



R05-26-A-058

APPLICATION INFORMATION SHEET

- (1) **Applicant Identification** Kalamazoo County Brownfield Redevelopment Authority
201 W Kalamazoo Ave
Kalamazoo, MI 49007
- (2) **Website URL**
Kalamazoo County Brownfield Redevelopment Authority: <https://kalcountybrownfield.com/>
City of Kalamazoo (Non-lead Coalition Member): <https://www.kalamazoocity.org/Home>
Comstock Charter Township (Non-lead Coalition Member): <https://comstockmi.gov/>
- (3) **Funding Requested**
- Assessment Grant Type: Assessment Coalition
 - Federal Funds Requested: \$1,200,000
- (4) **Location** Kalamazoo County, Michigan
City of Kalamazoo, Kalamazoo County, MI
Comstock Charter Township, Kalamazoo County, MI
- (5) **Coalition Members' Target Areas and Priority Site Information**
- **Kalamazoo County Brownfield Redevelopment Authority (Lead Coalition Member)**
Target Area: Westwood Neighborhood
 - Priority Site: 1824 West Main Street, Kalamazoo, MI
 - **City of Kalamazoo (Non-lead Coalition Member)**
Target Area: Northside Neighborhood
 - Priority Site: 436 Willard Street, Kalamazoo, MI
 - Priority Site: Zone 32 Phase II & III, 314 Parsons Street, 915 N. Pitcher Street, 810 N. Pitcher Street, 901 Porter Street, and 825 Porter Street, Kalamazoo, MI
 - **Comstock Charter Township (Non-lead Coalition Member)**
Target Area: Comstock Center
 - Priority Site: Comstock Riverfront Redevelopment, 6014, 5994, 5972, 5964, 5958, and 5922 King Highway and 211 River Street, Kalamazoo, MI
- Refer to the attached map, which illustrates the identified target areas and priority sites.
- (6) **Contacts**
- Project Director: Macy Rose Walters
Administrator, Kalamazoo County Brownfield Redevelopment Authority
269.384.8305
mrwalt@kalcounty.com
201 W Kalamazoo Ave
Kalamazoo, MI 49007



b. Chief Executive/Highest-Ranking
Elected Official:

Kenneth Peregon
Board Chair, Kalamazoo County Brownfield
Redevelopment Authority
269.760.2154
kperegon@ocba.com
201 W Kalamazoo Ave
Kalamazoo, MI 49007

(7) **Population**

Kalamazoo County (262,215)
City of Kalamazoo (73,122)
Comstock Charter Township (15,187)

(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.	3, 4, 5
The priority site(s) is in a federally designated flood plain.	4
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4
The reuse of the priority site(s) will incorporate energy efficiency measures.	4
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	4, 5
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

- Priority Sites:
1. 1824 West Main St
 2. 436 Willard S
 3. Zone 32 Phase II and III
 4. Comstock Riverfront Redevelopment

LEGEND

-  Nonlead Coalition Target Area-
City of Kalamazoo
-  Lead Coalition Target Area-
Kalamazoo County
-  Nonlead Coalition Target Area-
Comstock Charter Township
-  Approximate Priority Site
Boundary

**Westwood Neighborhood,
Kalamazoo Township
(Kalamazoo County)**

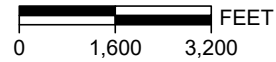
**Northside Neighborhood,
City of Kalamazoo**

Comstock Charter Township



NORTH

SITE MAP



0

1,600

3,200

FEET



NORTH

SITE MAP



0 7501,500

FEET

Hard copy is intended to be 8.5"x11" when plotted. Scale(s) indicated and graphic quality may not be accurate for any other size.

EPA Kalamazoo Coalition

City of Kalamazoo and Comstock Charter Township, Kalamazoo County, Michigan

**FY26 EPA BROWNFIELD COALITION
ASSESSMENT GRANT**

PROJECT NO.

N/A

FIGURE NO.

1



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

January 15, 2026

VIA EMAIL

Kenneth Peregon, Chair
Kalamazoo County Brownfield Redevelopment Authority
201 West Kalamazoo Avenue
Kalamazoo, Michigan 49007

Dear Kenneth Peregon:

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 2025

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

The KCBC is applying as a coalition for a \$1,200,000 Brownfield Assessment Coalition Grant. As a coalition of economic development organizations and general-purpose units of local government, including the Kalamazoo County Brownfield Redevelopment Authority, the city of Kalamazoo, and Comstock Charter Township, the KCBC is an eligible grant applicant.

Should the U.S. EPA award a brownfield grant to the KCBC, it would allow the coalition to conduct environmental investigations and promote economic development at brownfield sites. If you need further information about potential eligible sites in Kalamazoo County 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: David Harn, EGLE
Doug Koop, EGLE

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Coalition Members

The Kalamazoo County Brownfield Redevelopment Authority (the “KCBRA”) is the lead coalition member and applicant for this EPA Brownfield Assessment Coalition Grant. Non-lead coalition members include the City of Kalamazoo (the “City”) and Comstock Charter Township (the “Township”), two abutting local units of government (LUG) within Kalamazoo County. KCBRA successfully implemented county-wide Assessment Grants in the past that both non-lead coalition members benefited from. The City has a highly active Brownfield Redevelopment Authority (BRA) with 67 adopted Brownfield Plans that the BRA staff manage. However, the City BRA staff lacks the capacity to independently manage an EPA grant as the one BRA staff member splits her time amongst other departments within the City, whereas the county has staff dedicated solely to KCBRA operations. The City BRA owns over 40 brownfield parcels but has been unable to access brownfield grant funds for them, as projects without a developer or development plan in motion rarely meet the redevelopment funding selection criteria. The EPA grant will allow the City to complete environmental investigations on their owned property to better market them for reuse. The Township has never had an EPA Brownfield Grant and does not have a BRA. The Township staff are all dedicated to redevelopment and utilized EPA funding through the KCBRA in the past. Without the assistance of the KCBRA, the Township would not be able to pursue EPA grant funds, as their staff lacks the capacity and BRA infrastructure to apply and implement their own grant. Utilizing the application processes, experience, and capacity of the KCBRA, both non-lead coalition members feel the coalition opportunity will allow them to effectively tackle brownfield sites within their communities.

1.b. Overview of Brownfield Challenges and Description of Target Areas

The coalition will address brownfield sites within Kalamazoo County (population 262,215), located within southwest Michigan, midway between Chicago and Detroit. The largest LUG in the county is the City of Kalamazoo (population 73,122), comprising 27% of the county’s total population. The remainder of the county is primarily rural with three smaller cities, five villages, and fifteen townships, including Comstock Charter Township (population 15,187). Since its inception in the early 1800s, Kalamazoo County has been known for its celery, bedding plants, paper, Gibson guitars, Checker cabs, and Upjohn pharmaceuticals. Unfortunately, industrial waste was historically disposed of indiscriminately, much ending up in the Kalamazoo River due to the numerous adjacent closed factories, paper manufacturers, and associated waste landfills. The river is one of five National Priorities List sites in the county, the longest Superfund site in the nation (80 miles), and a Great Lakes Area of Concern. Intermixed with and adjacent to many of these industrial areas are low-income, under-resourced neighborhoods. With such a history, the KCBRA has an insurmountable task to address the 906 known contaminated sites countywide (Michigan Department of Environment, Great Lakes, and Energy [EGLE]). Kalamazoo County’s Planning and Development Corridor Study, currently underway, is identifying vacant/underutilized properties throughout the county. Based on the concentration of vacant properties along the West Main commercial corridor in Kalamazoo Township, the **Westwood Neighborhood** will be the primary target area for the KCBRA, containing census tracts 501 (CT501), 502 (CT502), and 503 (CT503). Bordering the City of Kalamazoo to the northwest, CT501 and CT503 are in the 91st and 85th percentiles, respectively, for environmental effects, including proximity to cleanup sites, solid waste sites and facilities, Risk Management Plan sites, and wastewater discharge according to the EGLE MiEJScreen Screening Tool (MiEJScreen). The preliminary Corridor Study identified over 24 parcels along West Main Street that are vacant lots, gas stations, repair shops, or micro manufacturers—many with leaking underground petroleum storage tanks, hydraulic car lifts, and other chemicals remaining on site. Therefore, environmental assessment is needed to safely reuse these sites and support redevelopment.

Building on the KCBRA’s previous EPA grants, the primary target area for the City of Kalamazoo will be the **Northside Neighborhood**. Bordered to the south by the New York Central Railroad and Kalamazoo River Valley Trail and to the east by the Kalamazoo River Superfund site, the Northside consists of economically impoverished census tracts 202 (CT202) and 300 (CT300). Together, these census tracts represent 4,512 residents in the 79th and 95th percentiles for socioeconomic factors, including high population of low-income households (89th and 95th percentiles), high populations of people of color (89th and 95th percentiles), low educational attainment (86th and 98th percentiles), low median incomes (\$29,114 and \$27,512), and high unemployment rates (94th and 96th percentiles) (MiEJScreen). By the late 1930s,

the Northside Neighborhood was decidedly industrial and the Home Owners' Loan Corporation rated two-thirds of the City's residential neighborhoods as "Definitely Declining." Because much of the neighborhood's housing stock is aging, combined with homeowners' inability to borrow against the equity that is typical elsewhere, many homes containing lead-based paint, asbestos, and lead have fallen into disrepair, blight, or demolition. As a result, 17% of the 2,095 units in the Northside Neighborhood are now vacant, compared to 7% countywide and 10% nationwide. Interspersed with the houses are commercial/retail parcels that were formerly gas stations, repair shops, or micro manufacturers and are now underutilized; 55% of the City BRA-owned property (22 parcels of land) are within the Northside Neighborhood, exemplifying the high concentration of environmentally burdened properties in this area. The City BRA budgets an annual ground maintenance fee of \$90,000 for lawn mowing and debris removal of their own properties. Investigating, marketing, selling, and redeveloping these properties within the target area would break the cycle of neglect, blight, and unaddressed contamination, as well as cut the City BRA's maintenance budget in half, allowing the funds to be utilized for other purposes such as environmental remediation on their most contaminated sites.

The primary target area for Comstock Charter Township will be **Comstock Center**. Although it is an unincorporated area within the Township, Comstock Center has all the attributes of a typical village with a definable downtown area, adjacent residential neighborhoods, public spaces, and institutional uses. This target area is encompassed within the economically impoverished census tract 201 (CT201) just east of the City, representing 2,319 residents. The "Center" has a historical foundation in the agricultural sector, and the fertile soil along the Kalamazoo River valley led the Comstock area to become known as the "Bedding Plant Capital of the World." Despite this, CT201 is in the 72nd percentile for socioeconomic factors including high population of low-income households (78th percentile), low educational attainment (81st percentile), and low median incomes (\$45,139), making job growth a vital priority for the Township. In the Comstock Center Place Plan for Redevelopment and Prosperity, the Township identified five priority sites within central Comstock, nearly all zoned and prioritized for community business to further build the Comstock Center "village." Many of these properties have had manufacturing and commercial businesses come and go over the years and are now blighted, underutilized eyesores in the community. Unfortunately, the Township lacks capacity to enforce blight and property maintenance within Comstock Center, which has impaired redevelopment interest. This EPA grant would be used to conduct due diligence for the priority sites, including Phase I and II Environmental Site Assessments (ESAs), Baseline Environmental Assessments, Hazardous Material/Lead/Asbestos Building Inspections (HMIs), Due Care Plans, and cleanup planning efforts which will remove an obstacle to redevelopment.

1.c. Description of the Priority Brownfield Sites

In Kalamazoo County, there are 906 sites of known contamination, with 407 sites located in the City (31.9%, 130 sites, are within the target area), roughly 210 sites are in Kalamazoo Township (26.7%, 56 sites, are within the target area), and 50 sites are in Comstock Township (20%, 10 sites, are within the target area). The coalition has identified the following priority sites, which demonstrate the large environmental challenges experienced by our target areas and are prime locations for redevelopment.

1. **1824 West Main Street:** Located off West Main Street, bordered between North Clarendon Street and North Berkley Street within the **Westwood Neighborhood** (KCBRA's target area), the property is currently a paved vacant lot. A filling station operated on the property from 1970 until 2010, when the associated gasoline underground storage tanks were removed and the building was razed. The adjoining properties also operated as filling stations from 1932 to 1972 and 1966 to 1972, causing petroleum volatile and semi-volatile organic compounds (VOCs) to be of concern in the vicinity. The site has known arsenic contamination in the soil and a significant lack of environmental assessment which has impeded reuse, making the site a priority for the coalition.
2. **436 Willard Street:** Located within the **Northside Neighborhood** (City's target area) and occupied by a 100,000-square-foot (sq. ft.) building utilized for machining and warehousing since the 1940s, the property has known contamination in the soil, groundwater, and soil vapor, including VOCs, causing redevelopment challenges as engineering controls and barriers are anticipated. A proposed expansion at the site makes it a priority for the coalition to ensure redevelopment protects the health and safety of the public and future occupants.

3. **Zone 32 Phase II & III:** Located within the **Northside Neighborhood** are five vacant parcels of property previously part of the J.A. Richards Company, which manufactured machines used in the die-cutting industry. In 2010, the City acquired the parcels through tax foreclosure and demolished the industrial building. Previous assessment work conducted for an adjacent parcel formerly a part of this industrial site identified VOCs, polynuclear aromatic hydrocarbons, and metals impacts to soil/groundwater on site, attributable to historic operations. The site is a priority as the City BRA has owned all five parcels for over a decade, making the property tax exempt, and has invested over \$208,000 to demolish the former manufacturing buildings along with ongoing ground maintenance expenses.
4. **Comstock Riverfront Redevelopment:** Located along the Kalamazoo River Superfund, within **Comstock Center** (Township’s target area), and across from the new Township offices, these ten parcels were previously supported by the KCBRA with Phase I and II ESAs, and metals were identified in soil at concentrations above state residential cleanup criteria, but further assessment is still needed. The Township has created a Site Design Plan incorporating community input and has received redevelopment property owner interest, making the site a priority.

1.d. Identifying Additional Sites

The coalition will solicit additional sites from community partners via educational outreach efforts. The coalition will utilize KCBRA’s existing application process and policy criteria which currently evaluates project need, total investment anticipated, jobs created and retained, availability and condition of infrastructure, LUG support, affordability of residential projects, etc. in concert with MiEJScreen to determine if grant support to a particular site is needed to understand potential or existing risks to the community and assist with safe redevelopment of a site. Kalamazoo County’s Planning and Development Corridor Study will also provide a list of vacant, underutilized sites within Kalamazoo County, which will be prioritized in accordance with local zoning and planning initiatives. For additional sites within the targeted **Northside Neighborhood** and **Westwood Neighborhood** areas, the 2018 Northside Neighborhood Plan and 2024 Imagine Westwood Neighborhood Plan’s goals will serve as our guide for evaluating, assessing, and addressing sites inhibiting the neighborhood’s strategic visions.

1.e. Reuse Strategy and Alignment with Revitalization Plans

The 2024 Imagine Westwood Neighborhood Plan outlines five goals: increased connectivity, enhanced public realm, community building, safety, and neighborhood resilience. The county’s preliminary Corridor Study identified over 24 vacant and underutilized parcels in the **Westwood Neighborhood**, all of which are designated for mixed-use in the 2024 Kalamazoo Township Master Plan, supporting the community’s vision to transition the current auto-oriented frontage corridor into a walkable district with housing, retail, and community-serving amenities.

1. **1824 West Main Street:** This long-vacant commercial parcel is located in the West Main Corridor, with a high rate of traffic incidents. Future land-use priorities shift the site from its current commercial vacant zoning to mixed-use. Redevelopment could support up to 8,300 sq. ft. of first-floor commercial space with up to 8,300 sq. ft. of residential units above, generating up to 12 jobs and \$5 million in private investment. This projected reuse directly advances local goals by activating a priority site, strengthening corridor walkability and safety, expanding neighborhood housing options, and reinforcing the community’s vision for a vibrant, resilient mixed-use neighborhood center.

Creating generational wealth for our **Northside Neighborhood** target area is rooted in the 2018 Northside Neighborhood Plan strategy of aligning and leveraging resources to meet the residents’ needs, including increasing resident-owned businesses (Goal #1), affordable housing (Goal #2), community assets (i.e., arts, culture, and open space) (Goal #3), and workforce development (Goal #4). The Northside Association for Community Development (NACD) is setting the plan in motion through funding, leveraged expertise, and support. The residents of the northside have been living with abandoned, contaminated industrial and commercial properties for generations, creating various redevelopment challenges.

2. **436 Willard Street:** A local logistics services developer has plans for an approximately 31,000 sq. ft. expansion of the existing warehouse, investing up to \$3.7M. Focusing on hiring City residents, the expansion is anticipated to create four new full-time equivalent (FTE) jobs, retain five FTE jobs, and create up to 20 temporary construction jobs. The redevelopment aligns with the Northside Neighborhood

Plan as it is located within the commercial district focus area and aims to improve the existing structure visually for the neighborhood (Goal #3).

3. **Zone 32 Phase II & III:** Adjacent to the 315 E. Frank Street development completed in early 2024 (Zone 32 Phase I), a local developer plans to redevelop these five vacant parcels into 36 affordable housing units, 12 workforce housing units, a 1,300 sq. ft. community room and gym, a 1,500 sq. ft. office, and a community garden, investing \$16M. The redevelopment will increase the number of resident-owned businesses in the northside (Goal #1), create affordable housing opportunities (Goal #2), create a community garden (Goal #3), and is located in the plan's mixed-use land use area.

The 2018 Comstock Center Place Plan for Redevelopment and Prosperity identified 11 liabilities within the **Comstock Center** target area, including a lack of a "destination," blight, boarded-up buildings, facades in need of updating, a lack of bike trails and sidewalks, and a lack of programs and events. These liabilities are still evident based on the 2024 Market Analysis, which identified gaps in Comstock Center for a local grocery store, a pharmacy, a hardware store, multiple types of cuisine restaurants, and 10 types of service industries, representing a total of 40,000 sq. ft. of commercial store needs in Comstock Center. The analysis also called for 80 new housing units over the next five years within Comstock Center, of which 15 should be for-sale and 65 should be for-rent. The study indicated the lack of new affordable housing is causing residents to migrate out of the Township, staying no more than one year unless new builds become available. These studies shaped the vision planning for the 2024 Riverfront Redevelopment Plan for Comstock Center and the reuse of our Township priority site.

4. **Comstock Riverfront Redevelopment:** The concept site plan includes a 720-foot walkway connected to the Kalamazoo River Valley Trail as the site is located along the river, 13,891 sq. ft. of commercial first-floor retail with 12 apartment units above, a 2,350 sq. ft. restaurant/brew pub, 5 two-story townhomes, a kayak/canoe launch, and 78 parking spaces, creating up to 25 jobs. According to the USDA Food Access Atlas, CT201 is a food desert, indicating the area is low income with low access to fresh foods within 1 to 10 miles, further establishing the need for a local grocery store tenant within the redevelopment. The Township was awarded a \$100,000 grant for engineering/design of the riverfront enhancement project and has received interest from the property owner in collaborating on the redevelopment. The project incorporates all four goals of the Comstock Charter Township Vision 2025 Master Plan: community beautification, adding public recreational, creating work opportunities, and increasing mobility by adding sidewalks and expanding the Kalamazoo River Valley Trail.

1.f. Outcomes and Benefits of Reuse Strategy

Focusing on contaminated brownfield sites in urban, low-income areas will accomplish four major goals: (1) begin eliminating the sites and conditions that may be contributing to the degradation of susceptible populations in our underserved communities; (2) eliminate blight and provide opportunities for energy-efficient, affordable, clean housing or clean areas for recreation or community gardens; (3) encourage additional investment and revenue generation, creating jobs and business opportunities; and (4) improve local extreme weather and natural disaster adaptation/mitigation and resilience for properties along the Kalamazoo River to protect residents and community investments. Through the priority site projects, we anticipate constructing up to 81 housing units; constructing or redeveloping 157,280 sq. ft. of commercial, retail, and industrial space; and leveraging over \$33M investment throughout our target areas, which could generate as much as \$542,000 in annual taxes within the Northside Neighborhood, \$144,000 in the Westwood Neighborhood, and \$220,000 in Comstock Charter Township. Without conducting an environmental assessment, it is difficult to understand what cleanup, planning, or funding is necessary to prepare a site for reuse. The EPA grant provides the impetus for attracting and leveraging public and private investment on brownfield sites including state grants and loans, bank financing, private funding, tax increment financing, etc. The NACD will incorporate local extreme weather and natural disaster resilience and renewable/energy-efficient systems for their projects when feasible. For low-income homeowners, it is imperative to keep operating costs as low as possible, which can be facilitated by using energy-efficient equipment and appliances. The NACD has experience incorporating green technologies into projects, as demonstrated through a green roof on a portion of their tech center. When feasible, similar opportunities to embrace green technologies with economic advantages will be incorporated. The **Comstock Riverfront Redevelopment** priority site is located along the Kalamazoo River, within a federally designated floodplain, making the site vulnerable to the impacts of extreme local weather and natural disaster events.

The redevelopment plan incorporates local resilience planning including setting the site back from the floodplain, leaving trees and greenspace along the floodplain. The Township also envisions installing solar-powered lights along the Kalamazoo River Valley Trail and incorporating public green space and a recreational park with picnic tables, a floating pier, and a kayak/canoe launch.

1.g. Resources Needed for Site Reuse

Michigan's brownfield laws allow the coalition to prepare Brownfield Plans for eligible sites, enabling future tax increment generated by new investment to reimburse environmental activities such as site investigation, demolition, cleanup, and lead and asbestos abatement. When properties are owned by the Land Bank or located in a core community such as the City of Kalamazoo, Brownfield Plans can also cover site-preparation costs and the installation of public infrastructure needed to support redevelopment. This creates a critical source of project cash flow in the coalition's target areas. For mixed-use redevelopments that include income-qualified units, Brownfield Plans may additionally support housing cost gaps, providing a meaningful financial advantage for mixed-income and affordable housing developments. The EPA grant can be used to develop Brownfield Plans, the coalition can use the tax increment capture from projects to reimburse the eligible brownfield activities, and once the developer is fully reimbursed, the coalition can capture another five years of tax increment for a Local Brownfield Revolving Fund (LBRF). This fund is locally controlled and can only be used for eligible activities on other brownfield sites; thus, the grant monies would truly act as seed money to leverage future brownfield redevelopment. The lead coalition member, the KCBRA, has adopted and successfully implemented 24 Brownfield Plans to-date, which have captured millions of dollars in tax increment to reimburse developers for cleanup, demolition, and due care activities. Similarly, one of the non-lead coalition members, the City of Kalamazoo, has adopted and implemented 67 Brownfield Plans to-date. Comstock Charter Township and Kalamazoo Township do not have BRAs, but the KCBRA has implemented three plans within Comstock Charter Township and two plans within Kalamazoo Township. The City and KCBRA can utilize their respective LBRFs for demolition and cleanup on sites assessed with the EPA grant. All coalition partners have experience accessing and implementing EGLE Brownfield Redevelopment Grants and Loans on projects that need funding for site investigation, cleanup, demolition, etc. Depending on the location and scale of a redevelopment project, other funds will be used to leverage the grant monies; potential public sources include tax abatements, Community Development Block Grants, and banks or developers that have an interest in improving the target community. The EPA grant creates a unique and exciting opportunity to not only assess sites, but also to leverage other funding to clean up sites, dramatically changing the target areas.

1.h. Use of Existing Infrastructure

The Westwood Neighborhood, Northside Neighborhood, and Comstock Center target areas and priority sites are served by existing municipal utilities; when possible, priority site projects will utilize existing infrastructure. The extent to which a project requires infrastructure improvements will be included in the evaluation criteria when reviewing incoming projects, especially if pursuing tax increment financing through a Brownfield Plan. The 2024 Imagine Westwood Neighborhood Plan identifies connectivity goals, including prioritizing using existing sidewalk in good condition and replacing damaged sidewalks (ensuring ADA accessibility) along West Main Street, and undergrounding right-of-way utilities where feasible to minimize outages and accidents, which is a resilience to extreme weather strategy. The 2024 Plan also identifies safety goals, including upgrading crosswalk at Solon and West Main Street near King-School, 1 mile west of **1824 West Main Street**, adding bus stops along West Main Street (already two within one minute walking distance of 1824 West Main Street), installing pedestrian refuge islands along West Main Street, and exploring traffic-calming measures on Clarendon Street, a 0.5-mile road that directly intersects with West Main Street and is the west right-of-way to 1824 West Main Street. The 2018 Northside Neighborhood Plan identifies a need for public infrastructure improvements including improved curb cuts for wheelchairs/walkers, upgraded sidewalks, walking trails in public spaces, and increased lighting. **436 Willard Street** is served with sidewalks within the right-of-way, which will be improved as a part of the expansion. Additionally, the current 100,000 sq. ft. building is blighted with chipping paint and graffiti. As a part of the redevelopment, the developer will improve the exterior walls of the structure, possibly incorporating a mural, improving the visual appearance of the site for the adjacent property owners. The

Northside Cultural Business District Authority adopted a tax increment financing plan in 2022 that opens a new source of funding for public infrastructure improvement projects; however, insignificant increment has been generated to date. **Zone 32 Phase II & III** is not serviced by sidewalks along North Pitcher Street and will be constructed as a part of the redevelopment, connecting to the Zone 32 Phase I recently constructed sidewalks. All priority sites within the Northside Neighborhood target area are a 7-minute walk from a Metro bus stop. The 2023–2028 Comstock Charter Township Capital Improvement Program identifies public infrastructure improvements including sidewalks, bike lanes, and bike paths as a priority, and \$60,000 has been slated to fill gaps and construct new areas over the next four years. The **Comstock Riverfront Redevelopment** is served by sidewalks and a bus stop; however, the existing streets do not have bike lanes or paths, which may be incorporated into the redevelopment. The conceptual site plan includes a 720-foot walkway connected to the Kalamazoo River Valley Trail to allow township residents to enjoy the views of the Kalamazoo River. **Comstock Center** is located within the Comstock Charter Township Downtown Development Authority (DDA). To upgrade and improve utilities, DDA funds will be leveraged to pursue outside funding, such as the Comstock Center Façade Improvement Program, which the DDA has utilized to help four local businesses since its creation in 2023. EPA-funded assessments will allow environmental conditions to be understood early, ensuring that needed infrastructure upgrades can be incorporated into Brownfield Plans and coordinated with redevelopment schedules before significant public investment occurs.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. The Community's Need for Funding

The coalition has prioritized the target areas because they represent some of the most economically disadvantaged and environmentally overburdened communities in Kalamazoo County. The coalition members—each operating within small, low-income jurisdictions—do not have the fiscal capacity to address the high concentration of contaminated and abandoned sites within their boundaries or across the broader county. Kalamazoo Township is a relatively small community, accounting for only 8.7% of the county's population, and a poverty rate of 15.2% (average of CT501-503; elevated compared to State, 13.1%). In the **Westwood Neighborhood**, West Main Street—referred to locally as the “River of Death” due to chronic traffic safety hazards—sees 17,188 to 19,418 vehicles per day, intensifying challenges along this commercial corridor. Although the City of Kalamazoo successfully reduced crashes by 23% through road-calming measures, Kalamazoo Township lacks the financial capacity to implement similar infrastructure improvements without external funding, a priority that will be incorporated into the **1824 West Main Street** redevelopment. The County Corridor Study has preliminarily identified over 24 parcels along West Main Street that are vacant or underutilized. These properties depress nearby home values, weaken the local tax base, and pose environmental concerns that the Township cannot afford to investigate. MiEJScreen identifies significant pollution burdens (CT501 91st percentile; CT503 85th percentile), compounding the socioeconomic challenges faced by this small, low-income community.

Although located within the county's most populous municipality, the **Northside Neighborhood** itself is extremely small, representing only 1.7% of the county's population yet containing 14.3% of the county's known contaminated sites. This neighborhood is struggling from decades of environmental conditions and economic impoverishment, resulting in disproportionate health impacts on the targets area's high concentration of sensitive populations. By the late 1930s, the Home Owners' Loan Corporation rated two-thirds of the Northside Neighborhood as “Definitely Declining,” which reduced home values, limited bank mortgages due to lack of collateral value, and notably lessened development interest. Today, these residents experience some of the highest poverty rates in the county; in the disadvantaged CT202 and CT300, 41.2% and 32.0%, respectively, are living in poverty, well above county (13.3%) and national levels (12.4%). Further, median household incomes (\$25,750 in CT202; \$38,444 in CT300) are nearly half of the median incomes of the county (\$66,303) and nation (\$78,538). The Northside Association for Community Development (NACD) has done a tremendous job bringing funding resources to this area, but when trying to overcome the magnitude of multi-generational environmental and socioeconomic disparities, it takes more than this single neighborhood agency has the capacity to obtain. This Assessment Grant would meaningfully advance ongoing revitalization momentum and support long-term, neighborhood-led redevelopment and health improvements.

Comstock Charter Township is a relatively small community, accounting for only 5.8% of the county’s population. The **Comstock Center** target area, part of the economically impoverished census CT201, is in the 78th percentile for low-income population, 81st percentile for educational attainment, and has an unemployment rate of 13%, continuing the cycle of economic downturn. These indicators point to persistent economic challenges, which restrict the Township’s ability to address brownfields or implement redevelopment planning. According to the 2022 Economic Development, Marketing, and Branding Strategy report, the Township’s biggest weakness is failing infrastructure. Blight exists along the main riverfront corridor in **Comstock Center**, with deteriorating housing stock within a four- to five-block radius. Blighted properties decrease surrounding property values, erode the health of local housing markets, pose safety hazards, and reduce local tax revenue. These socioeconomic factors exacerbate the area’s pollution burden (97th percentile for environmental effects; MiEJScreen) as the small, low-income community does not have the financial resources to assess, remediate, and redevelop these contaminated sites on their own.

2.b. Health or Welfare of Sensitive Populations

The 2025 Community Health Needs Assessment identified significant, deep-rooted variations in the lived experience in Kalamazoo County. These variations are tied to socioeconomic factors, barriers in access to services, and uneven living conditions—factors that strongly shape community health outcomes. Sensitive populations within the coalition’s target areas primarily include residents experiencing economic hardship. These groups are more vulnerable to negative health impacts associated with environmental contamination and deteriorated housing. The coalition’s target areas are in the 79th (CT202), 95th (CT300), 53rd (average of CT501–503), and 72nd (CT201) percentiles for socioeconomic factors, reflecting elevated rates of poverty, constrained household resources, and related demographic trends that increase vulnerability to environmental harms (MiEJScreen). Across the jurisdictions, 53% of City of Kalamazoo residents, 30% of Kalamazoo Township residents, and 33% of Comstock Charter Township residents are cost-burdened, Asset Limited, Income Constrained, Employed (ALICE) or living in poverty. This economic disadvantage directly affects health and welfare, limiting access to stable housing, nutritious food, and healthcare. Supplemental Nutrition Assistance Program (SNAP) benefit utilization reflects these pressures; in fact, while the overall county (10.4%) receives less SNAP benefits than the state (13.1%), our target areas access these benefits at exponentially higher rates: 36.5% in CT202, 43.3% in CT300, 11.7% in the Westwood Neighborhood (average of CT501–503), and 24.9% in CT201. These conditions reflect the persistent influence of social and institutional inequities—including historical patterns of development and investment that have limited economic mobility and resulted in worse health outcomes for our low-income populations.

These outcomes are exacerbated by environmental contamination, which weakens immune systems and causes cancer and other diseases. MiEJScreen ranks the target areas in the 98th (CT202), 97th (CT300), 67th (Westwood average), and 97th (CT201) percentiles for environmental effects. This is also reflected in the following: close proximity to cleanup sites (97th, 92nd, 40th, and 83rd, respectively), hazardous waste facilities (78th, 81st, 54th, and 97th), impaired waters (49th, 49th, 37th, and 85th), solid waste facilities (74th, 64th, 80th, and 74th), Risk Management Program sites (77th, 96th, 80th, and 70th), and historic lead and asbestos hazards (90th, 71st, 43rd, and 82nd). Generationally, young, low-income residents lived where they were able to buy homes, which to their detriment were near commercial and industrial facilities on contaminated land and adjacent to the Kalamazoo River, the longest Superfund site in the nation. The aging housing stock in these communities further compounds exposure risks; the majority of homes in the target areas were built before 1979—79.9% in CT202, 89.3% in CT300, 65.0% in CT502, 73.5% in CT503, and 87.1% in CT201—compared to the county (58.3%) or nation (50.5%) and thus likely contain lead-based paint and friable asbestos. EPA funding will allow the coalition to assess, evaluate, and mitigate environmental hazards affecting these sensitive populations. For example, the **Comstock Riverfront Redevelopment** will involve conducting Hazardous Materials Inspections for three rental homes built before 1920 and three blighted commercial buildings ranging from 34 to 54 years old, which will identify any lead- and asbestos-containing materials. By identifying contamination, advancing cleanup planning, and positioning sites for safe reuse, the grant will directly support improved health and welfare outcomes for low-income families, children, and other vulnerable groups.

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

According to the EPA, exposure to hazardous substances, pollutants, and contaminants is associated with increased rates of cancer, asthma, and other adverse health conditions. There are many opportunities for

residents adjacent to our priority sites to be exposed to contaminated soil, groundwater, surface water, and airborne contamination that increase the potential to contract a disease or adverse health condition. Using the comparison with state and national metrics as a baseline, Kalamazoo County has a higher cancer mortality rate (153.9 per 100,000) than the state (151.5) or nation (141.5), according to CDC Wonder (2023). CDC data further indicate that Black residents in the county experience a significantly higher cancer mortality rate of 209.6 per 100,000, compared to 167.4 statewide and 161.8 nationally. Within the coalition’s target areas, particularly the Northside Neighborhood with a minority population of 92.3% (average of CT202 and CT300), Black residents are disproportionately represented among economically impoverished households; therefore, these elevated mortality rates underscore how low-income populations concentrated in the target tracts face layered risks associated with environmental burdens and aging housing conditions. Taken together, these indicators demonstrate a greater-than-normal incidence of disease plausibly linked to contamination risks. Additional health stressors further compound these disparities. Four census tracts in the City of Kalamazoo, CT502 in Kalamazoo Township, and CT201 in Comstock Charter Township are food deserts, indicating low-income areas with low access to fresh foods within 1 and 10 miles (depending on whether urban or rural). People with limited access to supermarkets may depend on convenience stores and fast-food outlets for their meals, which may not contain the same nutrients that fresh foods do, contributing to weaker immune responses, which may exacerbate chronic conditions such as asthma. The target areas also rank in the 90th (CT202), 88th (CT300), 55th (CT501–503 average), and 82nd (CT201) percentiles for asthma prevalence, which correlates with high ozone exposure identified in MiEJScreen for these same tracts (79th, 80th, 79th, and 80th percentiles, respectively). The **Comstock Riverfront Redevelopment** conceptual site plan includes 13,891 sq. ft. of commercial retail space, which will likely include a local grocery store tenant based on the 2024 Market Analysis conducted, which would lift CT201’s food desert designation and improve respiratory and overall health outcomes. CT202 and CT300 face even greater cumulative health burdens, ranking high in nearly every MiEJScreen health factor—cardiovascular disease (95th and 89th percentiles), low birth weight infants (96th and 93rd), elevated blood lead levels (no data available for CT202 and 92nd for CT300), and life expectancy (72nd and 89th). These data demonstrate a pattern of elevated disease rates consistent with communities experiencing long-term environmental exposures. The proposed EPA grant will enable the coalition to identify, assess, and evaluate contaminants and exposure pathways contributing to these elevated health risks and support remediation planning that protects public health. By generating the environmental data needed to prioritize cleanup actions and prepare sites for safe and health-promoting reuse, the project will directly reduce long-term threats to residents of these economically burdened communities.

2.d. Economically Impoverished/Disproportionately Impacted Populations

The coalition’s target areas include some of the most economically impoverished and environmentally overburdened communities in Kalamazoo County. Decades of disinvestment, aging housing, and the high concentration of contaminated and abandoned industrial and commercial sites have created conditions in which low-income households disproportionately bear environmental risks they lack the resources to address. By the late 1930s, the **Northside Neighborhood** was decidedly industrial and the Home Owners’ Loan Corporation rated two-thirds of the City of Kalamazoo’s residential neighborhoods as “Definitely Declining.” This designation was reinforced by governmental policies, such as federal housing programs and underwriting guidelines, and carried out by commercial operations like banks and insurance companies. It resulted in disinvestment of housing and infrastructure, leading to deteriorating property values throughout the target area, restricted access to capital for residents to improve property, concentration of poverty as families were excluded from opportunities in higher-value neighborhoods, and limited economic mobility due to reduced business development and employment opportunities. Although these practices were outlawed decades ago, their effects persist today—housing disinvestment is evident with 60.7% (CT202) and 50.8% (CT300) of homes being built prior to 1939, compared to 13.4% countywide. Because of these historic industrial, governmental, and commercial operations/policies, Northside residents were placed directly adjacent to factories and contaminated land, contributing to persistent socioeconomic decline, with some of the highest poverty rates in the county (41.2% in CT202 and 32.0% in CT300). CT202 and CT300 also have extremely elevated Social Vulnerability Index scores (0.9592 and 0.926), which evaluates demographic and socioeconomic factors that contribute to communities being more adversely affected by public health emergencies and other external hazards and stressors that cause disease

and injury. Hundreds of deteriorated parcels and pre-1979 homes present asbestos, lead paint, and soil or groundwater contamination concerns, reinforcing health risks for the largely low-income community, as reflected in environmental effects in the 98th (CT202) and 97th (CT300) percentiles. The **Westwood Neighborhood** in Kalamazoo Township faces similar economic and environmental stressors. The Township’s small tax base (8.7% of the county population) limits its ability to address contamination along the West Main corridor, where more than two dozen former gas stations, auto repair shops, and light industrial sites now sit vacant or underused, as reflected in environmental effects in the 85th (CT503) and 91st (CT501) percentiles. In **Comstock Center**, CT201 has poverty rates (12.6%) over twice the Township average (5.3%) and a median income (\$66,303) 16.7% lower than the overall Township median income (\$77,376). Its location along the Kalamazoo River Superfund site has contributed to decades of economic decline and discouraged investment, leaving CT201 in the 97th percentile for environmental effects.

Redevelopment of priority sites through this grant will reduce longstanding environmental threats while expanding community benefits. At **Zone 32 Phase II & III**, assessments will determine the presence of remaining volatile organic compounds, metals, and asbestos in soils and subsurface materials, enabling cleanup plans that prevent exposure for future residents. At **1824 West Main Street**, grant-funded soil and groundwater sampling will clarify arsenic and petroleum-related risks that currently prevent safe reuse and impede reinvestment along a heavily traveled corridor. The **Comstock Riverfront Redevelopment** priority site involves residential, commercial, and recreational elements that will support diversification of the Township’s downtown economy, creating additional financial resources through the increased tax base, which will allow continued investment along the King Highway corridor. Further assessment of the Riverfront Redevelopment parcels will define exposure pathways from metals, legacy river contamination, and hazardous building materials, allowing the Township to design protective site layouts and elevate structures as needed. These assessment activities are the first required step in removing environmental hazards that have disproportionately affected disadvantaged communities for generations. The redevelopment of all priority sites will improve tax revenues for the LUG (as much as \$542,000 in annual taxes for the Northside Neighborhood, \$144,000 for the Westwood Neighborhood, and \$220,000 for Comstock), enhance and leverage public infrastructure, and support the communities’ development goals.

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

Organization & Point of Contact	Mission	Specific Project Involvement
Northside Association for Community Development (NACD), Jonathan Yarbrough, info@nacdkzoo.com	Promote/advocate for a healthier environment, job creation, financial independence, safety, and neighborhood revitalization.	Community liaison* in Northside; partnerships with city/county.
Westwood Neighborhood Association, Ron Huster, rhuster@westwoodkzoo.com		Community liaison* in Westwood; partnerships with city/county/twp.
Comstock Downtown Development Authority (DDA), Steve Diesler, sdeisler@comstockmi.gov	Promote cultural, business, and recreational opportunities to attract businesses/residents.	Community engagement in Comstock; funding resources for infrastructure in the downtown.
Local Initiatives Support Corporation Kalamazoo, Sonja Dean, sdean@lisc.org	Forge resilient and inclusive communities of opportunity.	Funding resources and technical assistance to small businesses and emerging developers.
Kalamazoo County Land Bank, Zac Bauer, landbank@kalamazoolandbank.org	Create vibrant communities; blight elimination, affordable housing, property value stabilization.	Collaborate on environmental assessment and redevelopment of tax-foreclosed properties.
Southwest Michigan First, Riley Lukomski, rlukomski@southwestmichiganfirst.com	Increasing economic prosperity for all in Southwest Michigan.	Regional economic development agency; will provide redevelopment technical and financial support.
Kalamazoo Valley Habitat for Humanity, Travis Meier, mailbox@habitatkalamazoo.org	Build homes, community, and hope.	Provide educational and technical support for energy-efficient/affordable home projects.

*Community Liaisons will be involved in redevelopment planning in their respective target areas; assisting in outreach events to generate community input and distributing educational materials, etc.

2.g. Incorporating Community Input

As these priority sites advance, there will be ample opportunities to engage the community during regularly scheduled Kalamazoo County Brownfield Redevelopment Authority (KCBRA) and City of Kalamazoo BRA public meetings. To ensure accessibility and provide a full alternative to in-person engagement, all KCBRA meetings include a virtual participation option via Zoom. The coalition will convene three in-person community open houses, one per target area, over the first three years. Input from the NACD, Westwood Neighborhood Association, and Comstock DDA will assist in decision-making of these events to ensure community needs are incorporated into planning. At these meetings, new information about programs and available resources will be presented, feedback will be sought, and a solicitation for any new sites will also be prepared. These open houses will allow target area residents to provide input, share concerns on potential reuse strategies, etc. The coalition will work closely with the NACD in the **Northside Neighborhood**, a nonprofit community organization trying to create generational wealth for our sensitive populations through providing affordable housing, educational workshops, recreation activities, land-use planning, and employment services. Efforts will be made to inform and notify residents and businesses in the target communities and countywide through our partners, mailings, and posting information on the KCBRA’s social media and at local retail/restaurant establishments, churches, community centers, etc. It will be critical to identify opportunities to interact with underserved community members in our target areas during times they can meet, which may not be during normal business hours due to their work schedules. We will also publicize programs, minutes, applications, and successes through KCBRA’s website and our community-based project partners’ websites. Factsheets, brochures, and performance dashboards will continue to be utilized and distributed through the KCBRA’s website, soliciting feedback at any time.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

Task 1: Phase I Environmental Site Assessments (ESAs)
a. Project Implementation: 32 Phase I ESAs on priority sites within our target areas, 8 Phase I ESAs on non-priority sites countywide as determined by the coalition, with community outreach event input.
b. Anticipated Schedule: 8 Phase I ESAs (priority sites) & 2 Phase I ESAs (non-priority sites), annually.
c. Task Lead: Qualified Environmental Professional (QEP) for Phase I ESAs, Applicant oversight.
d. Outputs: 40 Phase I ESAs, eligibility demonstrations, site access agreements, ACRES updates.
Task 2: Phase II ESAs, Baseline Environmental Assessments (BEAs), Due Care Plans
a. Project Implementation: Complete Quality Assurance Project Plan (QAPP); Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HASPs) for each Phase II ESA. 20 Phase II ESAs on priority sites in target areas, 8 Phase II ESAs on non-priority sites countywide as determined by the coalition, with community outreach event input. For contaminated sites (estimated 12), completion of BEAs for liability protection and Due Care Plans to address “continuing obligations.”
b. Anticipated Schedule: 5 Phase II ESAs, 2 BEAs/Due Care Plans (priority sites) & 2 Phase II ESAs, 1 BEA/Due Care Plan (non-priority site), annually.
c. Task Lead: QEP for Phase II ESAs, Applicant oversight.
d. Outputs: 1 QAPP, 28 Phase II ESAs and SAPs/HASPs, 12 BEAs/Due Care Plans, ACRES updates.
Task 3: Cleanup Planning – Act 381 Brownfield Plans and Work Plans
a. Project Implementation: 16 Brownfield Plans (12 for priority sites) to utilize tax increment financing to leverage grant funds. BRA, local unit of government (LUG), and governing body will review/approve plans. Estimated 6 sites (4 for priority sites) to require Work Plans for state tax support and approval.
b. Anticipated Schedule: Complete 3 Brownfield Plans and 1 Work Plan at priority sites annually; 1 non-priority site Brownfield Plan annually; 2 non-priority site Work Plan by the end of the grant term.
c. Task Lead: QEP for plans, Applicant oversight.
d. Outputs: 16 Brownfield Plans; 6 Act 381 Work Plans/state regulatory reviews, ACRES updates.
Task 4: Community Outreach, Programmatic, Travel, and Supplies
a. Project Implementation: Procurement of a QEP; preparation of Grant Work Plan; preparing for, attending, and participating in public hearings, municipal, and KCBRA/coalition meetings; creating

and disseminating brochures/flyers/webpages about the EPA grant; educating and informing community groups and stakeholders about the EPA grant and brownfields; community outreach events; attending the National Brownfield Conference; preparing EPA quarterly and annual reports.
b. Anticipated Schedule: Community outreach efforts will be intense at the outset of the grant and will include 3 community outreach events (one per target area) annually through the first three years (9 total). Monthly KCBRA/coalition meetings. Outreach efforts will continue throughout the grant term.
c. Task Lead: Applicant will plan outreach efforts with QEP assistance. QEP will prepare quarterly and annual reports with applicant oversight.
d. Outputs: Procurement of 1 QEP; 16 quarterly reports; 4 Federal Finance Report; 1 Final Technical Report; 9 community open house/education events; 48 monthly KCBRA meetings; educational materials; National Brownfield Conference trip for 3 KCBRA members and the project director, 2 City of Kalamazoo staff, and 1 Comstock Township staff.

3.e. Cost Estimates

Budget Categories	Task 1: Phase I ESAs	Task 2: Phase II ESAs	Task 3: Brownfield/Cleanup Plans	Task 4: Community Outreach/Programmatic	Total
Personnel	\$0	\$0	\$0	\$25,000	\$25,000
Travel	\$0	\$0	\$0	\$9,800	\$9,800
Supplies	\$0	\$0	\$0	\$4,000	\$4,000
Other	\$0	\$0	\$0	\$1,960	\$1,960
Contractual	\$160,000	\$676,000	\$264,000	\$59,240	\$1,159,240
Total Direct Costs	\$160,000	\$676,000	\$264,000	\$100,000	\$1,200,000
Total Budget	\$160,000	\$676,000	\$264,000	\$100,000	\$1,200,000

91.7% of the Assessment Grant is designated for Phase I and II ESAs and Cleanup Planning. 2% of the budget is designated as administrative personnel costs, not including the financial and performance reporting costs, within the 5% limitation; Task 1, Contractual Costs: 40 Phase I ESAs at average cost of \$4,000 = \$160,000 total. Task 2, Contractual Costs: 28 Phase II ESAs at average cost of \$22,000 = \$616,000; 12 BEAs/Due Care Plans at average cost of \$5,000 = \$60,000; \$676,000 total. Task 3, Contractual Costs: 16 Brownfield Plans at average cost of \$12,000 = \$192,000; 6 Work Plans at average cost of \$12,000 = \$72,000; \$264,000 total. Task 4, Personnel Costs: 500 hrs.@ \$50/hr. = \$25,000; Travel Costs: travel for 7 coalition staff/board members including airfare, lodging, food, etc. at an average cost of \$1,400 per person = \$9,800 total; Supplies Costs: supplies for meetings, outreach events, printing, etc. at an average cost of \$250 per quarter = \$4,000; Other Costs: registration for 7 coalition staff/board members to the National Brownfield Conference at an average cost of \$280 per person = \$1,960; Contractual Costs: 16 quarterly reports at average cost of \$1,500 = \$24,000; preparation of 4 Federal Financial Reports at average cost of \$1,000 per report = \$4,000; preparation of 1 Final Technical Report for a total cost of \$3,960; preparation for 9 community open houses/educational outreach events, with a minimum of 2 in each coalition area, at average cost of \$1,600 per event = \$14,400; project review and evaluations 7 hours per quarter @ \$115/hr. = \$12,880; \$59,240 contractual subtotal; \$100,000 total.

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

The lead coalition member, the KCBRA, will track, measure, and evaluate progress in achieving outputs and outcomes throughout the grant program. Assessment information (outputs)—including number of Phase I and II ESAs, BEAs, Due Care Plans, Brownfield Plans, and Cleanup Plans funded by the grant—will be documented in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES). Grant quarterly reports and a dashboard will also be created, as the KCBRA has done for previous EPA grants. The dashboard documents the outcomes, or the number of grant-related outreach activities, project investment leveraged, jobs created, jobs retained, and grant-funded projects per LUG/coalition member boundary, including our target areas. The dashboard, available on the KCBRA’s website, will be distributed at meetings/events regularly. The KCBRA will track the number of sites/acres prepared for reuse, including sites that have been cleaned up, had blight removed, and had exposure concerns removed or minimized. The KCBRA, working with the non-lead coalition members and various partners, will track and evaluate

long-term outcomes, such as affordable housing units built, improved property values, and health outcomes for our sensitive populations, especially those in our target areas and near our priority sites.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

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

The lead coalition member, the Kalamazoo County Brownfield Redevelopment Authority (KCBRA), will manage the grant and be accountable to the EPA for proper expenditure of funds. The KCBRA has extensive experience managing EPA grants and already meets monthly to evaluate incoming and ongoing projects, allowing timely and successful expenditure of funds. The KCBRA will approve projects and requests for grant-funded tasks subject to a project application process. Project applications will be reviewed with the local unit of governments and non-lead coalition members where a project is proposed, to obtain input and concurrence. The KCBRA has contracted with a Qualified Environmental Professional (QEP) in the past, and the coalition will solicit a request for proposal to select a QEP(s) to carry out the technical requirements of the coalition grant, if awarded. Macy Walters (Brownfield Redevelopment Administrator), with support from Rachael Grover (County Director of Planning & Development), successfully managed the KCBRA's FY21 and FY16 EPA Assessment Grants, meeting all reporting, Work Plan, and Cooperative Agreement (CA) requirements, and will continue in this role, carrying out the administrative requirements of the coalition grant. Ms. Walters has extensive experience and 3+ years with EPA grant implementation, funding, reporting, and compliance. Ms. Grover previously served as the county's Brownfield Redevelopment Coordinator and has been intimately involved with related projects throughout the county. Ms. Grover has 12+ years of experience with grant implementation, funding, reporting, and compliance. John O'Connor (County Accountant) with the assistance of Jennifer Wagner (Financial Reporting Manager) will manage the financial requirements of the grant by submitting cash requests in the Automated Standard Application for Payments. Mr. O'Connor is a former financial specialist with 6+ years of accounting experience, and Ms. Wagner has 12+ years of accounting/financial reporting experience with a Master of Business Administration.

4.d. Acquiring Additional Resources

One or more QEPs will be selected by the coalition, following appropriate procurement requirements, to assist with the grant tasks as outlined above. The QEP(s) will provide timely updates to ACRES and assist the Project Director with timely reporting required by the Cooperative Agreement (CA).

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

4.e.(1) Accomplishments

The KCBRA was awarded a \$300,000 EPA Brownfield Assessment Grant in 2021 (CA BF-00E03048, grant period: 09/29/2021 to 9/30/2025). During the grant, 16 sites were assessed in 11 different census tracts. The outputs (9 Phase I ESAs, 8 Phase II ESAs, 1 BEA, 6 Hazardous Materials Inspections [HMIs], 5 Brownfield Plans/Evaluations, 3 Cleanup Planning deliverables) addressed over 390 acres, resulting in approximately 298 jobs and \$49,216,450 in private and public investment leveraged. The KCBRA was also awarded a \$400,000 EPA Brownfield Assessment Grant in 2016 (CA BF-00E02007, grant period: 10/1/2016 to 9/30/2020) that assessed 21 sites in 7 communities. The outputs (13 Phase I ESAs, 12 Phase II ESAs, 6 BEAs, 4 HMIs, 1 Brownfield Plan, 24 grant-related outreach activities) addressed over 65 acres, resulting in approximately 112 new jobs, over 215 retained jobs, and approximately \$74,504,105 in investment. Information was reported to EPA for both grants via ACRES and is fully up to date.

4.e.(2) Compliance with Grant Requirements

The KCBRA has consistently met the requirements for Work Plan development, QAPP development, eligibility demonstrations, SAPs, HASPs, quarterly reports, ACRES reporting, MBE/WBE and financial status reports, and community notification. At the time of this application, the KCBRA has expended 100% of the FY21 Assessment Grant (grant period: 09/29/2021 to 9/30/2025). The FY21 Assessment Grant is currently undergoing closeout, with \$0 remaining. When the FY16 Assessment Grant closed, there was under \$500 remaining. No open EPA Brownfield grants held by coalition members have unexpended balances, and all performance reporting, financial reporting, and ACRES updates were submitted on time and in full compliance with EPA terms and conditions. The KCBRA therefore demonstrates a consistent record of effective grant management, timely drawdowns, and full compliance with all CA requirements.

THRESHOLD CRITERIA RESPONSE
KALAMAZOO COUNTY BROWNFIELD REDEVELOPMENT AUTHORITY
KALAMAZOO COUNTY, MICHIGAN

1. Eligibility of Lead and Non-Lead Coalition Members

a. The Kalamazoo County Brownfield Redevelopment Authority (KCBRA) is a redevelopment agency and is an eligible entity in that it is fully sanctioned by the State of Michigan under the authority of Public Act 381 of 1996, as amended, the Brownfield Redevelopment Financing Act (refer to attached resolution.).

The two non-lead coalition members of this application are the City of Kalamazoo and Comstock Charter Township. Both of these non-lead coalition members are Michigan General Purpose Units of Local Government and are eligible to receive funding through the EPA Brownfield Assessment Grant program. Documentation of Comstock Charter Township's eligibility is attached.

b. The KCBRA and two non-lead coalition members are not exempt from federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Target Areas

The identified target areas for each coalition member have been included below. No target areas overlap. Refer to the Application Information Sheet for discussion of identified priority sites within each target area.

- Kalamazoo County Brownfield Redevelopment Authority
Target Area: Westwood Neighborhood, Kalamazoo Township, Kalamazoo County, MI.
- City of Kalamazoo
Target Area: Northside Neighborhood, City of Kalamazoo, Kalamazoo County, MI.
- Comstock Charter Township
Target Area: Comstock Center, Comstock Charter Township, Kalamazoo County, MI.

3. Non-lead Member(s) that Never Received an EPA MARC Grant

Comstock Charter Township has never been awarded an EPA Brownfields Multipurpose, Assessment, Revolving Loan Fund, or Cleanup Grant.

4. Legal Authority to Expend Grant Funds on Behalf of Non-Lead Coalition Members

a. As a County Authority, the KCBRA has the legal authority to expend grant funds on behalf of the non-lead coalition members, as local units of government within the county.

b. N/A

5. Coalition Agreement

Letters from both of the non-lead coalition members to the grant applicant in which they agree to be part of the coalition are attached.

6. Community Involvement

As these priority sites advance, there will be ample opportunities to engage the community during regularly scheduled KCBRA and City of Kalamazoo BRA public meetings. To ensure accessibility and provide a full alternative to in-person engagement, all KCBRA meetings include a virtual participation option via Zoom. The coalition will convene three in-person community open houses, one per target area, over the first three years. At these meetings, new information about programs and available resources will be presented, feedback will be sought, and a solicitation for any new sites will also be prepared. These open houses will allow target area residents to provide input, share concerns on potential reuse strategies, etc. The coalition will work closely with the Northside Association for Community Development (NACD) in the Northside Neighborhood, a nonprofit community

organization trying to create generational wealth for a disenfranchised population through providing affordable housing, educational workshops, recreation activities, land-use planning, and employment services. Efforts will be made to inform and notify residents and businesses in the target communities and countywide through our partners, mailings, or posting information on the KCBRA's social media and at local retail/restaurant establishments, churches, community centers, etc. It will be critical to identify opportunities to interact with underserved community members in our target areas during times they can meet, which may not be during normal business hours due to their work schedules. We will also publicize programs, minutes, applications, and successes through KCBRA's website and our community-based project partners' websites. Factsheets, brochures, and performance dashboards will continue to be utilized and distributed through the KCBRA's website, soliciting feedback at any time.

7. Expenditure of Existing Grant Funds

The KCBRA has an open EPA Brownfields Assessment Grant. The FY21 Assessment Grant is currently undergoing closeout, with \$0 remaining. A copy of a financial record displaying the amount of cooperative agreement funds drawn down is attached.

8. Contractors and Named Subrecipients

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