadvantaged community with high poverty (75th percentile), low median household income (\$50,972; 2021 ACS 5-year Estimates, U.S. Census), and high unemployment (63rd percentile). EPA Assessment Grant funds will assist with evaluating the environmental conditions of this site, so that the site can be reused, helping discourage urban sprawl and promoting mixed uses including affordable housing.

#### 1.a.iii. Identifying Additional Sites

The Ionia County Brownfield Redevelopment Authority (ICBRA) will utilize a project application and public engagement process to identify additional sites for assessment under this grant. The site selection process is designed to facilitate a collaborative approach between County staff, the ICBRA, communities, developers, and associated stakeholders, which includes a screening evaluation and open public meetings. Through the completion of a project nomination form, additional prospective sites are screened against various criteria including, but not limited to, known/perceived contamination,

redevelopment potential, impact on underserved/disadvantaged communities, adaptive reuse, incorporation of sustainability principles, and urban sprawl reduction. Each project nomination form is then scored by County staff followed by ICBRA review and discussion during an open public meeting. Prospective additional sites are then approved (or denied) for advancement through the EPA eligibility determination process. In addition to the County's 166 known contaminated sites, numerous perceived contaminated properties exist. These sites consist of former industrial properties, gasoline service stations, auto repair shops, and dry cleaners primarily located in the communities of Saranac, Lake Odessa, Portland, Clarksville, Muir, and Lyons.

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

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

In 2019, the target area of Ionia participated in Project Rising Tide (PRT), an initiative to assist communities with identified need associated with factors such as poverty, unemployment, and building vacancies. The effort was coordinated by the Michigan Economic Development Corporation (MEDC) and the Michigan State Housing Development Authority and focused on defining revitalization strategies to help with accessing state and federal funds that advance efforts to meet community need. The PRT strategy report identified a housing shortage that would negatively impact the area's growth and ability to attract new residents. This aligns with the 2022 housing study completed for Ionia County (W.E. Upjohn Institute), which noted that housing stock was needed, especially targeting area median household income levels in the target area disadvantaged census tracts.

To improve these conditions, the PRT report encouraged assembly of property in or near the City of Ionia, which can benefit all of Ionia County's housing needs, to help facilitate the construction of housing types identified in the housing study. The redevelopment sites are easily accessible to the east/west I-96 expressway and the M-66 north/south travel corridors that lie across Ionia County to other cities and counties for employment opportunities. The City of Ionia is working with the SLB on a transition plan for the **DCF** and **RCF** priority sites that would result in new affordable housing stock for the City of Ionia and Ionia County.

In the target area of Belding, the waterfront portion of the vacant, manufacturing priority site (**302 Ashfield**) is one of a couple remaining industrial sites along the Flat River. With multi-family zoned property directly east of the site and general business and single-family zoned property to the west, adjoining old and established neighborhoods, the portion of this priority site along the waterfront is prime for mixed-use redevelopment as encouraged in Belding's Master Plan. The Master Plan notes that undeveloped land near the downtown should be developed for mixed-use, including multi-family residential uses. Repurposing the existing industrial building promotes reuse of vacant space and discourages urban sprawl.

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

Reuse of the **DCF** and **RCF** priority sites in the City of Ionia would put more than 150 acres of land into productive use after sitting dormant for more than a decade, offering new affordable housing options for low-income residents and creating other types of job opportunities from light industrial to educational types, for a community impacted by unemployment. This reuse strategy will utilize existing infrastructure, discourage urban sprawl, and preserve farmland. Reducing the construction of these tracts of land, which are located adjacent to the Grand River, will prevent accelerated runoff conditions during rain events and increased flooding hazards. These actions will assist with climate resiliency. Converting these sites to private use, after being under State of Michigan ownership, will bring new tax revenue to Ionia County and the City of Ionia. Sustainable development concepts including energy-efficient design, enhanced storm water management, and use of renewable building materials will be encouraged, as part of the funding partnership with the ICBRA.

Redevelopment of the **302 Ashfield** priority site in Belding is anticipated to support reuse of an industrial property, which would create new jobs and increase the tax revenues generated at this site. It also provides mixed-use opportunities to add affordable housing stock to the community and public access to the Flat River, which lies adjacent to the potential redevelopment site. The project addresses

climate adaptation by using building setbacks that encourage shoreline softening, reducing erosion and costly damage to buildings and infrastructure as a result of increased flooding brought about by climate change.

### **1.c. Strategy for Leveraging Resources**

#### **1.c.i. Resources Needed for Site Reuse**

**Tax Increment Financing (TIF):** New tax revenue generated from brownfield redevelopment can be a source of reimbursement to developers and communities to assist in the cost of activities such as cleanup, housing development, and infrastructure/site preparation (in certain communities). Each of our priority sites are eligible for this funding, assuming end users are not tax exempt.

**EGLE Grant and Loans:** State funding for environmental cleanup and risk mitigation at properties with known contamination. Local units of government/municipal entities can apply for funding. Funding is limited to a \$1 million grant and \$1 million loan per applicant per year. Each of the priority sites would potentially be eligible to apply for funding.

**EGLE Refined Petroleum Fund (RPF):** The RPF establishes an environmental protection regulatory fee that funds petroleum-related cleanup. Eligible properties include properties where soils contaminated by releases from registered underground refined petroleum tanks exist.

**Tax Abatements:** Local, and in some cases state, tax relief is available to encourage the rehabilitation of obsolete, commercial, and industrial properties. The type, amount, and length of the tax abatement is dependent upon the property history and need for assistance. This resource can be utilized by most of the priority sites.

**The Michigan Department of Natural Resources Trust Fund (MNRTF):** Grant resources are available to local units of government for land acquisition involving natural resource protection and expansion of outdoor recreation with public access. Priority sites in both target areas have the potential to access these funds, specifically the waterfront properties adjoining the Grand River and the Flat River. Both communities' redevelopment sites are near and accessible to public parks, river access points on the Flat River and Grand River, and major local pathway trails that connect to pathways that cross Michigan.

**MEDC Grants and Loans:** MEDC's Community Revitalization Program is also an available resource for qualifying projects (i.e., near downtown, mixed-use development). This program can provide up to 25% of the project cost as a cash benefit to the developer upon successful completion of the project. Low-interest loans are also available to fund eligible brownfield redevelopment activities. The City of Ionia is a certified Redevelopment Ready Community through MEDC, optimally positioning the city for prospective brownfield projects as they surface.

#### **1.c.ii. Use of Existing Infrastructure**

The County promotes the use of existing infrastructure to support brownfield redevelopment. Existing and adequate infrastructure exists within the two target areas—including local streets, roads, and sidewalks, as well as the accessible M-66, M-21, M-44, and I-96—to accommodate the needs of redevelopment. Each priority site has accessible utilities, including electrical, natural gas, water, and sewer, that already lie within the redevelopment sites. As a result of these existing infrastructure conditions, priority sites in the target areas are shovel ready.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **2.a. Community Need**

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

EPA Grant funds are needed to evaluate the large number of contaminated sites within the County. EGLE's Remediation Information Data Exchange system lists over 99 contaminated sites in the small target area communities of Belding and Ionia ([www.egle.state.mi.us/RIDE](http://www.egle.state.mi.us/RIDE)). The Belding target area (population 6,070) includes census tracts (CTs) 302 and 303, which are both disadvantaged according to the Climate and Economic Justice Screening Tool (CEJST) due in part to low income (CT 302: 75th percentile, CT 303: 82nd percentile), poverty (CT 302: 63rd percentile, CT 303: 75th percentile), and unemployment (CT 302: 63rd percentile, CT 303: 88th percentile). The Ionia target area (population

11,655) includes CTs 317 and 321, which are both disadvantaged (CEJST) partially due to low income (CT 317: 82nd percentile, CT 321: 66th percentile), poverty (CT 317: 88th percentile, CT 321: 75th percentile), and low median income (CT 317: 72nd percentile, CT 321: 81st percentile).

Adding to these circumstances is an old housing stock that exists in our disadvantaged target area census tracts. Belding's CTs 302 and 303 have 93.5% and 68.9% of homes being built in or before 1979, while Ionia CTs 317 and 321 have 91.2% and 55.1%, respectively, of their homes built in or before 1979. Housing stock built prior to 1979 commonly contains lead-based paint, which represents health exposure risks to children, including damage to the brain and nervous system and slowed growth and development. It is known that families with constrained incomes have difficulty paying for maintenance of homes where lead-paint exposures may exist. EPA Assessment Grant funds will be utilized by the County to assess brownfields in the target areas so that new affordable housing stock can be constructed, helping ease the need for housing in areas where lead paint exposure risks may exist. Adding new housing stock will increase property values and community revenues while reducing maintenance costs for families with income constraints.

#### 2.a.ii. Threats to Sensitive Populations

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

According to the CEJST, the Belding target area CT 302 is in the 88th percentile for low life expectancy and 85th percentile for asthma and CT 303 is in the 59th percentile for low life expectancy and 91st percentile for asthma. Ionia CT 317 is in the 90th percentile for asthma, and CT 321 is in the 69th percentile for low life expectancy and 63rd percentile for asthma. These sensitive populations are impacted by poverty and environmental contamination. One of the target area's census tracts exhibiting the highest percentile of socio-economic factors influencing poverty rates is Ionia's CT 317 (MiEJScreen). This census tract is in the 78th percentile (low-income population 78th; black, indigenous, people of color 49th; educational attainment 81st; linguistic isolation 46th; population under age 5 90th; population over age 64 14th; unemployment 73rd; and housing burden 68th). CT 317 also ranks in the 85th percentile for pollution burden (proximity to cleanup sites 92nd, proximity to hazardous waste facilities 80th, proximity to RMP sites 36th, proximity to solid waste sites and facilities 78th, wastewater discharge indicator 83rd, and lead paint indicator 88th). Environmental contamination threatens the health of these sensitive populations by weakening immune systems, which can lead to asthma, cancer, and other diseases.

Additionally, existing dwelling units throughout the target areas are older, with large percentages being built prior to 1979 (CT 302: 93.5% and CT 317: 91.2%). These housing units have a greater likelihood of containing lead-based paint and require more maintenance effort and cost than a newer unit. Assessment, cleanup, and redevelopment of the priority sites through an EPA Assessment Grant will help lead to redevelopment projects that meet the housing needs of these sensitive populations and reduce exposure to environmental contamination.

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

According to data from the 2021 American Community Survey 5-year Estimates Data Profiles, in the Belding target area 6.0% (CT 302) and 6.7% (CT 303) of the population are children under the age of five. In the Ionia target area, 11.3% (CT 317) and 7.0% (CT 321) of the population are children under the age of five. Both target areas exceed Michigan and national percentages. This sensitive population is more susceptible to impacts of environmental exposures than normal as a result of lead-based paint from high percentages of housing stock built prior to 1979 (CT 302: 93.5% and CT 321: 91.2%) and soil contamination at priority sites, specifically heavy metals particulate ingestion and inhalation. With already weakened immune systems compromised by asthma, CTs 302 (85th percentile) and 321 (90th percentile) are further threatened by exposure to these contaminants (CEJST). Worsened asthma conditions have been exacerbated by manufacturing plants, which emitted heavy metals pollutants for decades in CTs 302 and 321. Assessment, cleanup, and redevelopment of the priority sites through the use of this EPA Grant would reduce metals exposure concerns and positively influence the future health of the County.



2.a.ii.(3) Environmental Justice

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

The CEJST has identified two census tracts (302 and 303) in the Belding target area that are disadvantaged. CT 302 is in the 75th percentile for low income, 85th percentile for asthma, 93rd percentile for lead paint, 74th percentile for proximity to hazardous waste sites, and 63rd percentile for poverty. CT 303 is in the 75th percentile for poverty, 87th percentile for low median income, 88th percentile for unemployment, 69th percentile for proximity to hazardous waste sites, 64th percentile for lead paint, and 82nd percentile for low income. A disproportionate percentage of contaminated sites in close proximity to these disadvantaged populations exists. Further, the housing stock is old, with 93.5% (CT 302) and 68.9% (CT 303) of homes built in or before 1979. Increased occupant exposure to lead paint represents increased threats to the development of children under five (CTs 302 and 303 have higher percentages of children under five than Michigan and national percentages; 2021 ACS 5-year Estimates).

In the target area of Ionia, census tracts 317 and 321 are disadvantaged according to the CEJST. CT 317 is in the 77th percentile for expected building loss rate (natural hazards), 64th percentile for projected flood risk, 82nd percentile for low income, 90th percentile for asthma, 94th percentile for lead paint, and 98th percentile for proximity to Superfund sites. CT 321 is in the 92nd percentile for proximity to Superfund sites, 75th percentile for poverty, 93rd percentile for unemployment, and 66th percentile for low income. These census tracts have a disproportionate percentage of contaminated sites and are burdened by old housing stock built prior to 1979, which poses increased lead paint exposure concerns to children under five (CTs 317 and 321 have higher percentages of children under five than Michigan and national percentages; 2021 ACS 5-year Estimates).

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

Disadvantaged census tracts in the target areas of Belding (CTs 302 and 303) and Ionia (CTs 317 and 321) need affordable housing to replace the aging housing stock that poses lead paint exposure concerns to children under five (percentiles between 64 and 94 for these census tracts). A Housing Study completed by Ionia County in 2022 revealed a shortage of affordable owner-occupied units and rented units. The County will utilize this EPA Grant to support the cleanup and redevelopment of brownfield priority sites, such as **302 Ashfield**, located within the Belding target area, into vibrant mixed-uses that include affordable housing, which will lessen lead exposure risks, reduce maintenance costs for income constrained families, and increase property values and community tax revenues. These projects will not cause the displacement of residents or businesses in the target areas.

**2.b. Community Engagement**

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

Key organizations that will collaborate with us during this assessment grant have a sound understanding of the economic and social status of the County. These partnerships will allow us to better connect with the residents and businesses in our target area communities, so that we can improve our environmental justice issues through focused initiatives.

<b>Organization / Contact (name &amp; email)</b>	<b>Involvement in project</b>
Ionia County Economic Alliance Precia Garland, Chair pgarland@ci.ionia.mi.us	Focused on job retention and expansion. Will collaborate with the Ionia County Brownfield Redevelopment Authority (ICBRA) on opportunities in target areas that help with workforce housing.
The Right Place Ryan Wilson wilsonr@rightplace.org	Provides Ionia County with business expansion and development support and economic development assistance including leveraging other funding sources that benefit brownfield redevelopment in the target areas. Will serve to connect businesses and developers to the ICBRA’s grant resources and assist with advancing projects through redevelopment planning and

	implementation. A lead site marketer and meeting coordinator for site-specific projects under the grant.
Ionia County Habitat for Humanity (HFH) Stacy Moore, Executive Director smoore@ioniahabitat.org	Nonprofit provider of affordable housing. Familiar with the demographics and housing needs of the community. The ICBRA will work with the HFH to improve the shortage of affordable housing in the target areas through outreach and leveraging of resources.

The Ionia County Brownfield Redevelopment Authority (ICBRA) was developed under state statute to implement various incentive tools and will be involved in the decision-making process for this grant. We will continue to rely on our established relationship with the Michigan Department of Environment, Great Lakes, and Energy (EGLE), which will provide petroleum eligibility determination approvals, assistance on education, and review and approvals of future brownfield cleanup and redevelopment programs. The EPA will also be invited to public meetings and will review materials and provide grant oversight and associated approvals. Our target area local government partners, the City of Belding and City of Ionia, will participate in decision-making and outreach activities associated with assessment, cleanup planning, and cleanup implementation relating to the priority sites. Virtual meeting options will be available during community engagement meetings to capture input from as many as possible, including those that cannot participate in person.

**2.b.iii. Incorporating Community Input**

Community input will be primarily gathered by the ICBRA during collaborative community engagement meetings. ICBRA public meetings will be held regularly (typically at least once a month) to share input received and facilitate public comments. These meetings will have virtual attendance options. Typically, meeting locations in the target area communities will be held through a means of public notice. Other prioritized sites in Ionia County will accordingly receive public notice for input. Public comments obtained during these forums will result in the grant manager’s follow up directly to those community members to ensure all input can be received and incorporated into future decision making. The public may also convey inquiries and public comments to the ICBRA via their webpage. We will use press releases via print and web-based news outlets to circulate information about the progress of the grant activities and how the public can provide input. All forms of communication and outreach will include contact information and the County’s dedicated brownfield webpage address.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**3.a. Description of Tasks/Activities and Outputs**

<b>Task 1: Cooperative Agreement Oversight</b>
<i>i. Project Implementation:</i> Cooperative Agreement oversight will include but is not limited to general grant management, contractor procurement and oversight, ensuring reporting requirements are met, budgeting, and invoice reconciliation. These activities will be conducted for the priority sites and any additional sites in the target areas or identified through the secondary inventory. If personnel time is beyond what is included in our budget is necessary, it will be completed as an in-kind activity.
<i>ii. Anticipated Schedule:</i> Throughout the grant cycle, approval of work plans and contractor procurement are anticipated in the first 90 days
<i>iii. Task Lead:</i> County staff with assistance from the qualified environmental consultant
<i>iv. Outputs:</i> Approved EPA Work Plan and Quality Assurance Project Plan (QAPP), quarterly reports, and final close-out report
<b>Task 2: Inventory and Community Outreach</b>
<i>i. Project Implementation:</i> We will continue to grow our existing inventory of brownfield sites with the assistance of project partners and a technical consultant. Information summarizing our inventory of brownfield sites will be updated on our website to promote our priority sites and attract developers. The County, project partners, and contracted consultant will conduct community outreach and education to inform local stakeholders about the grant and project updates and solicit input and will also work with private real estate professionals (developers, realtors, banks, etc.) to achieve

<p>redevelopment plans based on community goals; both the priority and additional inventory sites will be reviewed. Key staff/grant project manager will attend two brownfield conferences (e.g., National Brownfield Conference) to improve the quality of the program and network with developers. If personnel time beyond what is included in our budget is necessary, it will be completed in-kind.</p>
<p><i>ii. Anticipated Schedule:</i> Task will begin in Quarter 1, then take place throughout the grant cycle. At a minimum, quarterly meetings will be held throughout the grant cycle, each addressing outputs applicable to the current and upcoming grant tasks.</p>
<p><i>iii. Task Lead:</i> County staff with assistance from the qualified environmental consultant</p>
<p><i>iv. Outputs:</i> approximately 12 meetings, attendance at two conferences, further establishment of inventory and updated brownfield website</p>
<p><b>Task 3: Environmental Site Assessments (ESAs)</b></p>
<p><i>i. Project Implementation:</i> Conduct 12 Phase I ESAs and 10 Phase II ESAs on priority sites in target area communities. In addition to the priority sites, it is estimated that 8 additional Phase I ESAs and 5 Phase II ESAs will be conducted for secondary inventory sites. Costs will include consulting and reporting expenses, printing, and other eligible assessment-related costs. Site assessments will adhere to the All Appropriate Inquiry guidelines, applicable ASTM International Standards and environmental liability will be evaluated as it pertains to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The Quality Assurance Project Plan and eligibility determinations will be reviewed by EGLE and the EPA.</p>
<p><i>ii. Anticipated Schedule:</i> For priority sites, Phase I ESAs will take place primarily within Quarters 1 through 3, Phase II ESAs will take place in Quarters 2 through 4 of the agreement. For non-priority sites, Phase I ESAs are expected to take place primarily within Quarters 3 through 10 and Phase II ESAs will take place in Quarters 4 through 11 of the agreement.</p>
<p><i>iii. Task Lead:</i> Qualified environmental consultant overseen by the County</p>
<p><i>iv. Outputs:</i> Site specific eligibility determinations, ESAs, site specific health and safety plans, types and concentration of contamination and risk posed, and updates to the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database</p>
<p><b>Task 4: Site Specific Cleanup Planning</b></p>
<p><i>i. Project Implementation:</i> This task involves the creation of a cleanup plan for redevelopment, as well as implementation strategies for developing and utilizing resources. A qualified environmental consultant will be contracted to assist with developing these plans for priority sites. The consultant will be responsible for determining cleanup measures and costs to mitigate unacceptable exposures and prevent exacerbation relating to known contaminants, which will be summarized in an analysis of brownfield cleanup alternatives (ABCAs)/response activity plan/due care plan and/or a Brownfield Plan/Act 381 Work Plan. It is estimated that this will be conducted for a total of 2 priority sites. This task also includes travel to attend meetings with EGLE staff or other stakeholders related to the actual cleanup or proposed development plans. Costs for supplies such as mapping, copying, publishing, mailing, etc. are also included. At this time, it is anticipated that cleanup planning under the grant will only take place on the priority sites.</p>
<p><i>ii. Anticipated Schedule:</i> Quarters 5 through 8</p>
<p><i>iii. Task Lead:</i> These activities will be overseen by the County and conducted by a qualified environmental consultant</p>
<p><i>iv. Outputs:</i> 2 ABCAs/state equivalent, meetings with EGLE and project stakeholders</p>

**3.b. Cost Estimates**

Budget Categories	Task 1:CA Oversight	Task 2:Inventory and Community Outreach	Task 3:Site Assessments	Task 4:Cleanup and Redevelopment Planning	Total
Personnel	\$2,000	\$2,000	\$2,000	\$2,000	\$8,000
Fringe Benefits	\$1,000	\$1,000	\$1,000	\$1,000	\$4,000
Travel		\$3,680		\$300	\$3,980
Supplies		\$470		\$300	\$770
Contractual		\$2,250	\$360,000	\$21,000	\$383,250
Total Direct Costs	\$3,000	\$9,400	\$363,000	\$24,600	\$400,000
Indirect Costs					
Total Budget	\$3,000	\$9,400	\$363,000	\$24,600	\$400,000

– **Task 1: \$3,000 total; Personnel Costs:** 50 hours at \$40/hour = \$2,000; **Fringe Benefits:** 50 hours at \$20/hour = \$1,000

– **Task 2: \$9,400 total; Personnel Costs:** 50 hours at \$40/hour = \$2,000; **Fringe Benefits:** 50 hours at \$20/hour = \$1,000; **Travel:** assumes one staff member traveling for two conferences averaging three days each (\$400/per flight, \$250 per hotel room per night, and \$80/day per diem per person) totaling \$2,780, community outreach travel and associated mileage reimbursement at approximately 28 miles/month (48 months total) at current rate of 0.655/mile (\$900); **Supplies:** supplies to support printing and presentation materials (\$470); **Contractual:** 22.5 hours at \$100/hour = \$2,250. Grantee will provide meeting space.

– **Task 3: \$363,000 total; Personnel Costs:** 50 hours at \$40/hour = \$2,000; **Fringe Benefits:** 50 hours at \$20/hour = \$1,000; **Contractual:** 20 Phase I ESAs at an average \$3,000 per ESA (\$60,000 total), 15 Phase II ESAs at an average \$20,000 per ESA (\$300,000 total).

– **Task 4: \$24,600 total; Personnel Costs:** 50 hours at \$40/hour = \$2,000; **Fringe Benefits:** 50 hours at \$20/hour = \$1,000; **Travel:** mileage reimbursement at approximately 10miles/month (48months total) at current rate of 0.655/mile (\$300); **Supplies:** \$300 for supplies to support printing, presentation materials; **Contractual:** average estimated cost of \$10,500 per ABCA/state equivalent (2 total).

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

ACRES and quarterly reports will be used as the means of conveying work progress and status, difficulties encountered, financial expenditures, data results, and next steps to EPA and the community. ICBRA will also track data for each assessment site noting specific accomplishments, contaminants discovered and locations, if clean-up activities are required and the implementation progress, and other resources that have been leveraged to assist with the redevelopment of the site. To assist with determining outcomes for completed projects, we will obtain a summary of outcomes from developers, including number of jobs created, acres cleaned up, investment leveraged, square footage of new construction, etc. Project outputs and outcomes tracking will be maintained by the Project Manager and contracted environmental consultant. In the event progress is slower than anticipated, the Project Manager will work with the environmental consultant to increase communication and community outreach efforts. At the end of the grant period, a final report will be produced comparing objectives to outcomes.

**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 EPA Assessment Grant will be managed by the Ionia County Brownfield Redevelopment Authority (ICBRA), which consists of six members who have extensive brownfield experience, two of whom served during the FY 2004 EPA Grant and three of whom served during the implementation of our EGLE 2019 Brownfield Redevelopment Grant. ICBRA members are from across Ionia County and represent interests in local banking, real estate, agriculture, economic development, and health. Julianne Burns, Chairperson of the ICBRA, will be serving as Project Manager. Ms. Burns has over 30 years of

economic and community development experience in Ionia County, having previously been the assistant to the City Managers for both the City of Belding and Ionia. Ms. Burns' responsibilities included writing and administering all grants for various state and federal programs, including the FY 2004 EPA Assessment Grant awarded to Ionia County. Ms. Burns has served as a board trustee with the ICBRA since its inception in 2001, and she has served as Chairperson for the past 13 years. Ms. Burns' knowledge of Ionia County and the county's brownfield sites; the relationships between the county and its residents; and local, state, and federal resources, will be an asset to achieving a successful EPA project and grant closure. Ms. Burns will work closely with the environmental consultant to ensure that the project, program goals, and budget are all on target with timely reporting to the EPA.

Key staff supporting Ms. Burns include Patrick Jordan, Ionia County Administrator; Tim Dame, Ionia County Finance Director; and Judith Clark, Ionia County Treasurer. Mr. Jordan has experience in grant management at both the state and federal level and will assist with the flow of information between the Board of Commissioners, ICBRA, and the public. Tim Dame prepares all finance reports; budgets; and audit statements, under the Administration Office and in cooperation with Judith Clark, County Treasurer. Together, Mr. Dame and Ms. Clark will assist Ms. Burns with the financial components of this grant. Requests for proposals and invoices are processed through the Ionia County Administration's Office and the Finance Department, following prescribed accounting methods and procedures regularly utilized by Ionia County.

The environmental consultant hired for conducting the assessments will be required to provide monthly financial reports to use as a cross-comparison for local financial reports to ensure accuracy. The consultant will be utilized to obtain eligibility confirmation with the EPA to complete the project profiles for reporting purposes.

#### 4.a.iv. Acquiring Additional Resources

Similar to the previous EPA Assessment Grant awarded to Ionia County in 2004, a Request for Proposal (RFP) will be issued to procure a local qualified environmental consultant for professional environmental services to support the grant. The ICBRA will secure these services in accordance with the grant program's selection protocol and Ionia County's purchasing policies, which follow a robust procurement process to ensure that ICBRA receives the highest quality services from the consultants and contractors. It is anticipated that the consultant selection process, involving proposal review and interviews, would be completed immediately following grant award. The selected consultant will be reviewed and approved by the County Board of Commissioners. Michigan Works!, which is the statewide workforce development agency, provides resources, training, and local outreach to connect job seekers with local brownfield employment opportunities.

### **4.b. Past Performance and Accomplishments**

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

##### 4.b.i.(1) Accomplishments

Ionia County was previously awarded an EPA Hazardous Substances and Petroleum Assessment Grant in 2004 for \$400,000. The FY 2004 grant was administered by the ICBRA, on behalf of the county. The assessment activities included completing 16 Phase I; 14 Phase II Environmental Site Assessments; and five supplemental assessments. Successful outcomes, some of which occurred after the grant closeout, included leveraging \$270,000 from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) (then known as the DEQ) for additional assessment, demolition, and cleanup activities at sites where Assessment Grant resources were deployed; 36 acres designated as ready for use; 10 new jobs created; and 13 jobs retained.

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

The ICBRA has consistently met the requirements for Work Plan and Quality Assurance Project Plan development; eligibility demonstrations; Sampling Plans; Health and Safety Plans; Quarterly Reports; Assessment, Cleanup, and Redevelopment Exchange System (ACRES) reporting; MBE/WBE and Financial Status Reports; and community notification requirements. The period of the FY 2004 Assessment Grant started October 1, 2004, and ended September 30, 2008, and was fully implemented.

**THRESHOLD CRITERIA RESPONSE  
IONIA COUNTY, MICHIGAN**

**1. Applicant Eligibility –**

a. Ionia 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 –** Community input will be primarily gathered by the Ionia County Brownfield Redevelopment Authority (ICBRA) during collaborative community engagement meetings. ICBRA public meetings will be held regularly (typically at least once a month) to share input received and facilitate public comments. These meetings will have virtual attendance options. Typically, meeting locations in the target area communities will be held through a means of public notice. Other prioritized sites in Ionia County will accordingly receive public notice for input. Public comments obtained during these forums will result in the grant manager's follow up directly to those community members to ensure all input can be received and incorporated into future decision making. The public may also convey inquiries and public comments to the ICBRA via their webpage. We will use press releases via print and web-based news outlets to circulate information about the progress of the grant activities and how the public can provide input. All forms of communication and outreach will include contact information and the County's dedicated brownfield webpage address.

**3. Expenditure of Existing Grant Funds –** Ionia 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.