



COUNTY OF CASS, MI

NARRATIVE INFORMATION SHEET

1. **Applicant Identification:** Cass County, Michigan
120 N. Broadway
Cassopolis, Michigan 49031
2. **Funding Requested**
 - a. Assessment Grant Type: Community-wide
 - b. Federal Funds Requested: \$300,000
3. **Location:** Cass County, Michigan
4. **Target Area and Priority Site Information:**

Target Area: City of Dowagiac (census tracts 26027002000 and 26027002100)

 - Priority Site 1: S. Front Street Corridor, 501 to 511 S. Front Street, Dowagiac, MI
 - Priority Site 2: Former Division Tire Building, 315 E. Division Street, Dowagiac, MI

Target Area: Village of Cassopolis (census tract 26027002100)

 - Priority Site 3: S. Broadway Street Corridor, 221, 410, and 521 S. Broadway, Cassopolis, MI
 - Priority Site 4: N. Disbrow Street Neighborhood, N. Disbrow Street, Cassopolis, MI
5. **Contacts**
 - a. Project Director: Matthew Newton, County Administrator
269.445.4420
matthewn@cassco.org
120 N. Broadway
Cassopolis, Michigan 49031
 - b. Chief Executive/Highest Ranking Elected Official: Jeremiah Johnson, Board Chair, County Board of Commissioners
269.445.4420
jeremiahj@cassco.org
120 N. Broadway
Cassopolis, Michigan 49031
6. **Population:** City of Dowagiac (5,731)
Village of Cassopolis (1,842)
7. **Other Factors:**

Other Factors	Page #
Community population is 10,000 or less.	1, 5
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, 4



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Other Factors	Page #
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.	1, 2, 3, 4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	1, 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 30, 2023

VIA EMAIL

Matthew Newton
Administrator
Cass County
120 N Broadway
Cassopolis, Michigan 49031

Dear Matthew Newton:

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 Cass 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 Cass County's need for funding.

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

Should the U.S. EPA award a brownfield grant to Cass 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 Cass 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: Doug Koop, 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

Cass County (pop. 51,632), located in southwestern Michigan, is the smallest county in the state by total area (508 square miles) (data.census.gov). The county shares its southern border with Indiana and includes one city, four villages, and fifteen townships all with populations of less than 5,000 with only three exceptions, which are less than 10,000. Cass County's size has no relationship with the large role it has played in our nation's history. One of the county's earliest inhabitants, the Potawatomi, maintain a large reservation of the Pokagon Band of Potawatomi Indians headquartered in the City of Dowagiac, one of the target communities for this grant. In the early 1800s, abolitionists (Quakers) settled in Cass County to become part of the Underground Railroad network of stations (urscc.org). Many "freedom seekers" were offered sanctuary as they made their way north with many settling in the county, creating an integrated society well before its time. Finally, Edward Lowe, who invented "Kitty Litter," grew up in Cassopolis, one of our target communities, leaving behind a legacy foundation that focuses on entrepreneurship programs and land stewardship (edwardlowe.org).

Despite the county's natural beauty and access to hundreds of small lakes, its small rural communities experience many challenges, including poverty, low-wage jobs, disinvestment, lack of affordable housing, and numerous sites of contamination. The county has 101 known sites of contamination (egle.state.mi.us/RIDE) and many others that are perceived to be contaminated. If awarded, the county, through its Brownfield Redevelopment Authority (Authority), will utilize this grant countywide; however, the primary target areas will be the **City of Dowagiac** (pop. 5,731) and **Village of Cassopolis** (pop. 1,842), which are part of two disadvantaged census tracts (CT20 and CT21) and two partially disadvantaged census tracts (CT19 and CT22) (Climate and Economic Justice Screening Tool, or CEJST). Dowagiac and Cassopolis are working-class communities with limited resources, median household incomes well below the state and national averages, high poverty, and significant minority populations. Half of the known contaminated sites in the county (50 sites) are located in Dowagiac and Cassopolis, with many of them concentrated in the downtown areas and along the railroad corridors. These communities also have blighted structures which are being addressed by the Cass County Land Bank Authority (CCLBA). The CCLBA has identified 75 sites countywide that require demolition with a few that can be stabilized and reused. The county, through its Authority, is taking the lead on this grant because the rural communities have limited resources to address these brownfield sites. This EPA Grant will provide funding to conduct Phase I and II environmental assessments, hazardous material building surveys including lead and asbestos surveys, due care, and cleanup planning. The information gained from assessing these sites will support future reuse and help to attract additional funding from local, state, and federal sources.

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

This application is for a Community-wide Assessment Grant and will address sites throughout Cass County. With 101 known sites of contamination in the county (half of these sites located in our target areas of Dowagiac [36 sites] and Cassopolis [14 sites]), as well as many other sites perceived to be contaminated, the following priority sites have been identified.

The **City of Dowagiac** has seen a slow population decline over the last several decades (City of Dowagiac 2019 Master Plan). To help reverse this trend, the city has begun offering residential lots at no cost to anyone who wants to build a house in Dowagiac. In an effort to address utility costs, enhance affordability, and affect climate change, the "Dowagiac. Live Smarter" initiative, which involves the construction of sustainable zero-energy homes, has been implemented. This EPA Grant will be used to further enhance this program by evaluating brownfield sites that can be redeveloped for housing and complementary uses. This will require assessing, understanding, and managing potential environmental risks associated with the historical uses of these sites.

S. Front Street Corridor (501 to 511 S. Front Street) (CT19): The City of Dowagiac has identified five adjacent properties as a redevelopment priority for energy-efficient, affordable housing. Since the late 1800s, these parcels have been developed for industrial and commercial uses including the city's Department of Public Works yard, an agricultural implement manufacturer, bulk fuel distribution, auto service, and tool and die. The properties remain contaminated with metals, volatile organic compounds (benzene, xylenes, tetrachloroethene), polynuclear aromatic hydrocarbon compounds (naphthalene), and petroleum/automotive fluids, from former auto service activities, fuel distribution and leaking

underground storage tanks. Disadvantaged, low-income minority residential areas have surrounded these parcels for decades, being exposed to potential contamination. The city purposefully acquired the parcels and is pursuing funding through both Blight Elimination Grants to demolish the blighted/vacant structures and Affordable Housing Grants to build. One of the county's community partners, Market Van Buren, recently received a \$2 million Revitalization and Placemaking Grant to assist with the construction of housing and infrastructure; however, further environmental assessment from an EPA Assessment Grant will inform what risk mitigation and cleanup will be needed.

Former Division Tire Building (315 E. Division Street) (CT20): Dowagiac residents identified this as a priority site during the development of the city's 2019 Master Plan. This blighted warehouse is within walking distance of the downtown and is surrounded by single-family homes. Potential future uses include a community swimming pool, daycare facility, or something designed to serve the neighborhood. Historical use likely included auto service, which utilized oils, solvents, engine cleaner, and other chemicals that may remain on site. Further assessment through an EPA Grant would help to realize the reuse dream for this disadvantaged low-income (30.4% poverty), minority (26.7%) community.

The **Village of Cassopolis** is the County Seat and has been aggressively preparing for redevelopment in its downtown. As a Michigan Certified Redevelopment Ready Community, the city has streamlined its processes and procedures, making it more business friendly and encouraging to private investment. By embracing a Placemaking Strategy, the downtown will be the catalyst for creating a quality place where people want to live, work, and play. This strategy includes its natural areas, neighborhoods, and the downtown. To realize this future, numerous brownfield sites require immediate attention and assessment and have become priorities for the community.

S. Broadway Street Corridor (221, 410, and 521 S. Broadway) (CT21): As outlined in the village's 2019 Master Plan, the downtown area is connected to a unique asset, Stone Lake. This asset has been underutilized, and the community identified finding more ways to use the lake as a priority. Phase one has created a park, fishing docks, bike racks, a beach, and boardwalk area. Phase two is getting ready to start and has funding through a Community Development Block Grant. This project will provide free year-round access to public gathering spaces, which is especially important in a community where over 26% live in poverty, 49.5% are minority, and 63% are living below the Asset Limited, Income Constrained, Employed (ALICE) threshold. As this exciting project moves forward, there are at least three properties opposite this planned waterfront development that have known petroleum contamination (egle.state.mi.us/RIDE) and are either underutilized or continuously vacant due to perceived issues related to historical use as gas stations. These sites likely contribute to groundwater and surface water contamination to the lake, including volatile organic compounds (benzene, toluene, and xylenes), and potential vapor intrusion concerns to the disadvantaged residents immediately behind these locations. Further assessment will help support this project and improve the corridor for this community.

N. Disbrow Street Neighborhood (CT21): One block west of the downtown main street between E. York Street and Cemetery Street are eight blighted trailers and various outbuildings that have depressed this disadvantaged residential neighborhood. The lots have junk, broken-down cars, and other debris which may be contaminating the soil and groundwater with volatile organic compounds (benzene, toluene, and xylenes). As identified in the village's Master Plan, neighborhoods that provide affordable, accessible, energy-efficient housing are a critical element to attracting and maintaining young people to this community. The Cass County Land Bank Authority (CCLBA) was awarded Blight Elimination Grant funds to acquire the properties, demolish the structures, and remove the junk/debris that may be contaminating the sites. This EPA Grant will help to assess the properties post-demolition to determine if there is any contamination remaining prior to building affordable housing that uplifts the neighborhood and provides better living conditions for its residents.

1.a.iii. Identifying Additional Sites

In collaboration with the Economic Development Corporation and CCLBA, the Authority has acquired a list of 101 contaminated sites throughout the county from the Michigan Department of Environment, Great Lakes, and Energy (EGLE). The CCLBA has also solicited blighted sites from all the local units of government throughout the county for prioritization of limited Blight Grant funding from the State of Michigan Land Bank; many of the 75 sites identified for demolition have asbestos and lead-based paint, junk cars, garbage, and debris that may be contaminating the soil and groundwater. In the event

EPA Assessment Grant funds remain after the priority sites have been addressed, the grant funds can be used to identify potential contamination at these additional sites, as well as conduct hazardous materials building surveys to understand the amount of asbestos and other hazardous materials that need to be removed prior to demolition. These sites will be prioritized based on the local communities' Master Plans; level of risk associated with the site in relation to CEJST disadvantaged, low-income residents; and potential to redevelop a site that will assist emerging entrepreneurs. For instance, in the Village of Edwardsburg (pop. 1,207), the Authority, the CCLBA, and EGLE are cooperating to address an old collapsing gas station. This site was identified by the adjacent museum with concerns for its well-being. The tanks and potential contaminated soil will be removed by EGLE, the CCLBA is demolishing the building, and depending on the level of remaining contamination, if any, there is a desire to construct a mixed-use affordable apartment/commercial/ retail structure. Additional assessment will be needed to understand due care obligations for reuse.

Another optimal site for assessment is in the Village of Marcellus (pop. 1,254), where a 2.9-acre industrial property is operating as a plastic injection molding company and an iron casting company. The property is owned by the village and leased to the two operators. These properties provide jobs and income to the community; however, layoffs over the last several years (53 employees in 2020, WARN 2023) have occurred, threatening the viability of these businesses. The village is concerned that both companies will close or move in the near future, leaving behind a contaminated industrial legacy in their downtown, directly adjacent to the Township Public Library. The EPA Assessment Grant could help the village understand the site conditions, needs for future reuse, and impact on the adjacent library and residential neighborhood.

1.b. Revitalization of the Target Area

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

As part of the development of the county's Master Plan and in concert with the target communities' Master Plans, investing in and improving their downtowns, attracting and retaining new businesses, and creating a sense of place are priorities.

The City of Dowagiac's Master Plan identifies an increasing need for neighborhood improvement, blight removal, and an increase in quality of housing. Assessment activities anticipated at the **S. Front Street Corridor** and **Former Division Tire Building** priority sites will provide further understanding of the contamination present at these properties and support future site uses that are in line with these goals. After the blighted structures in the **S. Front Street Corridor** have been demolished and environmental assessments conducted (along with any resulting risk mitigation/cleanup), it is intended for the five properties to be repurposed for energy-efficient, affordable housing. The **Former Division Tire Building** was identified as a priority site during development of the city's Master Plan, with several future uses being considered including a community swimming pool, daycare facility, or something designed to serve the neighborhood.

The 2019 Village of Cassopolis Master Plan identifies future land use along the **S. Broadway Street Corridor** as shifting from low-density residential to waterfront mixed-use. It is anticipated that our three known sites of contamination—which are located opposite a planned waterfront development that includes a park, fishing docks, bike racks, a beach, and boardwalk area—will need to be assessed as reuse planning and activation of Phase two of this corridor is initiated. The village Master Plan also emphasizes the “Neighborhood Plan,” which identifies key elements that each neighborhood should have including walkability, safety, transportation options, mix of unit types, public gathering spaces, and accessible public services. The **N. Disbrow Street Neighborhood** contains many of these features, just a short walk away from the Village Clerk, local library, and core downtown. Upon removal of the blighted structures, the neighborhood is a primary candidate for a multi-family residential development, consistent with future land use plans in the Master Plan.

Additionally, the Authority will continue to work with the CCLBA to assess sites countywide that have been tax foreclosed and are blighted or vacant properties. In some cases, the CCLBA will demolish the structure and the Authority will assess the property for other environmental issues. These two entities have great synergy and resources to hold, prepare, and return property for reuse. Once ready, the properties can be offered for sale at a much lower cost (or no cost) for energy-efficient, affordable housing or small businesses. Currently, the CCLBA is utilizing approximately \$690,000 in state blight elimination grant funds to begin addressing the 75 identified blighted properties. Additionally, the CCLBA was awarded a \$750,000 Michigan Housing Opportunities Promoting

Energy Efficiency (MI-HOPE) grant. This grant will be used countywide to help our disadvantaged, low-income, and minority communities improve home energy efficiency, rehabbing aging housing stock, assisting elder residents to age in place, and make home repairs possible for residents on fixed incomes. This program will also reduce energy costs to our low-income residents, improve their living conditions, and decrease stress on the energy grid which may help reduce the impacts of climate change including greenhouse gas emissions.

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

Assessing sites in our target communities and countywide will be critical for realizing the ultimate reuse vision of ensuring brownfield redevelopment contributes to the well-being of the communities in concert with our targeted communities' redevelopment and renewal strategies. This is accomplished by (1) understanding the conditions that make a site a brownfield (i.e., contaminated, blighted), (2) arriving at solutions for alleviating the brownfield conditions (i.e., cleanup, due care or continuing obligations, compatible reuse), (3) providing tools, resources, and incentives to implement the solutions (i.e., utilize the Land Bank to secure and stabilize blighted and vacant properties), and (4) educating the community, allowing informed decisions on brownfield properties to eliminate or manage risks.

The low-income, minority communities in Cass County have a disproportionate environmental stressor burden and high cumulative impacts. Focusing on contaminated brownfield sites in our target communities and throughout the county will accomplish three major goals: (1) begin eliminating the sites and conditions that may be contributing to the degradation of susceptible populations, (2) eliminate blight and provide opportunities for energy-efficient, affordable, clean housing or clean areas for recreation (the CCLBA's MI-HOPE energy grant will help support this effort), and (3) encourage additional investment and revenue generation, creating jobs and business opportunities. By accomplishing goals 1 and 2, investors and entrepreneurs will recognize the benefits of reinvesting in communities, reusing infrastructure, and providing opportunities for hardest-hit areas. Leveraging the EPA Grant will help realize the outcomes noted above for our target communities. The City of Dowagiac will eliminate blighted, contaminated structures/properties along the **S. Front Street Corridor**, preparing the site for badly needed energy-efficient, affordable housing and eliminating environmental risks to surrounding residents. The **Former Division Tire Building** project in Dowagiac will involve redevelopment of a blighted warehouse, with potential future uses being something that will serve the neighborhood, such as a community swimming pool or daycare. The Village of Cassopolis will enhance its planned Stone Lake recreational area (which will provide free access to public gathering spaces including a park, fishing docks, a beach, and a boardwalk area) by addressing contaminated sites along the **S. Broadway Street Corridor**, eliminating contaminated run-off risks from increased climate induced storm events that may pose a risk to users of the lake and area residents.

Without assessing sites, it is difficult to understand the additional funding or resources that will be necessary to prepare the 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 Brownfield Plans, etc. The Authority intends to assess as many known or perceived contamination sites as possible, as demonstrated by utilizing 83% of the grant funds for Phase I (13 sites) and II (15 sites) assessments.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse

Michigan's Brownfield Laws allow the Authority to develop Brownfield Plans for eligible project sites. These plans capture future tax increment from new investment on a property to pay for Phase I/II Environmental Site Assessments, Baseline Environmental Assessments, Due Care Plans, demolition, soil and groundwater cleanup, lead and asbestos abatement, and housing development activities. Also, in the City of Dowagiac or with utilization of the Land Bank, Brownfield Plans can pay for site preparation and infrastructure costs to support the reuse plan for a site. The EPA Grant can be used to develop Brownfield Plans, and the Authority can use the tax increment capture from projects to reimburse eligible brownfield activities. Once the developer is fully reimbursed, the Authority can capture another five years for the Local Brownfield Revolving Fund, which is locally controlled and can only be used for eligible activities on other brownfield sites. While these programs are valuable, they do not provide advance funding for assessment and cleanup. Additionally, since brownfields typically lack collateral value, traditional financing cannot be secured to cover upfront environmental assessments at project inception. The EPA Grant would act as seed money to leverage future brownfield

redevelopment activities and would help benefit our lower-income or minority entrepreneurs, who may have limited access to financial capital.

The Authority will pursue State 128a Brownfield Assessment funds to conduct free assessments on brownfield sites. Additionally, the Authority will have the ability to access Michigan Department of Environment, Great Lakes, and Energy (EGLE) Brownfield Redevelopment Grants/Loans for projects that need funding for site investigation, cleanup, demolition, etc. EGLE has \$10 million in hazardous site grant funds and \$5 million in petroleum grant funds available in FY24. These grants will be pursued to assist with cleaning up sites that have been assessed using our EPA Grant funds. The Authority will work with the Land Bank to pursue State Land Bank grants and loans that are directly supportive of energy-efficient, affordable housing.

1.c.ii. Use of Existing Infrastructure

Limited areas of Cass County are served by public sewer and water service. These areas are primarily limited to the City of Dowagiac and the county's four villages, which includes our two target areas. Public sewer and/or water in each of the county's townships are non-existent or otherwise very limited. Where sanitary services have been extended to township areas, it is typically limited to specific lake areas. When a project site is located in the City of Dowagiac, the Land Bank is utilized, or the project includes housing development activities, infrastructure improvements are eligible brownfield activities that can be reimbursed through tax increment financing in a Brownfield Plan. This can be a funding source for infrastructure if needed. The Authority intends to support existing infrastructure by prioritizing assessments at sites within areas served by public infrastructure.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

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

Cass County is seeking an EPA Community-wide Brownfield Assessment Grant because we do not have the financial wherewithal to address the 101 known sites of contamination countywide (egle.state.mi.us/RIDE) and the many other perceived contaminated sites that need assessment support. The County Board of Commissioners established the Cass County Brownfield Redevelopment Authority (Authority) to take a leadership role in addressing these brownfield sites because our rural, small, low-income communities do not have the resources to address their large number of brownfields. The City of Dowagiac target area is the county's only city, with a population of 5,731. Our remaining four villages and fifteen townships all have populations less than 10,000, with the Village of Cassopolis target area having a population of just 1,842. The City of Dowagiac and Village of Cassopolis are Eligible Distressed Areas (Michigan State Housing Development Authority), which exhibit higher than statewide average levels of economic distress based on a negative population change, lower property values, higher poverty rates, and higher unemployment rates than statewide averages. Our target areas of Dowagiac and Cassopolis have poverty rates of 30.4% and 26.4%, respectively, which are higher than in the county (12.4%), state (13.3%), and country (12.6%). The Median Household Incomes are also significantly lower in our two target areas of Dowagiac (\$42,371) and Cassopolis (\$36,438) compared to the county (\$60,725), state (\$63,202), and country (\$69,021). Unemployment also continues to be a problem in Dowagiac (12.3%) and Cassopolis (13.9%), levels much higher than the county (5.6%), state (6.2%), and country (5.5%) (data.census.gov). In Cass County, many residents are employed in low-wage jobs associated with tourism, services, manufacturing, and agribusiness and are without post-secondary education training, making access to higher-paying jobs limited. The Climate and Economic Justice Screening Tool (CEJST) disadvantaged census tracts within our target areas (CT20 and CT21) are in the 92nd and 94th percentile for unemployment, respectively, and 19% and 17% of the populations only have high school education. According to the 2021 Community Needs Assessment Report for Cass County, lacking education puts an individual at risk of falling into the "poverty trap," which tends to create an intergenerational poverty gap. Education and skill training provides the knowledge necessary to obtain a job and make a living. The EPA Grant will be a tremendous catalyst to help these struggling communities achieve their reuse goals and objectives, improving residents' quality of life.

2.a.ii. Threats to Sensitive Populations

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

The sensitive populations in our target areas (i.e., minority population and children; see table below) are impacted by poverty status. The CEJST disadvantaged census tracts that contain the majority of

our two target areas (CT20 and CT21) are in the 83rd and 75th percentile for socioeconomic factors (including low-income population – 67th and 67th; black, indigenous, people of color – 61st and 67th; educational attainment – 90th and 88th; linguistic isolation – 67th and 46th; population under age 5 – 51st and 53rd; population over age 64 – 70th and 70th; unemployment – 75th and 45th; and housing burden – 45th and 47th, respectively) (MI EJSscreen). Overwhelmingly, the social and institutional inequities that cause poverty, especially in minority communities like our target areas of the City of Dowagiac (26.7% minority) and the Village of Cassopolis (49.5% minority), 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. Additionally, there are a significant number of occupied housing units built before 1979 in the City of Dowagiac (78.3% of homes) and Village of Cassopolis (74.4% of homes). These rates show a high percentage of occupants are potentially exposed to lead-based paint and asbestos, which can be a significant detriment to the younger populations that are prevalent in our target communities. Through this EPA Grant, the target areas 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	Young Population (Age Under 18)	Poverty Rate	% Minority	Median Household Income
City of Dowagiac	23.3 %	30.4%	26.7%	\$42,371
Village of Cassopolis	22.5%	26.4%	49.5%	\$36,438
Cass County	20.9%	12.4%	15.0%	\$60,725
Michigan	21.8%	13.3%	26.0%	\$63,202
Nation	22.5%	12.6%	40.6%	\$69,021

(data.census.gov; 2021 ACS 5-year Estimates Data Profiles)

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 various human diseases and conditions. With 101 known sites of contamination in the county, and half of these sites being in the City of Dowagiac and the Village of Cassopolis (egle.state.mi.us/RIDE), there are many opportunities for residents in the target communities to be exposed to contaminated soil, groundwater, surface water, and airborne contamination, which increases the potential to contract/exacerbate a disease or adverse health condition. The effects of exposure to environmental contaminants associated with these brownfield sites disproportionately impact our poorer communities with limited access to health care systems and benefits—12.4% of Dowagiac residents and 6.1% of Cassopolis residents have no health insurance compared to the county (5.7%) and state (4.5%). Nearly three-quarters of the housing stock in our target areas of Dowagiac and Cassopolis were built prior to 1979 (78.3% and 74.4%, respectively). According to the 2021 Community Needs Assessment, there is substantial scientific evidence linking physical housing conditions to health risks including respiratory and cardiovascular disease, allergies, infectious disease, and chronic illness. In our target census tracts CT20 and CT21, there is a higher prevalence of higher adult current asthma (both 12.0%) than in the state (11.5%) or country (9.7%) (CDC PLACES, 2021). According to the Van Buren-Cass County Health Department, in 2021 the leading causes of death across most age groups in the county was heart disease and cancer, which can be linked to exposures to contamination typically found on brownfield sites. This is reflected in the fact that Cass County has a higher cancer mortality rate (182.4) (age-adjusted data, per 100,000) than the state (157.3) and country (144.1) (CDC Wonder, 2020). The federal government additionally ranked Cass County as a Health Professional Shortage Area and Medically Underserved Population. Lack of insurance and access to health care is a significant barrier to seeking timely care if an individual contracts a contaminant-caused disease. This EPA Grant allows the Authority to assess and evaluate risks associated with these contaminated sites, older housing stock, and blighted properties, ultimately developing cleanup plans and creating a more equitable and healthy living condition for target area 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

our target communities are disproportionately affected by the risks and socio-economic impacts brownfield sites have on their community. Cass County has two census tracts identified through the CEJST as being disadvantaged (CT20 and CT21) because they meet one burden threshold and the associated socioeconomic threshold which include a low-income (71st and 67th percentiles, respectfully), unemployed (92nd and 94th percentiles), and lower education population (19% and 17%). Additionally, the lands of the Pokagon Band of Potawatomi Indians in these census tracts are considered disadvantaged. The **Former Division Tire Building** priority site is located in CT20, with the **S. Front Street Corridor** only feet from CT21. The two priority sites in the Village of Cassopolis (**S. Broadway Street Corridor** and **N. Disbrow Street Neighborhood**) are located in CT21. 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. Many of the minority and low-income populations from our target areas of the City of Dowagiac and Village of Cassopolis are forced to live in the areas they can afford, which tend to be in substandard housing adjacent to industrial/commercial areas. Over 63% of the housing in the county was built prior to 1979 (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 residents. The priority site projects will not cause displacement of residents or businesses in the target areas.

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

This EPA Grant will be a catalyst for bringing positive change to residents’ lives in our disadvantaged, underserved communities by conducting Phase I and II Environmental Assessments of vacant, blighted buildings and substandard housing throughout our target areas and identifying brownfield conditions and risks that require cleanup, exposure mitigation, asbestos or lead abatement, and improved infrastructure. Many properties including our priority sites remain vacant or poorly utilized. The Authority, the Cass County Land Bank Authority (CCLBA), and our community partners can bring resources to these communities to safely reuse sites for the construction of affordable housing and recreational areas, 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. The Authority is excited to work with our community partners including the Social Justice Alliance of Cass County, whose mission is to focus on elevating social justice by promoting action, changing culture, and ensuring justice, which will help with the review and prioritization of brownfield sites in the county.

2.b. Community Engagement

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

Organization / Contact	Involvement in project
Helping Hands of Cass County Sheryl DeLuca, [REDACTED]	Direct connection to low-income residents; will co-host with Authority outreach event(s) and assist with identifying brownfield sites that directly impact disadvantaged residents
Social Justice Alliance of Cass County Gerry Bundle, Gerry.Bundle@ccta-mi.org	Direct connection to minority populations; will co-host outreach event(s) with Authority and provide guidance on reuse of brownfield sites that uplift Black, Indigenous, and People of Color (BIPOC) residents
Cass County Conservation District Korie Blyveis, casscod@gmail.com	Provide technical support on brownfield site reuses that protect and enhance Cass County’s natural resources
Market Van Buren Zach Morris, morrisz@marketvanburen.org	Regional economic development organization; will provide financial guidance and mentoring for emerging entrepreneurs to redevelop priority sites

2.b.iii. Incorporating Community Input

At the early stages of the EPA Grant, the Cass County Brownfield Redevelopment Authority (Authority) will convene several community open houses, allowing for remote access, to present information about the EPA Grant and the Authority’s programs and available tools and resources. The Authority is excited to co-host with our community partners, Helping Hands and the Social Justice Alliance, ensuring the most affected populations are provided information about the programs and tools. A preliminary site inventory has been developed and will be updated from feedback, and a

solicitation for any new sites will be requested prior to the meetings. The site inventory will eventually be located on Google Earth for ease of public access. The Authority will co-host an event with our regional economic development agency, Market Van Buren, where the lending, developer, and realtor communities are invited to learn about the grant and the various brownfield programs and tools available. Similar events will be scheduled during the term of this grant. Efforts will be made to inform and notify residents and businesses in the target communities and countywide through 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 disadvantaged community members in the county and target areas during times they can meet, which may not be during regular business hours due to their work schedules. We will 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. Factsheets, brochures, and performance dashboards will be used and distributed.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs

The Applicant is not charging salary and fringe dollars for programmatic/administration activities for any tasks noted below. The implementation schedule will meet 35% within an 18-month spend rate.

Task 1: Phase I Environmental Site Assessments (ESAs)
<i>i. Project Implementation:</i> 8 Phase I ESAs on priority sites in target communities. 5 Phase I ESAs on non-priority sites countywide chosen by Authority, with community input.
<i>ii. Anticipated Schedule:</i> Complete 4 Phase I ESAs on priority sites by 4th qtr. FY25 and 4 by 4th qtr. FY26; for 5 non-priority sites, we estimate completing 1–2 Phase I ESAs every 3 qtrs.
<i>iii. Task Lead:</i> Qualified Environmental Professional for Phase I ESAs, Applicant oversight
<i>iv. Outputs:</i> 13 Phase Is, eligibility demonstrations, site access agreements, ACRES updates
Task 2: Phase II Environmental, Baseline Environmental Assessments/Due Care Plans
<i>i. Project Implementation:</i> Completion of Quality Assurance Project Plan (QAPP), completion of Sampling Plans and Health and Safety Plans for each Phase II. 6 Phase II ESAs on priority sites in target communities. 3 Phase II ESAs on non-priority sites countywide as determined by Authority, with community outreach event input. For contaminated sites (estimated 6), completion of Baseline Environmental Assessments (BEAs) for liability protection and Due Care Plans to address “continuing obligations.”
<i>ii. Anticipated Schedule:</i> Complete 4 Phase II/BEAs/Due Care Plans at priority sites by 4th qtr. FY25 and 2 by 4th qtr. FY26; for remaining 3 non-priority sites, we estimate 1–2 Phase IIs completed every 3 qtrs.
<i>iii. Task Lead:</i> Qualified Environmental Professional for Phase II ESAs, Applicant oversight
<i>iv. Outputs:</i> 1 QAPP, 9 Phase IIs and Sampling and Analysis Plans/Health and Safety Plans, 6 BEAs/Due Care Plans, ACRES updates
Task 3: Brownfield Plans and Cleanup Planning
<i>i. Project Implementation:</i> 6 Brownfield Plans (estimate) to utilize tax increment financing to leverage grant funds on priority sites and community-wide. Plans will be reviewed by the Authority and local unit of government and approved by County Commissioners at a public hearing. Estimated that 2 sites will require Cleanup Plans (Act 381 Work Plans) for state tax support, with state approval.
<i>ii. Anticipated Schedule:</i> Complete 3 Brownfield Plans and 1 Cleanup Plan (Act 381 Work Plan) at priority sites by 4th qtr. FY26; remaining 3 Brownfield Plans and 1 Cleanup Plan (Act 381 Work Plans) at non-priority sites estimated to be completed by the end of the grant term.
<i>iii. Task Lead:</i> Qualified Environmental Professional for Plans, Applicant oversight
<i>iv. Outputs:</i> 6 Brownfield Plans, 2 Cleanup Plans (Act 381 Work Plans), 6 Local Resolutions, 6 Public Hearings, 2 State Regulatory reviews, ACRES updates
Task 4: Community Outreach, Programmatic, Travel, and Supplies
<i>i. Project Implementation:</i> Activities include working with the EPA; procuring a Qualified Environmental Professional; preparation of Grant Work Plan; preparing for, attending, and participating in public hearings; municipal and Authority meetings; creating and disseminating brochures/flyers/webpages about the EPA Grant; educating and informing community groups and

stakeholders about the grant and brownfields; community outreach events; attending the National Brownfield Conference; preparing EPA quarterly/financial/performance reports.

ii. Anticipated Schedule: Community outreach efforts will be intense at the outset of the grant and will include 1 community open house in each target community by 3rd qtr. of FY25, 3rd community open house by 1st qtr. FY26, and monthly Authority meetings. Outreach efforts will continue throughout the grant term.

iii. Task Lead: Applicant will plan/initiate outreach efforts, and Qualified Environmental Professional will assist outreach efforts and do required reporting with Applicant as review.

iv. Outputs: Procurement of 1 Qualified Environmental Professional, 5 community open house/education events, 48 monthly Authority meetings, 16 Quarterly Reports, 4 financial and MBE/WBE reports, numerous educational materials and outreach events, 1 trip to National Brownfield Conference for 3 Authority Members and Director, final closeout report

3.b. Cost Estimates

Budget Categories	<u>Task 1:</u> Phase I Assessments	<u>Task 2:</u> Phase II Assessments	<u>Task 3:</u> Brownfield Plans	<u>Task 4:</u> Community Outreach/ Programmatic	Total
Travel				\$6,000	\$6,000
Supplies				\$1,500	\$1,500
Contractual	\$45,500	\$204,000	\$32,000	\$11,000	\$292,500
Total Direct Costs	\$45,500	\$204,000	\$32,000	\$18,500	\$300,000
Indirect Costs					
Total Budget	\$45,500	\$204,000	\$32,000	\$18,500	\$300,000

83% of the Assessment Grant is designated for Phase I and II Environmental Assessments.

- Task 1, Contractual Costs: 13 Phase I site assessments at average cost of \$3,500 = **\$45,500 total.**
- Task 2, Contractual Costs: 9 Phase II site assessments at average cost of \$20,000 = \$180,000; 6 BEAs/Due Care Plans at average cost of \$4,000 = \$24,000; **\$204,000 total.**
- Task 3, Contractual Costs: 6 Brownfield Plans at average cost of \$4,000 = \$24,000; 2 Cleanup Plans (Act 381 Work Plans) at average cost of \$4,000 = \$8,000; **\$32,000 total.**
- Task 4: \$18,500 total; Travel Costs: Travel for 3 Authority Members and Project Director including airfare, lodging, food, and expenses at an average cost of \$1,500 per person = \$6,000 total; Supplies Costs: supplies for meetings, outreach events, printing, web hosting, etc. at cost of \$1,500; Contractual Costs: 16 Quarterly Reports at average cost of \$500 = \$8,000; preparation for 5 community open houses at average cost of \$600 per event = \$3,000; \$11,000 total.

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

The Cass County Brownfield Redevelopment Authority (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) 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. The Dashboard documents the outcomes, i.e., the number of grant-related outreach activities, 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 cleaned up sites and sites where blight was removed or 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 built, 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 Cass County Brownfield Redevelopment Authority (Authority) will utilize the Cass County Administration Office’s knowledgeable staff to implement and manage the Assessment Grant with input from the Authority Board. Matthew Newton, the County Administrator, will be the Project

Director. Mr. Newton has managed many grants over his 8-year career in local government, with extensive experience in all aspects of grant implementation, funding, reporting, and compliance. Mr. Newton will be supported by other team members, as needed, including support staff, legal counsel, and administrative staff. Jennifer Rentfrow, the county's Finance Director, keeps financial track of all the grants for Cass 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, Hope Anderson (Chair of the Cass County Land Bank Authority (CCLBA), member of the Authority, and County Treasurer) attends Authority meetings and is actively engaged in all discussions, meetings, and functions. Ms. Anderson has extensive experience in all aspects of grant implementation. The Authority Board is made up of eleven individuals (who also make up the Economic Development Corporation Board) representing a broad cross-section of the county. 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 continues to create 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. The consultant will conduct Phase I and II Environmental Site Assessments, Baseline Environmental Assessments, Brownfield Plans, and Cleanup Plans. The consultant will assist with community outreach efforts, reporting, and timely updates to the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) required by the Cooperative Agreement. The Authority 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.

4.b. Past Performance and Accomplishments

4.b.ii. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance Agreements

4.b.ii.(1) Purpose and Accomplishments

Cass County has never received an EPA Brownfield Grant; however, the county has experience managing other similar grants. Federal sources include a \$750,000 Michigan State Housing Development Authority Michigan Housing Opportunities Promoting Energy Efficiency (MI-HOPE) grant, which is federally funded through the U.S. Department of Treasury American Rescue Plan Coronavirus State and Local Fiscal Recovery Funds. The purpose of the grant is to increase home energy efficiency, rehab aging housing stock, assist elderly residents with aging in-place, and make home repairs for residents on a fixed income. The Cass County Land Bank Authority (CCLBA), in collaboration with the Local Council on Aging and our community partner Helping Hands, is currently conducting 51 energy audits for MI-HOPE applicants, which will be the foundation for extensive retrofitting activities in 2024 including installing energy-efficient appliances, insulation, windows, roofs, and heating systems.

The county, through the CCLBA, has received \$690,261 in grant funds through the Michigan State Land Bank Authority Blight Elimination Program. To date, this program, funded at the state and federal levels, has demolished seven privately owned structures and one publicly owned structure, with an additional three privately owned and two publicly owned commercial structures currently under demolition. Future efforts include building stabilization, environmental remediation of a privately owned structure, and the rehabilitation of a publicly owned house. This concerted effort is not just about tearing down structures; it is a deliberate step toward ushering in a significant enhancement in both aesthetics and safety, revitalizing the targeted communities from the ground up. As custodians of this transformative initiative, the CCLBA will track the influx of private investments and developments in the aftermath of the Blight Elimination Program to gauge its impact on community revitalization.

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

For the grants included in the previous section, the projects are being successfully implemented and managed. All grant requirements including work plans, schedules, reporting requirements, and other compliance-related activities are being met.

THRESHOLD CRITERIA RESPONSE CASS COUNTY, MICHIGAN

1. Applicant Eligibility –

a. Cass 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 – At the early stages of the EPA Grant, the Cass County Brownfield Redevelopment Authority (Authority) will convene several community open houses, allowing for remote access, to present information about the EPA Grant and the Authority's programs and available tools and resources. The Authority is excited to co-host with our community partners, Helping Hands and the Social Justice Alliance, ensuring the most affected populations are provided information about the programs and tools. A preliminary site inventory has been developed and will be updated from feedback, and a solicitation for any new sites will be requested prior to the meetings. The site inventory will eventually be located on Google Earth for ease of public access. The Authority will co-host an event with our regional economic development agency, Market Van Buren, where the lending, developer, and realtor communities are invited to learn about the grant and the various brownfield programs and tools available. Similar events will be scheduled during the term of this grant. Efforts will be made to inform and notify residents and businesses in the target communities and countywide through 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 disadvantaged community members in the county and target areas during times they can meet, which may not be during regular business hours due to their work schedules. We will 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. Factsheets, brochures, and performance dashboards will be used and distributed.

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3. Expenditure of Existing Grant Funds – Cass 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.