



R05-26-A-030

Ionia County Administration
Chad Shaw, County Administrator
Courthouse, 101 West Main Street, Ionia, MI 48846
616.527.5300 Fax: 616.527.5380
cshaw@ioniacounty.org

APPLICATION INFORMATION SHEET

- (1) **Applicant Identification** Ionia County, Michigan
101 W. Main Street
Ionia, MI 48846
- (2) **Website URL** <https://ioniacounty.org/>
- (3) **Funding Requested**
a. Assessment Grant Type: Community-wide
b. Federal Funds Requested: \$400,000
- (4) **Location** Ionia County, Michigan
- (5) **Target Area and Priority Site Information**
Target Area: City of Ionia
 - Priority Site 1: 242–244 S. Steele Street, Ionia, MI
 - Priority Site 2: Former Deerfield Correctional Facility, 1755 Harwood Road, Ionia, MI
 - Priority Site 3: Former Riverside Correctional Facility, 777 W. Riverside Drive Ionia, MI**Target Area:** City of Belding
 - Priority Site 4: 429 N. Bridge Street, Belding, MI
- (6) **Contacts**
a. Project Director: Julianne Burns, Chairperson of Ionia County BRA
616.527.1829
[REDACTED]
101 W. Main Street
Ionia, MI 48846

b. Chief Executive/Highest-Ranking Elected Official: Chad Shaw, County Administrator
616.527.5300
cshaw@ioniacounty.org
101 W. Main Street
Ionia, MI 48846
- (7) **Population** City of Ionia (population 12,950)
City of Belding (population 5,949)

(8) Other Factors

Other Factors	Page Nos.
Community population is 15,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water.	N/A
The priority site(s) is in a federally designated flood plain.	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	3,4
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	3,4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority site(s) within the target area(s).	N/A
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	N/A

(9) Letter from the State or Tribal Environmental Authority

Attached.

(10) Releasing Copies of Applications

N/A



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
REMEDIATION AND REDEVELOPMENT DIVISION



PHILLIP D. ROOS
DIRECTOR

December 16, 2025

VIA EMAIL

Chad Shaw
County Administrator
Ionia County
101 W Main St.
Ionia, Michigan 48846

Dear Chad Shaw:

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 2026

Thank you for your notice and request for a letter of acknowledgment for Ionia County's proposal for a U.S. EPA Brownfield Grant. EGLE's Remediation and Redevelopment Division encourages and supports community-led environmental assessment and redevelopment efforts and recognizes Ionia County's need for funding.

Ionia County is applying for a \$400,000 Community-wide Brownfield Assessment Grant. As a general-purpose unit of local government, Ionia County is an eligible grant applicant.

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

Sincerely,

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

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

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

Ionia County (the County) is located in west-central Michigan between the metropolitan areas of Lansing to the east and Grand Rapids to the west. The County comprises three cities, seven villages, and sixteen townships, with a total population of 66,706 according to the U.S. Census Bureau's 2023 American Community Survey 5-year estimates. Major transportation corridors include Interstate 96, which runs east–west and connects Lansing and Grand Rapids, and M-66, a north–south highway that bisects the County and links the City of Ionia—the County seat—to I-96.

The County's economy relies heavily on agriculture and manufacturing, ranking fourth statewide in agricultural product sales (2022 Census of Agriculture), with manufacturing representing about 20 percent of total employment (rightplace.org). Between 2017 and 2022, the number of farms in the County declined by 18 (2022 Census of Agriculture), underscoring the importance of preserving farmland as development pressure from industrial expansion and new housing construction continues. Redirecting industrial expansion and new housing developments to underutilized brownfield sites within existing urban areas allows the County to support manufacturing growth and meet workforce housing needs while limiting sprawl, leveraging existing infrastructure, and protecting agricultural land. Efforts to redirect development from farmland to brownfield sites within the County's urban landscapes are hindered by unknown environmental conditions, resulting from past industrial land uses, drycleaners, and gas stations. Assessment of these sites is essential to identify exposure risks, inform cleanup planning, and support reuse strategies that align with community revitalization plans, preserve agricultural lands, address housing needs, and strengthen local economic opportunities. Failure to assess the County's brownfield sites will constrain economic revitalization, exacerbate urban blight, and contribute to the continued conversion of farmland for development.

Although this EPA grant application is intended to be community-wide, the **primary target areas** for our assessment and reuse efforts will be the **City of Ionia** (census tracts [CTs] 317 and 321; population of 12,950) and the **City of Belding** (CTs 302 and 303; population of 5,949), where the highest concentration of known and suspected brownfield sites, sensitive populations, and redevelopment-ready properties exist. Ionia and Belding face significant economic challenges relative to both the state of Michigan and the United States. According to the U.S. Census Bureau's American Community Survey (ACS) 2023 5-year estimates, Belding's median household income is approximately \$55,895 with a poverty rate of 17.8 percent, and Ionia's median household income is about \$60,729 with 16.4 percent of residents living below the poverty line, both based on Census QuickFacts and ACS profiles. In comparison, Michigan's median household income was \$69,183 with a poverty rate of 13.5 percent (ACS 2023 estimates), and the national median household income was \$77,719 with a national poverty rate of 12.5 percent. These disparities indicate a higher concentration of low-income households and greater economic vulnerability in both communities relative to statewide and national conditions.

Further compounding challenges in these communities are 72 known contaminated sites in the City of Ionia and 29 sites in the City of Belding, representing more than half of all brownfield sites in the County (www.egle.state.mi.us/RIDE). These properties, including former manufacturing facilities, gasoline stations, and dry cleaners, are situated near low-income neighborhoods where residents face elevated risks of chronic and acute health conditions. Vacant and underutilized properties have also contributed to declining property values, neighborhood blight, and increased crime, perpetuating cycles of economic disadvantage. Funding from the EPA grant would serve as a critical catalyst for the reuse and redevelopment of these sites, supporting Phase I and Phase II environmental site assessments (ESAs), hazardous materials surveys (including lead and asbestos), due care planning, and cleanup strategies that promote economic revitalization. Without such upfront resources to identify and address environmental risks, these sites will remain stalled in a legacy of contamination and uncertainty.

Gaining this knowledge is essential to reversing this cycle, enabling developers to reinvest in these communities, and fostering the transformation of neglected areas into safe, vibrant, and economically resilient neighborhoods.

1.b. Description of the Priority Brownfield Site(s)

Ionia County has 171 documented contaminated sites, with 72 located in the Ionia target area and 29 in the Belding target area (www.egle.state.mi.us/RIDE). The sites prioritized by the target area communities were based on factors including the type and extent of known or suspected contamination, potential exposure risks to residents, and the anticipated benefits of redevelopment for nearby low-income populations. In the target area of Ionia (CT 317 – a designated Opportunity Zone), **242–244 S. Steele Street** has been identified in the city’s *Parks and Recreational Plan* as a priority redevelopment site for public recreational use. This property is located adjacent to a historical district, has been vacant for more than a decade, and operated as a former gasoline station/repair facility. Sensitive populations surrounding this site (2023 ACS 5-year estimates) include a high population of women of childbearing age (17.6%), a high population of children under the age of five (9.0%), and a high percentage of incomes below poverty level (15.7%). Limited environmental data has been obtained to evaluate this site, creating uncertainty with the proposed recreational use and potential sensitive population exposures. EPA Assessment Grant funds will be used to evaluate site conditions, inform redevelopment planning, and support the development of cleanup strategies necessary to address potential exposure risks associated with existing contamination, considering the site’s proposed recreational use and nearby sensitive populations.

Two additional priority sites within Ionia’s target area, specifically Census Tract 321, include the former **Deerfield Correctional Facility (DCF)** and **Riverside Correctional Facility (RCF)**. Together, the DCF and RCF properties encompass approximately 152 acres, have been vacant for more than a decade, and are located adjacent to one another and the Grand River. These sites are situated within an economically distressed community, based on 2023 ACS 5-year estimates, characterized by high unemployment (15.5 percent) and elevated poverty levels (17.4 percent of residents living below the poverty line). Historically, the properties utilized underground storage tanks, which pose potential environmental concerns that may hinder future redevelopment. Demolition of existing structures was completed by the State Land Bank in early 2024. EPA Assessment Grant funding will support environmental assessments of these sites to facilitate property disposition and redevelopment planning, reduce potential environmental risks to the surrounding economically distressed population, expand the local tax base, help prevent urban sprawl, and create new employment opportunities for residents facing persistent unemployment. Planned redevelopment includes affordable housing and commercial and industrial uses.

A key priority site within Belding’s target area (Census Tract 303) is **429 N. Bridge Street**, a former gasoline station owned by the Ionia County Land Bank that has remained vacant for more than 20 years. A limited site assessment conducted in 2019 identified soil and groundwater contamination, which has constrained the Land Bank’s ability to market and sell the property. According to 2023 ACS 5-year estimates, the surrounding neighborhood is economically distressed, with high unemployment (11.4 percent) and 21.2 percent of residents living below the poverty line. The area also includes a relatively high proportion of women of childbearing age (20.0 percent), indicating the presence of sensitive populations. Belding’s Master Plan identifies a need for additional affordable housing, and the site—zoned residential—is located adjacent to an elementary school and established single-family neighborhoods. Cleanup and redevelopment of this property would reduce potential environmental exposure risks to nearby sensitive populations while expanding the community’s affordable housing stock. EPA Assessment Grant funding will support further evaluation of site conditions to inform cleanup planning and provide the certainty needed to advance redevelopment and attract prospective purchasers.

1.c. Identifying Additional Sites

The Ionia County Brownfield Redevelopment Authority (ICBRA) will use a project application and public engagement process to identify additional sites for assessment under this grant. The site selection process is intended to support a collaborative approach among County staff, ICBRA, local communities, developers, and other stakeholders, and will include a screening evaluation and open public meetings. Through completion of a project nomination form, prospective sites will be evaluated against multiple criteria, including but not limited to known or suspected contamination, redevelopment potential, opportunities for adaptive reuse, incorporation of sustainability principles, and reduction of urban sprawl. Each nomination will be scored by County staff and then reviewed and discussed by ICBRA during an open public meeting, with community input used to help guide final site selection. Prospective sites will then be approved or denied for advancement through the EPA eligibility determination process, ensuring compliance with CERCLA §104(k) requirements prior to the expenditure of assessment funds. In addition to the County's 171 known contaminated sites, there are numerous additional properties suspected of contamination, including former industrial facilities, gasoline service stations, auto repair shops, and dry cleaners, primarily located in the communities of Saranac, Lake Odessa, Portland, Clarksville, Muir, and Lyons.

1.d. Reuse Strategy and Alignment with Revitalization Plans

The City of Ionia participated in Project Rising Tide (2019), which identified a housing shortage that could constrain the city's growth and limit its ability to attract new residents. This finding is reinforced by both the County's 2022 Housing Study and the City of Ionia's 2025 Master Plan, which identifies the expansion of housing options—particularly affordable and workforce housing—as a key community priority within economically distressed target areas. To address these needs, the City of Ionia is working in partnership with the State Land Bank to advance a transition plan for the **DCF** and **RCF** priority sites that would result in new affordable housing opportunities for the City and Ionia County. In addition to housing, the City has prioritized the development of new public recreational amenities in its 2024–2028 Parks and Recreation Master Plan to enhance quality of life and expand access to recreation for target area residents. Since acquiring **242–244 Steele Street**, the City has begun securing funding for the design and construction of a new public park. Redevelopment of this priority site will transform a vacant, contaminated property into a safe and accessible recreational space that promotes healthy activities. This investment is especially important given that nearly 49 percent of Ionia residents are either living below the federal poverty line or classified as Asset Limited, Income Constrained, Employed (ALICE), limiting their ability to participate in fee-based recreational opportunities. In Belding's target area, the **429 N. Bridge Street** priority site represents a prime urban infill opportunity for residential redevelopment, supporting the expansion of affordable housing—a key objective of Belding's Master Plan.

1.e. Outcomes and Benefits of Reuse Strategy

Reuse of the DCF and RCF priority sites in the City of Ionia would return more than 150 acres of long-vacant land to productive use after remaining dormant for over a decade. Redevelopment of these sites would provide new affordable housing options and support commercial and industrial job creation in a community experiencing elevated unemployment. This reuse strategy will leverage existing infrastructure, discourage outward development, and create new greenspace, thereby enhancing local resilience to extreme weather events and natural disasters by reducing development pressure on agricultural lands that provide critical stormwater infiltration. In addition, transitioning these properties from public to private ownership will generate new tax revenue for Ionia County. Sustainable development practices—including energy-efficient building design, improved stormwater management, and the use of renewable or low-impact building materials—will be encouraged. Conversion of **242–244 Steele Street** to recreational use will add approximately eight acres of new public park space. Revitalization of this site will reduce potential exposure to contamination, expand

recreational opportunities for residents, and stimulate reinvestment in nearby vacant and contaminated properties. Replacing existing paved surfaces with greenspace will improve infiltration, reduce runoff, and provide additional flood buffering along the nearby Grand River, which is vulnerable to flooding from extreme weather events. Park amenities, including restrooms, will incorporate energy-efficient lighting and water-conserving fixtures to reduce energy use and protect water resources. Redevelopment of the **429 N. Bridge Street** priority site in Belding will support reuse of a long-vacant former gas station property, creating new affordable housing while eliminating potential exposure risks associated with contamination. This project emphasizes urban infill development, helping limit sprawl and preserve farmland and natural features that serve as critical flood buffers during increasingly severe weather events.

1.f. Resources Needed for Site Reuse

Tax Increment Financing (TIF): New tax revenue generated from brownfield redevelopment can be a source of reimbursement to developers and communities to assist in the cost of activities such as cleanup, affordable housing development, and infrastructure/site preparation (in certain communities). Each of our priority sites are eligible for this funding, assuming end users are not tax exempt.

Michigan Department of Environment, Great Lakes, and Energy (EGLE) Grant and Loans: Local units of government/municipal entities can apply for state funding for environmental cleanup and risk mitigation at properties with known contamination. Funding is limited to a \$1 million grant and \$1 million loan per applicant per year. Each of the priority sites would potentially be eligible to apply for funding.

Michigan Department of Natural Resources Trust Fund (MNRTF): Grant resources are available to local units of government for land acquisition involving natural resource protection and expansion of outdoor recreation with public access. Priority sites in both target areas have the potential to access these funds.

Michigan Economic Development Corporation (MEDC) Grants and Loans: MEDC's Community Revitalization Program is also an available resource for qualifying projects (i.e., near downtown, mixed-use development). This program can provide up to 25–50% of the project cost as a cash benefit to the developer upon successful completion of the project.

Michigan State Housing Development Authority (MSHDA) Grants: This resource is available for housing projects that align with regional and statewide housing initiatives addressing affordable housing shortages. MSHDA grants apply for priority sites where new housing is created and at least 20% of the units are available for households at 60% area median income.

1.g. Use of Existing Infrastructure

The County actively promotes the use of existing infrastructure to support brownfield redevelopment. Both target areas are served by adequate infrastructure, including local streets, roads, and sidewalks, as well as convenient access to regional transportation corridors such as M-66, M-21, M-44, and I-96, to accommodate planned redevelopment projects. All priority sites are served by existing utilities, including electric, natural gas, water, and sanitary sewer, which are already located within or immediately adjacent to the redevelopment parcels. As a result, the priority sites within the target areas are considered shovel-ready for redevelopment.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. The Community's Need for Funding

EPA grant funding is needed to address the large number of contaminated sites in Ionia County. State databases identify 101 known contaminated sites in the small target area cities of Belding and Ionia alone, accounting for more than half of the County's total contaminated sites. The Belding target area (population 5,949) includes Census Tracts (CTs) 302 and 303, both of which are economically distressed. Poverty in Belding (17.8 percent) exceeds county (11.4 percent), state (13.1 percent), and national (12.4 percent) levels, with even higher poverty in CT 303 (21.2 percent). These conditions are

compounded by elevated unemployment (6.9 percent citywide and 11.4 percent in CT 303) and a low median household income (\$55,895) compared to county, state, and national averages. The Ionia target area (population 12,950) includes Census Tracts 317 and 321, which also experience economic hardship. Ionia’s poverty rate (16.4 percent) and median household income (\$60,729) are worse than county, state, and national levels. Unemployment in CT 321 (15.5 percent) is more than twice the rate observed countywide, statewide, and nationally. (U.S. Census Bureau, 2023 ACS 5-year estimates). Due to limited population size, economic hardship, and constrained tax base capacity, local governments lack resources to independently conduct environmental assessments, creating a critical funding gap for environmental assessments that EPA brownfield assessment grant assistance is positioned to address.

2.b. Health or Welfare of Sensitive Populations

Sensitive populations within the target areas include low-income households, women of childbearing age, children under the age of five, and families with children living in poverty. In Belding, 55 percent of residents, and in Ionia, 49 percent of residents, are either living below the federal poverty line or classified as Asset Limited, Income Constrained, Employed (ALICE). Economic vulnerability in the target areas is further reflected by elevated unemployment rates (11.4 percent in Belding CT 303 and 15.5 percent in Ionia CT 321), compared to the state (5.8 percent) and national (5.2 percent) averages, along with lower median household incomes. Proximity to contaminated sites poses ongoing health risks for these sensitive populations, as exposure to environmental contaminants can weaken immune systems and increase the risk of asthma, cancer, and other adverse health outcomes. EPA Assessment Grant funding will support comprehensive environmental assessments of priority sites within the target areas, helping to advance reuse strategies that reduce or eliminate exposure risks and protect the health of vulnerable residents.

Children represent a substantial share of the population in both target areas, with 24.1 percent of Belding residents and 15.2 percent of Ionia residents under the age of 18. Younger children are particularly concentrated in Belding CT 302 and Ionia CT 317, where 6.0 percent and 9.0 percent of residents, respectively, are under the age of five. According to the 2024 Kids Count in Michigan report, 49.2 percent of K–12 students in Ionia County are economically disadvantaged, 13.1 percent of children ages 0–17 live below the poverty line, and 20.5 percent of families experience a high housing cost burden. These sensitive populations are especially vulnerable to environmental health risks associated with contaminated priority sites, including exposure to soil contamination through ingestion and inhalation of heavy metals and particulates, as well as exposure to lead-based paint in older housing stock. In the Belding target area, 74.4 percent of homes were built in or before 1979, compared to 78.6 percent in Ionia. Housing constructed prior to 1979 commonly contains lead-based paint, which poses serious health risks to children, including impacts to brain and nervous system development and delayed growth. EPA Assessment Grant funding will enable the County to assess brownfield sites within the target areas to support redevelopment and construction of new affordable housing, helping reduce reliance on older housing where lead exposure risks persist. These redevelopment efforts will also help stabilize neighborhoods by increasing property values, strengthening local tax revenues, and reducing long-term maintenance costs for income-constrained families.

2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

Health Issue				County	State	U.S.
Cancer Mortality Rate ¹				162.3	158.3	146.0
Chronic Lower Respiratory Disease Mortality Rate ²				51.0	41.9	36.4
Age-adjusted lung/bronchus cancer incidence rate ⁶				74.9/100,000	64.2/100,000	59.2/100,000
Adult Current Asthma Prevalence, <i>data by census tract (CT)</i> :						
Belding CT 302 - 11.7% ³	Belding CT 303 - 12.3% ³	Ionia CT 317 - 11.9% ³	Ionia CT 321 - 10.7% ³	11.0% ⁴		8.9% ⁵

¹ StateCancerProfiles.cancer.gov (2018–2022; per 100,000); ² CDC WONDER (2020; per 100,000); ³ CDC PLACES: Local Data for Better Health (2023); ⁴ MDHHS Behavior Risk Factor Survey (2023); ⁵ CDC National Center for Health Statistics (2023) ⁶ MDHHS, 2023; CDC, 2023

Refer to the table above for health data related to cancer, chronic lower respiratory disease, and asthma in the County and target area census tracts. Exacerbating these greater than normal asthma and lung cancer occurrences in the target communities is the presence of numerous contaminated sites, specifically former gas stations like **429 N. Bridge Street** and **242-244 S. Steele Street**, which have exposed soil and known petroleum-based contaminants that may be ingested and/or inhaled. Assessment, cleanup, and redevelopment of the priority sites through this EPA grant would reduce metals exposure concerns and positively influence the future health of the County.

2.d. Economically Impoverished/Disproportionately Impacted Populations

The census tracts encompassing Belding (CTs 302 and 303) and Ionia (CTs 317 and 321) reflect communities facing pronounced economic hardship and disproportionate health burdens. The City of Belding has a poverty rate of approximately 17.8%, well above both Ionia County (14.1%) and Michigan statewide rates (13.4%), and a per capita income of about \$25,270, substantially below state and national averages, highlighting significant economic stress (U.S. Census Bureau, 2019–2023 ACS 5-Year Estimates). In Ionia, CT 317 is designated a Low-Income Opportunity Zone, with roughly 30% of households living below the federal poverty level—more than double the statewide rate—and a median household income of around \$47,000. Nearby CT 321 reports median incomes in the mid-\$30,000s, indicating persistent socioeconomic vulnerability (U.S. Census Bureau, 2019–2023 ACS 5-Year Estimates). Further compounding these economic conditions are elevated unemployment rates in Belding CT 303 (11.4%) and Ionia CT 321 (15.5%). In addition to these economic challenges, elevated lung cancer burdens the region. Ionia County’s age-adjusted lung/bronchus cancer incidence rate of roughly 74.9 per 100,000 exceeds the Michigan state rate of 64.2 per 100,000 and the national rate of 59.2 per 100,000, highlighting a higher local occurrence of lung cancer diagnoses (Michigan Department of Health and Human Services [MDHHS], 2023; Centers for Disease Control and Prevention [CDC], 2023). Environmental exposures may further compound these health risks. The communities and priority brownfield sites are near documented contamination and industrial operations—including Mueller Industries’ metals recovery facility in Belding, PFAS presence near the Belding wastewater treatment plant, and the Ionia City Landfill Superfund site—which contribute to respiratory and carcinogenic hazards (U.S. Environmental Protection Agency [EPA], 2023; MDHHS, 2023). The economic challenges coupled with elevated lung cancer incidences and legacy environmental contamination highlights the disproportionate impacts on these populations and underscores the urgent need for targeted assessment, remediation, and redevelopment efforts to reduce exposures, improve long-term health outcomes, and help with the path to economic recovery.

2.e.–2.f. Project Involvement and Project Roles

Key organizations that will collaborate with the County during this assessment grant have a sound understanding of the economic and social status of the County. These partnerships will allow the County to better connect with the residents and businesses in target area communities, so that environmental challenges can be overcome through focused initiatives.

Organization/Point of Contact	Involvement in the Project
<p>Ionia County Habitat for Humanity Stacy Moore, Executive Director smoore@ioniahabitat.org <u>Mission:</u> To provide affordable homes in Ionia County.</p>	<p>Community-based organization familiar with the demographics and affordable housing needs of the community. Will work with the ICBRA to identify priority sites that directly impact sensitive populations.</p>
<p>The Right Place Ryan Wilson</p>	<p>Will serve to connect businesses and developers to the ICBRA’s grant resources and assist with</p>

wilsonr@rightplace.org <u>Mission:</u> To drive sustainable economic growth and shared prosperity for all in the Greater Grand Rapids Region.	advancing projects through site selection, assessment, and redevelopment planning and implementation. A lead site marketer and meeting coordinator for site-specific projects under the grant.
Belding Housing Commission (BHC) Sharon Carlson, Executive Director info@beldinghousing.org <u>Mission:</u> To provide descent, safe, and sanitary housing and maintain it in good repair for persons who meet eligibility requirements.	Familiar with the demographics and housing needs of the target area of Belding. Will work with the ICBRA to identify sites for assessment/reuse that reduce environmental threats to sensitive populations.

The ICBRA was established under state statute to administer incentive tools and will play a central role in decision-making for this grant, with input from the key organizations identified above, County residents, and other relevant stakeholders engaged throughout grant implementation. Local government partners within the target areas—the Cities of Belding and Ionia—will actively participate in decision-making and outreach related to site assessment, cleanup planning, and cleanup implementation for the priority sites. To ensure broad and inclusive participation, virtual meeting options will be offered during community engagement activities to accommodate residents who are unable to attend meetings in person.

2.g. Incorporating Community Input

Community input—from residents, local government partners, key organizations, and other identified stakeholders—will be gathered primarily through collaborative ICBRA community engagement meetings. ICBRA public meetings will be held on a regular basis (typically at least monthly) to share community input received, facilitate public comment, and provide updates on grant activities. All meetings will offer virtual participation options to ensure broad and inclusive access. Meetings held within the target area communities will be publicly noticed, and sites located outside the target areas will also receive appropriate public notice to solicit input. Public comments received during these meetings will be documented, and the grant manager will follow up directly with community members, as appropriate, to ensure feedback is fully considered and incorporated into future decision-making. In addition, the public may submit questions and comments to the ICBRA through its website. Press releases, distributed through print and web-based media outlets, will be used to share information on grant progress and opportunities for public involvement. All outreach materials will include relevant contact information and a link to the County’s dedicated brownfield webpage. Community input and project updates will be maintained by the ICBRA and reviewed in coordination with key organizations and other relevant stakeholders to help guide responses and actions discussed during public meetings.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

Task 1: Cooperative Agreement Oversight
a. <u>Project Implementation:</u> Cooperative Agreement (CA) oversight will include, but is not limited to, general grant management, contractor procurement and oversight, ensuring reporting requirements are met, budgeting, and invoice reconciliation. These activities will be conducted for the priority sites and any additional sites that are in the target areas or identified through the secondary inventory. If personnel time beyond what is included in our budget is necessary, it will be completed as an in-kind activity.
b. <u>Anticipated Schedule:</u> Throughout the grant cycle, approval of work plans and contractor procurement are anticipated in the first 90 days.
c. <u>Task Lead:</u> County staff with assistance from the qualified environmental consultant.
d. <u>Outputs:</u> Approved EPA Work Plan and Quality Assurance Project Plan (QAPP), quarterly reports, and final close-out report.

Task 2: Inventory and Community Outreach

- a. Project Implementation: The ICBRA will continue to grow the existing inventory of brownfield sites from across Ionia County with input from project partners and the technical consultant. Inventory summaries of Ionia County brownfield sites will be updated on the ICBRA website, promoting priority sites and attracting developers. Countywide project partners, Ionia County, and the technical consultant will conduct community outreach and education covering grant and project updates with all stakeholders, including private real estate professionals (i.e., developers, bankers, and realtors). Stakeholder input and regular review of priority and added inventory sites will achieve redevelopment goals, based upon community needs. Key project staff will attend two brownfield conferences (e.g., National Brownfield Conference) to gain EPA program insight and network with conference attendees. If necessary, in-kind personnel time will supplement budget.
- b. Anticipated Schedule: Task will begin in Quarter 1, then take place throughout the grant cycle. At a minimum, quarterly meetings will be held throughout the grant cycle, each addressing outputs applicable to the current and upcoming grant tasks.
- c. Task Lead: County staff with assistance from the qualified environmental consultant.
- d. Outputs: Approximately 12 meetings, attendance at 2 conferences, additions and enhancement of brownfield inventory and updated brownfield website.

Task 3: Environmental Site Assessments (ESAs)

- a. Project Implementation: Conduct 12 Phase I ESAs and 10 Phase II ESAs on priority sites in target areas. In addition to the priority sites, it is estimated that 8 additional Phase I ESAs and 5 Phase II ESAs will be conducted for secondary inventory sites. Costs will include consulting and reporting expenses, printing, and other eligible assessment-related costs. Site assessments will adhere to the All Appropriate Inquiry guidelines and applicable ASTM International Standards, and environmental liability will be evaluated as it pertains to the Comprehensive Environmental Response, Compensation, and Liability Act. The QAPP and eligibility determinations will be reviewed by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) and the EPA.
- b. Anticipated Schedule: For priority sites, Phase I ESAs will take place primarily within Quarters 1 through 3, Phase II ESAs will take place in Quarters 2 through 4 of the agreement. For non-priority sites, Phase I ESAs are expected to take place primarily within Quarters 3 through 10, and Phase II ESAs will take place in Quarters 4 through 11 of the agreement.
- c. Task Lead: Qualified environmental consultant overseen by the County.
- d. Outputs: Site-specific eligibility determinations, ESAs, site-specific health and safety plans, types and concentration of contamination and risk posed, and updates to the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database.

Task 4: Site Specific Cleanup Planning

- a. Project Implementation: This task involves the creation of a cleanup plan for redevelopment, as well as implementation strategies for developing and utilizing resources. A qualified environmental consultant will be contracted to assist with developing these plans for priority sites. The consultant will be responsible for determining cleanup measures and costs to mitigate unacceptable exposures and prevent exacerbation relating to known contaminants, which will be summarized in an analysis of brownfield cleanup alternatives (ABCAs)/response activity plan/due care plan and/or a Brownfield Plan/Act 381 Work Plan. It is estimated that this will be conducted for a total of 2 priority sites. This task also includes travel to attend meetings with EGLE staff or other stakeholders related to the actual cleanup or proposed development plans. Costs for supplies such as mapping, copying, publishing, mailing, etc. are also included. At this time, it is anticipated that cleanup planning under the grant will only take place on the priority sites.
- b. Anticipated Schedule: Quarters 5 through 8.

- c. Task Lead: Conducted by a qualified environmental consultant with County oversight.
- d. Outputs: 2 ABCAs/state equivalent, meetings with EGLE and project stakeholders.

3.e. Cost Estimates

Budget Categories	<u>Task 1: CA Oversight</u>	<u>Task 2: Inventory and Community Outreach</u>	<u>Task 3: Site Assessments</u>	<u>Task 4: Site-Specific Cleanup Planning</u>	Total
Personnel	\$2,000	\$2,000	\$2,000	\$2,000	\$8,000
Fringe Benefits	\$1,000	\$1,000	\$1,000	\$1,000	\$4,000
Travel	\$0	\$3,680	\$0	\$350	\$4,030
Supplies	\$0	\$470	\$0	\$250	\$720
Contractual	\$0	\$2,250	\$360,000	\$21,000	\$383,250
Total Direct Costs	\$3,000	\$9,400	\$363,000	\$24,600	\$400,000
Indirect Costs	\$0	\$0	\$0	\$0	\$0
Total Budget	\$3,000	\$9,400	\$363,000	\$24,600	\$400,000

- Task 1: \$3,000 total; Personnel: 50 hours at \$40/hour = \$2,000; Fringe Benefits: 50 hours at \$20/hour = \$1,000
- Task 2: \$9,400 total; Personnel: 50 hours at \$40/hour = \$2,000; Fringe Benefits: 50 hours at \$20/hour = \$1,000; Travel: assumes one staff member traveling for two conferences averaging three days each (\$525/per flight, \$275 per hotel room per night, and \$80/day per diem per person) totaling \$2,630, community outreach travel and associated mileage reimbursement at approximately 30 miles/month (48 months total) at current rate of 0.725/mile (\$1,050); Supplies: supplies to support printing and presentation materials (\$470); Contractual: 22.5 hours at \$100/hour = \$2,250. Grantee will provide meeting space.
- Task 3: \$363,000 total; Personnel: 50 hours at \$40/hour = \$2,000; Fringe Benefits: 50 hours at \$20/hour = \$1,000; Contractual: 20 Phase I ESAs at an average \$3,000 per ESA (\$60,000 total), 15 Phase II ESAs at an average \$20,000 per ESA (\$300,000 total).
- Task 4: \$24,600 total; Personnel: 50 hours at \$40/hour = \$2,000; Fringe Benefits: 50 hours at \$20/hour = \$1,000; Travel: mileage reimbursement at approximately 10 miles/month (48 months total) at current rate of 0.725/mile (\$350); Supplies: \$250 for supplies to support printing, presentation materials; Contractual: average estimated cost of \$10,500 per ABCA/state equivalent (2 total).

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

ACRES and quarterly reports will be used to communicate project progress and status, challenges encountered, financial expenditures, data results, and next steps to the EPA and the community. The ICBRA will also track data for each assessment site, including specific accomplishments, contaminants identified and their locations, the need for cleanup activities and implementation progress, and other resources leveraged to support site redevelopment. To support outcome determination for completed projects, the ICBRA will compile developer-provided summaries documenting outcomes such as jobs created, acres cleaned, leveraged investment, and new construction square footage. Project outputs and outcomes will be tracked by the project manager in coordination with the contracted environmental consultant. In the event progress is slower than anticipated, the project manager will work with the environmental consultant to increase communication and community outreach efforts. At the end of the grant period, a final report will be produced comparing objectives to outcomes.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a.–4.c. Organizational Capacity, Organizational Structure, and Description of Key Staff

The EPA Assessment Grant will be managed by the ICBRA, a nine-member board, with experience during the FY 2004 EPA grant and a EGLE 2019 Brownfield Grant. Julianne Burns, chairperson of

the ICBRA, will be serving as project manager. Ms. Burns has over 32 years of economic and community development experience in Ionia County and previously was assistant to the City Managers for both the cities of Belding and Ionia. Ms. Burns' responsibilities included writing and administering all grants for various state and federal programs, including the FY 2004 EPA Assessment Grant awarded to Ionia County. Ms. Burns has served as a board trustee with the ICBRA since its inception in 2001, and she has served as chairperson for the past 13 years. Ms. Burns' knowledge of Ionia County and the County's brownfield sites; the relationships between the County and its residents; and local, state, and federal resources will be an asset to achieving a successful EPA project and grant closure. Ms. Burns will work closely with the environmental consultant to ensure that the project, program goals, and budget are all on target with timely reporting to the EPA. Key staff supporting Ms. Burns include Chad Shaw, County administrator; Roxy Craton, County finance director; and Judith Clark, County treasurer. Mr. Shaw has experience in grant management and will assist with the flow of information between the Board of Commissioners, ICBRA, and public. Mr. Craton prepares all finance reports, budgets, and audit statements under the Administration Office and in cooperation with Ms. Clark. Together, Ms. Craton and Ms. Clark will assist Ms. Burns with the financial components of this grant. Requests for Proposals and invoices are processed through the Ionia County Administration's Office and the Finance Department, following prescribed accounting methods and procedures regularly utilized by Ionia County. The environmental consultant hired for conducting the assessments will be required to provide monthly financial reports to use as a cross-comparison for local financial reports to ensure accuracy. The consultant will be utilized to obtain eligibility confirmation with the EPA to complete the project profiles for reporting purposes.

4.d. Acquiring Additional Resources

A Request for Proposal will be issued to procure a local qualified environmental consultant for professional environmental services to support the grant. The ICBRA will secure these services in accordance with the grant program's selection protocol and Ionia County's purchasing policies, which follow a robust procurement process to ensure that ICBRA receives the highest quality services from the consultants and contractors. It is anticipated that the consultant selection process, involving proposal review and interviews, would be completed immediately following grant award. The selected consultant will be reviewed and approved by the County board of commissioners.

4.e. Currently Has or Previously Received an EPA Brownfields Grant

4.e.(1) Accomplishments

Ionia County was previously awarded an EPA Brownfields Assessment Grant in 2004 for \$400,000. The FY 2004 grant was administered by the ICBRA, on behalf of the County. Assessment activities included assessment of 21 properties with 16 Phase I ESAs, 14 Phase II ESAs, and five supplemental assessments completed. Successful outcomes, some of which occurred after the grant closeout, included leveraging \$270,000 from EGLE for additional assessment, demolition, and cleanup activities at sites where Assessment Grant resources were deployed, 36 acres designated as ready for use, 10 new jobs created, and 13 jobs retained. The grant's outputs and outcomes were accurately reflected in the ACRES.

4.e.(2) Compliance with Grant Requirements

The ICBRA consistently met the grant requirements including Work Plan and QAPP development, eligibility demonstrations, Sampling Plans, Health and Safety Plans, quarterly reports, ACRES reporting, and financial status reports, and community notification requirements. The period of the FY 2004 EPA Brownfield Assessment Grant started October 1, 2004, and ended September 30, 2008, with no funds remaining.

**THRESHOLD CRITERIA RESPONSES
IONIA COUNTY, MICHIGAN**

(1) Applicant Eligibility

a. Ionia County is a Michigan General Purpose Local Unit of Government and is eligible to receive funding through the U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grant program.

b. Ionia County is not exempt from federal taxation under section 501(c)(4) of the Internal Revenue Code.

(2) Community Involvement

Community input, involving residents, local government partners, key organizations, and other identified stakeholders, will be primarily gathered during collaborative Ionia County Brownfield Redevelopment Authority (ICBRA) community engagement meetings. ICBRA public meetings will be held regularly (typically at least once a month) to share input received, facilitate public comments, and provide grant project updates. These meetings will have virtual attendance options. Typically, meetings in the target area communities will be held through a means of public notice. Other non-priority sites in Ionia County outside the target areas will accordingly receive public notice for input. Public comments obtained during these forums will result in the grant manager following up directly to those community members to ensure all input can be received and incorporated into future decision-making. The public may also convey inquiries and public comments to the ICBRA via its website. Press releases will also be used via print and web-based news outlets to circulate information about the progress of the grant activities and how the public can provide input. All forms of communication and outreach will include contact information and the County's dedicated brownfield webpage address. Community input and updates will be maintained by the ICBRA. The ICBRA will review community input with key organizations and other identified and relevant stakeholders to assist with response approach during public meetings.

(3) Expenditure of Existing Grant Funds

Ionia County does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

(4) Contractors and Named Subrecipients

N/A, a contractor/subrecipient has not been procured or named.