



Tuscola County Economic Development Corporation
Empowering Leaders in Agriculture, Manufacturing and Clean Energy

**NARRATIVE INFORMATION SHEET
COALITION OF TUSCOLA COUNTY, HURON COUNTY, AND SANILAC COUNTY
FY2024 U.S. EPA BROWNFIELD ASSESSMENT GRANT**

1. **Applicant Identification:**
Tuscola County Economic Development Corporation (EDC)
141 South Almer Street
Caro, Michigan 48723

2. **Funding Requested:**
 - a) Assessment Grant Type: Coalition
 - b) Federal Funds Requested: \$600,000

3. **Location:** Tuscola County, Huron County, Sanilac County, Michigan

4. **Coalition Members' Target Areas and Priority Site Information:**
 - a) Tuscola County Target Area – Vassar, Michigan
 - i. Priority Site: Former Vassar Coating, 211 Sherman Street, Vassar, Michigan
 - b) Huron County Target Area – Bad Axe, Michigan
 - i. Priority Site: City of Bad Axe Dump, No Address, Parcel ID 51-820-018-10
 - c) Sanilac County Target Area – Brown City, Michigan
 - i. Priority Site: Brown City Bus Garage, 4279 Main Street, Brown City, Michigan

5. **Contacts:**
 - a) Project Director:
Mr. Stephen Erickson, Executive Director
Tuscola County EDC
141 South Almer Street, Caro, Michigan 48723
Phone: (989) 673-2849
E-mail: directorerickson@tuscolaedc.org
 - b) Chief Executive/Highest Ranking Elected Official:
Mr. Kim Vaughan, Chair of the Tuscola County Board of Commissioners
125 West Lincoln Street, Suite 500, Caro, Michigan 48723

Phone (989) 672-3700

E-mail: kvaughan@tucscocolacounty.org

6. Population Tuscola County – 53,168; Huron County – 30,986; Sanilac County – 40,878 (*U.S. Census Bureau [2020]*)

7. Other Factors Checklist:

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

8. Letter from State or Tribal Environmental Authority: A letter from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) is attached.

9. Releasing Copies of Applications: Not applicable.



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 26, 2023

VIA EMAIL

Stephen Erickson
Executive Director
Tuscola County Economic Development Corporation
141 South Almer Street
Caro, Michigan 48723

Dear Stephen Erickson:

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 the Tuscola County Economic Development Corporation's (TCEDC) 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 TCEDC's need for funding.

The TCEDC is applying for a \$600,000 Brownfield Assessment Coalition Grant. As a coalition of local units of government and an economic development agency created by a general-purpose unit of local government, the TCEDC is an eligible grant applicant.

Should the U.S. EPA award a brownfield grant to the TCEDC, it would allow them to conduct environmental investigations to promote economic development at brownfield sites. If you need further information about potentially eligible sites in the coalition's member communities 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: Heath Bobick, EGLE

FY 2024 U.S. EPA BROWNFIELDS ASSESSMENT GRANT APPLICATION

COALITION OF TUSCOLA COUNTY, HURON COUNTY, AND SANILAC COUNTY, MI

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Coalition Members, Target Areas, and Brownfields

1.a.i. Coalition Members: Tuscola, Huron, and Sanilac Counties have formed a coalition (the Coalition) to apply for a FY24 EPA Assessment Coalition Grant. The Tuscola County Economic Development Corporation (EDC) will be the lead eligible entity, with the Huron County EDC and Sanilac Regional Economic Consortium.

1.a.ii. Overview of Brownfields Challenges and Description of Target Areas: The geographic boundaries where Grant activities will be conducted are Tuscola County (921 sq. mi.), Huron County (2,137 sq. mi.), and Sanilac County (1,590 sq. mi.), which is defined as the Coalition area. This area is identified as the “Thumb Region” of Michigan and is bordered by Saginaw Bay to the west and Lake Huron to the north and east. Saginaw Bay and Lake Huron are both in federal flood plains. Saginaw Bay also adjoins Tuscola and Huron Counties and is identified by the U.S. EPA as a Great Lakes Area of Concern (AOC). About 52 miles of Tuscola and Huron County shoreline adjoins Saginaw Bay, and an additional 68 miles of shoreline in Huron County and Sanilac County adjoins Lake Huron. The Coalition area is located in the Saginaw Bay Watershed, which drains about 15% Michigan and is the largest watershed in the State. The Coalition area includes 9 cities, 21 villages, 77 townships, and 72 unincorporated communities with a total population of 125,659 residents. Each of the cities and villages are micro-communities with populations of less than 5,000. Approximately 89% of land in the area is agricultural and used to grow sugar beets, beans, corn, grains, and support cattle and dairy production. In the 1950’s and 1960’s manufacturing became more prevalent in the area and was associated with the growth of the automotive industry in Detroit. The industrial facilities were built in the cities and villages with infrastructure to support their operations. Today facilities like forges, metal stamping operations, tool and die shops, injection plastic molding, trucking and freight operations, foundries, and power generation plants are present in the Coalition area. In 2000, Michigan experienced a devastating economic downturn, that, when combined with the national recession in 2008, decimated the manufacturing portion of the Coalition’s economy and resulted in vacant manufacturing plants, gasoline stations, commercial centers, and downtown businesses. Even though the economy of the “Thumb Region” has improved since 2008 many of the vacant industrial and commercial properties remain.

The Coalition formed in 2016 to assist communities with addressing brownfields because of a lack funds or expertise in the communities to deal with assessing the brownfields. The Coalition has proven that their efforts work through the completion of their FY2017 and FY2021 U.S. EPA Assessment Grants, which assessed brownfields throughout the Coalition area. The use of grant funds also stimulated several brownfield redevelopments. However, the Coalition also discovered that they had only scratched the surface of evaluating brownfields and additional funds are still needed to continue to assess and redevelop sites.

The highest concentration of brownfields in the Coalition are in cities and villages and are typically located in or near residential neighborhoods, downtown areas, parks, and rivers or streams emptying into Lake Huron or Saginaw Bay. The Coalition will focus grant funds on brownfields in these three Target Areas (TAs): **1) Huron TA - Bad Axe** (population 3,793) – This is the county seat and the largest city in Huron County. It is densely populated with residential neighborhoods intermingled with commercial and industrial sites in a 2.3 sq. mi. area. According to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) it has over 40 known brownfield sites. These sites range from current and former gasoline station and fuel depots to dry cleaners to industrial/manufacturing sites located near residential areas and downtown Bad Axe. **2) Sanilac TA - Brown City** (population 1,300) – It is located in the southwest portion of Sanilac County and encompasses about 1.1 sq. mi. Brown City is predominately a residential town industrial and commercial properties along Michigan Highway 90 (M-90) that is Main Street and adjacent to the railroad tracks that bisect the town from the southeast to the northwest. According to EGLE, Brown City has 10 identified brownfield sites, which are in or near residential neighborhoods. **3) Tuscola TA - Vassar** (population 2,751) – It is in the southwest portion of Tuscola County and bisected by the Cass River, which is in a federal flood plain. Vassar consists of residential, commercial, and industrial areas all located in a 2.1 sq. mi. area. Approximately 40 known brownfield sites are in the city limits with many located near the Cass River and residential neighborhoods. Each of the TAs encompasses the entire city or town and is not limited to a

certain. The Coalition also choose the TAs to focus on underserved and disadvantaged communities.

1.a.iii. Description of the Priority Brownfield Sites: The **priority site** in the **Huron TA - Bad Axe** is the former **City of Bad Axe Dump** (Thompson Rd – 10 acres). The site is in the south portion of town in an area of industrial and manufacturing developments and near residential neighborhoods. The **City of Bad Axe Dump** site consists of about 10 acres and was used for the disposal of residential and industrial refuse from at least 1941 to 1968. The site has been vacant since 1968. Because the **City of Bad Axe Dump** was not a licensed landfill, it was not lined, monitored, regulated, or appropriately capped when closed. Contaminants likely include methane, VOCs, PAHs, PCBs, heavy metals, and general refuse. The Coalition identified the City of Bad Axe Dump as a priority site because environmental assessment is required to understand if contaminated vapors pose a risk to business and residents adjoining the site. The Coalition also sees an opportunity to redevelop the 10-acre parcel as a solar farm to help offset energy costs for residents and businesses.

The **Brown City Bus Garage priority site** (4279 Main St. – 1 acre) is in the **Sanilac TA - Brown City**. The priority site is near the high school in the northeast portion of the town. The site was originally developed as a dairy bottling facility and was then converted to the bus garage in 1972. The site formerly had underground storage tanks but the environmental condition of the site is unknown. Potential contaminants are VOCs, chlorinated solvents, PAHs, and heavy metals. The **Brown City Bus Garage** was chosen as a priority site because little is known about its environmental condition. The site is very likely to be redeveloped and the Coalition wants to assist Brown City with adequately understanding environmental concerns at the site and help them plan appropriately for the redevelopment.

The **priority site** in the **Tuscola TA – Vassar** is the **former Vassar Coating site** (211 Sherman St. – 0.95 acre). This site is situated adjacent to the main railroad spur that runs through town and is adjacent to a residential neighborhood. The priority site is a former manufacturing facility with potential contaminants such as, VOCs, chlorinated solvents, PAHs, and heavy metals. The Coalition identified the **former Vassar Coating site** as a priority site because assessment is needed to make sure the building is safe to occupy. Based on its industrial history there are concerns about contamination impacting the air quality in the building. The Coalition is also concerned about contamination migrating into the residential neighborhood to the west of the site and the assessment will help determine if cleanup planning is required. The site is also situated along railroad tracks and has a high redevelopment potential.

1.a.iv Identifying Additional Sites

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

1.b. Revitalization of the Target Areas: 1.b.i. Reuse Strategy and Alignment with Revitalization Plans: Through the process of identifying the priority sites, the Coalition reviewed Master Plans for Bad Axe, Vassar, and Brown City to ensure reuse strategies for each priority site aligned with land use plans in the TAs. Each Master Plan discussed the need to preserve and enhance existing infrastructure while planning for orderly commercial and industrial growth within the communities that provided buffers from residential neighborhoods. Another focus was to provide citizens with services, facilities, and employment opportunities to allow for a high quality of life in the communities. The Coalition also reviewed each county's Master Plan and identified three common goals that will govern the Grant project: 1) protect prime agricultural land; 2) increase growth/development in local cities and villages with existing infrastructure, governmental services,

and planning/zoning to accommodate development; and 3) practice environmental conservation to protect rivers and tributaries feeding Saginaw Bay and Lake Huron. To support the goals of each TA and each county, the Coalition will use grant funds to assess priority sites in the TAs as summarized below.

The **Bad Axe Dump priority site**, because of its past use as the city dump, presents several significant constructability issues that would make redevelopment with a building difficult. The city will redevelop the site as a solar farm to supplement energy needs to existing industrial operations in the area. This will also reduce the use of fossil fuels and help the city meet their green energy goals. The site has existing infrastructure that will allow for the redevelopment and upload of energy to the local energy grid. The construction of the solar farm will enhance existing infrastructure while providing a buffer from residential neighborhoods and will allow the county to preserve prime agricultural land.

The **Brown City Bus Garage priority site** is in downtown Brown City and is used for bus storage and offices. The Coalition chose this site because of its redevelopment potential. The Brown City school district will be building a new bus garage and the existing building will be redeveloped into offices and storage for the Brown City Police Department and Department of Public Works. This will benefit the local community through updating/modernizing the building to incorporate energy-efficient building systems and renewable energy sources like solar panels and will repurpose buildings with existing infrastructure.

The **former Vassar Coatings priority site** is a historic industrial site adjacent to residential neighborhoods. Assessment of the site will allow Vassar and the Tuscola County Health Department to adequately measure the levels of contamination and determine the impacts to the residential neighborhoods. The site will be redeveloped as an office or commercial space to support local businesses. This redevelopment meets Vassar's goal of orderly commercial growth through the reuse of an existing commercial property, will provide local employment opportunities, and will utilize existing infrastructure in an area with adequate planning/zoning to accommodate redevelopment.

1.b.ii. Outcomes and Benefits of Reuse Strategy: The redevelopment of the priority sites will have the following outcomes and economic benefits.

Bad Axe Dump priority site: Assessment and redevelopment of the site will create 10 acres of reusable land for renewable energy use. The solar farm will require \$1 to \$2 million investment while creating jobs for construction and electrical contractors. There would also be long-term jobs created to service and maintain the farm. The solar farm would also be associated with other solar farm developments in Huron County. The solar farm will also reduce energy bills for residents.

Brown City Bus Garage priority site: Redevelopment of this site will greatly benefit the community of Brown City by allowing the for the safe reuse of existing buildings while protecting citizens. The assessment and redevelopment of the site will create 20 construction jobs and will allow Brown City to provide adequate and safe space for existing city employees. The redevelopment will also create investment of \$500K to \$900K, allow for sustainable reuse of the existing buildings, and facilitate energy efficiency improvements to the facility.

Former Vassar Coating priority site: Redevelopment of this site will allow Vassar to mitigate contamination and protect residents living near the site while facilitating improvements to the site. Redevelopment and reuse of the existing buildings will allow for incorporation of more energy efficient systems in the building while creating an estimated investment of \$500K to \$700K in downtown Vassar. The updating of the building will create 10 to 20 construction jobs. The redevelopment may allow for an existing business to relocate to a better location or will allow for new investment in Vassar without consuming greenspace or agricultural land.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: Each Coalition Member has experience and expertise in leveraging and developing partnerships that bring resources to their projects. In addition, each Coalition Member has a Brownfield Redevelopment Authority that allows capture of incremental taxes on brownfield projects to reimburse eligible costs associated with assessment, remediation, and redevelopment. This expertise will be used during and following the Grant to leverage additional funds from private, State, and Federal resources to ensure completion of the revitalization efforts in the TAs and throughout the Coalition area. The Coalition has been able to leverage over \$1.5 M in State grants following assessment conducted with the FY17 and FY21

Assessment Grant funds. Additional key resources that can be used to support assessment, remediation, or reuse/redevelopment of priority and non-priority sites identified during the Grant project are listed in Table 1.

Table 1. Key Resources

Source	Description	Eligibility	Funding Use
MI Department of Environment, Great Lakes and Energy (EGLE) grants and loans	Grants/loans of up to \$1M for projects that promote economic development and reuse of brownfields	Local units of government can apply	Assessment, due care and remedial activities, demolition, and lead/asbestos abatement. Support abatement of lead/asbestos at Brown City Bus Garage and Former Vassar Coatings , and cleanup activities at the all 3 priority sites.
Community Development Block Grants (CDBG)	Funding for improvements in low-moderate income areas (both target areas)	Local units of government can apply for CDBG funds.	Rehabilitation of structures on brownfields and redevelopment of brownfields into public-use facilities. Support improvements to the Brown City Bus Garage and Former Vassar Coatings priority sites and non-priority sites.
US Department of Agriculture Rural Development Loans and Grants	Funding for development of business, industry, housing and community facilities in communities with less than 20,000 residents	Each Coalition member can apply for funds to assist communities	Funds for fixed assets and working capital for expansion of existing or new businesses. Support capital expenditures and improvements to Former Vassar Coatings priority sites.

1.c.ii. Use of Existing Infrastructure: The TAs and the priority sites are located in older, industrial areas that contain the required infrastructure to support most types of redevelopments and the revitalization plans discussed in Section 1.b.i. Directing grant funds to these priority sites and TAs will facilitate the use of existing infrastructure during redevelopment activities.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need: 2.a.i. The Community’s Need for Funding: Each county in the Coalition has experienced population decline and a reduction of their tax-base over the last 20 years. Between 2000 and 2020, about 13,800 or 10% of residents left the Coalition area. This was caused by the closure of manufacturing plants and other business; and a lack of new businesses and jobs coming into the communities. These plants and businesses are in the cities and villages that had resources and infrastructure to support their operations and received taxes from the businesses to help maintain public services. The loss of business and jobs in these communities with small populations of less than 5,000 residents, which also includes our TAs, has led to less tax base to operate county and local governments. These conditions mean no funding is available at the county or local level to assess brownfields. The Eastern Michigan Council of Governments (EMCOG) has estimated the percentage of residents living in the poverty in this region increased by 4.4% between 2000 and 2009 and by 2011, 19% of region’s population lived at or below the poverty level compared to 17.5% in Michigan and only 15% nationally. By 2016, EMCOG estimated that 42% of the households in the region were living at or below poverty levels. This coupled with the loss of population, declining tax base, depressed home values have added to regional economic struggles that have lasted for 20-30 years.

As shown in the table presented in 2.a.ii, the poverty levels for families and children in the TAs of Bad Axe, Brown City, and Vassar are higher than state and national levels. The data in Table 2 corroborates with the observations made by EMCOG. These small communities chosen to be the TAs for this grant are also defined as disadvantage communities due to low incomes. According to the 2021 American Community Survey, the median household income in Bad Axe, Brown City and Vassar is \$45,929, \$53,087, and \$48,703, respectively. These incomes are 20 to 30% lower than

the median household income in Michigan, which is \$66,988 and 30 to 40% lower than the national rate, which is \$74,755. These numbers show that residents in the TAs are struggling to pay their bills and meet their family's basic needs. Coupled with higher energy costs and inflation families are being negatively impacted by a lack of economic opportunities in their communities. This also means that local governments are using most of their budgets to provide essential services like fire, police, and ambulance operations to residents. Lower local tax revenue joined with higher operating costs leave no funding to help assess brownfields. These communities need outside funds to assess, remediate, and eventually redeveloping brownfields. The EPA Assessment Grant will provide funds not otherwise available to help identify, assess brownfields, and begin cleanup planning efforts.

2.a.ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: Residents impacted the most by health and welfare concerns associated with brownfields in the TAs include women, children, and the elderly.

Table 2. Demographic Information

DEMOGRAPHIC INFORMATION	BAD AXE (HURON Co.)	BROWN CITY (SANILAC Co.)	VASSAR (TUSCOLA Co.)	MICHIGAN	UNITED STATES
Population ¹	3,793	1,300	4,064	9,957,488	322,903,030
Females of child-bearing age ¹ (2021)	24.6%	23.8%	22.6%	24.9%	25.7%
65 years or older ¹ (2021)	22.6%	14%	16.0%	18.7%	17.3%
Families with children under 18 yrs – Poverty Rate ¹	26.4%	18.2%	22.7%	15.1%	13.6%
Children – Poverty Rate ¹	23.2%	26.1%	17.9%	18.2%	16.3%
Female Householder w/own children under 18 yrs – Poverty Rate ¹	43.8%	50.0%	42.9%	35.9%	32.7%

¹ 2021 American Community Survey data profile

As shown in the table, residents over 65 years of age and women make up nearly 50% of the population in the TAs. In each TA, poverty rates for families with female householders are higher than the county, state, and national percentages. Similarly, the percentage of households relying on Food Stamps/SNAP benefits ranges from 13.3% to 22.4% (2022 American Community Survey (ACS)), which is at or higher than the state rate of 13.6% and a national rate of 12.4%. The information presented in the table shows a lack of opportunity and reinvestment in the TAs for the sensitive populations. There are also health concerns with uncontrolled exposures to contamination or exposure to hazardous materials (asbestos, lead-based paint) from blighted commercial and industrial buildings in and near their neighborhoods. The overriding health risks and welfare concerns combined with the exposure to contaminants from uncontrolled brownfields can be minimized by using grant funds to assess the priority sites in the TAs, which will lead to removal of blight, restore safe site conditions, and stimulate redevelopment, job growth, and quality of life.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions: Health issues like cancer, heart disease, asthma prevalence, and chronic lower respiratory disease have been linked to exposure to contaminants like those identified at the priority sites in the TAs. Cancer, heart disease, liver disease, and chronic lower respiratory deaths for Huron, Tuscola, and Sanilac Counties along with the state and national rates are presented below. Data is not available below the county level.

Table 3. Health Conditions

Chronic Disease Indicators ¹	Huron County	Sanilac County	Tuscola County	Michigan ¹	U.S. ²
All Cancer	163.5	163.2	164.6	159.0	146.6

Heart Disease	225.2	244.0	206.0	205.3	173.8
Liver Disease	19.3	12.9	15.7	13.5	14.5
Chronic Lower Respiratory Deaths ^{1,2}	111.7	171.6	181.3	123.8	34.7

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

As shown in the table, incidence of cancer, heart disease, liver disease, and/or chronic lower respiratory deaths in the Coalition area exceed the Michigan and U.S. rates. Chronic lower respiratory deaths in Huron County exceed State and U.S. rates by over 50%. These rates of cancer and chronic lower respiratory deaths typically affect older residents (65 years of age and older) and are likely tied to the chronic effects of a lifetime of living near brownfields in the TAs and other communities. The Assessment Grant will support characterizing threats the brownfields pose to human health and the environment in the TAs. Threats will be subsequently reduced by development/implementation of cleanup plans that incorporate engineering and/or institutional controls to further limit exposures.

(3) Environmental Justice: (a) Identification of Environmental Justice Issues: The TAs and the priority sites presented in this application are identified as "disadvantaged" based on data provided from the Environmental Justice Screening and Mapping Tool (EJSCREEN) and the CEJST. The **Bad Axe Dump priority site** in Bad Axe, which is a low-income community (81st percentile) with a high rate of heart disease (93rd percentile). Portions of Bad Axe also have broadband service gaps which limits resident's ability to effectively work and children's ability to learn or complete school assignments. The underserved community of Brown City (**Brown City Bus Garage priority site**) is surrounded by agricultural land and severely lacks green space (94th percentile). The community also has an Amish community with a lack of indoor plumbing (98th percentile) which also adds to the environmental justice issues. Brown City is also a low-income community (85th percentile) and has transportation barriers (98th percentile). The transportation barrier is associated with the time and distance residents are required to travel for their jobs. This barrier also plays a role in unemployment rate for the community (91st percentile). Another disparity impacting residents is high asthma rates (91st percentile), which are due in some part to brownfields in the community. Environmental justice issues are also present in Vassar, which contains the **former Vassar Coatings priority site**. Vassar is another low-income community (82nd percentile) with residents being impacted by high energy costs (91st percentile). The underserved community also has transportation barriers (92nd percentile) because residents have significant travel times and distances to get to their jobs located outside the community. The rate of asthma (90th percentile) is a health disparity impacting residents. The Cass River runs through downtown Vassar, which is in the federal flood plain; therefore, the risk associated with flooding is another issue resident's may be impacted by on a yearly basis.

(b) Advancing Environmental Justice: By leveraging Grant-funded assessments and subsequent redevelopment initiatives, the Coalition will advance environmental justice through identification, removal, and effective management of contamination at priority and non-priority sites in the target areas that will create a healthier living environment for residents. Through redevelopment, **Brown City Bus Garage and former Vassar Coatings priority sites**, communities will be able to safely remediate hazards like asbestos and contamination that create health disparities while creating local jobs that allow residents to not travel as far for work. The reuse of the buildings at the priority sites will also protect precious green space in Brown City and allow for the creation of better paying jobs for residents. The development of the **Bad Axe Dump priority site** as a solar farm will assist disadvantaged residents in the low-income community by reducing energy costs. The focused redevelopment in the TAs will also not minimize or displace existing residents or businesses. The Coalition is focused on enhancing residents' lives, improving the economy in the Coalition area, and protecting the natural resources that are vital to the area.

2.b. Community Engagement

2.b.i.-2.b.ii. Project Involvement and Project Roles: The following community partners will be involved in the grant project. Each partner will assist the County in making decisions or provide technical assistance for site selection, cleanup, and/or redevelopment of brownfields.

Table 5. Public Involvement and Project Roles

Partner Name	Point of Contact	Description
Cass River Greenway (CRG)	Robert Zeilinger President [REDACTED]	CRG is a non-profit group of volunteers working to enhance recreational opportunities and environmental well-being of the Cass River. CRG will assist the Coalition with community outreach and education of the Grant.
Role: CRG will have meaningful involvement by identifying brownfields along the Cass River and providing valuable input for cleanup planning associated with former Vassar Coatings priority site that may be venting to the Cass River.		
Eastern Michigan Council of Governments	Sue Fortune Executive Director sfortune@emcog.org	EMCOG serves 14 counties including the Coalition Members and promotes enhancing the regional economy, improving transportation, protecting the environment, and encouraging place making. EMCOG will use their private and public partners to assist with community outreach within the Coalition.
Role: EMCOG will assist with seeking additional grants or other funding sources to enhance the redevelopment of Brown City Bus Garage and former Vassar Coatings priority sites and non-priority sites in the Coalition area. Their meaningful involvement will stem from their resources and connections throughout the region and at the State of Michigan.		
Huron County Community Foundation (HCCF)	Mackenzie Price Executive Director mackenzie@huroncounity.com	The HCCF supports the well-being and improvement of the quality of life in Huron County. They support philanthropic interests in Huron County and facilitate partnerships to address community challenges while providing grants to address community needs.
Role: HCCF will have meaningful involvement with the Bad Axe Dump priority site by coordinating public communications and soliciting input regarding redevelopment of brownfields in the Bad Axe TA.		

2.b.iii. Incorporating Community Input: The Coalition is made up of the economic development organizations for Tuscola, Huron, and Sanilac Counties. Each organization has a diverse board of directors made up of local government and industry representatives. The intent of each organization is to represent and be a voice for all communities in the Coalition. During the FY17 and FY21 EPA Assessment Grants, the executive director for each organization shared the progress of tasks and assessment activities associated with the grant during the monthly board meetings. This communication allowed for widespread outreach throughout the Coalition area.

As with the previous Assessment Grants, the Coalition’s plan to involve stakeholders will include three primary efforts: 1) The Coalition will announce the Grant award in a press release to the local newspaper, in an ad placed on local radio stations, and through an announcement on the local Public Access Television station in order to reach residents at all education and access levels. The announcement will also be posted on Coalition Member’s websites and social media (Facebook and Twitter) pages. Key community organizations (Section 2.b.i) will also be given information to distribute and place on their websites. 2) The Coalition Members will host an **initial outreach and “kick-off” meetings** to acquaint key community organizations, environmental organizations, educational institutions, and the media with the grant project. The Coalition will ask stakeholders to identify additional brownfields they feel are impacting their health and welfare. These sites will be added to the Coalition’s list of potential sites for funding. Meeting outcomes will be distributed through Coalition Member’s websites and community social media pages and a newsletter. 3) The Coalition Members will also work with local leaders, religious organizations, and

local hospitals and healthcare providers to reach underserved residents and groups directly affected by project work on the priority sites. At these meetings, residents will be asked to comment on the priority sites and proposed reuse as well to identify additional sites they feel should be assessed. The Coalition will work with its key project partners to acquaint the Coalition area at-large with the grant project and ask residents to provide additional potential sites for assessment. All the additional sites identified at these meetings will be added to the Coalition’s list of potential sites for funding and be prioritized as discussed in Section 1.a.iii. This step is needed to ensure that the public’s concerns are incorporated into the project. These meetings will include a virtual option using video conferencing software (e.g., Zoom or Teams).

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

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs: The Coalition will use the grant to assess the priority sites in the target areas and other high-risk and developable non-priority sites identified during the 4-year performance period. No subawards or participant support costs are anticipated. The following four tasks will be implemented to accomplish this plan.

Task 1 – Programmatic and Outreach
<p><u>3.a.i. Project Implementation</u></p> <ul style="list-style-type: none"> ● The Work Plan will be prepared and the Cooperative Agreement (CA) will be executed. Grant project tracking and financial systems will be set up and maintained. ● A Qualified Environmental Professional(s) (QEP) will be retained in compliance with applicable federal procurement regulations. ● Quarterly reports will be submitted to the EPA; the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) will be updated; MBE/WBE/DBE reports and final project closeout documentation will be submitted. ● Staff will attend brownfields training programs. ● Project “kick-off” meetings will be hosted by each county in the Coalition. ● Community Outreach Activities: Press Releases, updating each county’s and community partners’ websites and social media pages, and site-specific meetings will be conducted. Impacted residents will be notified of assessments. ● Assistance will be requested from each county’s health department or the State health department as appropriate to understand and prioritize health risks at brownfield sites identified for assessment. <p>In-kind Coalition staff time for document preparation and travel will be contributed for amounts over those accounted for in 3.b.</p>
<p><u>3.a.ii. Anticipated Schedule</u></p> <ul style="list-style-type: none"> ● The Work Plan will be prepared within 1 month of the grant award; CA will be executed by September 2024 CA compliance tracking and financial systems will be set up upon award of grant and maintained throughout the term of the grant. ● A QEP will be retained within three months of the executed CA. ● After the grant award, ACRES will be updated and quarterly reports will be submitted within 30 days of the end of the reporting period. Annually, ACRES will be updated with cleanup and redevelopment data. Annual MBE/WBE reports will be submitted. Project closeout documents will be submitted when the performance period ends. ● Staff will attend the 2025 EPA National Brownfields Conference.

<ul style="list-style-type: none"> • A project “kick-off” meeting will be held within one month of receiving notification of the grant award for each member of the Coalition. • Community outreach activities will continue throughout the performance period.
<p><u>3.a.iii. Task/Activity Lead:</u> Tuscola County EDC, along with assistance from the Coalition members will be responsible for day-to-day programmatic oversight and outreach activities throughout the performance period.</p>
<p><u>3.a.iv. Outputs:</u> Work Plan, CA, quarterly reports (16); ACRES updates; MBE/WBE reports (4) and final project closeout documentation; staff training; outreach meetings throughout the term and development of outreach materials.</p>
<p>Task 2 – Site Inventory</p>
<p><u>3.a.i. Project Implementation</u></p> <ul style="list-style-type: none"> • Additional (non-priority) sites will be evaluated for assessment based on the following: 1) sites identified as an imminent threat to public health or the environment; 2) high-opportunity brownfields that will help the Coalition achieve its brownfields program goals; and 3) brownfields identified as high-priority by communities served by Coalition members. • Non-priority sites will be evaluated and added to the inventory. <p>In-kind Coalition staff time and travel will be contributed for amounts over those accounted for in 3.b.</p>
<p><u>3.a.ii. Anticipated Schedule</u></p> <ul style="list-style-type: none"> • The prioritization system used during the successful FY17 and FY21 Assessment Grants will continue throughout 4-year performance period. • Non-priority sites will be added to the inventory throughout the 4-year performance period.
<p><u>3.a.iii. Task/Activity Lead:</u> The Tuscola County EDC will be the lead and work with Coalition members and QEP(s) to update/maintain existing inventory of brownfield sites.</p>
<p><u>3.a.iv. Outputs:</u> Updated brownfields inventory and prioritization.</p>
<p>Task 3 – Site Assessment</p>
<p><u>3.a.i. Project Implementation</u></p> <ul style="list-style-type: none"> • Priority sites (and non-priority sites identified during the performance period) will be evaluated through performance of Phase I and/or Phase II assessments conducted in accordance with All Appropriate Inquiry (ASTM Standard E1527-21) and other ASTM standards/practices. Health and Safety Plans (HASPs) will be prepared prior to each assessment. • The selected QEP(s) will prepare a Quality Assurance Project Plan (QAPP) and submit it to the EPA for approval. • Assessments on priority and other sites after securing site access. • The Coalition and QEP(s) will meet to ensure required site access has been secured, individual assessments are progressing, and the overall project schedule is met. <p>In-kind Coalition staff time will be contributed for sites access and assessment scheduling coordination.</p>
<p><u>3.a.ii. Anticipated Schedule</u></p> <ul style="list-style-type: none"> • Phase I and/or Phase II assessments will continue throughout the performance period. • Assessments will begin once the selected QEP(s) receives U.S. EPA approval for the Quality Assurance Project Plan (QAPP) (this depends on EPA timing but is anticipated to be accomplished within three months of QEP selection). • Assessments on both priority and other sites following securing site access will continue throughout the performance period.

<ul style="list-style-type: none"> Coalition staff and QEP(s) will meet monthly to discuss priority sites, ensure required site access/eligibility have been secured, individual projects are progressing, and the overall project schedule is met.
<p>3.a.iii. Task/Activity Lead: The QEP will lead this task because they will be implementing the site assessment tasks.</p>
<p>3.a.iv. Outputs: 1 QAPP and the anticipated completion of 25 Phase I, 6 HMA, and 16 Phase II ESA reports.</p>
<p>Task 4 – Cleanup Planning</p>
<p>3.a.i. Project Implementation: Cleanup/ redevelopment planning as required by various State of Michigan programs for sites (both priority and additional sites that are assessed using the grant) where redevelopment is imminent. This may include preparation of Remedial Action Plans, assessment of brownfield cleanup and redevelopment alternatives, and preparation of Brownfield Plans/Work Plans to support acquisition of tax increment financing (TIF).</p>
<p>3.a.ii. Anticipated Schedule: Cleanup planning will be conducted at priority sites and other sites following completion of the associated assessment activities and will continue throughout the performance period.</p>
<p>3.a.iii. Task/Activity Lead: The QEP will lead this task because they will be evaluating cleanup options and preparing the cleanup documentation.</p>
<p>3.a.iv. Outputs: Outputs include at least 6 cleanup planning documents.</p>

3.b. Cost Estimates: Approximately 97% of the Assessment Grant budget will be used for site assessment and cleanup planning. The remaining 3% will be split between programmatic activities (1.5%) and inventory/prioritization of sites (1.5%). No grant funds will go to direct administrative costs, indirect costs, fringe benefits, equipment, or supplies.

Task 1 – Programmatic: \$10,000 Total Budget

- Personnel costs:** 80 hours at an average rate of \$50/hour = **\$4,000** for contractor selection/oversight, monthly progress meetings, and reporting.
- Travel costs:** **\$2,000** for one person’s attendance at one U.S. EPA Brownfields Conference: registration-\$200, airfare-\$700, 4 nights hotel-\$740, 4 days per diem and incidentals-\$360.
- Contractual:** **\$4,000** for QEP assistance on quarterly report technical summaries, monthly progress meetings, and outreach activities throughout term of grant.

Task 2 - Site Inventory and Prioritization: \$8,000 Total Budget

- Personnel:** 100 hours at average rate of \$50/hour = **\$5,000** for stakeholder interviews, project site visits, prioritization of sites, and coordinating site access.
- Contractual:** **\$3,000** for QEP assistance on interviews and site visits throughout term of grant.

Task 3 – Site Assessment: \$564,000 Total Budget

- Contractual: \$564,000**
 1 QAPP and updates = \$2,000 25 Phase I ESAs @ \$4,000 each = \$100,000
 6 HMAs @ \$5,000 = \$30,000 16 Phase II ESAs @ \$27,000 each = \$432,000

Task 4 – Cleanup Planning \$18,000 Total Budget

- Personnel:** 40 hours at average rate of \$50/hour = **\$2,000** for meetings with stakeholders regarding cleanup and redevelopment planning.
- Contractual:** 4 cleanup planning documents at average cost of \$4,000 = **\$16,000.**

Table 6. EPA Brownfields Assessment Budget Request

Budget Categories	Program Tasks				
	Task 1 Programmatic and Outreach	Task 2 Site Inventory	Task 3 Site Assessment	Task 4 Cleanup Planning	Total Budget

Personnel	\$4,000	\$5,000	\$0	\$2,000	\$11,000
Travel	\$2,000	\$0	\$0	\$0	\$2,000
Contractual	\$4,000	\$3,000	\$564,000	\$16,000	\$587,000
Total Direct Costs	\$10,000	\$8,000	\$564,000	\$18,000	\$600,000

¹No indirect costs will be incurred.

3.c. Measure and Evaluate Environmental Progress and Results: The Coalition will track, measure, and report outputs (e.g. number of Phase I and Phase II ESAs, HMAs, and meetings) and outcomes (e.g. acres of land assessed, remediated, and/or redeveloped; acres of greenspace created; the number of jobs created or retained; tax revenue generated; redevelopment investment value; and other funding leveraged) in ACRES. The Coalition will report other outcomes/outputs (social meeting updates, staff training, community outreach/meetings) in quarterly reports. The Coalition will evaluate the extent of the outputs results in the protection of human health and the environment. Project progress, including outputs/outcomes will be evaluated semi-annually. If goals are not being met, the Coalition will meet with the QEP and local stakeholders to discuss shortcomings and adjust the project approach.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Capacity: The Tuscola County EDC has the capacity to carry out the programmatic, administrative, and financial requirements for this Grant. The Tuscola County EDC and the other Coalition members will use the same organizational structure and team as the Coalition’s FY17 and FY21 EPA Assessment Grants.

4.a.ii. – 4.a.iii Organizational Structure and Description of Key Staff: Tuscola County EDC will be the grantee. The governing body will consist of the executive director of the Tuscola County EDC, the executive director for the Huron County EDC and Sanilac Regional Economic Consortium. This structure was used during the successful FY2017 EPA Assessment Grant. Coalition members will utilize the Memorandum of Agreement (MOA) used during the FY2021 EPA Assessment Grant. The project team will be led by Mr. Steve Erickson, Executive Director of the Tuscola County EDC, who has over 26 years of economic development experience. Mr. Erickson will oversee the grant operations, which includes community outreach, marketing, initial project evaluations, site/loan document preparation, reporting, etc., and management of the environmental consultant. He will also be responsible for payment requests and transfers through the Automated Standard Application for Payments (ASAP) system and will be responsible for establishing and managing the program’s financial accounts. Carl Osentoski is the Executive Director of the Sanilac Regional Economic Consortium and the Huron County EDC, will also be key member of the project team. Mr. Osentoski has over 30 years of economic development experience and will be an integral part of the team because of his experience and partners in Huron and Sanilac Counties. He will be involved with the daily Grant operations and will serve as the project lead if Mr. Erickson leaves. Mr. Erickson and Mr. Osentoski worked together successfully to implement and manage the Coalition’s successful FY2021 Assessment Grant.

4.a.iv. Acquiring Additional Resources: Each Coalition member has managed the procurement of contractors on several state and federal grant projects. The process complies with federal procurement regulations (40 CFR §31.36) and includes guidance to attract and utilize minority- and women-owned businesses, as possible. As the Grantee, Tuscola County EDC will use their established procurement process to retain a highly competent QEP to assist in managing and tracking the activities funded by the grant. The selected QEP will be experienced in U.S. EPA Assessment Grant management, Michigan’s Voluntary Cleanup Program, Michigan’s Brownfield Law (Act 381), and will have managed several previous U.S. EPA Assessment Grants projects. The selected QEP will have extensive knowledge of each county in the Coalition and will have successfully managed at least five successful brownfield redevelopment projects where multiple brownfield financing incentives were leveraged.

4.b. Past Performance and Accomplishments

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

(1) Accomplishments: The Coalition was the recipient of a \$600,000 FY17 Brownfields Assessment Grant and currently has a FY21 Brownfields Assessment Grant in the amount of a \$600,000. Accomplishments from the two assessment grants includes a brownfields inventory, community outreach meetings, completion of 43 Phase I ESAs, 32 Phase II ESAs, and 11 Hazardous Materials Reports. The work completed with the grant funds allowed for preparation of 2 EGLE grant applications for cleanup funding, and other summary reports. These accomplishments directly lead to the Coalition Members being able to leverage \$2 million in EGLE grant funding for cleanup and redevelopment of 3 sites, generated nearly \$10 million in private investment; has created over 50 temporary construction jobs, 25 permanent jobs, and has increased the taxable base for the county's and local communities in the Coalition Area.

(2) Compliance with Grant Requirements: The FY17 assessment grant and the FY21 assessment grant, which closes September 30, 2024, have been managed in compliance with grant requirements. For each grant the Tuscola County EDC developed a Work Plan and successfully executed the CA with the U.S. EPA. The Coalition received approval of its Quality Assurance Project Plan (QAPP), associated updates, and all Sampling and Analysis Plans (SAPs) and Health and Safety Plans required for the Phase II activities. 88% of the total budget was spent on site assessment activities. The Coalition has conducted community engagement programs, complied with financial status reporting requirements, and successfully updated ACRES throughout the performance period and continues to update ACRES with cleanup, investment and redevelopment data as appropriate. The Coalition was able to utilize the entire \$600K of the FY17 assessment grant funding by the close of the grant.

The Coalition is currently complying with the Work Plan and associated schedules, terms, and conditions of the FY21 assessment grant, which expires in September 2024. The Coalition also continues to submit timely quarterly reports in ACRES. Due to the timing of this grant application, approximately \$27,000 remains in the \$600,000 grant budget which equates to about 95% of the grant being utilized. The remaining funds are under contract for preparation of 2 Phase I ESAs and completion of 2 Hazardous Material Assessments, and grant closeout reporting. The Coalition anticipates that the remaining grant funds will be expended by during the 1st quarter of 2024. An ASAP.gov ledger dated September 25, 2023 is attached to document drawdowns from the FY21 grant.

THRESHOLD CRITERIA

FY 2024 U.S. EPA BROWNFIELDS ASSESSMENT GRANT APPLICATION

Tuscola County, Huron County, Sanilac County, Michigan

1. Applicant Eligibility

Tuscola County is a General Purpose Unit of Local Government in the State of Michigan.

2. Number and Eligibility of Non-Lead Coalition Members:

There are two non-lead Coalition members: Huron County and Sanilac County. Both members are General Purpose Units of Local Government in the State of Michigan that are eligible for grant funding.

3. Target Areas: The following target areas have been identified for each Coalition member:

- Tuscola County – Vassar
- Huron County – Bad Axe
- Sanilac County – Brown City

4. Existing Brownfields Grants to Non-lead Members: Huron County and Sanilac County are not recipients of open cooperative agreements for MARC grant funding or were awarded a MARC Grant that closed in 2016 or later.

5. Coalition Agreement: Huron County and Sanilac County have agreed to be part of this Coalition with Tuscola County acting as the lead/grant applicant. Signed letters of commitment from each non-lead member are attached.

6. Community Involvement: To ensure participation of residents in the targeted communities, each county in the Coalition will rely on their local leaders and community-based organizations (i.e. church groups, chamber of commerce, historical societies) to engage residents in the targeted areas. These leaders and organizations will assist with setting up face-to-face meetings to obtain input about site selection, project planning, and cleanup discussions. Each county will also work with their individual communities to advertise local brownfield workshops for resident education and will request resident input through press releases, surveys, and social media to assist with identification of potential brownfields. Health concerns associated with brownfield sites will be reported to the appropriate County Health Department and they will disseminate the information to the public and respond to the health threats. We will also address workforce development through social media by posting about opportunities from the Grant and through our leveraging partners and community organizations.

The Coalition originally started working together in 2012 to educate communities about brownfields and create dialogue between communities, state and federal agencies, and developers to evaluate redevelopment options for brownfields. An example of these efforts was the “Thumb Area Redevelopment Opportunities and Resources” Workshop held in 2013. The workshop brought together members from the Michigan Department of Environmental Quality (now EGLE), Michigan Economic Development Corporation, the EPA TAB Program, USDA Rural Development, developers, and local leaders and provided

information to the local communities about brownfields and the tools available to redevelop them. Local community representatives were asked to provide information about brownfields in their communities. The participants and panel explored the issues with the brownfields and ways to redevelop the sites. The response from this workshop was very positive because it educated participants about brownfields and presented options for addressing contaminants and redeveloping brownfields.

Upon grant award, we will issue a press release in local newspapers in the Coalition area and post notices on community and county websites that will include information about upcoming meetings and outreach sessions. To reach residents without access to newspapers or the internet we will post fliers at local buildings like government offices, community centers, and public libraries. Reporting progress to stakeholders will be done on a quarterly basis through Huron County, Tuscola County, and Sanilac County Brownfield Redevelopment Authority (BRA) and Economic Development Corporation (EDC) meetings. Community and county government officials from the Coalition area will be invited. The quarterly update report will describe the Grant activities and projects. The information will be shared with residents through the Coalition member websites and Facebook pages in the targeted communities and through our community-based organizations. Based on the small size of the communities in the Coalition area, we believe that our community-based organizations are the best way communicate with residents. We also believe that information posted to each county website and on social media will be an effective means to communicate with younger residents.

7. **Expenditure of Assessment Grant Funds:** Tuscola County is the lead agency for an active FY2021 U.S. EPA Coalition Grant for Hazardous Substances (\$600,000). Tuscola County has expended \$572,681.05 (~95%) of this active grant by September 25, 2023. Documentation of this grant drawdown is attached.
8. **Contractors and Named Subrecipients:**
N/A Tuscola County has not procured a contractor or named a subrecipient.