



NARRATIVE INFORMATION SHEET
FY 2024 U.S. EPA BROWNFIELDS ASSESSMENT GRANT COALITION APPLICATION
Calhoun County Land Bank Authority, City of Albion, and Battle Creek Community
Foundation, Michigan

1. Applicant Identification:
 Calhoun County Land Bank Authority
 315 West Green Street
 Marshall, Michigan 49068
2. Funding Requested:
 - a) Assessment Grant type: Assessment Coalition
 - b) Federal Funds Requested: \$1,500,000
3. Location: Calhoun County, Michigan
4. Coalition Members' Target Areas and Priority Site Information: The Coalition includes the CCLBA (applicant) and the City of Albion and Battle Creek Community Foundation (BCCF) (non-lead members). Each of the Coalition Members' Target Area is described below. The Target Areas do not overlap.

CCLBA Target Area – High Warren (City of Battle Creek, Census Tract 26025000600). The priority site within this target area is Winding Way. This target site does not currently have an address but was historically addressed as 100-101 Winding Way.

City of Albion Target Area - West Albion (City of Albion, Census Tracts 26025003300 and 260025003600). The priority site within this target area is the Gale Industries. This target site includes the main parcel with an address of 998 West Erie Street, one adjacent parcel with address of 109.5 North Gale Street, and two adjoining parcels that do not have addresses.

BCCF Target Area - Washington Heights/Bottoms Target Area (City of Battle Creek, Census Tracts 26025000300, 26025001000, and 26025004100). The priority site within this target area is the Hancock Court Block. The addresses included in the Hancock Court Block are 154, 160, 170, 178, 182, 188, 192, 196, and 200 Hubbard Street; 15, 16, 26, 40, 43, and 47 Hancock Court; and 167, 171, 181, 185, 187, 195, 199, 207, and 211 North Wood Street. This block also includes numerous parcels that do not have addresses.



5. Contacts:

a) Project Director and b) Chief Executive:
 Ms. Krista Trout-Edwards
 Calhoun County Land Bank Authority Executive Director
 315 West Green Street, Marshall, Michigan 49068
 Phone: (269) 781-0777, email: kedwards@calhouncountymi.gov

6. Population: Calhoun County: 134,473; City of Battle Creek: 51,475; City of Albion: 8,324
 (*American Community Survey, 2021 5-Year Estimates*)

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority site(s) is impacted by mine-scarred land.	
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).	Page 2
The priority site(s) is in a federally designated flood plain.	Page 1
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	Page 3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Page 3
At least 30% of the overall budget will be spent on eligible reuse/area-wide planning activities for priority site(s) within the target area(s).	
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.	

8. Letter from State of Tribal Environmental Authority: Attached

9. Releasing Copies of Applications: NA – application does not have confidential, privileged, or sensitive information.





GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 26, 2023

VIA EMAIL

Krista Trout-Edwards
Executive Director
Calhoun County Land Bank Authority
315 West Green Street
Marshall, Michigan 49068

Dear Krista Trout-Edwards:

SUBJECT: Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Acknowledgment of a United States Environmental Protection Agency
(U.S. EPA) Brownfield Grant Proposal for 2024

Thank you for your notice and request for a letter of acknowledgment for the Calhoun County Land Bank Authority'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 Land Bank Authority's need for funding.

The Calhoun County Land Bank Authority is applying for a \$1,500,000 Brownfield Assessment Coalition Grant. As a coalition of local units of government and a land bank created by a general-purpose unit of local government, the Calhoun County Land Bank Authority is an eligible grant applicant.

Should the U.S. EPA award a brownfield grant to the Land Bank Authority, it would allow them to conduct environmental investigations to promote economic development at brownfield sites. If you need further information about potentially eligible sites in Calhoun or assistance regarding EGLE's brownfield programs, please feel free to contact me at the number below or by email at SmedleyR@Michigan.gov.

Sincerely,

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

cc: Doug Koop, EGLE

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1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Coalition Members, Target Areas and Brownfields

i. Coalition Members: Our Coalition is made up of the Calhoun County Land Bank Authority (CCLBA), the City of Albion (Albion), and the Battle Creek Community Foundation (BCCF). The CCLBA will be the lead applicant. Albion, a local unit of government, and the BCCF, a non-profit community-based organization, will be the non-lead members. Albion is an impoverished small city with a population of ~8,300 that does not have the City staff to apply for or manage a Brownfields Grant. In addition, Albion has been facing budget shortfalls for over a decade and does not have funds to assess/redevelop brownfields. BCCF staff do not have the environmental knowledge or experience to apply for or manage a Brownfields Grant. The BCCF is funded by charitable donations and those dollars are earmarked for grants to local non-profits and community organizations for health/community wellness, education, and community engagement/quality of life projects and not for brownfields assessment. Albion and the BCCF formed a coalition with the CCLBA to coordinate their limited public and charitable donation dollars and utilize the CCLBA's ability to acquire and combine parcels to promote a regional approach to the assessment and redevelopment of brownfields. These three entities are working together to support the statewide push for construction of affordable/attainable housing in Michigan communities. Expanding this partnership to brownfields assessment is the next step in the Coalition members' plan to provide predevelopment support for affordable/attainable housing redevelopments in the County.

ii. Overview of Brownfield Challenges and Description of Target Area: The grant will focus on redevelopment of brownfields within the geographic boundaries of Calhoun County (County), Michigan. The County is located in south-central Michigan, midway between Chicago and Detroit. Battle Creek and Albion account for nearly 45% of the County's population, with the remainder of the population dispersed in smaller towns and rural areas. The Kalamazoo River flows westward through the County, traversing through downtown Battle Creek and Albion. The County's economy has historically been based on manufacturing. Development began in the late 1800s with food processing facilities in Battle Creek and heavy manufacturing in Albion. By the 1980s, all sectors of the manufacturing industry were declining, and the near failure of American automakers in 2008/2009 decimated the remaining industrial employers. The CCLBA serves as a clearinghouse for foreclosed sites and has an inventory of over 750 blighted sites and anticipates receiving 50 more sites each year in the next five years. This inventory includes commercial buildings that are literally collapsing as well as abandoned, unsecured industrial facilities that have not been safe to enter for over a decade. These brownfield sites continue to pose health and welfare threats to County residents, hold area property values down, and require local resources for maintenance and access control. The Coalition is seeking grant funds to assess blighted sites in the following three underserved target areas where infill affordable residential development is needed.

(1) CCLBA Target Area – High Warren (southeast Battle Creek) – Area located south of downtown that includes impoverished residential neighborhoods built around former industrial facilities. A portion of the area along the Kalamazoo River is in the federal flood plain.

(2) BCCF Target Area - Washington Heights/Bottoms (northwest Battle Creek)– Neighborhood located west of downtown that is bisected by the Kalamazoo River and includes the highest numbers of minorities and impoverished residents in the City. The Bottoms portion of the area was redlined by the federal government in 1936 and then nearly destroyed in a 1947 flood that resulted in the primarily black residents being relocated to the adjoining Washington Heights area.

(3) Albion Target Area - West Albion– Western portion of Albion that includes over 120 acres of underused land along the Kalamazoo River (some in the flood plain); multiple former heavy manufacturing sites, and the highest numbers of minorities and impoverished residents in the City.

iii. Description of the Priority Brownfield Sites: The **High Warren** target area includes residential neighborhoods with numerous vacant parcels resulting from decades of blight removal activities. These residences/vacant parcels are sandwiched between two cemeteries, nearly 5 acres of an

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iron/metal salvage yard, and over 13 acres of abandoned industrial properties with over 90,000 square feet of vacant industrial structures. The priority site in this target area is the 17-acre **Winding Way** site. This site is vacant land located on the bank of the Kalamazoo River that is being used as an uncontrolled dumping ground. It is adjoined by low-income apartment buildings and an impoverished neighborhood of old single-family homes. The former onsite structures were demolished over ten years ago and the site was backfilled with undocumented fill material. The environmental conditions of the site are not known but based on the continued dumping and placement of unknown fill material, it is likely that surficial soil is impacted with metals, PAHs, and PCBs that may pose direct contact concerns. This site is a priority because a past failed redevelopment of the site resulted in a nearly \$600,000 mortgage on the site that can only be waived if the site is redeveloped with attainable housing.

The **Washington Heights/Bottoms** target area includes multiple vacant and underutilized commercial and industrial operations along the Kalamazoo River. This target area also includes former auto repair, gasoline stations, dry cleaning operations, and railroad lines. The priority site in this target area is the 3-acre **Hancock Court Block**. The **Hancock Court Block** is located in an impoverished minority residential neighborhood and includes multiple vacant lots where buildings have been demolished and areas backfilled with undocumented fill material. The environmental issues on the properties are not known but assessments on similar sites in Battle Creek have identified fill materials impacted with heavy metals and PAHs. It is also likely that the **Hancock Court Block** priority site could be impacted by migration of VOC contaminated soil gas and groundwater from area gasoline stations, dry cleaners, and auto repair operations. This site is a priority because of its location within the City's most underserved neighborhood, potential direct contact and vapor intrusion exposure concerns for underserved residents, the dire need for affordable/attainable housing in this area, and the fact that people/entities interested in redeveloping this area need financial assistance especially now that inflation has resulted in skyrocketing construction costs.

The **West Albion** target area is home to over 120 acres of vacant land, partially demolished building slabs/foundations, and building remnants associated with the former Gale Industries and Harvard foundries and Brown Weld and Union Steel metal manufacturing operations. This target area also contains numerous former/abandoned gasoline stations, dry cleaning operations, small-scale manufacturing operations (machining shops, etc.), and vacant lots where structures have been demolished due to safety concerns. Residential sites are mixed in with these brownfields. The priority site in this target area is the 17-acre **Gale Industries** site and the adjoining vacant/underutilized lots (collectively referred to as the Gale Industries priority site). The **Gale Industries** priority site is located along the Kalamazoo River and next to a sports field and senior center. Previous assessments in this area of Albion have found buried foundry sand and soil contaminated with heavy metals, VOCs, PAHs, and PCBs. This site is a priority because of its location along the Kalamazoo River, potential soil and vapor exposure concerns for nearby residents, and its redevelopment will provide much needed infill residential development.

iv. Identifying Additional Sites: If grant funds remain after assessing the priority sites, additional eligible sites will be identified within the County for assessment using grant dollars. These additional sites will be identified through outreach meetings with community groups, residents, and local businesses/developers. Identified sites will be prioritized for grant support based on the following criteria: 1) sites identified as an imminent threat to public health or the environment; 2) sites that will be redeveloped with attainable housing; 3) sites that will be redeveloped with facilities that will benefit underserved communities (grocery stores, community centers, workforce training centers; and commercial/light industrial operations generating new full-time jobs); and 4) brownfields identified as high-priority by County communities due to location and proximity to sensitive populations and/or location in key redevelopment areas. Furthermore, when an additional site is nominated for grant funds, the CCLBA will determine if the site is located in an underserved

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community and/or a disadvantaged census tract and will direct at least 70% of the remaining grant funds to sites in these locations.

b. Revitalization of the Target Areas: The assessment grant will support the CCLBA's 2020 Strategic Plan vision to be a catalyst for community stabilization by creating equitable, inclusive opportunities through sustainably repurposing challenged properties. This coincides with goals in the 2018 Battle Creek Master Plan and the 2022-2026 Albion Comprehensive Plan: 1) promote reinvestment in established neighborhoods; 2) provide a diverse range of housing options for all income levels; 3) revitalize riverfronts; and 4) expand accessible parks, trails, and recreational opportunities. The projected reuses of the priority sites also align with Michigan's 2022 Statewide Housing Plan that identifies improving the quantity, quality, and location of Michigan's housing stock, particularly for low-income and marginalized communities, as a key goal for the State.

i. Reuse Strategy and Alignment with Revitalization Plans: The projected reuse of the **Winding Way** priority site in the **High Warren** target area is multi-family, attainable housing units with greenspace and safe, accessible access to the Kalamazoo River. This planned redevelopment aligns with Battle Creek's Master Plan priority of affordable housing in established neighborhoods and revitalizing the riverfront and ties directly into statewide housing goals.

The projected reuse of the **Hancock Court** priority site in the **Washington Heights/Bottoms Neighborhood** target area is infill affordable/attainable housing units and will include lawns and parklike areas, onsite stormwater controls, and sidewalks that will make the area more walkable and accessible. The redevelopment aligns with the Battle Creek's Master Plan's goal of diverse housing and accessible trails in the City. It also aligns with the Land Reuse Strategy that Washington Heights area leaders and the CCLBA developed specifically for this target area.

The projected reuse of the **Gale Industries** priority site in the **West Albion** target area is high density, affordable/attainable housing units with landscaping and trails that will allow residents to walk/bicycle into downtown Albion as well as walk to the Kalamazoo River for recreational opportunities. The proposed redevelopment aligns with the City of Albion's goals to promote reinvestment in established neighborhoods; develop higher density, affordable housing; and improve accessibility to the river and statewide housing goals for marginalized communities.

ii. Outcomes and Benefits of Reuse Strategy: The **Winding Way** priority site is located along the banks of the Kalamazoo River in the census tract with the highest poverty rate in Battle Creek. Redeveloping this site with attainable multi-family residential units will waive the current mortgage that has made it financially unfeasible for area developers to take on this site. The redevelopment will likely include investment of greater than \$5 million, create 10-20 local construction jobs, and generate over \$100,000 in annual property tax revenue. The inclusion of Kalamazoo River focused green space will add recreational space for residents. The housing units will include energy efficient appliances, lighting, and windows and code-compliant insulation to help minimize utility usage and costs for impoverished residents who rent or buy the units. The buildings constructed on this site will be set back from the river and constructed to prevent damage from flood hazards, which will improve the target area's climate adaptation/resilience and lower flooding risk when extreme storms occur.

The **Hancock Court** priority site is located in the middle of an underserved, black neighborhood that has faced everything from redlining to general disinvestment over the past few decades. Bringing federal assessment grant dollars into this area will show residents that the tide is turning and improve their trust in government agencies. Based on the current values of the lots in this area (some as low as \$1,120), the redevelopment will result in property values increasing by over one order of magnitude. This will generate hundreds of thousands of dollars in property tax revenue and dramatically improve surrounding property values. The housing units will include energy efficient appliances, lighting, and windows and code-compliant insulation to help minimize utility usage and costs for impoverished residents who rent or buy the units. This project will improve local climate adaptation/resilience by limiting stormwater flow off the site when extreme storms occur.

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The **Gale Industries** priority site is in an underserved target area in Albion. The most important benefit of its redevelopment will be reinvestment in the neighborhood. The construction of new housing is expected to include over \$3 million in investment and increase the tax value of the priority site by over \$150,000 per year. The improvement of this unsightly site will also spur additional investment in the neighborhood. The trails connecting the site to the Kalamazoo River will help preserve this natural feature and the recreational opportunities it provides. The high-density residential units will use modern insulating products and energy efficient appliances to minimize energy usage and save residents money. The use of energy efficient heating and cooling appliances will result in residents being able to afford to run their appliances during periods of climate change driven extreme heat or cold, thereby improving local climate adaptation/resilience.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse: The CCLBA has identified the following additional key resources that can be used to support assessment, remediation, or reuse/redevelopment of priority sites and additional sites identified during the grant project.

Source	Description	Access	Funding Use
MI Department of Environment, Great Lakes and Energy (EGLE) grants and loans	Grants/loans up to \$1M for economic development projects and reuse of brownfields	Local units of government can apply	Funding for asbestos/lead abatement/demolition of structures on the Gale Industry priority site, and cleanup and exposure barriers/mitigation systems on all three priority sites.
Calhoun County ARPA Funds	Funding for predevelopment activities for projects supporting housing development	\$50,000 in ARPA funds allocated to CCLBA	Site clearing, debris removal, housing design, and other preconstruction activities on all three priority sites after assessment work and remediation are complete.
Community Development Block Grants (CDBG)	Funding for improvements in low-moderate income areas (both target areas include low-moderate income neighborhoods)	Battle Creek is an entitlement community, CCLBA can apply for funds for Albion/other cities	Rehabilitation of structures on the Hancock and Gale Industries priority sites and support for affordable/attainable residential redevelopment on all three priority sites.
Michigan State Land Bank Authority Blight Grant (Blight Grant)	\$2.5M for community blight elimination	Grant provided to CCLBA	Stabilize vacant/blighted buildings, demolish dangerous structures, site preparation, and provide gap funding for environmental remediation on all three priority sites after assessment is completed.

The assessment grant will stimulate the availability of these funds by supporting assessment of the **three priority sites**, which will prepare these sites for predevelopment activities to be funded by ARPA and for the remediation and reuse strategy/redevelopment work that will be supported by EGLE, CDBG, and Blight Grant funds. The CCLBA also has a \$200,000 grant from The WK Kellogg Foundation that it can use to pay attorney and title company fees for quiet title action (i.e., get a clean title for sites with complicated/disputed titles), which will allow the CCLBA to get the priority sites shovel ready after assessment without developers paying these often high costs.

ii. Use of Existing Infrastructure: The three target areas and the priority sites were developed in the early 1900s and contain the required basic public infrastructure (water, sewer, electricity, etc.)

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to support redevelopment. Area streets, curbs, and sidewalks will likely need to be modernized/upgraded and this work will be done by the Cities of Albion and Battle Creek Capital Improvement Programs. It is also anticipated that communication/high speed internet access in the target areas may need to be improved to meet current residential and business needs. Michigan is set to receive \$1.5 billion in Infrastructure Investment Jobs Act funding to expand high-speed internet access in underserved areas and these funds will be pursued as part of the redevelopments.

2. Community Need and Community Engagement

a. Community Need

i. The Community’s Need for Funding: The communities located within the CCLBA’s geographic boundaries include the Cities of Albion and Battle Creek (which account for nearly 45% of the County’s population), numerous other small towns with populations under 8,000, and isolated rural areas. Albion and Battle Creek are low income communities with overall poverty rates of 22% to 28.5% and median incomes ranging from 53.4% to 65.6% of national rates¹. The remaining communities in the County are also lower income than national averages and they have the added challenge of having small populations. Due to their low income and/or small populations, the communities in the CCLBA’s boundaries do not have sources of funding for environmental assessment and remediation of brownfields in the target areas or in other areas in the County. The CCLBA itself would like to provide funding for assessment and cleanup but it too has financial struggles. CCLBA’s funding comes from properties it sells, a portion of property taxes on those properties, grants, and support from the County. Grants (primarily previous USEPA Assessment Grant funds) accounted for 46% of their budget in 2022. Because it has struggled to get many of its properties back on the tax rolls, the CCLBA’s operating dollars outside of grant funds are very limited and it’s grant fund dollars are nearly expended. With the costs of upkeep on their land bank sites and demolition of unsafe structures on these sites requiring over 30% of their annual budget, the CCLBA needs additional grant funds in order to support brownfields assessment and redevelopment in the target areas. This is key to redevelopment in the target areas because the costs of assessment and remediation combined with skyrocketing construction costs (CCLBA estimates residential construction costs in the County have increased by 40% since 2019) make construction of attainable/affordable housing unfeasible for local developers and businesses.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: As shown in the following table, the sensitive populations in the three target areas include minorities, children, and impoverished residents. In each target area, the percentage of minorities and children are substantially higher than those in Michigan and the U.S. In addition, the target areas are substantially economically disadvantaged

Area	Minority ¹	<5 Yrs Old ¹	Poverty Rate ¹	Median Household Income ¹	Per Capita Income ¹	Food Stamp/ SNAP ¹
U.S.	18.4%	5.9%	12.6%	\$69,021	\$37,638	11.4%
Michigan	21.5%	5.7%	13.3%	\$63,202	\$34,768	12.6%
<i>Washington Heights TA</i>	43.4%-58.1%	7.6%-16%	30.9%-34.2%	\$24,018 -\$35,755	\$15,529-\$19,854	20.6%-31.3%
<i>High Warren TA</i>	43.9%	11.4%	44.2%	\$31,066	\$14,509	10.4%
<i>West Albion TA</i>	39.1%-64.9%	8.3%-9.3%	27%-45.9%	\$24,531-\$39,727	\$14,310-21,218	32%-32.2%

with poverty rates up to four times greater than the U.S. and median incomes more than half that of the U.S. as a whole. The main health and welfare concerns for these sensitive populations are the ongoing disinvestment in the target areas and residents’ uncontrolled exposures to

¹ American Community Survey, 2021 5-Year Estimate

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contaminated soil, groundwater, and soil gas and hazardous building materials. Brownfields threats to the identified sensitive populations will be determined by completing grant-funded site assessments. Risk identification will be key to planning for ways to limit residents' exposures to brownfields contaminants. Threats will be subsequently reduced by development/implementation of cleanup plans that incorporate engineering and/or institutional controls to limit exposures. The assessment and redevelopment of brownfields in the target areas will also reduce blight, thereby drawing residents and businesses back into these target areas, triggering additional reinvestment and redevelopment that will further improve the health and welfare of the target areas.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: The brownfields located in the target areas are negatively impacting impoverished residents, minorities, and children by exposing them to contaminants via direct contact, ingestion, airborne particulate inhalation, and vapor intrusion pathways. The contaminants likely on the **priority sites** (heavy metals, VOCs, PAHs, and/or PCBs) and other brownfields in the target areas are known to cause cancer and respiratory problems. In addition, research has found that exposure to air pollutants is linked to higher infant mortality². Exposures to the contaminants from the **priority sites** and other brownfields in the target areas have likely contributed to lower life expectancy and elevated cancer, asthma, and infant mortality rates in the County and within the target areas (see following table; city/target area statistics are presented when available) when compared to both Michigan and the U.S. Where data are available, the harsh disparity in rates between whites and blacks in the County further illustrates the adverse health conditions faced by underserved populations in the County.

	U.S.	Michigan	Calhoun County	Battle Creek or TA	Albion or TA
Life Expectancy (years)	77 ³	77.5 ⁴	75.2 (white-75.5; black-70.6) ⁴	<i>Wash. Heights TA</i> ; 69.7-73.6 ⁵	<i>West Alb TA</i> ; 74.4-78.4 ⁵
Cancer Mortality Rate*	143.7 ⁶	158.5 ⁶	192.2 ⁶	Battle Creek; 189.9 ⁶	NA
Adult Current Asthma Prevalence	9.3% ⁷	10.9% ⁸	11.5% ⁸	NA	NA
Chronic Lower Respiratory Disease Death Rate*	36.2 ⁶	42.4 ⁶	67.9 ⁶	Battle Creek; 65 ⁶	NA
Infant Mortality Rate**	5.2 ⁹	6.8 ¹⁰	8.8 (white-4.6; black-10.6) ¹⁰	Battle Creek; 10.2 ¹⁰	NA

* rates per 100,000; ** rates per 1,000 live births; TA – target area; NA – data not available

Specific brownfields health threats to sensitive populations will be identified by completing grant-funded assessments. These exposures can be reduced by implementing remediation activities and/or putting engineering controls in place prior to or as a part of redevelopment. At the priority sites, this will likely include removal of impacted soil, construction of direct contact barriers in greenspace areas, and the use of vapor mitigation systems in impacted residential structures. The remediation and redevelopment of target areas' brownfields will reduce exposures to contaminated soil, groundwater, soil gas, and hazardous building materials (asbestos, lead, etc.), and limit

² University of Michigan Environmental Health Policy Brief, Infant Mortality and Air Pollution, April 2014

³ US Department of Health and Human Services, Mortality in the United States 2020

⁴ County Health Rankings and Roadmap, 2022

⁵ US Small-Area Life Expectancy Estimates Project, 2010-2015

⁶ Michigan Department of Health and Human Services, Age-Adjusted Mortality Rates, 2020.

⁷ Michigan BRFSS Surveillance Brief, December 2018

⁸ Michigan Asthma Atlas, 2019

⁹ US Department of Health and Human Services, Infant Mortality in the United States, 2020

¹⁰ Michigan Department of Health and Human Services, Infant Mortality Tables, 2020. Race data is 2018-2020.

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migration of contamination onto nearby residential sites. This will reduce the target areas' cumulative environmental exposure risks and lead to a reduction in cancer, respiratory disease, and infant mortality rates.

(3) Environmental Justice:

(a) Identification of Environmental Justice Issues: When looking at the three target areas using the U.S. EPA's Environmental Justice Screening and Mapping Tool (EJSCREEN) (summary of indicators below), it is very clear that the residents in these target areas are facing environmental justice issues. EJ Screen also lists all three target areas as Justice40 Disadvantaged and medically underserved, and **Climate and Economic Justice Screening Tool (CEJST) identifies each of the three priority sites and full target areas as being within a disadvantaged census tract(s).**

Target Area	Environmental Indicators*			Health Disparities Indicators*		Socioeconomic Indicators*	
	Superfund proximity	UST proximity	Lead paint	Low life expectancy	Asthma	Low income	Unemployment rate
<i>Washington Heights</i>	87-95	81-94	90-95	90-100	95-100	90-100	70-95
<i>High Warren</i>	87	92	97	Data missing	96	88	90
<i>West Albion</i>	87-98	73-96	81-95	50-90	95-100	90-100	95-100

**Compared to the U.S. An indicator of 95 means that only 5% of the U.S. block groups have a higher or worse value.*

The EJ Screen data show that these underserved communities have very low incomes and high unemployment, are living closer to contaminated sites (Superfund and USTs), are being exposed to lead-based paint in their homes, are experiencing high rates of asthma, and have low life expectancy. When combined with the adverse health effects discussed in the previous section, it is clear that residents in the target areas continue to face environmental justice issues associated with legacy industrial operations/brownfield sites and their remaining contamination.

(b) Advancing Environmental Justice: Exposure threats from brownfields in the target areas/disadvantaged census tracts are not fully known so they cannot currently be controlled. The grant-funded assessment and subsequent redevelopment of these sites will reduce underserved communities' exposures by removing and/or controlling sources of contamination in the target areas. This will reduce residents' cumulative exposure risks, lessen the disproportionate environmental impact historic industrial/commercial operations have had on these underserved populations, and provide a mechanism to begin to improve property values and contribute to economic growth and equity. No residents or businesses will be displaced by the redevelopments. Instead, the proposed redevelopments will take vacant, blighted, and/or underused land and put it back into productive use as affordable/attainable housing with usable and accessible greenspace.

b. Community Engagement

i. and ii. Project Involvement and Project Roles: The following community organizations will assist in making decisions or provide technical assistance for site selection, cleanup, and/or future reuse of brownfields, including the priority sites.

Name	Point of Contact	Description
Neighborhood Planning Council (NPC#2)	Monique French, President pastormoniquefrench@gmail.com	Citizen group that works with the CCLBA and BCCF and Battle Creek staff to address concerns of the neighborhoods included in the <i>Washington Heights/Bottoms</i> target area.
Project Involvement/Role: Coordinate public meetings and solicit input for assessment and decisions on redevelopment options for the Hancock Court Block priority site and additional sites in the <i>Washington Heights/Bottoms</i> target area. Pastor French is currently working to redevelop sites within the target area, and she will use her local connections and the		

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relationships she has formed with community members to help improve trust between the underserved populations in the target area and the CCLBA. She will also use her work in the community to get residents honest opinions on sites to be assessed and community supported plans for redevelopment that she can share with the Coalition members.		
Albion Reinvestment Corporation (ARC)	Samuel Shaheen, President sam@shaheendevelopment.com	Nonprofit whose mission is promote revitalization of the downtown Albion business district and surrounding areas.
Project Involvement/Role: Capital, property, and other incentives to businesses considering locating in Albion, and support for redevelopment of the Gale Industries priority site. ARC will also work with Albion residents and business to identify additional sites for assessment and develop redevelopment plans that the community understands and supports.		
Neighborhood Planning Council (NPC#1)	James Moreno, President, James.Moreno@dla.mil	Citizen group that works with the CCLBA and Battle Creek staff to address concerns of the neighborhoods included in the High Warren target area.
Project Involvement/Role: Coordinate public involvement and solicit input for assessment/redevelopment planning for the Winding Way priority site and additional sites in the High Warren target area. NPC#1 members are currently providing property maintenance (mowing, tree trimming, etc.) services for CCLBA owned properties in this target area and they will use their knowledge of the sites to support assessment planning and connections with community members to ask for input on what other target area sites should be assessed.		

Our project partners each work in one of the Coalition member target areas and they will work to keep their respective communities informed of the grant project and engaged in decision making regarding site selection, cleanup, and reuse of the priority sites and other sites identified during the project. In addition, the CCLBA formed the Washington Heights Neighborhood Advisory Committee to make sure that the needs and desires of the community were addressed and will work with this committee for **Washington Heights/Bottoms** target area projects. The two non-lead Coalition members (BCCF and Albion) will each provide a representative that will form an executive board with the director of the CCLBA. This board will meet at least quarterly to discuss the grant progress on the priority sites and share plans for involving their respective communities in selecting additional sites for assessment, cleanup, and redevelopment. The CCLBA will act as the representative for the County at-large as well as for the County’s smaller cities and rural areas.

iii. Incorporating Community Input: Upon grant award, a press release will be issued in the local newspapers in and posted on the Coalition members’ websites and on their social media accounts, which are interactive internet forums that allow the community to interact with the Coalition in real time. The CCLBA will also place advertisements on local radio stations to reach members of the community at all educational levels and those without internet service. Key project partners (see Section 2b.i) will be notified and given information to distribute and place on their websites. News releases, web postings, and written materials will include a notice that Spanish-language versions are available and that translators will be available for public meetings, allowing Hispanic residents in the County (5.1%)¹ to participate in the public process. The CCLBA will host an initial public kick-off meeting in each of the target areas. These meetings will be held at a regularly scheduled NPC#1, NPC#2, or ARC meeting to reach underserved residents and groups directly affected by project work on the priority sites. At these meetings, they will ask the public to comment on the priority sites and proposed reuse as well to identify additional sites they feel should be assessed. The CCLBA will also hold a public meeting from their offices to acquaint the County at-large with the grant project and ask County residents to provide additional potential sites for assessment. All the additional sites identified at these meetings will be added to the Coalition’s list of potential sites for funding and be prioritized as discussed in Section 1.a.iv. This

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step is needed to ensure that the public’s concerns are incorporated into the project. These meetings will include a virtual option using video conferencing software (e.g., Zoom or Teams).

As part of ongoing outreach as additional sites are selected for assessment, the CCLBA will present the reasoning for the selection on their internet forums and solicit public feedback as well as conduct stakeholder meetings/interviews. Public meetings will be held at readily identifiable and accessible public buildings in, or as close as possible to, the site to receive and discuss additional comments. As above, the meetings will have a virtual option. The combination of social media, public meetings, and written information will allow for information sharing and give residents and citizen groups a way to voice their health and safety concerns for grant funded assessments. Ongoing project updates will be provided at the monthly public CCLBA meetings (either in person or virtually). When cleanup and/or redevelopment planning is initiated, more intensive involvement activities, including explanations of plans and rationales and solicitation of comments and feedback on those plans, will be implemented and additional more in-depth stakeholder meetings will be held. At the close of the grant, the CCLBA will hold a final public meeting (either in person or virtually) to notify the community of the outcomes of the project. All presentation materials used throughout the project will be archived and will be available at the CCLBA’s office.

3. Task Descriptions, Cost Estimates, and Measuring Progress

a. Description of Tasks/Activities and Outputs: The CCLBA will use the grant to assess priority sites in the target areas and other sites identified during the 4-year grant project.

<p>Task 1 – Programmatic and Outreach</p> <p><i>i. Project Implementation</i></p> <ul style="list-style-type: none"> • The Work Plan will be prepared and the Cooperative Agreement (CA) will be executed. Grant project tracking and financial systems will be set up and maintained. • A Qualified Environmental Professional(s) (QEP) will be retained in compliance with applicable federal procurement regulations. • Quarterly reports will be submitted to the U.S. EPA; the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) will be updated; MBE/WBE and financial reports and final project closeout documentation will be submitted. • Staff will attend brownfields training programs as available during the grant period. • A project “kick-off” meeting will be hosted by the CCLBA. • Community outreach activities including updating websites and social media, meetings in target areas, and notifying residents about assessments will be conducted. <p>In-kind Coalition member staff time will be contributed for amounts over those in 3.b.</p>
<p><i>ii. Anticipated Schedule</i></p> <ul style="list-style-type: none"> • Work Plan will be prepared within 1 month of receiving notification of the grant award; CA will be executed by September 30, 2024. ACRES and Financial Systems will be set up upon award of grant and maintained throughout term. • A QEP(s) will be retained within 3 months of award. • Starting January 2025, quarterly reports will be submitted within 30 days of the end of the reporting period and ACRES will be updated as priority and non-priority sites are assessed. ACRES will be updated with cleanup and/or redevelopment information during and/or after the project. Annual MBE/WBE and financial reports will be submitted. Final project closeout documentation will be submitted as required once the performance period ends. • Coalition staff will attend the 2025 EPA National Brownfields Conference. • A project “kick-off” meeting will be held within 1 month of notification of the grant award. • Community outreach activities will begin immediately upon award announcement and continue throughout the performance period.
<p><i>iii. Task/Activity Lead:</i> CCLBA will be the lead for programmatic and outreach activities.</p>

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<p>iv. <u>Outputs:</u> Work Plan, CA, 16 quarterly reports; ACRES updates; 4 MBE/WBE and financial reports, and final project closeout documentation; staff training; and outreach meetings/materials.</p>
<p>Task 2 – Site Inventory</p>
<p>i. <u>Project Implementation</u></p> <ul style="list-style-type: none"> • Non-priority sites will be identified by the Coalition and community and added to inventory. • Additional (non-priority) sites will be evaluated for assessment (see plan in Section I.a.iv). In-kind Coalition member staff time and travel will be contributed for site visits and working with the QEP(s) to select sites.
<p>ii. <u>Anticipated Schedule</u></p> <ul style="list-style-type: none"> • The prioritization system will be finalized within 3 months of grant award. • Non-priority sites will be added to the inventory throughout the 4-year performance period.
<p>iii. <u>Task/Activity Lead:</u> CCLBA will be the lead and work with the Coalition members and QEP to update/maintain existing inventory of brownfield sites.</p>
<p>iv. <u>Outputs:</u> Updated brownfields inventory and prioritization of additional sites.</p>
<p>Task 3 – Site Assessment</p>
<p>i. <u>Project Implementation</u></p> <ul style="list-style-type: none"> • Priority sites (and additional sites identified during the performance period) will be evaluated through performance of Phase I and/or Phase II assessments conducted in accordance with All Appropriate Inquiry (ASTM Standard E1527-13 and/or E1527-21) and other ASTM standards/practices. • QEP(s) will prepare a Quality Assurance Project Plan (QAPP) for U.S. EPA approval. • Assessments on both priority and additional sites following securing site access will continue. • The Coalition members and QEP(s) will meet to ensure required site access has been secured, individual assessments are progressing, and the overall project schedule is met.
<p>ii. <u>Anticipated Schedule</u></p> <ul style="list-style-type: none"> • Once sites are selected and site access is granted, eligibility determinations will be submitted to U.S. EPA for approval. Phase I assessments will begin by January 2025 and continue throughout the project. • Phase II Assessments will begin once the selected QEP(s) receives U.S. EPA approval of their QAPP (depends on EPA timing but is anticipated to be accomplished by April 2025). • Upon selection of QEP(s), the CCLBA and QEP(s) will meet monthly to discuss priority sites, ensure required site access/eligibility have been secured, individual projects are progressing, and the overall project schedule is met.
<p>iii. <u>Task/Activity Lead:</u> The QEP(s) will lead this task because they have the technical expertise.</p>
<p>iv. <u>Outputs:</u> 1 QAPP, 3 QAPP update letters, 37 Phase I ESAs, 23 Hazardous Materials Assessments, and 32 Phase II ESA reports.</p>
<p>Task 4 – Cleanup Planning</p>
<p>i. <u>Project Implementation</u></p> <p>Cleanup/redevelopment planning as required by various State of Michigan programs for sites (both priority and additional sites that are assessed using the grant) where redevelopment is imminent. This may include preparation of Remedial Action Plans, Assessment of Brownfield Cleanup and Redevelopment Alternatives (ABCAs), preparation of Brownfield Plans/Work Plans, and Response Activity Plans for Due Care (aka Continuing Obligations) Compliance.</p>
<p>ii. <u>Anticipated Schedule</u></p> <p>Cleanup planning will be conducted at priority sites and additional sites following completion of the associated assessment activities and will continue throughout the performance period.</p>
<p>iii. <u>Task/Activity Lead:</u> The QEP(s) will lead this task because they have the technical expertise.</p>
<p>iv. <u>Outputs:</u> Outputs include at least 13 cleanup planning documents.</p>

b. Cost Estimates: Approximately 97% of the budget will go to site assessment and cleanup planning; none to direct administrative costs, indirect costs, fringe benefits, equipment, or supplies.

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Task 1 – Programmatic: \$24,920 Total Budget

- **Personnel costs:** Programmatic- \$5,000 (100 hours at average rate of \$50/hour) for QEP selection/oversight, progress meetings, and reporting. Outreach- \$4,000 (80 hours at average rate of \$50/hour) for outreach activities.
- **Travel costs:** \$3,920 for two person’s attendance at one U.S. EPA Brownfields Conference (registration-\$600, airfare-\$500, 4 nights hotel-\$800, 4 days per diem and incidentals-\$360).
- **Contractual:** \$12,000 for QEP(s) assistance on technical summaries for quarterly reports, monthly progress meetings, all outreach activities throughout term of grant.

Task 2 - Site Inventory: \$13,680 Total Budget

- **Personnel costs:** \$6,000 (120 hours at average rate of \$50/hour) for meetings with Coalition members and community members for site nomination and selection and time for site visits and site access negotiations.
- **Contractual:** \$7,680 for QEP(s) to assist in site selection and prioritization and site access.

Task 3 - Site Assessment: \$ 1,381,400 Total Budget

- **Contractual:** For the QEP(s) to conduct Phase I ESAs averaging \$3,200, Phase II ESAs averaging \$35,000, and hazardous materials assessments (HMAs) that will average \$6,000.
 1 QAPP and updates = \$5,000 37 Phase I ESAs @ \$3,200 each = \$118,400
 23 HMAs @ \$6,000 = \$138,000 32 Phase II ESAs @ \$35,000 each = \$1,120,000

Task 5 - Cleanup Planning: \$80,000 Total Budget

- **Contractual:** Complicated cleanup planning documents for the three priority sites at \$10,000 each (total of \$30,000) and an additional ten cleanup planning documents at average cost of \$5,000 each (total of \$50,000).

		<u>Grant Project Tasks</u>				
<u>Budget Categories</u>		Task 1 Programmatic	Task 2 Site Inventory	Task 3 Site Assessment	Task 4 Cleanup Planning	Total Budget
Direct	Personnel	\$9,000	\$6,000			\$15,000
	Travel	\$3,920				\$3,920
	Contractual	\$12,000	\$7,680	\$1,381,400	\$80,000	\$1,481,080
Total Budget		\$24,920	\$13,680	\$1,381,400	\$80,000	\$1,500,000

c. Plan to Measure and Evaluate Environmental Progress and Results: The CCLBA will diligently track, measure, and report on the success of the project utilizing ACRES to track the following **outputs**: number of Phase I and II ESAs completed and number of cleanup planning documents. The actual outputs will be compared to the estimated number of outputs listed in Section 3.b. CCLBA will track/report the following **outcomes** in ACRES: acres of land assessed; land remediated and redeveloped; acres of parks and greenspace preserved or created; number of jobs created or retained; tax revenue generated; redevelopment investment value; and other funding leveraged. CCLBA will report outcomes/outputs that cannot be easily entered into ACRES (i.e., website updates, staff training, community outreach/meetings) in quarterly reports. CCLBA will evaluate project progress semi-annually against the goals in Section 3.b and, if goals are not being met or are off schedule, will meet with local stakeholders and the QEP(s) to discuss the shortcomings and adjust the project approach and schedule, as needed.

4. Programmatic Capability and Past Performance

a. Programmatic Capability:

i., ii., and iii. Organizational Capacity, Organizational Structure, and Description of Key Staff: The CCLBA’s operating budget is primarily funded by grants so they are very familiar with managing local, state, and federal grant dollars and have developed the capacity needed to carry out grant

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related tasks. The CCLBA will use the same project team during the entire grant period. The project team includes the CCLBA's Executive Director (Ms. Krista Trout-Edwards), the CCLBA's Assistant Director (Ms. Amy Rose Robinson), and an environmental consultant(s). The project team will be led by Project Manager Ms. Krista Trout-Edwards, who has over 18 years of planning, redevelopment, brownfield, and loan management experience. Ms. Trout-Edwards will be responsible for all grant operations (community outreach, marketing, initial project evaluations, site/loan document preparation, reporting, etc.), establishing and managing the program's financial accounts, payment requests and transfers through the Automated Standard Application for Payments (ASAP) system, and management of the environmental consultant. Ms. Robinson, who has over 17 years of redevelopment and loan/grant management experience, will serve as assistant Project Manager. She will be involved in the daily grant operations and will become the Project Manager if Ms. Trout-Edwards leaves the CCLBA. Ms. Trout-Edwards and Ryann Lee from BCCF and Haley Snyder from the City of Albion will form an executive board that will negotiate how the grant monies will be split between the Coalition members, make decisions on what sites on which to expend grant funds, and will meet regularly to discuss the grant, progress on the assessment of the priority sites, and share plans for involving their respective communities in selecting additional sites for assessment, cleanup, and/redevelopment.

iv. Acquiring Additional Resources: The CCLBA will retain an environmental consultant(s) (QEP(s)) to assist with Assessment Grant activities and conduct environmental assessments. CCLBA's procurement process will comply with federal procurement regulations (40 CFR §31.36). The CCLBA will follow its purchasing policy that includes a commitment to using local labor, utilizing responsible contractors with a history of safe and strong labor practices, and attracting and using minority- and women-owned businesses, as possible. Our selected consultant will be experienced in EPA Assessment Grant management, Michigan's Voluntary Cleanup Program, Michigan's Brownfield Law (Act 381), and will have managed several previous EPA Assessment Grants projects. They will also have extensive knowledge of our community and will have successfully managed complex brownfield redevelopment projects.

b. Past Performance and Accomplishments

(i) Currently Has or Previously Received an EPA Brownfields Grant: The CCLBA is the lead agency for a Coalition that was awarded a FY2017 U.S. EPA Assessment Grant for Hazardous Substances (\$600,000) and a FY2020 U.S. EPA Assessment Grant for Hazardous Substances (\$600,000).

1. Accomplishments: Using these two grants, 54 sites have been assessed resulting in the following outputs: 54 Phase I ESAs/Phase I ESA Updates, 51 Phase II ESAs (task includes HMAs), and 17 Baseline Environmental Assessment Reports, 20 Due Care Plans, and 4 cleanup planning documents for the Michigan VCP. Using the grants, the CCLBA has supported the following outcomes: assessment of ~85 acres of brownfields, redevelopment of these brownfields with nearly \$18 million in leveraged funding, and creation of over 280 jobs. The outputs and outcomes were reported in ACRES.

2. Compliance with Grant Requirements: The CCLBA developed a Work Plan and successfully negotiated a Cooperative Agreement with the U.S. EPA for each of the grants. The CCLBA complied with the Work Plans and their associated schedules, terms, and conditions. The CCLBA submitted and received approval for project QAPPs and associated updates, complied with quarterly reporting and annual financial status reporting requirements, and submitted to the U.S. EPA, via the ACRES database, the site information and assessment data for the grant.

The FY2017 grant started in October 2017 and ended in September 2020. The CCLBA expended the full grant (\$10.74 remaining). As of October 1, 2023, the CCLBA had drawn down \$533,933.28 (~89%) of the FY2020 grant (expenditures to date are \$553,423.43). The \$46,576.57 remaining in the FY2020 Assessment Grant is allocated to close out multiple sites in the County and will be spent by April 2024 (CCLBA received a 9-month extension on the grant).

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1. **Applicant Eligibility:** The Calhoun County Land Bank Authority (CCLBA) is a Michigan local unit of government. A copy of the establishing resolution is attached.

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

There are two non-lead Coalition members. The City of Albion and the Battle Creek Community Foundation (BCCF) are the two non-lead Coalition members.

The City of Albion is a General Purpose Unit of Local Government in the State of Michigan that is eligible for grant funding.

The BCCF is a non-profit organization that has tax-exempt status under section 501(c)(3) of the Internal Revenue Code that is eligible for grant funding. Documentation of BCCF's tax exempt status is attached.

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

- CCLBA – High Warren Target Area
- City of Albion – West Albion Target Area
- BCCF – Washington Heights/Bottoms Target Area

These target areas do not overlap and are detailed in Section 4 of the Narrative Information Sheet.

4. **Existing Brownfields Grants to Non-lead Members:** The City of Albion and the BCCF are not recipients of an open cooperative agreement for MARC grant funding nor do they have MARC grants that closed in 2016 or later.

5. **Coalition Agreement:** The City of Albion and the BCCF have agreed to be part of the Coalition with the CCLBA action as the lead/grant applicant. Signed letters from each non-lead member are attached.

6. **Community Involvement:** The CCLBA has been working with its Coalition and community partners and using public funding since 2006 to stabilize neighborhoods burdened by large numbers of vacant, abandoned, and foreclosed properties and brownfields. The CCLBA worked closely with local units of government, economic development groups, and community organizations to develop a Strategic Plan for blight elimination, economic development, and community revitalization. The process included a two-day event facilitated by the Center for Community Progress with stakeholders from throughout the County, including representatives from Albion and Battle Creek and the target areas within these cities. The CCLBA and stakeholders agreed that assessment and redevelopment of brownfields was a key component to revitalizing the County. The CCLBA and its Coalition members hope to build on that momentum and consensus to continue to engage these stakeholders, and additional stakeholders/citizens who may be affected, in the Assessment Grant project. The CCLBA will use the following methods to communicate progress of the grant project.

Upon grant award, a press release will be issued in the local newspapers in and posted on the Coalition members' websites and on their social media accounts, which are interactive internet forums that allow the community to interact with the Coalition in real time. The CCLBA will also place advertisements on local radio stations to reach members of the community at all educational levels and those without internet service. Key project

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partners (see Section 2b.i) will be notified and given information to distribute and place on their websites. News releases, web postings, and written materials will include a notice that Spanish-language versions are available and that translators will be available for public meetings, allowing Hispanic residents in the County (5.1%)^{Error! Bookmark not defined.} to participate in the public process. The CCLBA will host an initial public kick-off meeting in each of the target areas. These meetings will be held at a regularly scheduled NPC#1, NPC#2, or ARC meeting to reach underserved residents and groups directly affected by project work on the priority sites. At these meetings, they will ask the public to comment on the priority sites and proposed reuse as well to identify additional sites they feel should be assessed. The CCLBA will also hold a public meeting from their offices to acquaint the County at-large with the grant project and ask County residents to provide additional potential sites for assessment. All the additional sites identified at these meetings will be added to the Coalition's list of potential sites for funding and be prioritized as discussed in Section 1.a.iv. This step is needed to ensure that the public's concerns are incorporated into the project. These meetings will include a virtual option using video conferencing software (e.g., Zoom or Teams).

As part of ongoing outreach as additional sites are selected for assessment, the CCLBA will present the reasoning for the selection on their internet forums and solicit public feedback as well as conduct stakeholder meetings/interviews. Public meetings will be held at readily identifiable and accessible public buildings in, or as close as possible to, the site to receive and discuss additional comments. As above, the meetings will have a virtual option. The combination of social media, public meetings, and written information will allow for information sharing and give residents and citizen groups a way to voice their health and safety concerns for grant funded assessments. Ongoing project updates will be provided at the monthly public CCLBA meetings (either in person or virtually). When cleanup and/or redevelopment planning is initiated, more intensive involvement activities, including explanations of plans and rationales and solicitation of comments and feedback on those plans, will be implemented and additional more in-depth stakeholder meetings will be held. At the close of the grant, the CCLBA will hold a final public meeting (either in person or virtually) to notify the community of the outcomes of the project. All presentation materials used throughout the project will be archived and will be available at the CCLBA's office.

In addition, depending on the scope of the project, the CCLBA may conduct verbal and written interviews of project stakeholders to collect additional data on how the community feels about the project and what ideas/concerns they might have on the assessment/cleanup/redevelopment. The CCLBA will also work with key community organizations to acquire information on residents' concerns (Neighborhood Planning Council #2 (NPC#2) representing the Washington Heights/Bottoms target area, NPC#1 representing the High Warren target area, and Albion Redevelopment Corporation representing the West Albion target area). These groups have already come together to support redevelopment and the CCLBA anticipates that it can easily bring them back together to involve them in brownfields assessment, cleanup, and redevelopment in the target areas. Because the CCLBA has completed numerous stakeholder involvement activities, they know how to gauge the success of their outreach. If they recognize that the community/stakeholder outreach is/are not reaching their intended audience (especially impoverished or underserved residents), they will make an effort to reach out to those people/businesses individually.

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7. **Expenditure of Assessment Grant Funds:** The CCLBA is the lead agency for an active FY2020 U.S. EPA Coalition Assessment Grant for Hazardous Substances (\$600,000). The CCLBA had expended \$533,933.28 (~89%) of this active grant by October 1, 2023. Documentation of this grant drawdown is attached.

8. **Contractors and Named Subrecipients**
N/A - The CCLBA has not procured a contractor or named a subrecipient