

**NARRATIVE INFORMATION SHEET
CAPITAL REGION BROWNFIELDS COALITION**

1. Applicant Identification

County of Ingham
341 S. Jefferson St.
Mason, MI 48854-1651

2. Funding Requested

- a. Assessment Grant Type: Assessment Coalition
- b. Federal Funds Requested: \$1,500,000

3. Location

Lansing Region Brownfields Coalition, led by Ingham County as lead coalition member, serves the Lansing-East Lansing region in Michigan, consisting specifically of Clinton, Eaton, and Ingham counties as its geographic boundaries.

County of Ingham – Lead member

- a) City: Mason b) County: Ingham c) State: Michigan Geographic Boundary: Ingham County

County of Clinton – Non-lead member

- a) City: St. Johns b) County: Clinton c) State: Michigan Geographic Boundary: Clinton County

County of Eaton – Non-lead member

- a) City: Charlotte b) County: Eaton c) State: Michigan Geographic Boundary: Eaton County

Cinnaire – Non-lead member

- a) City: Lansing b) County: Ingham c) State: Michigan Geographic Boundary: Region-wide

Melanated Business Alliance – Non-lead member

- a) City: East Lansing b) County: Ingham c) State: Michigan Geographic Boundary: Region-wide

4. Coalition Members' Target Area and Priority Site Information

Lansing Region Brownfields Coalition's Target Areas and Priority Sites are as follows:

Ingham County

- Target Area: City of Williamston
- Priority Site: Williamston Ice House, 200 Elevator St. Williamston, MI 48895

Clinton County

- Target Area: City of St. Johns
- Priority Site: Former FC Mason Site, 300 E. Steel Street, St. Johns, MI 48879

Eaton County

- Target Area: City of Eaton Rapids
- Priority Site: Horner Mill Factory, 224 N Main St, Eaton Rapids, MI 48827

Cinnaire

- Target Area: Downtown East Lansing-Grand River Corridor
 - Tract 26065004301, MICHIGAN, EPA Region 5 (Population: 4,539)
 - Tract 26065004100, MICHIGAN, EPA Region 5 (Population: 5,274)
 - Tract 26065004302, MICHIGAN, EPA Region 5 (Population: 2,398)
- Priority Site: Tasty Treat Plaza, 1307 E. Grand River Ave. East Lansing, MI 48823

Melanated Business Alliance

- Target Area: S. Martin Luther King Jr. Boulevard Corridor Improvement Authority (S. MLK CIA)
 - Tract 26065003700, MICHIGAN, EPA Region 5 (Population: 4,749)
 - Tract 26065005100, MICHIGAN, EPA Region 5 (Population: 3,464)
 - Tract 26065005201, MICHIGAN, EPA Region 5 (Population: 5,218)
- Priority Site: Logan Square, 3222 S Martin Luther King Jr Blvd, Lansing, MI 48910

5. Contacts

a. Project Director:

Dillon Rush
 (517) 331-0069
dillon@purelansing.com
 1000 S. Washington Ave. Suite 201, Lansing, MI 48910

b. Chief Executive/Highest Ranking Elected Official:

Gregg Todd
 Controller, Ingham County
 517-676-7203
gtodd@ingham.org

Ryan Sebolt
 Chair, Board of Commissioners
 (517) 676-7200
rsebolt@ingham.org
 Ingham County Courthouse, P.O. Box 319, Mason, MI 48854

6. Population

Population of three-county geographic boundary:	472,848
Clinton County:	79,748
Eaton County:	108,992
Ingham County:	284,108
City of St. Johns (Target Area/Priority Site):	7,710
City of Eaton Rapids (Target Area/Priority Site):	5,185
City of Lansing (Target Area/Priority Site):	112,537
City of East Lansing (Target Area/Priority Site):	47,340
City of Williamston (Target Area/Priority Site):	3,800

7. Other Factors

Community population is 10,000 or less.	No
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	No
The priority site(s) is impacted by mine-scarred land.	No
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).	Yes, Pg. 2-4
The priority site(s) is in a federally designated flood plain.	No
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Yes, Pg. 3, 11
The reuse of the priority site(s) will incorporate energy efficiency measures.	Yes, Pg. 3, 11
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Yes, Pg. 4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority sites within the target areas.	Yes, Pg. 10
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	No

8. Letter from the State or Tribal Environmental Authority

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 20, 2023

VIA EMAIL

Gregg Todd, Controller
Ingham County
315 South Jefferson Street
Mason, Michigan 48854

Dear Gregg Todd:

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 Ingham County's proposal for a U.S. EPA Brownfield Grant. EGLE's Remediation and Redevelopment Division encourages and supports community-led environmental assessment and redevelopment efforts and recognizes the County's need for funding.

Ingham County is applying for a \$1,500,000 Brownfield Assessment Coalition Grant. As a general-purpose unit of local government, Ingham County is an eligible grant applicant.

Should the U.S. EPA award a brownfield grant to Ingham County, it would allow the County to conduct environmental investigations such as Phase I and Phase II Environmental Site Assessments and other eligible activities to promote economic development at brownfield sites. If you need further information about potentially eligible sites 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: Sarah Venner, EGLE

NARRATIVE
CAPITAL REGION BROWNFIELDS COALITION

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

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

1.a.i. Coalition Members

Capital Region Brownfields Coalition (CRBC) is a 5-member coalition located in and serving the Lansing region, MI. This region consists of Clinton, Eaton and Ingham counties, as designated by the Governor. CRBC includes:

Name	Member	Entity Type
Ingham County	Lead	County Government
Eaton County	Non-lead	County Government
Clinton County	Non-lead	County Government
Cinnaire	Non-lead	Community-based Organization (CDFI, 501c3)
Melanated Business Alliance	Non-lead	Community-based Organization (501c3)

Contrary to Ingham County, Clinton and Eaton Counties are small and primarily rural counties, which limits financial and staff resources. However, with Ingham County, each is afforded the opportunity to tap into assessment resources on a large scale and contribute to regional redevelopment as an integral partner. Cinnaire is a nonprofit community development financial institution, making high-impact investments and loans to developers and nonprofits, often utilizing Low-Income Housing Tax Credit and New Markets Tax Credits. Melanated Business Alliance is a two-person nonprofit team with the mission to bring economic change within the underrepresented individuals, business, and communities in the Lansing region. Both struggle with direct capacity to financially or administratively lead efforts to advance environmental justice and remediation; however, both missions mesh well with CRBC’s intent and are well positioned to engage the development and underrepresented communities.

1.a.ii. Overview of Brownfield Challenges and Description of Target Area

CRBC’s geographic boundaries are as follows:

Coalition Member	Geographic Boundary
Ingham County	Ingham County
Eaton County	Eaton County
Clinton County	Clinton County
Cinnaire	Region-wide (all three counties)
Melanated Business Alliance	Region-wide (all three counties)

As illustrated in the table below, each county within CRBC is faced with unique challenges. Ingham County has a higher number of individuals living below the ALICE threshold – Asset Limited, Income Constrained, Employed persons earning below the minimum income level necessary for survival in a household as defined by the United Way – than the State of Michigan as a whole, as well as higher rates of SNAP users, lower per capita and median household incomes, and the second highest diversity index percentage in Michigan after Wayne County (county seat Detroit). Eaton and Clinton counties experience significantly higher rates of persons aged 65 or older, as well as other less quantifiable limitations often inherent to rural communities, including lack of immediate jobs outside metropolitan areas (a mean travel time to work at 24.2 minutes for Clinton County¹ and 22.6 minutes for Eaton County²), lack of broadband access, and lack of community resources and experience with brownfields.

Data Point	Michigan	Clinton County	Eaton County	Ingham County
Population	10,034,113	79,426	108,944	284,034
Percent Minority	38.4%	11.1%	18.5%	31.2%

¹ <https://www.census.gov/quickfacts/fact/table/clintoncountymichigan/PST045222>

² <https://www.census.gov/quickfacts/fact/table/eatoncountymichigan/PST045222>

Diversity Index	61.1%	25.8%	35.1%	52%
Poverty Rate	13.4%	7.8%	8.8%	15.8%
Median Household Income	\$63,202	\$76,161	\$72,173	\$58,226
Per Capital Income	\$34,768	\$38,503	\$36,761	\$33,141
ALICE Threshold**	39%	30%	32%	41%
Age 65 or Older	17.5%	19.1%	20.3%	14.8%
SNAP Users***	12.6%	5.4%	7.8%	12.9%

Data is sourced from American Community Survey, United Way, and Federal Reserve Economic Database

CRBC believes economic development is a tool to bring sustainable change for all communities. Equitable economic development in CRBC’s eyes is about expanding opportunities for low-income people, communities that are primarily Black, Indigenous and people of color (BIPOC) and other historically disenfranchised populations including women, returning citizens, LGBTQ+ and more. For example, focusing EPA resources on the following Target Areas positions each to offer opportunities for new jobs, business creation, wealth generation, improved infrastructure and reduced health hazard risks.

- **Ingham County – Lead Member – Target Area: City of Williamston:** City of Williamston is a small rural town of approximately 3,800 residents in east Ingham County. Williamston is built with strong bones and is ripe for economic reinvestment situated adjacent to I-96, along the Grand River, and in between Lansing and Detroit regions.
- **Eaton County – Non-lead Member – Target Area: City of Eaton Rapids:** City of Eaton Rapids is a small rural town of approximately 5,100 residents in south Eaton County. Eaton Rapids has experienced major closures and serious blight and contamination, notably in one of the most compelling Priority Sites for redevelopment in the Lansing region.
- **Clinton County – Non-lead Member – Target Area: City of St. Johns:** City of St. Johns is a small rural town of approximately 7,650 residents in Clinton County. As the largest city in the county, St. Johns is home to dozens of historic buildings, including commercial and industrial. One of the largest industrial buildings in the Lansing region sits vacant and contaminated on the edge of downtown.
- **Cinnaire – Non-lead Member – Target Area: Downtown East Lansing Grand River Ave. Corridor:** City of East Lansing is a university-town home to Michigan State University and approximately 46,850 residents. East Lansing erupted in recent years with multiple largescale development projects, with a mix of student housing, fixed rate apartments, and office and community space. Despite recent investments, brownfield redevelopment opportunities are abundant along this corridor, and it is prime for inclusive entrepreneurship opportunities. Specific census tracts for this corridor (26065004301, 26065004100, 26065004302) include a total population of 12,211 (CEJST).
- **Melanated Business Alliance – Non-lead Member – Target Area: S. Martin Luther King Jr. Boulevard Corridor Improvement Authority:** The S. Martin Luther King Jr. Blvd. Corridor Improvement Authority (CIA) was once home to a bustling retail scene but has deteriorated for a variety of economic and societal reasons. The S. Martin Luther King Jr. CIA is one of the most diverse areas in the entire Lansing region and its census tracts (26065003700, 26065005100, 26065005201) include a population of 13,341 (CEJST).

1.a.iii. Description of Priority Brownfield Sites

As many as 1,260 facilities closed in the Lansing region area alone since 2000 largely stemming from the manufacturing sector, many of which are clustered around main commercial corridors, along riverfronts, in lower-income neighborhoods, and in prime locations hindering new development. CRBC identified Priority Sites with similar elements to best stimulate further regional brownfield redevelopment:

- **Ingham County – Lead Member – Williamston Ice House, Williamston:** The Williamston Ice House is a historic building located at 200 Elevator St. in the city of Williamston, still standing over 120 years since its construction. Once home to a cold storage operation, the building has sat vacant for years due to concerns

related to underground storage tanks. Redevelopment of the historic property is a priority of the local administration and will activate a blighted building acting as the welcome sign to downtown Williamston.

- **Eaton County – Non-lead Member – Horner Mill Factory, Eaton Rapids:** The 135-year-old home to historic Horner Woolen Mills has been empty for approximately a decade. Spanning across 130,000 square feet and adjacent to the Grand River, the building’s disrepair led to its listing as a Facility by Michigan Department of Environment, Great Lakes, and Energy (EGLE), proving challenging to redevelop with expected contamination and hefty remediation costs. Site is primed for assessment work and reuse planning, and remediation could provide unique attainable housing, lifestyle businesses, and new jobs in the area.
- **Clinton County – Non-lead Member – Former FC Mason Site, St. Johns:** The former FC Mason facility is located at 300 E. Steel St. and borders a historic downtown, neighborhoods, and the community’s Fred Meijer Clinton-Ionia Shiawassee Trail. This former auto manufacturing facility is in the EGLE Voluntary Cleanup Program, with contaminants including 1,2,4-trimethylbenzene, toluene, ethylbenzene, xylenes, trichloroethane, vinyl chloride and cis-1,2 dichloromethane. Remaining contamination threatens drinking supply and the Maple River Watershed ecological health. The impacted groundwater discharges into the nearby surface water. Remediation and rehabilitation of the site, either into new clean industrial, mixed-use residential/commercial, or public space, will eliminate one of the region’s largest contamination risks and evolve into a beacon of rural redevelopment.
- **Cinnaire – Non-lead Member – Tasty Treat Plaza, East Lansing:** The Tasty Treat Plaza at 1307 E. Grand River Ave. was formerly home to a gas station, ice cream store, and other shops. The site is likely East Lansing’s most contaminated site, with benzene, VOCs in groundwater above 1 ppb, and 3 underground tanks totaling 20,000 gallons, and sits less than 500 feet from the Red Cedar River. The site is underutilized and mostly derelict but is prime real estate at the corner of Grand River Ave. and Spartan Ave. with great proximity to Michigan State University (MSU) campus. Revitalization of the site will protect potential contamination from spreading into the Red Cedar River and activate an integral property along a major urban thoroughfare.
- **Melanated Business Alliance – Non-lead Member – Logan Square, Lansing:** Logan Square and its surrounding 150 acres of commercial and industrial structures are now mostly derelict and vacant at 3222 S. Martin Luther King Jr. Blvd. With former auto body shops, dry cleaners, and industrial sites, suspected contaminants include asbestos, mold, lead-based paints, and subsurface contaminants, threatening hazard exposure to adjacent low-income housing and a nearby Grand River tributary. Logan Square is a prime candidate for reuse planning, and reinvestment in this site will tangibly and positively impact the quality of life through beautification, job creation, and commercial reinvigoration.

1.a.iv. Identifying Additional Sites

Additional sites for eligible activities in CRBC’s defined geographic boundaries will be considered through a comprehensive project intake review process. Factors to be considered include public health threats, anticipated need for remediation, active community support, Comprehensive Economic Development Strategy (CEDS) Plan alignment, willingness of property owners to engage, likelihood for redevelopment or reuse planning to be realized, prospective investment and job retention/creation, prospective development’s focus on renewables and energy efficiency, proximity to lakes/rivers/bodies of water, alignment with CRBC’s equitable economic development priorities, prevalence of individuals at or below the ALICE threshold in the area, and CEJST and EJSscreen analysis for identifying high-impacted and high-need areas. Additionally, project intake leads will be curated through collaborative efforts amongst Coalition Members, community liaisons, and other partners performing on-the-ground community organizing.

1.b Revitalization of the Target Areas

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

CRBC will work to develop reuse plans in alignment with local and regional developed plans for community growth. Namely, an important resource is Tri-County Regional Planning Commission’s 2023-2028 CEDS plan for the Lansing region. Opportunities identified in its SWOT analysis will be considered in activating reuse planning,

such as the project’s impact on interconnected public transit and other aging infrastructure, diversifying housing stock, broadband accessibility, environmental sustainability, workforce training prospects, and start-ups. Additionally, Tri-County Regional Planning Commission is expected to unveil a new housing report in 2023, which will be integral in identifying gaps and opportunities in the region’s built environment and residential marketplace. Reuse plans for the specified sites are anticipated to include:

- **Ingham County – Lead Member – Williamston Ice House, Williamston:** The Williamston Ice House is positioned as a gateway to downtown Williamston from its most trafficked route. Local officials are extremely interested in understanding what redevelopment opportunities are possible. With few interested parties over the years, anticipated reuse planning includes a Site Reuse Assessment, Infrastructure Evaluation, and Site-Specific Resource Roadmap.
- **Eaton County – Non-lead Member – Horner Mill Factory, Eaton Rapids:** Located adjacent to the Grand River, the 7-acre site has promising reuse potential for a mixed-use commercial & residential development – a transformation of a historic manufacturing facility, potentially using eligible Property Assessed Clean Energy (PACE) financing. Due to the site’s history and size, a Site Reuse Assessment is anticipated, with possibly a Climate-Smart Brownfield Plan to prepare for potential change to its adjacent river levels.
- **Clinton County – Non-lead Member – Former FC Mason Site, St. Johns:** The FC Mason facility is immersed in residential and retail activity in St. Johns, adjacent to downtown and two blocks from the Old U.S. 27 HWY. This area is ripe for development, welcoming a major foreign investment project in 2018. Preliminary planning from the city of St. Johns demonstrates new streetscapes, mixed-use redevelopments, and public space enhancements for the site and its surrounding area. Anticipated reuse planning includes a Site Reuse Assessment and Infrastructure Evaluation.
- **Cinnaire – Non-lead Member – Tasty Treat Plaza, East Lansing:** The Tasty Treat Plaza has a complex environmental background but exists on a rapidly expanding commercial and mixed-use corridor. Mixed-use redevelopment is envisioned and planned by the city of East Lansing, as the plaza is surrounded by apartments and food/beverage establishments. Anticipated reuse planning includes a Market Study and Evaluation of Market Viability.
- **Melanated Business Alliance – Non-lead Member – Logan Square, Lansing:** Local businesses, residents and the city of Lansing came together to form the S. Martin Luther King Jr. CIA to better envision and revitalize the commercial corridor in which Logan Square rests heavily underutilized and contaminated. Complimenting the CIA’s development plans for the site, anticipated reuse planning includes a Site Disposition Strategy, to understand routes to new ownership and energy, and a Retail Market Study.

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

Assessment funding will address regional environmental, health, and socioeconomic challenges like blight removal, community-focused investments, quality of life, and improved access to economic opportunities for underrepresented communities. This grant will also stimulate infill development on properties with existing infrastructure, supporting redevelopment in the region’s urban areas and farmland preservation. From 1992 to 2007, the Lansing region lost roughly 16,000 acres of farmland to urban sprawl (over a third of Michigan’s farmland lost to sprawl). Each assessed and repurposed brownfield will follow urban growth policies and applicable universal development agreements (i.e., in the city of Lansing) to mitigate displacement of residents and/or business. Below is a table summary estimating the impact of the EPA Assessment Coalition grant for the Priority Sites, based on past EPA grant experiences, anticipated development, and tax projections.

Site	Reuse	Prospective Investment	Prospective Job Creation	Tax Revenue Increase
Williamston Ice House	Restoration, Commercial	\$7,500,000	15	\$154,667
Horner Mill Factory	Demolition, Residential	\$18,725,000	10	\$309,358
FC Mason Site	Restoration, Industrial	\$75,000,000	150	\$1,160,330
Tasty Treat Site	Mixed-Use	\$65,000,000	25	\$1,207,052
Logan Square	Restoration, Commercial	\$32,500,000	175	\$606,229

Total		\$198,725,000	400	\$3,437,635
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In addition, CRBC anticipates conducting assessments and reuse planning across approximately 40 sites, based on previous grant experience and current market insights. In total, inclusive of the Priority Sites, CRBC is estimating total prospective investment and job creation to reach \$325,000,000 and 650, respectively.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse

Over two decades, the Lansing region has mobilized over \$6 million in federal brownfields funding, resulting in over \$700 million in public and private investment leveraged and translating to approximately 117 dollars for each EPA dollar invested. Removing the environmental barriers has been and will continue to be critical for the Lansing region. Doing so has positioned CRBC well, through its broad network and economic development experience, to leverage these assessment funds for brownfield tax increment financing (TIF) plans, PACE financing, Michigan Environment, Great Lakes, and Energy (EGLE) programming, Michigan State Housing & Development Authority (MSHDA) tools, Michigan Economic Development Corporation (MEDC) community, job-creation and financing support programs, small business development support tools, and entrepreneurship accelerator/incubator programs, many of which are detailed below to bring projects to fruition:

Program	Entity	Purpose	P End Use	Type	Approval
Community Revitalization Program	MEDC	Gap financing for contaminated, blighted, or historic properties	Mixed-Use	Grant / Loan	6-12 months
Business Development Program	MEDC	Support creation of new jobs and investment	Industrial, Office	Grant	3-6 months
Housing TIF Program	MSHDA	Support residential projects via expansion of eligible TIF activities	Residential	TIF	3-6 months
LIHTC	MSHDA	Support fixed income residential projects	Residential	Tax Credits	6-12 months
PACE Financing	Local Community	Financing tool to enable energy efficiencies	Various	Loan	3-6 months
Brownfield Redevelopment	EGLE	Site assessment, reuse planning, and abatements	Various	Grant / Loan	6-9 months
Accelerator Funds	Lansing SmartZone	Support for high-tech entrepreneurship	Office, R&D, Commercial	Grant	3-6 months

1.c.ii. Use of Existing Infrastructure

The Lansing region prides itself on infill redevelopment and infrastructure revitalization. In 2013, the Lansing region received the EPA Region 5 Phoenix Award for its sustainable and innovative efforts to cleanup and transform the Ottawa Power Station into Accident Fund's new headquarters – a \$182 million investment adding 500 jobs. The Priority Sites are not only prime for redevelopment but also for sustainable existing infrastructure reuse. Williamston Ice House welcomes traffic from I-96 as a gateway to downtown Williamston while bordering a rail line. The FC Mason site is just two blocks from U.S. 27 and adjacent to the Shiawassee Trail, providing enhanced local and regional connectivity. Horner Mill Factory is along a state highway corridor. Logan Square is well-connected along two major commercial corridors in Southwest Lansing, with extensive paved acreage and utilities on site. And Tasty Treat Plaza is well-positioned near MSU along Grand River Ave and a rapidly developing mixed-use ecosystem. That said, Williamston Ice House, FC Mason, Horner Mill, and Logan Square likely require interior and access road improvements to realize the sites' full visions. CRBC enjoys great relationships with the county road commissions and Michigan Department of Transportation (MDOT) to access its Transportation Economic Development Fund grant program, of which CRBC members have earned in the

past. Logan Square and Tasty Treat Plaza also could benefit from an upgraded public transit bus route/stop to ensure more convenient and equitable accessibility. Capital Area Transportation Authority (CATA) is an active partner with all members of CRBC and is ready to mobilize to improve the public transit ecosystem in these areas, which was identified as a weakness in the most recent CEDS. Additionally, while not traditionally considered in the infrastructure realm, access to childcare is a critical business ecosystem issue for which Logan Square, Tasty Treat, and FC Mason, as potential large industrial or commercial development opportunities, need to consider. The Lansing region has one of the largest childcare coalitions in the state, created in 2022, to set forth an action plan to improve affordable childcare access for all.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

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

Despite the strong rebound the region has seen in the wake of major decline in manufacturing, foreclosures in Lansing and Ingham County are significantly higher than the state and national rate. The auto sector collapse has resulted in economic insecurity, brownfields, and environmental injustice across the region. Ingham County has a minority population of 31.2%, with significant environmental injustice and socioeconomic inequality implications. The Priority Sites' cities, Lansing, East Lansing, Eaton Rapids, Williamston, and St. Johns, struggle with median household incomes at just \$46,570, \$41,177, \$56,047, \$66,961 and \$59,890 respectively, compared to \$63,202 in Michigan and \$74,580 nationwide. Each also has a per capita income below the state and national rates, and Lansing residents are almost twice as likely to receive food stamps than the average American. Additionally, populations in St. Johns are more vulnerable to disease and environmental hazards than the state and national populations. These socioeconomic challenges compound, making environmental remediation a necessity, especially when considering the Non-lead Members' limited capacity.

2.a.ii. Threats to Sensitive Populations

1. Health or Welfare of Sensitive Populations

S. Martin Luther King Jr, CIA is, as indicated by CEJST, a disadvantaged community with each relevant tract calculating at least in the 95th percentile for persons with asthma, 90nd percentile for underground storage tanks and releases, 61st percentile for low-income residents. The surrounding neighborhoods also have a high concentration of low-income Persons of Color and is considered a disadvantaged community by the EPA. Downtown East Lansing Grand River Corridor consists of tracts in the 99th percentile for asthma, housing cost, and underground storage tanks releases and is considered a disadvantaged community by the EPA. City of St. Johns, specifically near the Former FC Mason Site, consists of a tract is in the 94th percentile for underground storage tanks and releases. City of Williamston, specifically near the Williamston Ice House, lies in a census tract where 23.4% of the population is age 65 or older, a rate approximately 34% higher than the State and 39% higher than the national average. City of Eaton Rapids, specifically near the Horner Mill Factory, consists of a tract in the 92nd percentiles for both lack of green space and transportation barriers.

A Logan Square Market Study could verify the viability for commercial redevelopment, offering job and entrepreneurship opportunities to enable its low-income residents to prosper economically. A Site Reuse Assessment with input from the community for the Williamston Ice House may prove beneficial in identifying appreciated and needed uses for a less mobile and aging demographic, such as a close-to-home brewery, banquet center, or community space. Tasty Treat Plaza is surrounded by either student or above market rate residential, whereas redevelopment plans aided by assessment and reuse planning may usher forth an attainable housing option to diversify the high-cost housing stock. Similar effects are anticipated for the Horner Mill Factory and FC Mason Site, likely revolving around health hazard mitigations, and CRBC looks forward to addressing these CEJST metrics through its various reuse plans and assessments, ensuring community feedback from the highly impacted populations is received and utilized.

2. Greater than Normal Incidence of Disease and Adverse Health Conditions

Each Target Area suffers from unique disease and adverse health condition disadvantages. As noted above, Melanated Business Alliance’s and Cinnaire’s Target Areas rank 95th and 99th percentile, respectively, for persons with asthma. Michigan’s Asthma Initiative reports the preventable hospitalizations rate for black males aged 1-14 in Ingham County is 6.5 times higher than the healthy goal. Additionally, and relevant to Clinton County’s Target Area, the Department of Community Health (MDCH) found that Clinton County blood lead levels were second worst in Michigan and, pertinent to the entire coalition, that 2 in 5 people in the Lansing region die prematurely. The risks of contaminants exacerbate poor health factors. Considering prior use of sites, CRBC expects that targeted brownfields could be contaminated by the following: high concentrations of polynuclear aromatic hydrocarbons (PAH), sulfur compounds, and complex cyanide, vinyl chloride, volatile or phenolic compounds; polychlorinated biphenyls (PCB) and heavy metals, asbestos-containing materials and debris; and petroleum contamination. The County Health Rankings by the Robert Wood Johnson Foundation ranked all three Lansing region counties in the lower half of Michigan counties for physical environment, including particulate matter and housing problems. Brownfields also yield negative psychological impacts on the region, as evidenced by comprehensive masterplans in each Lansing region county specifically noting the negative impact of brownfields and blight on the region’s economic sustainability, public health, and quality of life. As part of the project intake review process, public health threats will be considered in the evaluation, in addition to the extent for which the redevelopment positively addresses the threatened populations, such as those with asthma. For approval, reuse planning proposals will also need to consider supporting steps to reduce exposure of hazardous substances, pollutants, contaminants, or petroleum to threatened populations.

3. Environmental Justice

a. Identification of Environmental Justice Issues

Poor food access is a substantial issue in the Lansing region, especially for low-income areas, with all three counties hosting USDA-defined food deserts. Additionally, in 2019, the Center for Neighborhood Technology’s “Housing + Transportation Affordability Index” shows a majority of the region faces transportation and housing costs exceeding 45% of their incomes, defined as “unaffordable.” From a business perspective, the Lansing region historically was not immune from the exclusionary, systemic business lending practices based on race and ethnicity, especially in the urban Target Areas, furthering a large racial wealth gap. In part because of these issues, Logan Square and Tasty Treat Plaza Priority Sites are within CEJST disadvantaged census tracts.

b. Advancing Environmental Justice

All Priority Sites within the Target Areas are slated for potential redevelopment including affordable housing, mixed-use, manufacturing, and entrepreneurship opportunities in accessible, connected areas. Via the project intake review process, measures as part of the redevelopment plan to advance environmental justice will be evaluated, such as the creation of attainable housing, retention and creation of local quality jobs, improved access to healthy food retailers, improved access to public transit, support of inclusive entrepreneurship activities, and local inclusive procurement and contracting procedures, especially in disadvantaged communities identified by EJScreen. Projects that advance these issues will be reviewed more favorably.

As a proactive measure, CRBC and its community liaisons will engage community partners and developers to identify redevelopment and reinvestment opportunities from existing program pipelines. For example, the Lansing region’s economic development organization recently implemented various equitable economic development programs such as a Black business accelerator and inclusive entrepreneurship training, both of which CRBC looks to engage to drive entrepreneurship investment into the underserved Target Areas.

2.b Community Engagement

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

Partner Entity	Partner Type	Point of Contact	Specific Involvement
Community Liaisons (1-2)	Community Liaisons	TBD – County will open public application process upon award for appropriate review and selection	Partner & Target Area engagement; education / awareness building

Greater Lansing Hispanic Chamber	Community-based Organization	Chaz Carillo 810.892.3890 ccarrillo@davidchapmanagency.com	Partner; business / project referrals
Refugee Development Center	Community-based Organization	Erika Brown-Binion 517.999.5090 ebrown@rdclansing.org	Partner; housing / entrepreneurship insights
Capital Area Housing Partnership	Community-based Organization	Rawley Van Fossen 517.332.4663 rawley@capitalareahousing.org	Partner; housing / neighborhood insights
Ingham County Land Bank	Community-based Organization	Roxanne Case 517.267.5221 Rcase@ingham.org	Partner; housing / neighborhood insights
MEDC	Governmental Partner	Rachel Elsinga 517.643.7695 elsingar@michigan.org	Partner; investment/job creation programs
Small Business Development Center	Community-based Organization	Laurie Lonsdorf 517.483.1921 lonsdorl@lcc.edu	Business development ally; small business referral partner
Tri-County Regional Planning Commission	Governmental Partner	Nicole Baumer 517.999.8900 nbaumer@mitcrpc.org	Governmental ally; infrastructure (roads, transit) collaboration, CEDS cohesion

2.b.iii. Incorporating Community Input

CRBC will communicate quarterly with the community, residents, and prospective investors through forums, newsletters, print & online media, community liaisons, and other tools to reach diverse & multi-jurisdictional audiences. The many partner organizations listed above provide connections to neighborhood organizations, underserved corridor districts, and multiple development communities, and each strategic partner has committed to participating in CRBC for ensuring comprehensive community engagement. Additionally, and importantly, CRBC will host 2-3 community meetings each year to offer educational opportunities about brownfield contamination, assessment, and remediation, and each will also include soliciting feedback and input from the community. These will be held in-person and virtually (and recorded to share) to invite broad participation from the community, as a key metric of the meeting outputs is to better understand the needs of the various Target Areas and region and synthesize the feedback into an action plan moving forward.

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

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

3.a.i. Project Implementation – See Task/Activity charts below

3.a.ii. Anticipated Project Schedule – See schedule chart below

3.a.iii. Task/Activity Lead – see lead entity in Task/Activity charts below

3.a.iv. Outputs

Each Task/Activity chart below notes specific outputs and deliverables and are summarized below:

- 12-16 CRBC meetings for grant collaboration, community engagement analysis, project opportunities, and project updates
- 8-10 community engagement meetings for brownfield education, updates, referrals, planning and community feedback
- Conduct 45 Phase I Environmental Site Assessments; Conduct 40 Phase II Environmental Site Assessments and/or Hazardous Material Assessments, Due Care Planning, Baseline Environmental Assessments, etc.
- Conduct 8 Reuse Planning activities

Task / Activity 1	Project Administration (Task 1)
i. Project Implementation	Grant administration and oversight, including reporting, EPA-grant related travel for projects/conferences, environmental consultant procurement/contract management, project site selection administration
ii. Anticipated Schedule	See schedule below
iii. Lead	Ingham County
iv. Outputs	3-4 qualified contractors procured; 16 quarterly reports; one staff member attend up to 4 brownfield-related conferences/trainings (e.g., EPA National Brownfields Conference, EGLE events, etc.)

Task / Activity 2	Community Engagement (Task 2)
i. Project Implementation	1-2 Community Liaisons* (see below); Community engagement activities, including coalition meetings; community meetings for brownfield education, project updates, feedback with partners, neighborhood associations, residents, developers, etc.; content creation
ii. Anticipated Schedule	See schedule below
iii. Lead	Ingham County
iv. Outputs	12-16 coalition meetings (3-4 per year), 8-10 community meetings at key milestones (2-3 per year), dedicated webpage, outreach materials (digital & print)

*Ingham County, as lead coalition member, will advertise and consider applications from potential candidates following grant approval, utilizing criteria exemplified in the FY24 FAQ in tandem with Ingham County protocols.

Task / Activity 3	Environmental Assessments (Task 3)
i. Project Implementation	Brownfield environmental assessments, including, but not limited to (if eligible): Phase I & Phase II ESAs (& associated Sampling & Analysis / Health & Safety Plans), Hazardous Materials Studies, Baseline Environmental Assessments, Due Care Planning, etc.
ii. Anticipated Schedule	See schedule below
iii. Lead	Ingham County with contracted environmental firms
iv. Outputs	45 Phase I's, 40 Phase II's+ (e.g., HazMats, BEAs, etc.)

Task / Activity 4	Reuse Planning (Task 4)
i. Project Implementation	Remedial and reuse planning, including, but not limited to (if eligible): Remedial Action Plans, Response Activity Plans, Analysis of Brownfields Cleanup Alternatives, Constructability Analyses, Market Studies, and Site Reuse Visions, etc.
ii. Anticipated Schedule	See schedule below
iii. Lead	Ingham County with contracted environmental firms, planning firms, etc.
iv. Outputs	8 Reuse Planning deliverables

Anticipated Project Schedule – Overall

Activity		Year 1				Year 2				Year 3				Year 4			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
TASK 1	Grant Admin & Reporting	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Environmental Consultant	X	X														

	Procurement & QAPPS																
	Project Intake Site Selection		X	X	X	X	X	X	X	X	X	X	X	X	X	X	
TASK 2	Coalition Meetings	X	X	X	X	X	X		X		X		X	X	X	X	X
	Community Engagement Meetings		X		X		X		X		X		X		X		X
	Community Liaison Annual Applications & Contracts	X	X			X	X			X	X			X	X		
TASK 3	Phase I & Phase II Activities			X	X	X	X	X	X	X	X	X	X	X	X	X	
TASK 4	Reuse Planning Activities				X	X	X	X	X	X	X	X	X	X	X	X	

3.b Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		Task 1	Task 2	Task 3	Task 4	
Direct Costs	Personnel					-
	Fringe Benefits					-
	Travel	\$3,575				\$3,700
	Equipment					-
	Supplies		\$3,500			\$3,500
	Contractual			\$1,079,125	\$332,800	\$1,411,925
	Other*	\$57,000	\$24,000			\$81,000
Total Direct Costs		\$60,575	\$27,500	\$1,079,125	\$332,800	\$1,500,000
Indirect Costs						-
Total Budget		\$60,575	\$27,500	\$1,079,125	\$332,800	\$1,500,000

*Other = Admin: 950 hours @ \$60 / hour (based off previous grant previously awarded to the Lansing region)

Task 1 – Project Administration (\$64,200): The budget includes funding for the grant’s management and execution, supporting administrative costs (\$57,000 = 950 hours @ \$60 / hour), reporting and oversight responsibilities, and contractor management. Travel expenses (\$3,575) are included for an administrative member to attend up to four EPA and regional brownfields conferences to learn best practices and leverage resources. Supplies and equipment are not anticipated in Task 1 but are included in Task 2. In total between Tasks 1 and Task 2, administrative costs total 4.3%.

Task 2 – Community Engagement (\$27,500): The budget supports community, site owner, and stakeholder engagement through community meetings, neighborhood associations, newsletters, websites, social media, print fliers/brochures, and Community Liaison(s). Ingham County, as lead coalition member, will contract with 1 to 2 Community Liaisons for an estimated \$8,000 contract, for approximately 8 hours per week of grant-related work for one year. Estimating \$24,000 in total for Community Liaison(s), with additional \$3,500 administrative supplies and content creation for community outreach and engagement, applied to administrative costs.

Task 3 – Brownfields Assessments (\$1,079,125): Activities will occur via procured qualified environmental consultants, who will prepare eligibility determinations for site assessments and Sampling and Analysis Plans and Health and Safety Plans for Phase II assessments. Since brownfield sites vary in size, complexity, and condition, CRBC estimates conducting 45 Phase I assessments (average cost \$3,025) and 40 Phase II assessments/HazMat assessment/Baseline Environmental Assessments/etc. (average cost \$23,575).

Task 4 – Reuse Planning (\$332,800): Via procured qualified environmental consultants and other planning firms, funding will support an estimated number of 8 reuse planning projects (average cost \$41,600), such as Remedial Action Plans, Response Activity Plans, Analysis of Brownfields Cleanup Alternatives, Constructability Analyses, Market Studies, and Site Reuse Visions, etc.

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

CRBC will track key outputs to measure progress, including acreage and number of sites identified and assessed (Phase I/II), reuse plans developed, forums and community events held, new community partnerships formed, qualified consultants hired, and stakeholders engaged. Additionally, CRBC will track the amount of funding leveraged (will require in most cases a 10% cost-share for activities), number of brownfield cleanups on sites assessed, renewable energy systems deployed, number of jobs created from reuse, and public/private investment leveraged. Final measurables are to be noted on a public EPA grant-focused webpage.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

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

Ingham County will manage the CRBC. Ingham County will procure consultants, review site inventories and assessments, provide technical assistance, and complete all reporting and compliance requirements. Ingham County will also convene the non-lead coalition members for project intake review, ensuring all parties are in support of funding a site and project. Approval from each will be required before expending any funds. Ingham County has extensive brownfield experience, participating in previous EPA assessment grants (namely, the FY2019 Lansing Regional Brownfields Coalition Assessment Grant) as well as currently managing the Ingham County Brownfield Redevelopment Authority (Ingham County BRA), which has a handful of active brownfield plans. CRBC, who collaborate on numerous economic development projects and entrepreneurial initiatives, has a long list of marquee economic development successes ranging from manufacturing plants, office headquarters, small business openings, and mixed-use resident/commercial developments, of which many leveraged EPA assessment dollars as part of the overall support package. Dillon Rush, Director of Business Attraction, and primary project manager, has direct brownfields experience leading the Ingham County BRA and the 2019 \$600,000 EPA assessment grant. Ingham County also consists of a robust finance department, which is engaged in this application and is able and willing from a capacity standpoint to act as the lead fiduciary.

4.a.iv. Acquiring Additional Resources

CRBC will be supported by top brownfields consultants, procured by Ingham County as Lead Member in accordance with local, state, and federal standards, including consultants specializing in resource leveraging and public/private partnerships. If deemed necessary by the expert consultants, County Health Departments will evaluate environmental health, awareness and community health outcomes to help confirm off-site health threats posed by contamination; identify related toxicological issues and perform risk evaluations with assistance from the Agency for Toxic Substances and Disease Registry (ATSDR); design and conduct outreach programs; and coordinate health/blood testing if contamination is confirmed. Both the brownfields consultants and project intake submissions will need to demonstrate experience in and commitment to supporting local labor hiring practices and entrepreneurship. These priorities will be clearly conveyed as part of the procurement and project intake evaluation, and consistently measured and promoted via the activities described in 2.b.iii.

4.b. Past Performance and Accomplishments

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

Not applicable.

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

Ingham County has not previously received an EPA Brownfields Grant as a Lead Member; however, Ingham County has participated in previous EPA coalition grants and is familiar with the administrative demands to accomplish all phases of work under the grant. Ingham County has also received other federal funds as part of its operation as a county government – most often through HUD’s CDBG program via the State of Michigan for infrastructure-related programs, and recently notably via the American Rescue Plan Act.

1. Purpose and Accomplishments

Ingham County was a Non-lead Member of the most recent Lansing region assessment coalition grant (FY 2019 with the City of Lansing / Lansing Brownfield Redevelopment Authority). All funds were drawn down successfully, all ACRES reports completed, and the grant was properly closed out with no issues. The grant performed assessment and reuse planning on 33 sites, for projects totaling over \$260,000,000 in prospective redevelopment investment and 350 new jobs. A total of 29 Phase I ESAs, 43 Phase II ESAs, and 4 Reuse Plans were completed. Ingham County also received over \$50,000,000 in ARPA funding across 2021 and 2022, to be allocated by 2024, and implemented a two-phase approach to address the negative impacts of the COVID-19 pandemic. The first phase is to address citizens and businesses that were adversely affected by COVID-19, and the second phase is to address long-term solutions regarding affordable housing, critical infrastructure, and property tax assistance, all through an equitable outcomes lens. As a result, thus far, over \$8 million was awarded to 360 small business owners through a competitive application process; \$1 million was awarded to 162 households for mortgage/utility assistance; \$2.9 million to 404 households for direct assistance; \$3.8 million in essential employee pay; \$750,000 toward the development of neighborhood health center; \$1 million for emergency service provider equipment upgrades; and \$1.5 million for low-income housing.

2. Compliance with Grant Requirements

As a Non-lead Member, Ingham County assisted in closing out the FY 2019 Assessment Coalition grant, completed on time, with accurate and timely reporting throughout the grant period, which demonstrated met and exceeded measurables. No funds remain and the grant is closed out. The infrastructure related CDBG program delivered all outputs on time and under budget. As for the APRA programs, the entire initiative is tracking on pace and on budget to adhere to the ARPA guidelines.

4.b.iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements

Not applicable.

Leveraging

Leveraging that will materialize during the grant

All overhead expenses, such as building lease, utility costs, printing, and website hosting costs, will be provided for this grant in-kind. Additionally, each project selected for assessment awards, in most cases, will require a 10% cost-share match from the property owner or prospective developer. Doing so helps ensure private sector commitment to strategic development while also stretching the grant dollars further across more projects.

Leveraging that will materialize after the Brownfields Grant has ended

CRBC looks to be an active economic development partner for each project’s lifecycle. Doing so affords opportunities for investment/job creation grant and loan programs, PACE financing, workforce support, business plan support, public art investment, public transportation, infrastructure development, and ultimately remediation support from BRAs and EGLE.

Confidential Business Information

Not applicable.

THRESHOLD CRITERA
CAPITAL REGION BROWNFIELDS COALITION

1. Applicant Eligibility

- a. Ingham County is an eligible applicant for an Assessment Grant as a county government. Please see attached letter from Ingham County.

- b. Ingham County is not a 501(c)(4) entity.

2. Number and Eligibility of Non-lead Coalition Members

Capital Region Brownfields Coalition (CRBC) consists of lead member Ingham County and four non-lead members, namely:

- Eaton County: county government
- Clinton County: county government
- Cinnaire: community organization, 501(c)(3) nonprofit, IRS determination documentation attached
- Melanated Business Alliance: community organization, 501(c)(3) nonprofit, IRS determination documentation attached

None of the non-lead members are exempt under section 501(c)(4) of the Internal Revenue Code.

3. Target Areas

CRBC identified 5 Target Areas, one per member, detailed in the Narrative Information Sheet.

4. Existing Brownfields Grants to Non-lead Members

No member has an open cooperative agreement for a Brownfields Multipurpose, Assessment, Revolving Loan Fund, or Cleanup (MARC) Grant.

5. Coalition Agreement

Letters of commitment from each non-lead member are attached.

6. Community Involvement

CRBC will communicate with the community, residents, and prospective investors through forums, newsletters, online media, community liaisons and other tools to reach diverse & multi-jurisdictional audiences, as addressed in the Narrative. Specifically, the non-lead members listed above provide connections to neighborhood organizations, underserved corridor districts, and multiple development communities, and each has committed to participating in CRBC for ensuring comprehensive community engagement. CRBC will continue fostering community relationships through targeted outreach to vulnerable citizens; community meetings in each county; reports to partners and constituents; grant website updates; and print materials explaining projects and progress.

7. Expenditure of Existing Grant Funds

Ingham County does not have an open cooperative agreement for an EPA Brownfields Assessment Grant or Multipurpose Grant.

8. Contractors and Named Subrecipients

Not applicable.