

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area

The City of the Village of Douglas (population: 1,232) is in Allegan County in the southwest portion of Michigan's lower peninsula on the shores of Lake Michigan. First settled by European-Americans in 1851, the City's initial economy revolved around the lumber industry. Lumber production peaked after the Great Chicago Fire of 1871, as Douglas area sawmills became the primary source of the lumber that was used to rebuild the City of Chicago. After most of the harvestable trees in the area were cleared, the City's economy gradually shifted to become an epicenter for fruit production. By the late 1800's the area's abundance of scenic natural resources began to attract people from large urban centers, like Chicago, who were in search of a quiet and peaceful vacation locale. Today, Douglas is an established tourist community offering an eclectic art, food, and cultural scene with miles of trails and attractions that include the panoramic views of Lake Michigan. Douglas and its residents have strived to be a community where people from all walks of life are welcomed with open arms, earning its reputation as one of Michigan's most LGBTQ-friendly small towns.

Over the past five years, changes in demographics, housing markets, and the economy has prompted City leaders to devise new strategies to address critical needs for housing and commercial retail. Although the City has established neighborhoods and a downtown area (approximately 0.07 square miles on the western shore of Kalamazoo Lake), the City's reputation as a seasonal community has led to an average of 50.1% of City households that are occupied by non-family units (compared to Allegan County: 25.4%) and 24% of households that are renter occupied (compared to Allegan County: 8.8%). Since 2015, the City has experienced an overall decrease in owner occupied households of 16.2%, compared to an increase of 28.2% in renter-occupied households, and these trends are expected to continue.

In addition, the City is experiencing an increasing trend of older residents who are relocating to the City. Census statistics show that 24% of the City's population is comprised of residents over the age of 65 compared to 17% of Allegan County as a whole. Furthermore, the percentage of households with children under the age of 18 years is more than four times less than Allegan County (14.5% and 59.3%), which suggests that the City has become a preferred destination for retired individuals.

To support the health and vitality of the local economy, City leaders have determined that maintaining a balance of permanent and seasonal residents, as well as diversifying the City's population with young families, is necessary to sustain and grow local business, increase property tax revenues and support all populations. To accomplish this goal, the City must address the disparity in housing options between those who work and live in the City. According to Zillow.com, the average cost of a single-family home in the City is nearly 9% more than homes in the nearby City of Saugatuck, and over 90% more than the average cost per home in Allegan County. With an average cost of nearly \$413,000 for a single-family home, there is a lack of diverse housing stock within the City that can be accessed by working families. As a result, these families have sought other housing options in nearby cities, which has partially contributed to a population decrease in Douglas of approximately 14% over the last five years. With only 1.78 square miles of land area within the City's limits, there are few opportunities to create new residential and mixed-use developments that are necessary to attract younger, working families.

By engaging the public through several strategic planning initiatives, the City has identified the Blue Star Highway Corridor as a targeted area of focus to attract new development. As the City's main thoroughfare, the Blue Star Highway is an established commercial corridor which includes several established businesses, such as restaurants, hotels and lodging, banks, and small retail shops. Approximately 1.25 miles the corridor is the main north-south corridor that bisects the City. Within the last year, the corridor has begun to experience growth, with two redevelopment projects underway that are located approximately a half mile south of the City's downtown area. These projects include the conversion of a car wash facility into a medical retail facility, and a

\$1 million restaurant redevelopment that will provide multi-use restaurant space that includes a deli, bakery, a small market, restaurant, and kitchen space for cooking classes.

Across from these developments, is the former Haworth Manufacturing property (the target property), a former industrial manufacturing facility of approximately 7 acres. In 2014, the manufacturer closed operations at the site and relocated to a larger, more modern facility. Its resulting vacancy eliminated approximately 80 jobs within the community, which contributed to an already decreasing trend in the manufacturing sector within the City. Between the years of 2013 and 2018, the percentage of City residents employed by the manufacturing sector has decreased by approximately 6.5%, which has accounted for an average loss of four jobs annually. The steady decline of the manufacturing sector, combined with the lack of diverse housing stock within the City has likely contributed to an overall decrease in population of younger, working class age groups. Between the years of 2015 and 2018, the population of individuals ranging between 20 and 34 years old has decreased by approximately 28.9% (US Census).

Efforts by the City to attract a developer to undertake the redevelopment of the property have stalled due to the known contamination that exists at the site. With respect to the target property's location and size, its cleanup and redevelopment has the potential to attract additional "spin-off" developments to the Blue Star Corridor and achieve the City's objectives to attract new developments that provide diverse housing options, as well as new commercial mixed-use retail developments, jobs and increased tax revenues.

ii. Description of the Brownfield Site(s)

The target property is located at 200 Blue Star Highway and consists of a single parcel of approximately 7.18 acres. By 1938, it was initially developed as a fallow orchard with two small structures. By the 1940s, the property was redeveloped into its current configuration, which consists of two utility buildings and a 150,300 square foot, single-story industrial building with approximately 15 truck bays facing Blue Star Highway. From the 1940's through the mid-1970's the property's extensive history included plating, buffing, zinc die casting, metal forming, stamping, phosphatizing, and painting metal parts. Between the years of 1976 and 2014, the property was owned and occupied by Haworth Inc. (formerly Haworth Manufacturing) who used the facility to manufacture furniture. Since 2014, the vacancy of the massive metal warehouse-like structure is one of the first sights that greet those traveling into the City from the south. After six years of vacancy, the property remains unutilized, is not contributing to tax revenues, is an environmental risk and an eyesore. In addition to the overall cost associated with redeveloping the target property, the added expense of addressing the contamination has made redevelopment of the property financially prohibitive. To assist in leveraging funding opportunities for cleanup and redevelopment the City acquired the target property in 2019.

In 2015, Phase I and II Environmental Site Assessments (ESAs) were conducted to review previous assessments and investigate contamination from polychlorinated biphenyls (PCBs) and volatile organic compounds (VOCs) beneath the building, as well as evaluate pathways related to vapor intrusion. Sampling conducted in the former die cast pit area (eastern portion of the building) identified concentrations of PCBs above one part per million (ppm). In May 2018, a Remedial Alternatives Evaluation (RAE) was conducted to evaluate the extent of trichloroethene (TCE) and PCB impacts to determine options to address the risks associated with VOC contaminated groundwater and PCB contaminated soil. Analytical data suggests that the TCE contamination has migrated approximately 1,600 feet north-northwest of the target property, offsite. The RAE also summarized the results of previous site investigations that were conducted between 2015 and 2017 to define the horizontal and vertical extent of PCB contaminated soil impacts. These investigations identified soils impacted by PCBs at concentrations ranging from 3.4 parts per million (ppm) to 5,600 ppm, which are above the Toxic Substances Control Act (TSCA) Subpart D Cleanup Standard for high occupancy areas. The horizontal and vertical extent of the PCB impact were determined to be in the north central and eastern portions of the east room of the building, at depths ranging from 1' to 15.5' below ground surface (bgs). A cleanup strategy was prepared that involves addressing the contamination from the source areas on the target property by first addressing the PCB

contamination. This approach will assist in eliminating one of the concerns identified and as a result, in conjunction with other leveraged sources, better position the property to be marketed for redevelopment.

Before cleanup of the PCB cleanup activities can take place, it has been determined that it is necessary to demolish the building to access the PCB contaminated areas and implement cleanup activities. Before demolition activities can proceed, the abatement of asbestos containing materials (ACM) within must be completed. In preparation for this grant application, the City conducted an ACM survey of the building. Materials testing positive for asbestos include floor tile and mastic (8,560 square feet), window glazing (720 linear feet), ceiling tiles and glue pods (2,600 square feet), and gasket insulation (30 each).

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

The City has been involved in several local and area planning initiatives that include the City's Master Plan, the Tri-Community Master Plan, and the Blue Star Highway Corridor Study. One of the common overarching goals of these planning initiatives is to bolster the local economy by diversifying industries and services that cater to both tourism-based and full-time citizens. In support of this goal, several objectives have been identified for which the redevelopment of the target property could align. These objectives include: 1) create inclusive and inviting residential areas that include a multitude of affordable housing types that include mixed housing types of condos, stacked flats, live/work space, townhouses and single-family detached units that attract both seasonal and permanent homeowners; 2) ensure housing stock is inclusive of all age groups to encourage long-term, permanent residency within the City, and 3) support the creation of service-based, mixed uses that include health services, banking, shopping and other industries that would provide future opportunities to provide senior housing. These objectives are echoed within the Tri-Community Master Plan, a regionally based planning initiative that includes Douglas and the neighboring City of Saugatuck and Saugatuck Township. Specifically, the proposed reuse of the target property achieves the following: 1) provide a balanced range of diverse housing types at varying densities where public utilities are present or could be quickly provided, and 2) encourage high quality commercial development adjacent to existing commercial development and are compatible with adjoining uses.

Lastly, the City conducted the Blue Star Highway Corridor Study which was intended to obtain public input to formulate a community vision for the Blue Star Highway. Reuse of the target property was directly identified in the study as an opportunity to build upon the corridor as a regional business corridor of large-scale retail, eating and drinking establishments, personal service establishments, professional and support offices, and medical facilities that are capable of meeting the needs of year-round residents of the Tri-Community area.

As a result of these planning activities, over the past year the City has explored potential reuse scenarios that are consistent with these planning initiatives resulting in a conceptual site plan. Preliminary conceptual reuse plans include an estimated 80,000 square feet of commercial retail and restaurant space over 6 buildings, and 52,000 square feet of live-work space over 2 buildings. Several elements of the initial site design concept address the City's placemaking goals that includes the preservation of the City's reputation as a quaint destination community. These elements include the inclusion of walking trails and pathways that integrate into the City's existing trailways network, green space, and the construction of dog park. Along Blue Star Highway, site design features directly address the City's goal to reinvent the Blue Star Highway corridor into a safe, pedestrian friendly area that promotes a sense of place. These features include incorporating larger building setback distances, the relocation of parking areas behind the proposed buildings, and implementing streetscape improvements that are in accordance with the City's greenspace and tree ordinances.

The City has already allocated resources to retain an environmental consultant to perform environmental assessments as part of the City's acquisition of the target property, perform an asbestos containing materials survey, and identify state and local brownfield redevelopment incentives that can be leveraged to assist with

addressing contamination. In addition to retaining an environmental consultant, the City has a Memorandum of Understanding (MOU) in place with a local developer to redevelop the property. However, once grant funded cleanup activities are complete, the City intends to issue a Request for Proposal (RFP) to solicit additional developer interest, allow opportunities for continued community input into the redevelopment and planning process, and evaluate other redevelopment options for the site.

The target property is not located within a federally designated floodplain.

ii. Outcomes and Benefits of Redevelopment Strategy

Once redeveloped the proposed project will generate new property tax revenue, and no longer be a burden to the City’s budget. Based on the initial conceptual site design, it is anticipated that the taxable value of the target property would significantly increase, generating approximately \$87,500 annually in property tax revenues for the City. Converting the target property into commercial mixed-use retail, restaurants, and live-work space is estimated to create 140 jobs related to retail and restaurants usages, and an additional 85 office related jobs. According to the U.S. Energy Information Administration (EIA), food service and retail related uses average one job per every 567 square feet, and office uses average one job for every 600 square feet. The preliminary conceptual plan also incorporates placemaking features that includes approximately 800 feet of bike lane along the Blue Star Highway, 700 feet of sidewalk improvements along Chase Road.

Additional “spin off” developments are anticipated as a result of the reuse of the target property. For example, vacant parcels located to the west of the target property have generated development interest for residential uses, which are estimated to generate up to an additional \$92,500 in tax revenue for the City. Once the existing eye sore and known contamination has been adequately addressed for the target property’s reuse, the City anticipates that plans to redevelop these parcels will be accelerated.

The target property is not located within, or nearby an Opportunity Zone.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

The award of an EPA Brownfield Cleanup Grant is intended to provide financial assistance to address the PCB contamination at the target property. Once cleanup activities have been completed, several response activities will still be required to address remaining contamination to ensure the property is safe for those occupying it. Although the grant will not be used to address these activities, its award will make additional funding opportunities at the local and state level viable. These funding opportunities include several programs that provide incentives to private investors and developers to assist with the cost of redeveloping the property once grant funded cleanup activities are complete. These programs include:

Source	Role
Michigan Brownfield Act Tax Increment Financing	Michigan enables local governments to issue Tax Increment Financing (TIF) plans for clean and response activities to address brownfields. New tax revenue generated from brownfield redevelopment creates the tax increment, which is reimbursed to the developer over time. Once cleanup activities under this grant request have been completed, tax increment financing can be used to assist with funding the remaining cleanup and response activities. The value of this program is dependent on the final site plan and the post development taxable value of the property. This program is utilized regularly in partnership with the Michigan Department of Environment Great Lakes and Energy (EGLE). The City is setup to implement a TIF Plan following final developer selection under the RFP, through our Brownfield Redevelopment Authority.
Michigan Environment Great Lakes and Energy (EGLE) Grant and Loans	Provides funding of up to \$1 million in grant and up to \$1 million in loan funds for environmental cleanup and response activities at properties with known contamination. Funding can be applied to address remaining contamination that is not addressed under the EPA Cleanup grant. The City is eligible to apply for funding directly, upon finalization of the development

	plan, which will be catalyzed by the EPA Cleanup grant. The City was already awarded a grant under this fund in the amount of \$179,287 to complete additional assessment activities to delineate the contamination on the former Haworth Property and devise a cleanup strategy.
Obsolete Property Rehabilitation Act	A state tax abatement program that encourages the rehabilitation of obsolete, commercial, and industrial properties by freezing the taxable value of the property at predevelopment values for a period up to 12 years. The value of this program is dependent on the final site plan; however, it is estimated to be \$200,000 annually. While it may reduce the available TIF for a project, it can assist in reducing tax obligations while a project is working to stabilize itself and assist in developer attraction. The City would work with the developer to determine their level of need to ensure a viable project, while working to limit the amount of tax revenues that are reduced.
Community Revitalization Program	Funding of up to 20% of the total project investment is available for redevelopment projects that foster economic growth and job creation within a downtown or commercial corridor. These funds can be applied for by the future developer of the property, contingent upon proof of financing and financial need.
City of Douglas	To date, the City has expended \$100,000 to acquire the target property and has allocated another \$37,500 to perform environmental site assessments from their general operating budget.

ii. Use of Existing Infrastructure

The target property is located along the Blue Star Highway, which provides for easy access to existing infrastructure (roads, water, electricity, natural gas, sewers, etc.) that are sufficient to support the proposed redevelopment and reuse without significant additional investments into upgrading the existing infrastructure. As the City’s main thoroughfare, Blue Star Highway provides quick access (via Interstate I-196) to the City of Grand Rapids, Michigan’s second largest city. Less than 30 miles away, Grand Rapids provides advantages that are typical to metropolitan areas that include amenities such as an established transportation network of roads and access to an international commercial airport, both of which provide connections to other economic markets.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

The City’s rising operational costs, stagnated tax base, and reduced state revenue share, are the primary reasons why the City does not have the ability to completely fund the cleanup activities that are needed to redevelop the target property. Despite experiencing a decrease of about 13% in overall population over the past five years, coupled with the increased cost of providing basic City services, the City’s municipal budget has remained balanced. However, the City is met with constant challenges to maintain its fiscal responsibility. Over the past three years, the City has experienced an estimated 16.2% increase in public works expenses related to capital projects needed to maintain the City’s infrastructure, as well as increases in governmental operations expenses of approximately 14.8% which are correlated with rising health care costs, retirement obligations, and staff turnover.

With respect to the City’s size (approximately 1.78 square miles), large tracts of developable land are not available, which has reduced opportunities for new development within the City. As a result, the City’s tax revenues have stagnated, with an estimated 0.24% increase in the City’s overall net revenue over the past five years. Adding to the City’s fiscal challenges is the reduction of state revenue share of approximately 18.6% over the past three years.

In accordance with the goals and objectives of the City’s Master Plan to diversify commercial mixed-use and residential sectors, parcels located on, or in proximity to the Blue Star Highway Corridor target area provides the highest potential to generate a significant amount of new property tax revenues. Recognizing this opportunity,

the City acquired the target property and has proactively allocated a small portion of their general budget toward its assessment and cleanup. However, the City is unable to generate enough funding to fully fund cleanup activities at the target property without help from an EPA Brownfield Cleanup Grant.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Located within a one-third mile radius of the target property is a condominium development and the City's only mobile home park. 24% of the population within this radius is over the age of 65 (approximately 8% over the County and state averages) and 26% have incomes below the poverty level compared the City-wide average of 16% (EJSCREEN) (2018-ACS). The proximity of this segment of the population makes them more susceptible to health impacts because of exposure to the target property. Furthermore, there is only one senior living facility located within the City that has a capacity of 50 people. The next closest facilities are located at least 10 miles away in other communities. Although most of the senior population within the City are presently living independently, it is anticipated that the demand for senior housing and assisted living facilities within the City will increase as the City's population continues to age. Redevelopment along the Blue Star Corridor that includes the creation of service-based, mixed uses that include health services, banking, shopping and other retail and service-based industries has the potential to address the forecasted need to provide future opportunities for senior care facilities in addition to providing more diverse housing stock for younger residents, as well as mixed-use commercial retail space that would support both senior and middle class residential developments.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

According to CDC data between the years of 2010 and 2016, mortality from complications from lung cancer, chronic obstructive pulmonary disease, and liver disease all have all occurred within ages of 55 years old and older. According to the International Agency for Research on Cancer (IARC), PCBs and chlorinated solvents (which includes TCE) are a known carcinogen that effects the liver, skin, and reproductive system, which suggests that this segment of the population is more vulnerable to experience the more severe health effects of being exposed to PCBs. In addition, Alzheimer's disease is the 6th leading cause of death in Michigan according to the Alzheimer's Association. CDC data also suggests that the mortality rate of Alzheimer's Disease for populations over the age of 65 on a county-wide basis has increased by approximately 29% between the years of 2013-2016, while Michigan increased at slower rate (approximately 21%). According to articles published by the National Institute of Health, it is plausible that exposures to PCBs can increase the risk of neurodegenerative diseases that include Alzheimer's Disease, Parkinson's Disease, amyotrophic lateral sclerosis (ALS), and various cognitive attention disorders.

(3) Disproportionately Impacted Populations

In addition to the sensitive populations identified above, the Kalamazoo River, a widely used natural resource-based recreational feature which borders the City to the north, is a Superfund site. River sediments over the 80-mile stretch of river that spans from the City of Kalamazoo to Lake Michigan, have been impacted by PCBs from the operations of former paper mills. Since 1998, over 450,000 cubic yards of contaminated river sediment has been removed over seven miles of river, however, assessments conducted by the EPA show that additional contamination remains. Although the PCB contamination that occurred at the target property is not related to the contamination within the Kalamazoo River, the cumulative effect from both source areas has the potential to lead to above average exposures, which disproportionately impacts the community. Addressing the contamination at the target property would significantly curb exposure rates and reduce the cumulative effect of PCB contamination that is potentially affecting sensitive populations, as well as the entire population of the City as a whole.

b. Community Engagement

i. and ii. Project Involvement and Roles

The City has an ongoing, cooperative relationship with surrounding local units of government and local community organizations that was initiated during our participation in the planning process for the Tri-Community Comprehensive Plan and the Blue Star Corridor Planning Study as well as development of this application. These partners will provide critical input into the redevelopment process to ensure that the highest and best use of the target property is determined.

Organization	Contact	Role & Commitments
Community Resident Group	Tracey Shafroth shafroth.tracey@gmail.com (847) 612-4477	This community resident group is made of up locals invested in assisting the community in improving the environment. The group regularly attends Council Meetings and community input sessions to assist in educating their neighbors and ensuring residents have a voice. The group will be involved in proving resident input regularly throughout the grant cycle and distributing information to others within the City.
Saugatuck-Douglas Area Business Association	David Langley david@saugatuckdouglas.com	Provides economic development support; will provide communication to local businesses to advertise public input/involvement opportunities. Will provide input in decisions for cleanup/redevelopment based on knowledge of the area’s economic needs. Can bring local business owners/residents to community meetings through their extensive contacts.
City of Douglas Brownfield Redevelopment Authority	Matt Balmer, Chair (269) 857-1438	The Douglas BRA will provide a forum for the public to provide input during cleanup and provide input into the cleanup planning process. The BRA will also serve as a technical resource for pursuing state brownfield incentives once cleanup activities have been completed. The public will be given an opportunity to offer feedback on the project at their monthly meetings.
Allegan County Economic Development Commission	Cheri Schultz (269) 673-0205	The Allegan County BRA will serve as a technical resource to the City regarding Provide local and county expertise during the cleanup process and economic planning expertise in support of refining the reuses for the target property.

iii. Incorporating Community Input

All communication will be conducted in a variety of ways to ensure all stakeholders are involved in the planning and implementation of the project. The community will receive notifications through postings at the City Offices, the City’s website and Facebook pages, and updates at City Council and Brownfield Redevelopment Authority (BRA) meetings. Once awarded, a “kickoff” announcement meeting will be held, which will be followed by routine public meetings at regularly scheduled BRA meetings to update on the cleanup and redevelopment status of the project. These meetings will provide a platform for residents to provide input regarding health, safety, and community disruption posed by the project. These concerns will be recorded by the City to make decisions on improving the process and performance under the grant. Community input will be appropriately responded to by the grant manager and/or the consultant in a timely fashion in the residents preferred form of communication. Since the onset of the COVID-19 pandemic, the City has devised policies that have allowed City operations to continue, which include the holding of City Council meetings, and other community and operational meetings. The policies have been effective and will continue to be implemented over the course of this grant as needed. If complications with the COVID-19 pandemic makes meeting in person difficult and/or potentially dangerous, remote meetings will be held using the Zoom platform. Commentary will be collected in a variety of methods, including digital submissions through Zoom and recorded. Input will be used to facilitate discussion among the stakeholders and public, which will then be incorporated into the decision-making process to further refine best reuses for the target property. Public meetings will also be utilized to present potential redevelopment opportunities to interested developers, as well as provide technical assistance regarding additional financial incentives that can be potentially leveraged for the planned redevelopment. To reach residents that may not have the ability to attend public and/or virtual meetings, communication regarding grant updates will be posted on the City’s website, social media platforms, community wide emails, and mailers.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The selected cleanup alternative involves abatement of asbestos containing materials, demolition of the building, and utilizing a risk-based cleanup approach for the PCB contamination on the intended reuse of the property using the TSCA Subpart D Cleanup Standards for high occupancy uses. Demolition of the building is necessary to facilitate access to the PCB contaminated areas, therefore, the complete abatement and removal of ACM, in accordance with regulations, will be necessary to reduce the human health risk. This requires all contractors that could be potentially exposed to ACM to be licensed abatement firms as regulated by EGLE. Debris will be properly disposed of at a landfill that meets minimum standards under the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines. Following abatement, the buildings will be demolished with demolition materials being disposed of in an appropriate landfill. Once demolition has been completed, a risk based TSCA PCB Cleanup work plan will be prepared for EPA review and approval. Cleanup activities involves the disposal of contaminated soil and the installation and maintenance of appropriate surface cover.

b. Description of Tasks/Activities and Outputs

Task 1 – Community Involvement and Outreach

- *Project Implementation (i):* Includes the development of a Community Involvement Plan which outlines community participation activities that includes resident notification of cleanup schedules and progress and a minimum of three public meetings (pre, interim, and post) to educate and update the community of cleanup progress. This task also includes the attendance of one staff member at the EPA Regional Kickoff Meeting and National Brownfield Conference.
- *Schedule (ii):* Quarters 1-12
- *Task/activity Lead (iii):* City of Douglas, supported by a qualified environmental consultant
- *Outputs (iv):* Community Involvement Plan, Community outreach/involvement/meetings, Meeting minutes documenting the outcomes of each meeting
- *Additional Notes:* The development of the Community Development Plan also includes preparation of handout materials and flyers, as well as support from the environmental consultant throughout the task.

Task 2 – Cleanup Planning

- *Project Implementation (i):* Includes the finalization of the Analysis of Brownfield Cleanup Alternatives (ABCA), development of a risk based TSCA PCB Cleanup work plan/model, preparation of bids and specifications, and solicitation of competitive pricing.
- *Schedule (ii):* Quarters 2-4
- *Task/activity Lead (iii):* City of Douglas, supported by a qualified environmental consultant
- *Outputs (iv):* Final ABCA, Risk Based TSCA PCB Cleanup Work Plan, Bid Package/Solicitation, Pre-Bid Meeting/Site Walkover Attendance List, and Bid Tabulation and recommendation to award.
- *Additional Notes:* Attendance of a pre-bid meeting and site walkover will be mandatory for qualified contractors to submit competitive pricing. The retaining of a qualified contractor will abide by EPA Guidelines and the City’s established procurement process.

Task 3 – Cleanup Activities

- *Project Implementation (i):* 1) Activities include, creation of an ACM Management plan to minimize the potential release of asbestos fibers during abatement, 2) abatement of ACMs previously identified in the ACM survey, 3) abatement oversight and air monitoring during abatement activities that includes collecting area, personal, and clearance samples (where appropriate) and monitoring contractor activities to ensure compliance with project specifications and/or regulatory requirements 4) building demolition, which includes the removal of all building materials in accordance with applicable state and Federal regulations 5) implementation of a risk based TSCA PCB Cleanup work plan that involves the disposal of contaminated soil and the installation and maintenance of appropriate surface cover.
- *Schedule (ii):* Quarters 4-11
- *Task/activity Lead (iii):* City of Douglas, supported by a qualified environmental consultant
- *Outputs (iv):* 1) ACM Management Plan, 2) Asbestos abatement (quantities abated), 3) Air monitoring reports/data, 4) Oversight and reporting, 5) Demolition and disposal (material quantities removed), 5)

Contaminated soil removal (volume of material removed), 6) Placement of clean fill (quantity imported), and 6) Surface repaving (area repaved)

- Final ABCA, Bid Package/Solicitation, Pre-Bid Meeting/Site Walkover Attendance List, Bid Tabulation, and recommendation to award.
- *Additional Notes:* Cleanup of the PCB contaminated areas will be compliant with the cleanup standards outlined in TSCA Subpart D and will be conducted in the identified areas that were previously delineated.

Task 4 – Grant Management

- *Project Implementation (i):* Includes the preparation and submittal of required progress reports, input of project data into ACRES, and preparation and submittal of a final project report.
- *Schedule (ii):* Quarters 1-12
- *Task/activity Lead (iii):* City of Douglas, supported by a qualified environmental consultant
- *Outputs (iv):* Quarterly reports (11), entry into ACRES, final project report
- *Additional Notes:* Includes ongoing correspondence with EPA and EGLE as appropriate.

c. Cost Estimates

Budget Categories		Project Tasks (\$639,700)				Total
		Task 1 Community Involvement	Task 2 Cleanup Planning	Task 3 Cleanup Activities	Task 4 Grant Management	
Direct Costs	Personnel	\$0	\$0	\$0	\$0	\$0
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$5,000	\$0	\$0	\$0	\$5,000
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$0	\$0
	Contractual	\$0	\$6,500	\$488,500	\$0	\$495,000
	Other	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$5,000	\$6,500	\$488,500	\$0	\$500,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Federal Funding		\$5,000	\$6,500	\$488,500	\$0	\$500,000
Cost Share		\$9,000	\$0	\$81,000	\$10,000	\$100,000
Total Budget		\$14,000	\$6,500	\$569,500	\$10,000	\$600,000

Task 1 – Community Involvement and Outreach:

Contractual Costs: The cost of preparing presentations and attending three meetings, which includes the preparation of handout materials and flyers and consultant time to assist in the community outreach portion will be covered by the City’s 20% match. \$3,000/meeting, 10 hrs./meeting at an average rate of \$100/hr. = \$9,000. A total of \$5,000 is budgeted for key staff members to attend the EPA Regional Kickoff Meeting, as well as Brownfield conference and workshop travel (i.e. such as the National Brownfield Conference). This includes registration fees, a day per-diem, lodging and flights.

Task 2 – Cleanup Planning:

Contractual Costs: 65 hours at an average rate of \$100/hr. = \$6,500. This cost includes time necessary for an environmental consultant to complete cleanup planning, including finalizing the ABCA, preparing the Risk Based TSCA PCB Cleanup Work Plan, and scoping and bidding the project.

Task 3 – Cleanup Activities:

Contractual Costs: The creation of an Asbestos Containing Materials Management plan is estimated at \$3,000 (30 hours at an average rate of \$100/hr.) and will be performed by the environmental consultant. Asbestos abatement (\$60,000), demolition (\$175,000), cleanup activities and project oversight (\$334,500) (to be overseen by the environmental consultant) will be a paid for with a combination of grant funds, the City’s 20% match and additional leveraged sources. This cost is estimated at \$569,500.

Task 4 – Grant Management:

This task will be paid as part of the City's 20% match and is estimated to be \$10,000 (100 hours at \$100/hr.).

d. Measuring Environmental Results

The City will measure progress utilizing the EPA's ACRES database to record/track, measure and evaluate progress. This will include short term outputs such as the number of community involvement meetings and attendance at each. Long term outputs will include amounts of hazardous materials (ACM) abated, demolition materials removed from the site, excavation and disposal of contaminated soils, and the preparation of a closeout report documents abatement and cleanup activities. Outcomes will include improved environmental and health conditions and the positioning of the target property for redevelopment.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. and ii. Organizational Structure and Description of Key Staff

Project management and grant administration responsibilities will be handled by the City Manager of the City of Douglas, Mr. Rich LaBombard. As the City Manager, Mr. LaBombard oversees the day to day operations of the City which includes, public works, asset management and overseeing special projects such as road reconstruction, utility improvements, facility improvements and construction of new assets. Prior to his employment with the City, he has successfully procured and managed over \$5 million in grants over the past five years, and has demonstrated experience with project management, grant writing, technical writing, energy efficiency, energy conservation and renewable energy. Mr. Matt Smith, the City's Treasurer will assist Mr. Labombard with the financial management of the grant.

iii. Acquiring Additional Resources

Once EPA has approved a project work plan and has entered into a cooperative agreement with the City, the City will immediately begin the procurement process to retain a qualified environmental consultant. The desired consultant will be experienced in conducting various types of brownfield cleanup activities specific to those outlined within our cleanup plan, community outreach, and have familiarity with state and federal regulations. Additionally, the consultant will be expected to prepare the Generic Quality Assurance Project Plan (GQAPP) within the first 60 days of the grant so that the proposed cleanup assessments and activities are not delayed. Procurement of the qualified environmental consultant will be conducted accordance with the EPA's selection protocol as well as the established City's purchasing and procurement policies. This includes the publishing of a Request for Proposal that will be issued to qualified firms with allotted guidelines and deadlines. The City will review each response, select the most qualified candidate, and enter into a master services agreement with the selected consultant.

b. Past Performance and Accomplishments

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

(1) Purpose and Accomplishments

The City received a grant of \$1,789,549 from the Michigan Strategic Water Quality Initiatives Fund (SWQIF) to operate an existing treatment system, construct a new treatment system, that will eliminate soil and groundwater contamination from migrating into Wicks Creek. Operation of these systems will maximize risk reduction to groundwater and surface water and facilitate the redevelopment the affected property. The project is expected to be completed by December 2020.

In 2018, the City received a grant in the amount of \$179,287 from the Michigan EGLE under their Brownfield Grant and Loan program to conduct additional investigation activities and devise a cleanup plan for low occupancy uses at the former Haworth property. The purpose of the additional site investigation was to delineate the extent of PCB impacts and address data gaps that were identified in previous assessments. 27 borings were completed, where samples were collected several depth intervals. The results of the delineation of the contaminated areas was used to devise a cleanup plan that included the recommended use of several institutional and engineering controls.

(2) Compliance with Grant Requirements

Grant funds awarded to the City have been successfully managed and completed. The City was able to ensure compliance with approved work plans, schedules, reporting requirements and the terms and conditions placed on the use of all grant funds awarded.