



## NARRATIVE PROPOSAL AND PROJECT DESCRIPTION FY2010 HAZARDOUS SUBSTANCES AND PETROLEUM ASSESSMENT GRANTS

### THRESHOLD CRITERIA

1. Applicant Eligibility: Washtenaw County is a general purpose unit of government.
2. Letter from State Environmental Authority: A letter from the Michigan Department of Environmental Quality (MDEQ) is included in Attachment 1.
3. Site Eligibility and Property Ownership Eligibility: The applicant is requesting a community-wide assessment grant; therefore, site eligibility and property ownership eligibility criteria do not apply.

### RANKING CRITERIA FOR ASSESSMENT GRANTS

#### 1. Community Need

Washtenaw County, population 347,376, is a land of contrasts. Located in southeast Michigan between the metropolitan areas of Detroit and Jackson, the County is comprised of two urban centers, three small cities, three villages, twenty townships, three rivers and hundreds of square miles of rural farmland. Historically, the County was agricultural.

Ann Arbor and Ypsilanti, both founded in the mid-1820s and strategically located on the main road between Detroit and Chicago, quickly grew to become Washtenaw County's two urban centers. Early development of the communities was influenced and enhanced by the Huron River and its abundant waterpower. As the years progressed, the smaller river industries of the mid-to-late 19th century yielded to more intensive manufacturing and in the 1930s the two cities' economic engines diverged. Ypsilanti and surrounding townships became Washtenaw County's automotive manufacturing center. Ann Arbor became a technology-centered city focused on the University of Michigan's world-class research programs and spin-off businesses. Beginning in the late 20<sup>th</sup> century, the manufacturing foundations of Ypsilanti's and Washtenaw County's economy began crumbling due to foreign competition and overseas outsourcing of manufacturing jobs, mimicking impacts in the rest of Michigan. Ann Arbor also felt the impact, although to a lesser degree, until 2008 when the bottom fell out.

Smaller cities and villages of the County (Chelsea, Dexter, Saline, Manchester, and Milan) historically have been centers of agricultural production. However, since most are located on rivers, they attracted manufacturing in the 1920s, flourishing along with the automobile industry in southeast Michigan. Like Ypsilanti, when the automobile industry crashed in the early 21<sup>st</sup> century, these communities saw their industrial economies decline. Brownfields multiplied, unemployment soared, tax revenues plunged, and county and community budgets went into multi-million dollar deficits.

#### **1.a. Health, Welfare and Environmental Effects of Brownfields on Washtenaw County**

Washtenaw County may be a land of contrasts, but all of its residents share a common threat – exposure to contamination from brownfields. Brownfields inventories, created under previous EPA Assessment Grants, reveal that in 2007 there were over 950 brownfields, including over 500 petroleum sites with over 150 known to have leaking USTs. There are over 450 sites of known hazardous substances contamination on the Michigan Department of Environmental Quality's (MDEQ) list of contaminated sites. Washtenaw County's brownfield threats can be summarized as follows: 1) impacts from large and small contaminated brownfields on the sensitive populations in Ypsilanti, 2) large-scale impacts from closed, large manufacturing facilities, 3) out of proportion threats to residents in small towns posed by abandoned manufacturing facilities, 4) imminent threats posed by chemicals in recently abandoned small manufacturing facilities, and 5) impacts on the Huron River and River Raisin watersheds.



During the late 19<sup>th</sup> century and throughout the 20<sup>th</sup> century, Ypsilanti and adjoining Ypsilanti Township became the largest industrial hub in southeast Michigan outside the Detroit metropolitan area. Industrial facilities were often located near downtown areas, on waterways, and in or near workers’ residential neighborhoods. For example, Ypsilanti’s 38-acre Water Street Redevelopment renaissance project (comprised of 30 defunct industrial and commercial properties), lies in a horseshoe bend of the Huron River. The site adjoins the historic downtown district and is adjacent to two low-income residential neighborhoods, a nursing/assisted living facility for the elderly, and a preschool/K-5 charter school, posing threats to health, sensitive populations, and the river ecosystem and downstream populations. Larger manufacturing operations in Ypsilanti (General Motors, Ford, Motor Wheel Corporation) centered on metal-working, metal fabrication and machining, automotive and aircraft parts production, and related operations that were chemical-intensive, all of which are known brownfields.

Today these brownfields are having a disproportionate impact on low income residential neighborhoods, predominately populated by African-Americans who migrated to the north for manufacturing jobs. This situation is creating an environmental justice issue seen in many former manufacturing centers. For example, the population of Ypsilanti Township Census Tract 4123, which includes the soon to be abandoned, 5 million square-foot, GM Hydramatic plant, is 65.3% African American, and over 17% of the population lives below the poverty level. The former Ford parts manufacturing plant in the City of Ypsilanti is located in Census Tract 4108 and adjoins Census Tract 4106. Census Tract 4106 is 89.4% African American with 43.2% below the poverty level. Census Tract 4106 is 35.5% African American with 21.6% below the poverty level (2000 Census Bureau). On a smaller scale, abandoned gas stations, auto repair shops, restaurants and office buildings dominate and crowd neighborhoods, while small Hispanic, Islamic and Black churches struggle along Ypsilanti’s Michigan Avenue corridor.

Abandoned, larger, manufacturing plants pose a particularly high level of threat to human health, welfare and the environment because of the massive amount of chemicals and oils used and released in these facilities and their almost universal locations on rivers. These facilities also pose significant threats to youths, criminals, and the homeless as places, albeit very dangerous ones, to gather, explore, and use as a base for illicit activities. The following is a summary of some of the larger brownfield sites in Washtenaw County:

Description and Location	Contaminants	Exposure Pathways	Health Effects
Ford Motor Company <i>Auto Parts</i> Ypsilanti	Chlorinated and petroleum solvents, oils, petroleum fuels, metals, paints	Direct contact, vapor and airborne particulate inhalation	Respiratory effects, cancer, nerve damage, liver/kidney damage
GM Hydramatic <i>Auto Transmissions</i> Ypsilanti	Chlorinated and petroleum solvents, oils, petroleum fuels, metals, paints	Direct contact, vapor and airborne particulate inhalation, ingestion	Anemia, cancer, central nervous system damage, target organ damage
Motor Wheel Corporation <i>Auto Wheels</i> Ypsilanti	Chlorinated and petroleum solvents, oils, petroleum fuels, chromium (plating), metals, paints	Direct contact, vapor and airborne particulate inhalation, vapor, intrusion, ingestion	Respiratory, cancer, target organ damage
Ann Arbor News <i>Newspaper Printing</i> Ann Arbor	Chlorinated solvents, petroleum solvents, heavy metals (inks)	Direct contact, vapor and airborne particulate inhalation	Liver/kidney damage, cancer,

Description and Location	Contaminants	Exposure Pathways	Health Effects
Federal Screw Works <i>Screws and Bolts</i> Chelsea	Chlorinated and petroleum solvents, oils, metals	Direct contact, vapor and airborne particulate inhalation	Cancer, liver/kidney damage
Manufactured Gas Plant <i>Coal Gas</i> Ann Arbor	Benzene, toluene, ethylbenzene, xylenes, cyanide, PAHs, metals	Direct contact, vapor and airborne particulate inhalation, ingestion, vapor intrusion	Acute hazards, cancer, central nervous system, liver, kidneys, skin damage

Residents in the small towns of Dexter, Chelsea, Saline, Manchester and Milan are disproportionately impacted by their brownfields because the residents are compressed into a small area with big brownfields. Everyone suffers the effects, including pregnant women, children, and the sick and elderly. Examples of these sites include: the Longworth Plating site on Main Street in Chelsea; DAPCO Products on the banks of Dexter's Mill Creek; an abandoned oil terminal and the shuttered Collins & Aikman automotive parts plant one block from Manchester's downtown and the River Raisin. Many of these sites are known or suspected to be contaminated with chromium and lead, chlorinated solvents, metals, paints and lacquers, petroleum solvents or benzene posing health threats via direct contact and inhalation or through leaching to groundwater, hence to adjacent rivers. Physiological effects include cancer, childhood brain effects, liver/kidney toxicity. Significant assessment funds are needed to identify contamination on these sites and generate data to support environmental due diligence, cleanup planning, safe use planning (e.g. engineering controls, and brownfield redevelopment estimates).

A new threat to the health and welfare of Washtenaw County citizens has emerged during the recent collapse of the Michigan manufacturing industry – abandoned chemicals and wastes in smaller manufacturing plants in newer industrial parks. Today 20% - 30% of the plants in these industrial parks are empty, many abandoned with the chemicals, oils and wastes left inside in drums and vats. Over 100 such drums were discovered in a recent inspection of the tax-foreclosed Evergreen Chemical Products plant. These chemicals pose an imminent threat of fire and explosion, as well as threats to human health and the environment through uncontrolled releases and dispersment in plumes from fires. Abandoned chemicals in these plants must be assessed and characterized for disposal first and foremost to mitigate imminent fire, explosion, and release threats and to prepare these facilities for redevelopment.

The entire 720 square miles of Washtenaw County lie within the Huron River, River Raisin and Saline River watersheds, treasured natural features valued for natural habitats and recreation. The Huron River is the drinking water supply for the 115,000 citizens of Ann Arbor. The migration of contaminants from brownfields into these vital natural resources via contaminated storm water runoff and venting of contaminated groundwater poses a serious threat to the County's residents and the County's ecosystems and biota, including the 61 Endangered, Threatened and Special Concern. Contaminated sediments pose a threat to recreation and subsistent and sport fishing. Potentially contaminated sediments are a significant issue in current discussions about removing Argo Dam in Ann Arbor and restoring a portion of the Huron River channel. Assessment Grant funds are needed to support redevelopment, which will help control contaminant migration, and also to design sediment control procedures to support removal of the Argo Dam and Huron River channel restoration.

**b. Financial Need** Michigan's budget shortfall for FY 2010 is \$2.7 billion (*State of Michigan*). The Michigan Department of Environmental Quality has seen its current budget slashed to 1970s levels, almost \$100 million below its high of \$456 million in 2006 ([www.michigan.gov](http://www.michigan.gov)), severely impeding its ability to protect Michigan's environment and support brownfield redevelopment. Revenue sharing to counties, cities, villages, and townships has dropped from \$1.56 billion in FY

2001 to \$1.05 billion in FY 2009 (*State of Michigan*), further squeezing municipal budgets caught between declining revenues and increasing costs of services. Washtenaw County is walking a tightrope.

It is not news that, at 15.6%, Michigan has the highest unemployment rate in the country, almost six percentage points above the national average (*Michigan Department of Energy, Labor and Economic Growth*). Detroit was recently labeled *NoTown* in the featured story article in the October 5, 2009 issue of TIME magazine. It is news; however, that Washtenaw County's unemployment rate, which currently stands at 10.3%, has more than tripled in the last ten years (up from 3.1% since the year 2000). Since 2000, 17,648 jobs have disappeared from the County.

County and community budgets have been slashed as economic activity has declined, home values have fallen, foreclosures have skyrocketed, state revenue sharing has plummeted, and tax revenues have tumbled. State cuts in revenue sharing payments to local governments by 50%, and precipitous drops in tax revenues have left all local governments in Washtenaw County struggling to provide life-sustaining services at a time when business and personal economic conditions preclude increased tax rates. According to news reports (*Ann Arbor.com*, and *The Ann Arbor News*), the Washtenaw County Board of Commissioners recently announced cuts of \$2.4 million in mental health services and \$1.7 million in basic County services (e.g. public health and economic development), and staff reductions to help address the County's projected \$30 million structural deficit in FY 2010. Ann Arbor must address a \$6.1 million budget deficit and the City of Ypsilanti a \$660,000 deficit. Ypsilanti Township has reduced its workweek to four days for all staff. School districts, like Willow Run Schools in Ypsilanti/Ypsilanti Township, are confronting annual deficits as high as \$4 million (*Ann Arbor News*). Similar budget deficits and service cuts are occurring in every city, village, and township in Washtenaw County.

Industrial facility closings have devastated the County and its communities. When Ann Arbor's Pfizer Pharmaceutical shuttered its massive 2 million square-foot, 27-building, 129-acre research and development campus in 2009, more than 2,410 direct jobs (3,950 total local jobs), and \$2.9 million in tax revenue were lost from the closing of this one facility. Between 1998 and 2008, four of Ypsilanti's largest taxpayers closed their plants, reducing tax revenues by over \$4,925,000. GM's 5 million square-foot Willow Run transmission plant in Ypsilanti Township will close by December 2010 (*Ann Arbor.com*). The plant, which served as a B-24 bomber manufacturing facility during World War II, employed about 14,000 people during the 1970s; today, only 700 remain. The recent closure of Ford Motor Company's Ypsilanti parts plant resulted in the loss of over 2,000 jobs. Scores of smaller plants, tool and die shops, and support industries have shut their doors in the past five years. These plant closings and the attendant creation of brownfields have a double economic impact on Washtenaw County – the loss of jobs and tax revenues severely reduces community economic resources, which in turn eliminates their ability to apply resources to assess and redevelop the very brownfields that can help restore prosperity.

In smaller cities and towns, brownfields are usurping the landscape, and tax revenues are plummeting. "For Lease" and "For Sale" signs litter local office and industrial parks. A visual survey of industrial parks in Chelsea, Saline, Manchester, Milan, Ypsilanti and portions of southwestern Ann Arbor revealed an alarming trend: 20% - 30% of small to medium-sized manufacturing and industrial buildings, ranging in size from 2,000 to over 100,000 square feet, stand vacant, their parking lots cracked and choked with weeds.

To make matters worse, Michigan is experiencing a talent and population drain as people seek opportunities outside of the state and the U.S. On June 30, 2009, United Van Lines, the nation's largest mover of household goods, reported that 70% of its Michigan-related business is outbound (*Ann Arbor.com*). From 1997 to 2006, Michigan lost more than 6% of its population in the 18 to 44-year-old age range as young professionals and college graduates, the state's hope for the future, fled the state for better opportunities (*MI Dept. of Community Health*). Over 50% of the graduates from Michigan's universities and colleges leave the state within one year after graduation (*Detroit News*); 53% of University of Michigan graduates leave Washtenaw County



and Michigan. Ypsilanti's population has declined 5.4% since the 2000 census (*SEMCOG 2007 Inter-Census Estimate*) due to out-migration. Home foreclosures throughout Washtenaw County increased from 231 in 2002 to 1,439 in 2008, driving home values down (*MLive.com*). Ypsilanti and nearby Ypsilanti Township accounted for more than 42.5% of those foreclosures in 2008 – the highest in the County (*MLive.com*).

As shown in the table below, Washtenaw County is a land of contrasts with respect to economic impacts on its population. Where plants have closed and brownfields abound, so do higher minority populations, lower incomes, and higher poverty rates. The communities and census tracts where most of Washtenaw County's former industrial base once flourished -- Ypsilanti, Ypsilanti Township, and Census Tracts 4123, 4101, 4140, and 4143 -- share those characteristics. This situation creates significant environmental justice issues for disproportionately impacted, disadvantaged populations as indicated in the table below:

Geographic Area	Population (2008) <sup>1</sup>	% Non-white <sup>2</sup>	% African American <sup>2</sup>	% Individual Poverty <sup>2</sup>	% K-12 Free/Reduced School Meals <sup>3</sup>	Median Household Income <sup>2</sup>
State of Michigan	1,003,422	24.9	13.2	10.5	N/A	\$46,298
Washtenaw County	347,376	22.6	12.3	11.1	42	\$51,990
Ypsilanti	21,464	38.6	30.6	25.8	62	\$28,610
Ypsilanti Twp.	52,975	32.5	25.5	10.5	62	\$41,994
Ypsilanti Twp. Census 4123	3,390	69.8	65.3	17.2	78	\$46,250
Pittsfield Twp. Census 4101/4140/4143	5,560	50.4 <sup>4</sup>	23.4 <sup>4</sup>	25.1 <sup>4</sup>	62	\$27,930 <sup>4</sup>
Ann Arbor	114,386	25.3	8.8	16.6	21	\$46,299

<sup>1</sup> Bureau of Labor Statistics; <sup>2</sup> U.S. Census Bureau, 2000; <sup>3</sup> Michigan Department of Education, 2008-2009;

<sup>4</sup> Mean of the three census tracts

By far, those living in Ypsilanti and Census Tract 4123 (home of GM's Hydramatic plant) are suffering the worst. The median household income in Ypsilanti is only 55% of that of Washtenaw County and 65% of Michigan (*see table above*). The poverty rate in Ypsilanti is almost 26% compared to 11% for Washtenaw County and Michigan (*see table above*). The most alarming statistic is the high percentage of children (over 62%) who are receiving free or reduced-fee school meals. Washtenaw County's "Great Start Collaborative" reported in 2006 that, overall, the percentage of children under age five in Washtenaw County who live in poverty is less than the state level; however, racial differences are evident. Five percent of white children live in poverty; 27% of African-American children live in poverty. Adding to these economic impacts, over 40% of the city's land area (Eastern Michigan University, Washtenaw County, and public school lands) is exempt from taxes, forcing Ypsilanti to impose one of the highest municipal property tax rates in the state on the remaining taxable land to compensate for the loss of taxes from abandoned industrial properties. Ypsilanti is in economic trouble, is suffering from economic discrimination, and is deficient in economic and human capital needed for recovery.

Economic impacts have been similar in Washtenaw County's smaller cities, villages and townships. Plant closings in core urban areas have also cost their citizens jobs, negatively affecting the local economies. The devastating impacts on the smaller communities has been proportionally similar to those discussed above. For example, closure of the Collins & Aikman auto parts plant in Manchester eliminated over 100 jobs, a significant impact on a community of 2,200 residents. The Cities of Saline (population 8,880) and Dexter (population 3,270) have over a 25% vacancy rate in their industrial parks.



One of the biggest problems facing Washtenaw County and its communities is the lack of resources to reverse these trends. Redevelopment of the hundreds of acres of brownfields in the County, and especially Ypsilanti and surrounding areas, would be the best and most sustainable way to begin the revitalization process. However, the resources needed to attract developers, assess the environmental conditions and threats on the properties, develop safe use strategies, and assist developers with the added costs of environmental liability management and environmental response actions just do not exist, especially for the early stages of the projects. The state's brownfields environmental assessment grant program is out of money, and state budget deficits mean no future funding. The same is true of the state brownfields cleanup grant and loan programs. State, County and local governments are facing severe budget deficits and are struggling to maintain basic health, welfare, maintenance, and educational services and programs. There is no extra money to support brownfield redevelopment – EPA Brownfield Grant funding is critical to fill the void.

The value of EPA Assessment Grants to Washtenaw County has been demonstrated. The County received Assessment Grants in 2001 (hazardous substances) and 2005 (petroleum), and the City of Ypsilanti received a hazardous substances Pilot in 1998 to support acquisition of property for the Water Street Project. Funds from these grants have long been expended, quite successfully and productively. More is now needed to attack brownfield problems at levels not even contemplated when those grants were awarded.

## **2. Project Description and Feasibility of Success**

**2.a. Project Description** Washtenaw County intends to use Assessment Grant funds awarded in response to this application to address the following brownfields redevelopment priorities: 1) address the health, welfare and economic impacts of brownfields on disproportionately impacted underprivileged and minority populations by redeveloping sites in those population areas, 2) provide assessment support to mitigate imminent hazards and redevelopment obstacles posed by abandoned chemicals and wastes on brownfields in industrial parks, 3) stimulate redevelopment of abandoned, large manufacturing facilities and other brownfields that create manufacturing jobs and tax base, 4) support redevelopment of smaller industrial, commercial and retail brownfield sites, and 5) support protection and restoration of County watersheds and rivers and acquisition of greenspace. Hazardous materials funds will be applied to all sites where the sole or predominant contaminants of concern are hazardous substances, not petroleum based. Petroleum funds will be applied to sites, such as former gasoline service stations, bulk oil terminals (e.g. City of Manchester), and portions of larger sites, such as oil and fuel storage areas, where petroleum contamination is the predominant concern. Washtenaw County initially plans to allocate Assessment Grant funds to redevelopment priorities in the following manner:

1) 65% of the funds will be retained and made available for supporting redevelopment of sites with imminent redevelopment potential as evidenced by developer interest and a signed purchase agreement or letter of intent. Site selection will be based on developer commitment, developer financial capabilities, reasonableness of redevelopment success, location in targeted areas of disproportional impact, types and levels of health and environmental threat reductions, and ability to stimulate spin-off development.

2) 20% of funds will be allocated to sites designated as a priority based on threats to human health or the environment or long-term development potential consistent with each community's master plan. Selected sites will pose significant and imminent threats to human health, especially to that of sensitive populations, or to County waterways or drinking water. These assessments may be performed proactively without imminent redevelopment interest or potential if site access is approved.

3) 15% will be allocated in support of parks, greenspace, and trails development or expansion. Priority will be given to expansion of existing greenspace preservation programs, river/watershed protection/restoration programs, and expansion or connection of existing parks and preserves.

After grant award, Washtenaw County, which is the entity that will administer the grant, will convene its project management team, which will include the Project Manager and Project



Financial Manager. These individuals are full-time employees of the County. Washtenaw County and a qualified environmental consultant, retained for the project team, will lead a successful, community-oriented Assessment Grant project to support revitalization of brownfields in the County. The County will act as lead organization on the project, and the project team will work with the Washtenaw County Brownfield Redevelopment Authority (WCBRA) to identify, evaluate, and prioritize sites for application of grant funds, and leverage additional funding sources, to promote viable revitalization. The County will be responsible for day-to-day grant operations including the following: updating and maintaining the existing brownfields inventory, distributing information on the project to the community and initiating community meetings, selecting sites for assessment, tracking project progress, and financial tracking and accounting. The County will also be responsible for procuring all contractual services (e.g., environmental consultant) and submittal of all required reports to the U.S. EPA. The County's Finance Department will manage and track all project financial transactions and generate required financial reports. The County will prepare a draft Work Plan, coordinate public announcements of the grant award and project, and solicit public comments on the draft Work Plan. After the U.S. EPA approves the Work Plan, the County will begin the process of retaining a qualified environmental consultant in compliance with applicable federal procurement regulations. The environmental consultant will be retained to assist with grant management operations, perform technical assessment work, and assist with required reporting.

Funds from the requested Assessment Grants will be applied to conducting assessments and cleanup planning to directly stimulate brownfields redevelopment. Brownfields inventories were created under previous EPA grants and will only need to be updated during the course of the proposed project. Sites will be selected for application of grant funds only after concurrence of the host community and in accordance with the priorities described above. Selected sites will be compared to the EPA eligibility criteria to determine their eligibility status for funding. Eligibility determinations will then be prepared and submitted to the EPA to verify eligibility of each site prior to expenditure of Assessment Grant funds. Upon securing EPA approval of site eligibility, the County will present the proposed project and assessment tasks to the communities of the County through public meetings to solicit public comment and input. The County and environmental consultant will design an environmental assessment program that addresses the issues associated with the brownfield and maximizes community benefit from the grant funds.

Environmental assessment activities to support a typical redevelopment will begin with a Phase I ESA. The Phase I ESA will be conducted according to the requirements of All Appropriate Inquiry (ASTM Standard E1527-05) for investigating current, historical, and regulatory issues associated with the site and proximate properties to identify recognized environmental conditions that may indicate the presence of contamination. A Property Profile Form for the site will be entered into the Assessment, Cleanup, and Redevelopment Exchange System (ACRES). The Project consultant will design a Phase II ESA in general accordance with ASTM Standard E1903-97 to investigate the areas of potential environmental impact. The typical assessment goals will be to evaluate the environmental liability, safe use, potential off-site health effects, and redevelopment issues associated with on-site contamination. A Sampling and Analysis Plan (SAP) and Health and Safety Plan (HASP) will be submitted to EPA for review. Upon EPA approval of the SAP and HASP, the Project consultant will conduct a Phase II ESA. Upon receipt of the laboratory analytical data, the Project consultant will work with the County, individual community, potential developer, and partners (e.g., watershed council) to devise liability management, cleanup, and site use strategies that support redevelopment efforts and improve the health and welfare of residents and the environment. After completion of initial assessment activities, additional safe use or remedial investigations may be needed to further define the nature and extent of contamination and design response actions for cleanup and safe future use of the site.

Other eligible redevelopment support activities may include preparation of liability protection documents (Baseline Environmental Assessment reports) and safe use plans required by the Michigan Voluntary Cleanup Program, Remedial Action Plans, and Work Plans to support use of brownfields tax increment financing.



Community involvement will begin with public announcements of grant award and requests for public comment on the draft project Work Plan. During the course of the Assessment Grant project, additional public notices of activities and solicitation of public comment will occur at the points of site selection for use of grant funds, at the conclusion of project activities, and at the point of redevelopment plan consideration and review. Community involvement will continue through future site cleanup actions, if needed, and the site redevelopment planning and approval processes. The County will continuously involve specific partners and stakeholders, such as potential developers, lenders, and local business leaders in discussions of the following: highest and best redevelopment uses, identification and solicitation of potential developers, and financial options and mechanisms for funding future site preparation activities.

**2.b. Budget for EPA Funding and Leveraging Other Resources**

**2.b.(i) Budget**

Budget Categories (Programmatic costs only)	Project Tasks					Total Grant Budget
	Task 1 Programmatic Costs	Task 2 Community Outreach	Task 3 Site Assessment	Task 4 Cleanup Planning		
<b>Hazardous Substances</b>						
Personnel	\$0	\$0	\$0	\$0	\$0.00	
Fringe Benefits	\$0	\$0	\$0	\$0	\$0.00	
Travel	\$2,400	\$0	\$0	\$0	\$2,400.00	
Equipment	\$0	\$0	\$0	\$0	\$0.00	
Supplies	\$0	\$500	\$0	\$0	\$500.00	
Contractual	\$1,000	\$2,500	\$183,000	\$10,600	\$197,100.00	
Other	\$0	\$0	\$0	\$0	\$0.00	
<b>Total Haz. Subst.</b>	<b>\$3,400.00</b>	<b>\$3,000.00</b>	<b>\$183,000.00</b>	<b>\$10,600.00</b>	<b>\$200,000.00</b>	
<b>Petroleum</b>						
Personnel	\$0	\$0	\$0	\$0	\$0.00	
Fringe Benefits	\$0	\$0	\$0	\$0	\$0.00	
Travel	\$1,200	\$0	\$0	\$0	\$1,200.00	
Equipment	\$0	\$0	\$0	\$0	\$0.00	
Supplies	\$0	\$300	\$0	\$0	\$300.00	
Contractual	\$1,000	\$1,000	\$90,500	\$6,000	\$98,500.00	
Other	\$0	\$0	\$0	\$0	\$0.00	
<b>Total Petroleum</b>	<b>\$2,200.00</b>	<b>\$1,300.00</b>	<b>\$90,500.00</b>	<b>\$6,000.00</b>	<b>\$100,000.00</b>	

**Task 1 - Programmatic Costs** The Assessment Grant proposal budget includes projected programmatic costs of \$3,400 for hazardous substances funds and \$2,200 for petroleum funds. These costs include attendance of one person at three U.S. EPA annual Brownfields Conferences (\$1,200 per trip), and \$1,000 for consultant support. The County anticipates costs of at least \$6,000 (@ \$50/hr.) in programmatic costs for personnel interfacing and coordinating assessment activities with host communities and the Brownfield Redevelopment Authority, updating inventories, and reviewing and coordinating eligibility determinations, Sampling and Analysis Plans and assessment reports. The County will provide in-kind staff resources for these activities.

**Task 2 - Community Outreach** The County anticipates community outreach costs of \$3,000 using hazardous substances funds and \$1,300 using petroleum funds. These costs will include combined costs of \$3,500 for consultant support in coordinating and conducting community involvement and outreach programs and meetings, and combined costs of \$800 for preparing and printing project and site information, marketing pamphlets, documents, etc. To ensure the public remains informed and involved, the County will provide in-kind additional staff resources,

estimated value of \$5,000 to \$7,000 (@ \$50/hr.), needed to conduct environmental outreach meetings, draft press releases, update the County's website as new information is generated, and other activities to complete the community outreach programs. Community outreach and involvement activities will include the following: coordinating and conducting meetings with stakeholders and the general public; seeking, discussing, and implementing meaningful public input into grant processes; preparing and publishing public notices; preparing meeting materials and presentations; preparing and distributing brochures and other public information materials.

**Task 3 - Site Assessment** Prioritized brownfields initially will be evaluated through performance of Phase I and Phase II Environmental Site Assessments (ESAs). The assessments will be conducted in compliance with the requirements of All Appropriate Inquiry, applicable American Society for Testing and Materials (ASTM) standards and practices, and requirements of Michigan's Voluntary Cleanup Program (VCP) pursuant to Part 201 of the Michigan Natural Resources and Environmental Protection Act of 1994, as amended ("Part 201"). In Michigan, a component of the VCP for a brownfield site where sale and redevelopment are planned is completion of a Baseline Environmental Assessment (BEA), which provides a prospective purchaser/operator liability protection for existing contamination. The budget for the grant includes site assessment contractual costs of \$178,000 for hazardous substances funds and \$88,000 for petroleum funds. These costs are based on using hazardous materials grant funds to conduct approximately 9 Phase I ESAs at an average cost of \$3,000 each, 7 Phase II ESAs at an average of \$21,000, and 2 Michigan VCP documents at an average cost of \$4,500 each. The petroleum grant funds will be used to conduct approximately 6 Phase I ESAs at an average cost of \$3,000 each, 4 Phase II ESAs at an average of \$19,500, and 1 Michigan VCP document at an average cost of \$4,500 each.

**Task 5 - Cleanup Planning** The County will use Assessment Grant funds to conduct cleanup and redevelopment planning as needed for brownfields where redevelopment is imminent and such activities will facilitate redevelopment. Under Michigan's VCP "Due Care" obligation, owners of contaminated sites must protect the health of site users and third parties to prevent exacerbation of contamination. This must be documented in a Due Care Plan. The County's cleanup and redevelopment activities may also include preparing a Remedial Action Plan (RAP), assessment of brownfield cleanup and redevelopment alternatives, evaluation of institutional and engineering controls, and preparation of Brownfield Plans and Work Plans to support acquisition of Tax Increment Financing (TIF) under the Michigan Brownfield Redevelopment Act (Act 381 of 1996, as amended). Contractual costs for this task are estimated at \$10,600 for hazardous substances grant funds and \$6,000 for petroleum grant funds.

**(ii) Leveraging** Assessment Grant funds can be a vital component for catalyzing a brownfield redevelopment project because they can cover the costs of critical initial site assessments needed to support project design, liability management, and remediation planning. However, this redevelopment support alone is rarely sufficient to ensure a successful redevelopment. Additional human and financial capital in the form of in-kind services, grants, loans, tax abatements and credits, and/or tax increment financing usually are needed singly or in combination to make a project economically feasible by paying for additional environmental assessments and remediation, hazardous materials assessment and abatement, and site preparation. The County has 8 years experience leveraging U.S. EPA Assessment Grant funds, having previously used hazardous substances and petroleum grants to successfully support brownfield redevelopment.

To kick-start the project and ensure successful brownfields redevelopment, the County and their environmental consultant will leverage/contribute in-kind services. The County will provide staff and resources (meeting rooms, limited educational materials, etc.) needed for public notices, information sessions, hearings, updates to the County's website and GIS database, and other activities to complete the community outreach programs. The County also will provide staff to oversee the financial transactions associated with grant activities. The environmental consultant will be expected to contribute some, if not all, of the following in-kind services: preparation of monthly grant status reports, preparation of U.S. EPA required documents such as Quality



Assurance Program Plans (QAPPs) and Health and Safety Plans (HASPs), as well as attendance at periodic project administrative/coordination meetings.

As the project progresses and redevelopment of brownfields begins, the County will exercise its local leveraging options, including tax increment financing (TIF) and local tax incentives. The Washtenaw County Brownfield Redevelopment Authority (WCBRA), established in 1997 under Act 381, is empowered to capture incremental taxes generated by a brownfield redevelopment to reimburse costs for environmental response actions, such as 1) additional assessment costs, 2) environmental response costs, 3) demolition, and 4) hazardous materials abatement, that either are not eligible for Assessment Grant funding or for which sufficient funding is unavailable. Site preparation and infrastructure improvements also may be eligible for TIF reimbursement. If possible, developer equity or cash, reimbursed with TIF, will be used to fund these redevelopment costs. Furthermore, the Michigan TIF statute allows communities to capture additional incremental taxes from successful brownfield redevelopments to fund a Local Revolving Fund to support actions on other brownfield sites. However, under current financial circumstances, the County has not been able to sufficiently fund its Local Revolving Fund, but continues to try. As part of an incentive package, the County may also provide applicable real and personal property local tax abatements for redevelopments.

In addition to community leveraging options, the County can tap additional sources from the U.S. EPA and Michigan brownfield redevelopment economic “toolbox” to fill redevelopment funding gaps. Acquisition of the following funds will require the combined efforts and close cooperation between the County, MDEQ, and other state agencies:

- Additional U.S. EPA Assessment Grant funds – If site redevelopment schedules permit, the County also may apply for additional EPA Assessment Grant funding;
- U.S. EPA Brownfields Cleanup Grant – The County can apply for up to \$200,000 in clean-up funds per site for grantee-owned property;
- U.S. EPA Brownfields Revolving Loan Fund (RLF) Grant – The County can immediately access the DCCBC’s \$7,250,000 in EPA RLF Grant hazardous substances and petroleum funds to finance environmental response actions. Loans from the fund can serve as bridge financing for response actions at favorable rates, to be repaid through TIF or by the developer. If site risk issues and/or redevelopment schedules permit, the County also may apply for additional EPA RLF Grant funding.
- MDEQ Superfund Section, U.S. EPA Brownfields Redevelopment Assessment Grant (Superfund) – MDEQ staff can perform up to 12 assessments per year on brownfield properties identified by local units of government.
- Michigan Brownfield Redevelopment Grants and Loans Program – Loans may be available in amounts up to \$1,000,000/site for environmental and hazmat assessments, hazmat abatement, demolition, and environmental response costs at contaminated brownfield sites; grants may be available in the future if the state allocates additional funding to its brownfield program.
- Michigan Brownfield Redevelopment Business Tax Credits – Business tax credits of up to 20% of the investment in a brownfield site can be obtained for the site developer.

Finally, the County may secure additional funding/incentives from Community Development Block Grant (CDBG) and Brownfields Economic Development Initiative (BEDI) Funds, (Federal Department of Housing and Urban Development funds aimed at supporting low to moderate-income residents and redeveloping brownfields), and Michigan Department of Transportation (MDOT) grants. In partnership with state agencies, the County also can enhance redevelopment incentive packages utilizing the following state tax credits and abatements: Michigan Business Tax Credits, New Market Tax Credits, Michigan Industrial Development Tax Abatement (Act 198), Michigan Personal Property Tax Relief (Act 328), Michigan Economic



Growth Authority (MEGA) tax credit, and tax-free Renaissance and Agricultural Processing Renaissance Zones.

The County is currently involved in several brownfields redevelopment projects that illustrate their experience in utilizing multiple funding sources and incentives. The County used previous Assessment Grant funds to conduct due diligence and remediation assessment of five parcels of land on the west side of Ann Arbor. The WCBRA TIF reimbursement of the developer's costs for contaminated soil remediation and building demolition were needed to prepare the site for redevelopment. A new grocery store and retail space are now under construction on the site. The County also is working with the DCCBC to secure an EPA RLF subgrant for the City of Chelsea to use in remediating a former electroplating/auto dealership site on the western end of the downtown district. Chelsea will create a small downtown park on the site.

**c. Programmatic Capability** The County initiated its brownfields redevelopment program in 1997 with creation of the WCBRA. It then secured an EPA Assessment Pilot Grant (hazardous materials) in 2001 and an Assessment Grant (petroleum) in 2005 to further enhance the brownfields redevelopment program. All funds from these grants have been drawn down, and the grants have been closed out. The Work Plans for both grants were fully executed, and the County complied with all grant requirements, including QAPP approval, property eligibility determination and SAP reviews, quarterly reports, financial status reports, ACRES inputs, and other submittals. Accomplishments through the use of the combined assessment funds include the following: 24 Phase I ESAs, 20 Phase II ESAs, two VCP Due Car Plans, four TIF Plans, extensive community outreach, and over \$117,000 in leveraged private funds for site assessment cost-sharing. The grants supported \$4.5 million in brownfields redevelopment, creation of 75 direct and indirect jobs, \$100,000 in new tax revenues, and over \$30 million in pending brownfields redevelopment (175 jobs and \$750,000 in new tax revenues).

The Project Team consists of a Project Manager, Financial Manager, and an environmental consultant. The County management team will be backed-up by two other County managers (see next paragraph). The Project Manager will be responsible for administrative management of the project, interface with the EPA Project Officer and QA Officer, community involvement, interface with host communities and the WCBRA, reporting, and consultant management. The Financial Manager will be responsible for all financial aspects of grant management, including grant accounting, financial records, funds transfers, and invoice review and approval.

Mr. Brett Lenart, AICP, will serve as Project Manager for the grant program. Mr. Lenart is the Community Planning Supervisor with the Washtenaw County Office of Strategic Planning. He is responsible for administration of Washtenaw County's Brownfield Redevelopment Program and the Washtenaw County Brownfield Redevelopment Authority, which provides redevelopment assistance to 23 local units of government (LUGs). Mr. Lenart previously worked at the City of Ypsilanti, where he was a Project Manager for the City's 1998 EPA Assessment Pilot Grant, which was used to support acquisition of land for the 38-acre Water Street Brownfield Redevelopment Project. He also had responsibility for the City's Downtown Development Authority, Historic District Commission, Economic Development Corporation, and other redevelopment activities. Mr. Lenart was responsible for the successful management of numerous federal and state grants and public facility construction.

Mr. Xiaohong Wu will serve as Financial Manager for the project. Mr. Wu has 14 years accounting experience, with over 10 years at Washtenaw County. He works in the County Finance Department, where one of his responsibilities is grant management. He has managed over \$7 million in federal grants.

Washtenaw County will endeavor to maintain the grant management team during the entire grant period. It is anticipated that Mr. Lenart will serve as Project Manager throughout the grant period because he also is liaison with and provides staff support to the Washtenaw County Brownfield Redevelopment Authority. This role will be prioritized for retention in any staff restructuring. The County's plan for management continuity in the event of loss of Mr. Lenart relies on ready availability of the following personnel to ensure a smooth succession: 1) a



trained and capable supervisor, 2) experienced environmental consultant, and 3) an experienced EPA Assessment Grant Project Manager on staff in another County department. From day one, the proposed Project Manager's direct supervisor, Anthony VanDerworp, Director of Strategic Planning, will be intimately involved and become intimately familiar with grant operations so he can immediately step in as either interim or replacement Project Manager in case of loss or re-assignment of Mr. Lenart. A highly competent environmental consultant experienced in all aspects of EPA Assessment Grant management will support him. The consultant will have managed at least four Assessment Grant projects and be familiar with all administrative requirements to support the County's grant program. These members of the Project Team will have the primary responsibility for continued operations, selection and training of a successor Project Manager, and training of any new team members. The Project Team also will have access to additional expertise and EPA Grant experience within the County staff. Ms. Patricia Denig, Director of Planning and Operations, formerly managed the County's brownfield program and recent EPA Assessment Grant before assuming her current role. She will be available to assist Mr. VanDerworp and the environmental consultant to support and train a replacement Project Manager.

### **3. Community Engagement and Partnerships**

**3.a. Plan for Involving Affected Community** The County believes it is important to provide its citizens and community organizations ample opportunity to become informed and provide input into all phases of the project. Community involvement efforts are an essential component of Washtenaw County's multifaceted approach to land preservation, management and sustainable redevelopment in the County. Through management of other EPA and state-funded grant and redevelopment programs, the County has developed processes and "infrastructure" to inform and involve citizens, civic organizations, business leaders, neighborhood associations and communities in the decision making process. Information dissemination and community feedback are integral parts of the process.

Communication with residents of Washtenaw County will include the following: 1) press releases in local newspapers, 2) notices posted on the County's website ([www.ewashtenaw.org](http://www.ewashtenaw.org)), 3) presentations at meetings of the County, and local civic, community, and environmental organizations to provide information, answer questions and address concerns, and 4) announcements on the two local public radio stations, WEMU-FM 89.1 and WUOM-FM 97.1, and local access television. The variety of notification outlets (website, television, newspaper, library, radio and direct contact) and media (internet, television, radio, email, direct contact, and published fliers for direct contact) will ensure communication to the widest possible number of citizens and businesses, and address disparities in technology access and proficiency, literacy levels, and language. The County also will directly communicate with key community organizations: Ann Arbor SPARK, Ypsilanti's Community Policing Action Council (CoPAC), Huron River Watershed Council, Michigan Suburbs Alliance, Recycle Ann Arbor, Saline River Greenway Alliance, The Clean Energy Coalition, Huron Valley Community Network, the Ecology Center, and the Legacy Land Conservancy. Contact information for the Project Manager will be included in all project literature and notifications and on the County website.

Less than 3% of the County's population is Spanish-speaking. Although 6.3% of the population is Asian, there is no common language to support community outreach because of the variety of countries represented. Because of the low percentage of non-English speaking residents, and their dispersion throughout the County, outreach activities will generally be conducted in English. Where appropriate and requested, a translator will be employed to assist members of the County's non-English speaking community.

At the beginning of the project, a draft Work Plan and budget will be prepared. The availability of the draft Work Plan for public review and comment will be announced as described above. Copies will be made available on the Washtenaw County website, at each community's office and website, and in each public library in the County. Public comments on the Work Plan and grant project will be accepted at each unit of government for a period of at least 15 days. The



draft Work Plan will be modified as appropriate in response to relevant comments, and all comments and respective responses will be summarized in the final Work Plan.

Following approval of the Work Plan, the County will seek public input regarding the brownfields site inventory. An initial public meeting will be held to acquaint community leaders, lenders, developers, citizen groups, and other stakeholders with the project. The County will solicit nominations for the brownfields inventory and suggestions for site prioritization. The County is also interested in gathering as much information/suggestions from the community regarding potential developers and/or redevelopment goals. The County will incorporate sites nominated by citizens' and community organizations into the brownfields inventory.

Once a site is selected for use of grant funds, the host community will be notified as described above, plus the host community will be asked to identify local/neighborhood groups proximate to the target site so that more focused outreach can be conducted through those groups. The County then will hold a public meeting in accessible community facilities to discuss the site and project. When citizens or community organizations request additional information, additional public meetings or meetings with community organizations, respectively, will be held and a County representative will attend. These meetings will familiarize stakeholders with the rationale for selection of the site(s) and outline what to expect during and after the assessment process. The County's community outreach program will continue through site use planning, site plan approval, and zoning review as site redevelopment progresses.

**3.b. Government Agency Partnerships** The Michigan Department of Environmental Quality (MDEQ) and Washtenaw County Department of Environmental Health (WCDEH) will play key roles in Washtenaw County's brownfields assessment project. Partnering with these two agencies will help ensure that public health is protected and the project is successful. Washtenaw County will establish a strong partnership with the MDEQ to provide appropriate assessment, cleanup and development of brownfield sites. Compliance with the Michigan's self-implementing Voluntary Cleanup Program (VCP) is the primary method for assuring protection of public health and the environment during cleanup and/or redevelopment of brownfields not governed by federal statutes, such as the Toxic Substances Control Act (TSCA). The VCP controls reuse of contaminated property by statutorily requiring that any such use protect human health and prevent exacerbation of existing contamination. Contaminant-specific, risk-based cleanup criteria for protection of human health and the environment are established by rule for residential, commercial, and industrial uses of property. The MDEQ has published substantial guidance documents for design of environmental assessments, selection and implementation of sampling and analysis methods; selection of target analytes; statistical evaluation of data; quality assurance/quality control; and other critical activities and processes for implementing assessment and remedial actions under the VCP. The VCP also provides guidance for protecting public health and the environment through use of institutional and engineering controls.

Partnering with MDEQ district and headquarters staff will be important for acquisition of technical support, resolution of regulatory or procedural issues, and interpretation of rules and guidance documents. When petroleum impacted sites are identified for potential assessment, the MDEQ will be involved in the site eligibility determination. The MDEQ will also review and approve Closure Reports for sites where response actions are completed.

The MDEQ will be involved in the project when property is transferred to developers for redevelopment. New owners of contaminated property can get protection from liability for existing contamination by conducting a baseline environmental assessment (BEA) of the property to identify historic impact and establish a method for distinguishing existing contamination from a new release. The County will work with prospective property owners and the MDEQ to ensure that site developers' BEAs comply with statutory requirements and MDEQ guidance, especially when engineering/institutional controls are proposed.

The Washtenaw County Department of Environmental Health (WCDEH) is, and will continue to be, involved in environmental health and brownfield redevelopment issues facing communities within its jurisdiction. Based on previous discussions with the WCDEH, no disease or



symptomatic clusters that would indicate environmental health issues or related target contaminants associated with brownfields have been identified in Washtenaw County. When contamination is present on brownfield sites, the cleanup criteria established by the MDEQ under the VCP will be used to evaluate and address on-site and off-site health and environmental threats posed by the contaminants. If contamination on the sites has the potential to negatively impact the health of local populations through migration to off-site receptors, the MDEQ and WCDEH will be notified and brought in as project partners to help identify and address the issues. The expertise and experience of WCDEH will be called upon to help identify/verify offsite health threats posed by identified contamination, identify related toxicological issues and perform risk evaluations, design and conduct notification/education programs, and coordinate health testing (e.g. blood-lead in children near sites contaminated with lead) if migration of contamination from a site is confirmed.

The WCDEH has been actively involved in education/notification, testing and monitoring, and exposure evaluations related to environmental issues in the County. These are the capabilities that will be contributed to the Assessment Grant team when needed. For example, WCDEH has been actively involved in education and notification programs and exposure evaluations for 1) Armen Cleaners in downtown Ann Arbor, where dry cleaning solvent migrated under adjoining businesses and residences and 2) the Gelman Sciences site in Scio Township, the source of dioxane contamination in three aquifers under Scio Township and eastern Ann Arbor. The WCDEH, working with the MDEQ, has conducted over 87 residential drinking well assessment events near 11 different sites of contamination, conducted community notification and education programs about the issues, exposures, and health effects related to groundwater contamination and indoor air pollutants such as lead, mercury and radon.

**3.c. Description and Role of Key Community Organizations** The community-based organizations listed in the table below will be directly involved in the Assessment Grant project. The table below provides a description of each organization and its respective role in the project. The organizations' letters of support are included in Attachment 2.

Organization	Contact	Purpose of Agency	Role	Phone
Ann Arbor SPARK	Vince Nystrom	Attraction and retention of innovation-based businesses in Washtenaw County	Identification and marketing of potential redevelopment sites; prioritization of sites for assessment.	(734) 761-9317
CoPAC	Troy Fulton	Partnership of neighborhood associations and police for quality of life issues	Transferring information to residents and community organizations in Ypsilanti	(734) 483-8590
Huron River Watershed Council	Laura Rubin	Protects and sustains Huron River system	Aid in identifying environmental and ecological issues in Huron River watershed; public outreach	(734) 769-5123
Michigan Suburbs Alliance	Conan Smith	Networking Metro Detroit's mature suburbs	Site identification and public outreach	(248) 546-2380
Clean Energy Coalition	Sean Reed	Non-profit organization dedicated to promoting green technologies	Provide information on clean energy technologies to support sustainable redevelopment	(888) 818-0987
Legacy Land Conservancy	Susan Lackey	Protects forests, fields, wetlands and rivers of southern Michigan	Use conservation priorities database to identify greenspace sites for assessment, acquisition and preservation; community outreach	(734) 302-5263

**4. Project Benefits**

Washtenaw County has a road map for development -- its *Comprehensive Plan*. The Plan's purpose for economic development is as follows: A healthy economy is needed to provide jobs for our residents and raise the standard of living for our lower income citizens. A healthy economy also provides the necessary tax base needed to provide public services. When integrated with the land use, transportation and utility elements of a comprehensive plan, economic development policies can promote an efficient pattern of growth that supports our sense of place." The presence of large and small brownfields in close proximity to sensitive populations, vacant properties in the cities and villages of the County, and contamination migrating to the Huron River, Saline River, and River Raisin are all undermining the goals of the County.

**4.a. Welfare and/or Public Health** The Assessment Grant will help protect public health and welfare in the best way possible – restoring control of contaminated sites through assessment, cleanup and redevelopment. Restoring control removes threats and eliminates exposures, critical steps for protecting the general public and sensitive populations. Threats to residents can be mitigated by 1) bringing these sites and associated hazardous materials to the public’s attention, 2) completing site assessments designed to identify the presence and extent of contamination, and 3) directing remediation/abatement and/or redevelopment to reestablish site control through engineering and/or institutional controls.

While the County has not yet determined which brownfield sites will be assessed using grant funds, examples presented in the table below show what types of benefits can be expected:

Site	Health, Welfare and Redevelopment Benefits
Water Street Project Site Downtown Ypsilanti	Full extent of initially identified contamination from chlorinated solvents, PCBs, metals and petroleum products on the 38-acre site will be determined. Cleanup will mitigate the vapor intrusion and direct contact impacts on surrounding low income families and adjoining Huron River and make the site safe for redevelopment. Groundwater migration to the Huron River will be controlled.
DAPCO Products Downtown Dexter	Full extent of contamination will be determined, allowing clean-up to begin in critical areas that may impede reuse through direct contact or vapor intrusion exposure pathways; off-site migration threatening the downtown area, adjoining neighborhoods and the newly restored Mill Creek will be identified and mitigated. The site will be made safe for reuse through remediation or engineering controls.
Former Ford Motor Company Parts Plant Ypsilanti	Known solvent, petroleum and metals contamination will be delineated, and threats to adjoining minority neighborhoods and Huron River will be evaluated. Cleanup will be initiated to protect residents and users of the downstream, heavily used, Ford Lake and prepare the site for redevelopment.
Evergreen Products Ypsilanti	Over 100 drums of unknown chemicals and wastes must be characterized. Subsequent removal will mitigate imminent threats of fire, explosion and public health effects from releases to the environment.
Former Fuel Oil Terminal Downtown Manchester	The extent of petroleum releases on this site adjoining a residential neighborhood and the River Raisin will be determined. Groundwater contamination will be prioritized to evaluate threats to homes and the river. Discovery of significant impacts will lead to removal or capping of contaminated material to prevent exposures. Groundwater migration to homes or the river will be controlled. The site will be ready for redevelopment.

Actual site selection will be guided by priorities described in Section 2 (1) improving conditions for disproportionately impacted underprivileged and minority populations, 2) mitigating imminent hazards and redevelopment obstacles posed by abandoned chemicals and wastes, 3) stimulating redevelopment of abandoned, large manufacturing facilities, 4) supporting redevelopment of smaller industrial, commercial and retail brownfield sites, and 5) supporting protection and restoration of watersheds and acquisition of greenspace.

As shown in the examples above, a majority of brownfields in the County lie in or near neighborhoods, sensitive and underprivileged populations, and/or downtown areas. Cleanup and redevelopment of these sites will greatly reduce current threats to citizens living, working, shopping, learning, and playing in those areas. Also as shown in the above table, the benefits of brownfields site assessments and redevelopment also will accrue to the Washtenaw County waterways and watersheds. Redevelopment of brownfield sites will provide control of contaminated runoff, eliminating threats from those sites to the water sediments and ecosystems, thus protecting fish, amphibians, protected species, and human health (recreational contact).

Communities will be protected from exposures to contaminants during assessment work. First and foremost, access to each site will be prohibited during operations. A Health and Safety Plan (HASP) will be completed for each site where intrusive sampling will occur. When subsurface soil or groundwater samples are collected or hazardous building materials are disturbed, the release of particulates and vapors will be monitored and controlled. If releases pose a threat to off-site populations, dust and vapor suppression techniques, such as wetting, foaming, polyethylene enclosures (asbestos), will be employed to mitigate potential off-site exposures. Sampling equipment and vehicles, such as trucks, drilling rigs, and hydraulic probes, will be decontaminated during use and before leaving the site to prevent off-site spread of contamination. Decontamination wastes and water and purge water generated during groundwater sampling activities will be containerized on-site and appropriately disposed.

**4.b. Economic Benefits and/or Greenspace** Redevelopment of brownfields in Washtenaw County will result in economic benefits for residents in the small towns, affected neighborhoods in the larger cities of Ann Arbor and Ypsilanti, and the County as a whole through creation of job opportunities, improvement in economic activity, and improvement in the tax base. Brownfields redevelopment will also result in preservation and expansion of Washtenaw County's parks and greenspaces, such as along the Huron River after removal of Argo Dam.

**4.b.i) Economic Benefits** The biggest economic benefits of brownfields redevelopment will be increased jobs, economic activity, and tax revenues. The benefits will arise through redevelopment of Washtenaw County's 1) large, abandoned industrial sites and 2) smaller, town-centered, industrial sites and sites of chemically intensive retail and commercial operations, such as dry cleaners, automobile repair shops, printers, machine shops, etc., and 3) manufacturing, manufacturing support and R&D sites in industrial parks. Redevelopment of manufacturing sites for continued industrial operations is a high priority for the County. The goal is to replace as many of the lost higher wage jobs as possible for county residents. This will be accomplished by attracting new industries and manufacturers to the defunct large manufacturing sites and empty industrial park facilities. Washtenaw County is emerging as an R&D center for biomedical, battery, and alternative energy technologies. A major goal is to nurture the expansion of these technologies into full-scale production and manufacturing in the County. Assessment Grant funds are needed to help convert the County's existing industrial brownfields into homes for these companies. These 21<sup>st</sup> century industries will create critical new, high-wage jobs and generate badly needed taxes to support County operations and services to the underprivileged.

As much as industrial redevelopment is desired, redevelopment of larger sites inside communities typically produces mixed residential and retail/commercial developments because most communities' master plans and zoning do not support re-industrialization of urban core sites. These developments direct benefits through creation of new, local job opportunities and restore lost tax revenues. Redevelopment of a typical 20-acre site can be expected to generate up



to 80 - 150 jobs and \$1 million to \$3 million in tax revenues, with little infrastructure or other investment of public funds. Indirect economic benefits of these developments results from increasing the number of residents in and near downtown areas, stimulating economic activity through local shopping, entertainment, etc. Typical economic activity multipliers are 20 to 25 times the cumulative disposable income. A classic example of this is downtown Ypsilanti's 38-acre Water Street Project. Redevelopment of this site will provide new housing, jobs, taxes, and opportunities for the County's most economically distressed citizens.

Many times, redevelopment/reuse of smaller retail/commercial sites can be as important as the larger sites. These sites typically lie in downtown neighborhoods where losses of retail/commercial businesses have smaller, more intimate, but significant impacts on the local communities and neighborhoods. Direct impacts include the loss of jobs and economic activity. Indirect impacts include vacant and decaying buildings that cause blight, out-migration of other businesses and downward-spiraling property values. Redevelopment can prevent or reverse these negative economic impacts.

**4.b.ii) Greenspace** Redevelopment of brownfield sites along Washtenaw County's waterways will result in the creation of linked greenspace, parks and trails that will be enjoyed by the residents of the County and will limit construction on existing greenspace. As a condition of accessing public funds to support redevelopment, developers of brownfields on the County's waterways will be required to preserve and provide public access to greenspace along the waterways. For example, redevelopment of Ypsilanti's Water Street site will reduce pollution entering the Huron River and create a riverside park that will complete a two-mile, continuous series of parks, one of which (Riverside Park) was designed by the sons of Frederick Law Olmstead, designer of Central Park in New York City.

Reuse of previously developed brownfields instead of greenspace also will help preserve farmland and open space and protect the County's natural environment. Up to 15% of the Assessment Grant funds initially will be prioritized for assessment of land to link or expand existing parks and greenspace. Ann Arbor's Greenbelt Program and Washtenaw County's Natural Area Preservation Program are two primary targets for use of Assessment Grant funds. These programs, in partnership with similar programs in five of the County's townships, acquire title or development rights to farmland and unique natural lands throughout the County. To date, over 1,200 acres of greenspace have been secured and preserved. Environmental due diligence and contamination delineation assessments must be performed on these lands before acquisition. Expansion of the greenspace program is anticipated to accelerate in the near future because land values have declined, making acquisition more financially feasible.

In addition, promoting greenspace preservation will assist in managing storm water infiltration, preserve wetlands that provide additional filtering for storm water, and improve habitat for the 61 Endangered, Threatened and Special Concern species that live in the waterways and associated watersheds of the County. For example, another projected use of Assessment Grant funds will be to assess contamination of sediments behind the Argo Dam on the Huron River to support planning for its removal to restore the Huron River Channel. Miles of new greenways along the river will be created, restoring native flora and fauna and preserving the watershed's rare species.

**4.c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse** Washtenaw County historically has been a rural agricultural county blessed with ample woods, water features, and greenspace. The County's goals in its *Comprehensive Plan* include reduction of urban sprawl, preservation of farmland and open space, and protection of the natural environment in collaboration with the townships, cities, and villages of the County.

Redevelopment of large brownfields, whether for industrial reuse or residential, retail, commercial or mixed use, will reduce pressures to develop green land and the resulting suburban and exurban sprawl. Most former manufacturing sites are attached to large-capacity infrastructure (e.g. water, sewer, electricity, roadways, and natural gas), which will support renewed industrial or new uses, including residential and commercial, with little or no need for



additional investment of capital or resources. These larger sites also provide enough space for incorporation of sustainable development practices for storm water runoff control (green roofs, bioswales, rain gardens, etc.) into redevelopment plans. The County's goal is to encourage zero runoff from all new brownfield redevelopment projects. Developers using Assessment Grant funds must agree to strive for this goal. To further promote sustainable development, the County will require developers using Assessment Grant funds to add green/LEED features in projects resulting from use of those funds. Michigan state law prohibits local governments from changing building codes to require higher sustainability levels; it only allows incentives.

When existing buildings must be removed, whether large or small, the County will strongly encourage deconstruction (to reuse building materials, fixtures, etc.), rather than straight demolition, of buildings. Deconstruction maximizes the recovery, recycling and reuse of as much of the structural materials and fixtures as possible.

Redevelopment of the County's brownfields will help keep residents closer to home, with respect to jobs, shopping, and services. The 2000 U.S. Census Bureau statistics showed that 79% of Washtenaw County's working residents (approximately 190,000; *2006 Bureau of Labor Statistics*) commuted daily to work, averaging 22.2 minutes of driving. Assuming 12 miles each way per commuter, this equates to 4.6 million miles per weekday. Housing and jobs need to return to the urban core areas to support the local economy and achieve the goal of improving sustainable living. Shortening driving distances for jobs, shopping, and entertainment will reduce consumption of imported hydrocarbon fuels, reduce the County's greenhouse gas emissions and carbon footprint, and encourage the use of hybrid and plug-in electric automobiles and non-motorized transportation.

**4.d. Tracking and Measuring Project Progress** The County's goals for its brownfields program are to reduce environmental threats to the community, reduce sprawl, preserve greenspace, and improve economic conditions. The County will orient this goal to match the EPA's expected outcomes, which include creating new jobs and greenspaces, and leveraging additional funding through the reuse of brownfields. First, the County will evaluate Project achievements against those incorporated into the grant application and Work Plan. Second, the County will determine if the Project has resulted in an improved functioning of the brownfield redevelopment process (i.e., successful management, acquisition, and leveraging of brownfield financial incentives). Third, the County will document the following project elements and determine if each element meets the County's collective goals. The County will be diligent in measuring the outcomes from the use of the Assessment Grant funds.

The following Assessment Grant outcomes and outputs will be tracked and documented on a regularly updated project spreadsheet:

#### **Outcomes**

- Number of sites assessed.
- Number of sites identified with off-site risks.
- Number of response actions at identified sites.
- Number of title transfers facilitated.
- Number of sites redeveloped.
- Redevelopment investment value.
- New jobs and tax revenue generated
- Acres of parks and green space created/preserved.

#### **Outputs**

- Number of Phase I ESAs.
- Number of Phase II ESAs completed.
- Number of sites where cleanup planning was conducted.
- Number of community outreach events held.



## **Attachment 1**

Letter from State Authority



**Attachment 2**  
Letters of Support

