R05-26-C-008

City of Ypsilanti

Community Services

1. **Applicant Identification:** The City of Ypsilanti with the address of One South Huron Street, Ypsilanti, Michigan 48197.

2. **Website URL:** www.cityofypsilanti.com

3. **Funding Requested:**
   a. **Grant Type:** Single Site Cleanup
   b. **Federal Funds Requested:** $1,902,260

4. **Location:** Ypsilanti, Washtenaw County, Michigan
5. **Property Information:** Water Street Redevelopment Area, 4 Water Street, Ypsilanti, Washtenaw County, Michigan 48197
6. **Contacts:**
   a. **Project Director:** Ms. Katie Jones, Community, Economic Development Manager, & Equity Manager, City of Ypsilanti, will serve as the Project Director for this proposal. Ms. Jones' contact information is as follows:
   Phone: (734) 483-9646, Email: kjones@cityofypsilanti.com,
   Address: One South Huron Street, Ypsilanti, Michigan 48197.
   b. **Chief Executive/Highest Ranking Elected Official:** Ms. Nicole Brown serves as the Mayor of the City. Ms. Brown's contact information is as follows:
   Phone: (734) 888-4044, Email: nbrown@cityofypsilanti.com,
   Address: One South Huron Street, Ypsilanti, Michigan 48197.

7. **Population:** 19,937 (ACS 2023)
8. **Other Factors:**

Other Factors	Page
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	**2, 4 & 5**
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them.	**1, 2**
The proposed site(s) is located in a federally designated flood plain.	**2**
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	

The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	
The proposed project will improve local resilience to impacts of extreme weather events and natural disasters.	**3**
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

9. **Releasing Copies of Applications:** Not Applicable

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

The City of Ypsilanti (population 19,937, 2023 Census data), the geographic area for this Cleanup Grant application, is in Washtenaw County in southeast Michigan. It was the second incorporated city in the state and contains Michigan's fifth-largest historic district. Its industrial growth in the 19th and early 20th centuries was driven by the establishment of the Chicago Road and Michigan Central Railroad, as well as the founding of Eastern Michigan University (EMU) in 1849. EMU is now the city's largest tax-exempt landowner and the City's major economic driver. In the 20th century, Ypsilanti became a regional industrial hub with the construction of Ford's Willow Run Air Force Plant in 1942, which would eventually produce up to 23 B-24 bombers per day during World War II. The later construction of I-94 and US-23 further connected the city to Detroit, Flint, Ann Arbor, Toledo, and Chicago, strengthening its ties to the automotive and transportation industries.

The City's economy has shifted dramatically with the decline of the automotive and manufacturing sectors in the region. Since the Great Recession in 2008, Southeast Michigan has lost more than 44,000 manufacturing jobs (SEMCOG), with Ypsilanti losing an estimated 1,600 manufacturing jobs since 2001. The trends have contributed to rising numbers of vacant and underused industrial properties that have weakened the city's tax base, a challenge compounded by the fact that roughly 40% of Ypsilanti's land is owned by tax-exempt entities. While the regional economy has begun to recover, structural shifts continue to present challenges. According to employment forecasts from the Southeast Michigan Council of Governments (SEMCOG), an additional loss of approximately 71,000 manufacturing jobs is projected between 2015 and 2045 as the economy transitions from production-based industries to knowledge- and service-based sectors focusing on the trade of services over physical goods.

Today, Ypsilanti's economy is shifting toward small manufacturing, craft production, and renewable energy. The city is also gaining recognition for its growing destination restaurant scene. The city prides itself on its diversity and long-standing civil rights leadership, having passed Michigan's first living wage ordinance in 1999 and an anti-discrimination ordinance covering housing, employment, and public accommodations in 2020.

Shifts in demographics, housing demand, and the local economy have led the city to pursue new strategies for addressing housing and commercial retail needs. While Ypsilanti has established neighborhoods and a traditional downtown, it lacks new single-family workforce housing. As of 2023, only 36% of its housing stock consists of detached single-family homes (compared to 58% countywide), and 92% of these units are occupied (2023 Census data). Rising housing costs in nearby Ann Arbor (approximately 10 miles west of Ypsilanti)—now unaffordable for many working families—have further increased demand for affordable options in surrounding communities. In response, the city identified the Water Street Redevelopment Area (WSRA) (the target area), a former industrial property of 37.15 acres as a prime development opportunity to meet the City's workforce housing demands.

WSRA is located within Census Tract 26161410800 and is adjacent to the Huron River. Originally developed in the late 1800s, it formerly consisted of dozens of individual tax identification parcels. Between the 1880s and 1980s, WSRA had several unique historical land uses, many of which have contributed to environmental contamination at the site. Historical land uses include residential dwellings, foundries, lumber yards and mills, bulk petroleum, and coal storage, a Detroit United Railway (DUR) storage yard later used as a metal junk yard, manufacturing, railroads and sidings, former gravel pit(s) and/or marshland infilled with non-native material, automobile service and repair, dry cleaners, printers, restaurants, grocers, and public parks (e.g., Gilbert Park), etc. Several Environmental Site Assessments (ESAs) have been conducted on the property over the past two decades, which have identified concentrations of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and polychlorinated biphenyls (PCBs) above state and/or federal regulatory criteria.

Over the past three decades, the WSRA has remained vacant, generated little to no tax revenues and has become an eyesore, and continues to pose environmental risks. To leverage funding for cleanup and redevelopment, the City passed a bond in 1998 to acquire the affected properties, consolidate them into a single tax parcel, and coordinate a cleanup effort.

The WSRA target area has been broken into three focus areas, Areas 1 through 3. Area 1 comprises approximately 24.79 acres primarily impacted by VOCs, SVOCs, arsenic, and lead above the state's generic cleanup criteria (GCC). Several targeted cleanup projects have been conducted in Area 1 to address the most contaminated areas. Although contamination is present within Area 1, the use of brownfield tax increment financing (TIF) under Michigan's Brownfield Financing Act (Public Act 381 of 1996, as amended) is now sufficient to address the remaining remediation and/or mitigation costs that are needed to support future redevelopment activities.

Area 2 is comprised of approximately 6.13 acres of vacant land formerly operated as the Commerce Motor Truck Company manufacturing facility and Detroit United Railway (DUR) Storage Yard/metal junkyard. Investigations conducted within the footprint of the former Commerce Motor Truck Company manufacturing facility identified soils contaminated

with PCBs at concentrations greater than 1 part per million (ppm) and less than 10 ppm within four feet of the existing grade. The source is consistent with incidental releases, likely from former PCB-containing transformers, hydraulic equipment, and/or PCB-containing oil used as a dust suppressant on the exterior of the former building. PCB contaminated soil (>50 ppm within two feet of grade) has been found throughout the former DUR storage/metal yard, likely from surface spills caused by leaking rail-car transformers and possibly on-site dielectric-fluid storage. The southern half of the yard—previously identified as a "lead removal area" before widespread PCB contamination was discovered—also shows elevated lead levels. This overlap suggests that rail-car painting/stripping and transformer-service activities occurred in the same area. To address lead and PCB contamination in Area 2, the City secured $4.38 million from the Michigan Economic Development Corporation (MEDC) to remove and dispose of TSCA-regulated contaminated soils and to import clean backfill to restore grade. Cleanup began in August 2025 and was completed by December 2025. While this effort will address a substantial portion of the contamination, the funding is insufficient to remove all hazardous soils in Area 2. The City is therefore seeking additional support from the Downriver Community Conference's brownfield revolving loan fund to address the remaining cleanup activities, which are anticipated to begin in summer 2026.

Although the City has made significant progress by addressing the costliest cleanup activities within Areas 1 and 2, no cleanup has occurred to address the known contamination in Area 3 **(the proposed brownfield site)**, which remains necessary to safely redevelop the target area.

b. Description of Proposed Brownfield Site

Area 3 is comprised of 3.7 acres of former marshland bordering the former manufacturing facility and DUR storage yard to the north and the Water Street Trail (a portion of Washtenaw County's Border-to-Border, or "B2B," Trail) and the Huron River to the south. This area was historically mined for sand and gravel to support the construction of local railroads around 1900. Subsurface investigations indicate that Area 3 was used as a dumping site for solid waste from the former DUR storage yard, and for construction and demolition debris. PCBs have been detected in soil to depths of up to 9 feet, with some concentrations exceeding 50 ppm—levels considered hazardous under TSCA. Therefore, funding from an EPA Brownfield Cleanup Grant will address contamination at the proposed brownfield site, build on the momentum from prior MEDC funding, and complete the City's 26-year effort to remediate the Water Street Redevelopment Area, positioning the site for future redevelopment.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

The Water Street Redevelopment Area (the target area) has been identified in the City's Master Plan as a prime opportunity to address the shortage of new workforce housing stock, including condo and townhome developments, duplexes, and other multifamily housing options. The redevelopment of the target area into workforce housing resonates with several of the Master Plan's goals, including: *1) responsibly dealing with the legacy of polluted sites, 2) protecting the watershed from further contamination, 3) creating diverse and accessible housing options, 4) integrating placemaking and streetscape design features, and 5) creating opportunities to make the area more accessible by foot or bike to connect to nearby services.* The project also addresses the Ypsilanti Economic Development Action Plan goal of improving the general environment and quality of life by *1) prioritizing vacant, underutilized nonresidential properties for redevelopment that use innovative design concepts consistent with smart growth principles and 2) remediating potential brownfield sites to make land available for redevelopment.* The proposed brownfield site is located within a federally designated floodplain.

On a regional scale, the project resonates with objectives outlined in the Comprehensive Economic Development Strategy for Southeast Michigan (SEMCOG, 2021), which include: *1) creating and marketing quality places through connecting people to the places they live and supporting the growth of dynamic, diverse places to live, work, and visit, and 2) anticipating demands for land use by encouraging sustainable development of diverse and desirable housing options, considering regional needs and economic conditions, and prioritizing infill development*.

The city has conducted several public engagement events over the past decade (three occurring within the past year) to solicit community feedback and explore reuse scenarios for the target area and proposed brownfield site. In conjunction with the City's planning initiatives, the feedback received from these community engagement sessions was instrumental in developing a conceptual site plan to determine the best potential reuses. Major components of this site's conceptual plan include the construction of 54 single-family homes, 60 affordable townhome units, a single 5-story building consisting of 180 apartment units, 42,500 square feet of retail and restaurant space, and 40,800 square feet of mixed-use commercial office space. Devising a site conceptual plan was a key step in developing a detailed cleanup plan to facilitate the redevelopment of the target area and proposed brownfield site. While the desired reuses are largely residential, the conceptual site plan is intended to be a living document with specific uses that can be adapted to accommodate the community's changing needs. As such, the city will continue to provide opportunities for community input into the redevelopment and planning process and evaluate redevelopment options and specific uses for the site.

Over the course of the cleanup activities conducted in Area 2, the city hosted a workshop for area developers to generate development interest for the target area, learn more about the target area history, provide a status of ongoing cleanup initiatives, the availability of potential development incentives, and provided an overview of the desired reuse(s) for the target area and proposed brownfield site. Over the next year, the city intends to issue a Request for Qualifications to identify a development partner to redevelop portions of Areas 1 and 2 of the target area.

d. Outcomes and Benefits of Reuse Strategy

The redevelopment of the target area brownfield will achieve the goals of regional and local planning initiatives by providing affordable workforce housing, attracting new residents, developing a workforce to serve multiple sectors of the city, and creating spaces that provide walkable connections to Ypsilanti's downtown, Depot Town, and to parks for residents.

Target Area Reuse	Outcomes and Benefits	Tax Implications
Commercial Retail/ Office Space	• Two retail spaces totaling an estimated 42,500 square feet • 40,800 square feet of new office space • Creation of 98 new jobs*	Est. Taxable Value Increase: $6.1 million Annual Tax Revenue Increase: $505,000
Workforce Housing	• 60 affordable townhome units • 54 single-family homes • Housing for an additional 145 new residents	Est. Taxable Value Increase: $13.9 million Annual Tax Revenue Increase: $1.2 million
Multi-Family Housing	• 180 affordable apartment units • An additional 225 new residents	Est. Taxable Value Increase: $8.1 million Annual Tax Revenue Increase: $675,000

**According to data provided by the Energy Information Administration*

The redevelopment will also include a stormwater detention area designed using sustainable best management practices intended to offset the effects of climate change. Specifically, the detention area will reduce the effects of peak stormwater discharges during wet-weather rain events and mitigate channel degradation in the nearby Huron River. The basin will be stabilized with native wetland vegetation that has high transpiration rates, will provide habitat for area wildlife, and will have the capability of filtering non-point source pollutants commonly associated with urban stormwater runoff. Preliminary estimates indicate the detention area could store up to 600,000 gallons of stormwater.

Redevelopment of the target area will also improve local climate adaptation capacity and resilience, thereby protecting residents and community investments by reducing atmospheric greenhouse gas levels. According to the US Department of Agriculture's (USDA) I-Tree estimation tool, the inclusion of tree canopy planned for the redevelopment of the target area (see table below), can significantly reduce energy consumption for heating and cooling and reduce carbon dioxide emissions. In conjunction with carbon sequestration from the tree's life cycle, the redevelopment of the priority brownfield sites can improve climate adaptation capacity at the local level by reducing and removing carbon dioxide emissions.

Target Area Reuse	Estimate of Carbon Dioxide Reductions (lbs/year)			
	Trees Planted (estimated)	Energy Reduction from Heating/Cooling	Carbon Sequestration	Total*
Commercial Retail/ Office Space	30	91 lbs.	594 lbs.	685 lbs.
Workforce Housing	115	333 lbs.	2,180 lbs.	10,723 lbs.
Multi-Family Housing	16	49 lbs.	317 lbs.	366 lbs.

** Itreetools.com – Totals are calculated for the first year of planting only, using 2.5" caliper, balled and burlap trees. Totals do not account for carbon reductions over the lifetime of the trees.*

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

The City has completed multiple assessments of the proposed brownfield site, and it is now sufficiently characterized. No further site characterization is required for remediation to begin.

f. Resources Needed for Site Remediation

The City secured a $4,381,000 grant from the Michigan Economic Development Corporation (MEDC) to support environmental characterization and remediation of the former DUR storage/metal yard adjacent to the proposed brownfield site. Part of this grant funded the environmental characterization of the proposed brownfield site and is now complete. Cleanup activities under this grant were completed in December 2025.

The City also secured $3,000,000 in Community Project Funding (SPF) through the Consolidated Appropriations Act of 2023 for assessment activities in the Target Area (remediation is not eligible). A portion of these funds may be used for post-remediation verification sampling at the proposed brownfield site.

In addition to these secured resources, the funding requested in this application will be sufficient to complete remediation at the proposed brownfield site.

g. Resources Needed for Site Reuse

A summary of the funding resources that have been secured, sought, or will be sought to contribute to the completion of the reuse of the target area and proposed brownfield site is included in the table below.

Name of Resource	Is the Resource for (1.c.i.) Assessment, (1.c.ii) Remediation, (1.c.iii) Reuse Activities?	Is the Resource Secured or Unsecured?	Additional Details or Information About the Resource
Michigan Economic Development Corporation (MEDC)	Assessment, Remediation	Secured	MEDC awarded a grant in the amount of $4,381,000 to support environmental site characterization and remediation activities.
US Department of Housing and Urban Development (HUD)	Assessment, Remediation, Reuse	Secured	$3,000,000 in funding was secured as Community Project Funding (SPF) via the Consolidated Appropriations Act of 2023. Funding from this source will address the cost of verification sampling in support of cleanup activities, as well as soft costs related to identifying a developer.
Michigan Department of Environment, Great Lakes and Energy (EGLE) Brownfield Site Assessment Program	Assessment	Secured	EGLE has committed to the use of funds under their brownfield site assessment program (BSA) to support any additional site assessment/characterization needs that are needed to facilitate the cleanup of the target area and proposed brownfield site.
Tax Increment Financing (TIF)	Remediation	Unsecured	Michigan enables local governments to issue TIF plans for the cleanup and redevelopment of brownfields. Tax revenue generated from brownfield redevelopment within the target area or proposed brownfield site creates the tax increment, which is reimbursed to the developer over time to assist in the cost of cleanup activities.
EGLE Grant and Loans	Remediation	Unsecured	State funding is available for environmental assessment and cleanup of properties with known contamination. Local units of government can apply for funding. Funding is limited to $1 million in grants and loans per applicant per year.
EGLE Refined Petroleum Fund (RPF)	Remediation	Unsecured	The RPF establishes an environmental protection regulatory fee that funds the cleanup. Eligible properties include properties where soils are contaminated by releases from registered underground storage tanks (USTs), there are non-liable parties, and planned redevelopment in place.
Tax Abatements	Reuse	Unsecured	Michigan has several tax abatement programs available to encourage the rehabilitation of obsolete commercial, and industrial properties. The type, amount, and length of the tax abatement is dependent upon the property history and need for assistance.

h. Use of Existing Infrastructure

The target area and proposed brownfield site are adjacent to Ypsilanti's downtown district and have access to readily available utilities that include natural gas, electricity, water, sewer, and fiber optic lines that are sufficient to support redevelopment and reuse without significant additional resource investment. In addition, the city has already invested in creating the Water Street Trail, which provides a recreational connection from the target area to Riverside Park and, by extension, a multitude of recreational opportunities such as walking, biking, canoeing, and fishing along the Huron River. Regionally, the target area and proposed brownfield site has direct access to an established regional infrastructure, providing many advantages that include access to a world-class transportation network of highways, rail, airports, and waterways.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community's Need for Funding

The City's small and declining population (-4.8 since 2018, Census, 2023), low community income, and stagnating tax revenues are the primary reasons why the City does not have the ability to fund the cleanup activities needed at the proposed

brownfield site. Between 2024 and 2025, the City's projected revenues dropped by approximately 6% while operating expenses increased by 16.7% (Ypsilanti 2025-2026 Amended Budget Report. Although revenues from project property taxes are expected to rise by 3%, this is not enough to offset the increased costs of governmental operations and city services. To maintain fiscal responsibility, the City has reduced the budgets of parks and recreation by 46.9%, public safety by 0.8%, road maintenance by 2.3%, and reallocated budget from the City's general fund to make up the shortfall (Ypsilanti 2025-2026 Amended Budget Report). Therefore, the City is unable to fully fund cleanup activities at the proposed brownfield property without assistance from an EPA Brownfield Cleanup Grant.

Within Census Tract 4108, the presence of the target area and proposed brownfield site has likely had a negative impact on nearby residential properties. The average value of residential properties within Census Tract 4108 is approximately 15.2% below the City's average and less than half of the County-wide average. The population within this area is of low income and has a median household income ($38,125) that is approximately $6,000 less than the City's average ($44,141), less than half of the County's average ($87,156), and approximately $34,200 less than the State's average ($72,389). The poverty rate within Census Tract 4108 is 4% higher than the rest of the County, with 15.3% of households receiving public assistance compared to 8.9% of the County. Large tracts of developable land are not available outside the target area, reducing opportunities to increase property tax revenues from new development within the City.

b. Health or Welfare of Sensitive Populations

The target area includes disproportionately high concentrations of disabled, impoverished, low-income, women of child bearing age, and elderly populations, which increases their susceptibility to adverse impacts from contamination exposure. The table below presents a comparison of these population percentages within the target area census tract relative to the City and County based on 2023 Census data.

	Tract 4108	City	County	State
Percent Population with Disability*	14.2%	12.8%	10.3%	14.2%
Percent of Families in Poverty*	10.7%	19.7%	6.7%	8.8%
Percent of Low-Income Population**	22.5%	25.9%	9.6%	14.2%
Percent of Women of Childbearing Age (Ages 15-44)**	57.5%	62.8%	47.5%	37.4%
Percent of Population Aged 65+*	13.4%	9.2%	8.8%	18.2%

*American Community Survey, 2023)

**Source: unitedforalice.org – Low Income is defined as Asset Limited, Income Constrained, Employed (ALICE) — where median household income is above the federal poverty line, but not enough to afford basic expenses in the county (Washtenaw County – $38,172).

According to the health statistics published by the County Health Rankings and Roadmaps (www.countyhealthrankings.org), Washtenaw County exceeds the state average for severe housing problems (households that are experiencing overcrowding, high housing costs, or lack of kitchen or plumbing utilities) by approximately 3% and has a higher daily density of fine particulate matter (8.3 ug/cubic meter compared to 6.7 ug/cubic meter). Cleanup of the proposed brownfield site will reduce exposure to harmful chemicals and compounds, thereby reducing the negative health impacts associated with contamination for this segment of the population and position the property for redevelopment.

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

Residents living in proximity to the proposed brownfield site face disproportionate exposure to legacy contaminants and are at heightened risk for adverse health outcomes. According to the International Agency for Research on Cancer (IARC), PCBs are known carcinogens that impact the liver, skin, and reproductive system, suggesting that segments of the population that are exposed to these contaminants are more vulnerable to experiencing severe health effects. In addition, the IARC has determined that a correlation exists between long-term PCB exposure and non-Hodgkin lymphoma. Data published by the Michigan Department of Health and Human Services (MDHHS, 2021) indicates that the cancer-related mortality rate (per 100,000 persons) in Washtenaw County, where the target area lies, has increased by 1.1% since 2015, compared to a decrease at the State level (-3.9%). Specifically, the age group that has experienced the highest increase is individuals aged 50-74. Since 2015, cancer mortality for individuals within this age group has risen by 12.2% in the county compared to an increase of 4.0% at the state level. Although the incidence of liver-related cancer in Washtenaw County is consistent with the State, the incidence of non-Hodgkin lymphoma per 100,000 persons between 2017 and 2021 is 9.8% higher than the state's rate (MDHHS, 2021).

Underlying health vulnerabilities further exacerbate these risks. Asthma prevalence in Washtenaw County (19.5%) exceeds both the Michigan (9.3%) and U.S. (8.4%) averages (Michigan Department of Health, Asthma Burden Report). These disparities leave residents especially susceptible to airborne and soil-based contaminants commonly associated with brownfield sites.

d. Economically Impoverished/Disproportionately Impacted Populations

As stated in Section 2.a – The Community's Need for Funding, there are disproportionate impacted population present within the target area. Over 10% of residents in the target area live below the poverty line, underscoring the community's

inability to finance cleanup or redevelopment without federal assistance. Additionally, 9.6% of households lack access to a vehicle (compared to 7.9% countywide) which limits residents' ability to access healthcare, employment, and fresh food, compounding their vulnerability to contamination. This grant will assist the city in eliminating environmental hazards by remediating contamination that negatively impacts residents' health, depresses property values, and stagnates economic growth. As noted in Section 1.d – Outcomes and Benefits of the Reuse Strategy, the redevelopment of the target area and proposed brownfield site will address the needs of the surrounding underserved communities by creating additional affordable workforce housing options and commercial retail spaces that will create approximately 98 new jobs, contributing to long-term community stability and economic growth consistent with EPA Brownfields Program objectives.

Community Engagement

e. Project Involvement, f. Project Roles

The table below summarizes the roles of local organizations and groups that will provide technical assistance to the city and provide critical input into the cleanup and redevelopment process to ensure that the highest and best use of the target area property is determined.

List of Organizations, Entities, Groups & Roles

Name of Organization, Entity, or Group	Entity's Mission	Point of Contact (name & email)	Specific Involvement in the Project or Assistance Provided
Southeast Michigan Council of Governments (SEMCOG)	SEMCOG supports local planning efforts by providing technical assistance, regional data, and intragovernmental resources.	Kevin Johnson johnson@semcog.org	SEMCOG will assist the city by providing economic data pertaining to housing demand, trends, and other economic data.
Huron River Watershed Council (HWRC)	An organization dedicated to the health and improvement of the Huron River through the use of technical data, stewardship, and citizen involvement	Rebecca Esselman eresselman@hrwc.org	HRWC will advise the city to identify opportunities to improve the quality, natural habitat, and recreational value of the Huron River (the target area's southern border).
Washtenaw County Brownfield Redevelopment Authority (WCBRA)	WCBRA administers the Washtenaw County's brownfield program and manages brownfield tax increment financing plans and administers the local brownfield revolving fund.	Nathan Voght voght@ewashtenaw.org	WCBRA will provide technical assistance for local brownfield planning initiatives.
Ypsilanti Downtown Development Authority (YDDA)	YDDA's goal is to contribute to the City's vibrancy by fueling development and growth that benefits business and residents	Elize Jekabson elize@ypsilantidda.org	YDDA will assist the City by identifying the needs of current and future business owners that could potentially benefit from the redevelopment of the target area.
Border to Border Trail (B2B)	A citizen group that manages and organizes events for the 35-mile trailway traversing Washtenaw County	Patricia Tupacz Scribner info@B2BTrail.org	B2B will assist the City in identifying and recommending trail improvements for the section of trail that traverses the proposed brownfield property.
Ann Arbor/Ypsilanti Regional Chamber of Commerce	The chamber's mission is to foster greater regional economic success, community prosperity, and improved quality of life by advocating for, and supporting, the Ann Arbor/Ypsilanti business community.	Diane Keller dkeller@a2chamber.org	The chamber will serve as a liaison to the City for local business owners that are affected by the project and advise the City on the long-term uses of the target property that involve commercial uses.

g. Incorporating Community Input

The City will engage target area residents and the surrounding community through multiple communication channels, including the distribution of flyers, postings at City offices and local libraries, the City website, and social media. A planning consultant has already helped deliver three public presentations over the past year to explain the target area's history, environmental challenges, and the role of brownfield planning in its cleanup and redevelopment. Feedback from these meetings supported the decision-making process and helped refine reuse options for the target area.

The City also hosted a workshop for interested developers summarizing redevelopment opportunities and potential financial incentives that can be leveraged to support cleanup and redevelopment. By the end of the first quarter of 2026, the

City plans to issue a request for qualifications to identify a development partner with the experience and financial capacity to redevelop portions of the site where contamination has largely been addressed.

Once the grant is awarded, a "kickoff" announcement meeting will be held, followed by public meetings to update the public on the cleanup and redevelopment status of the project. These meetings will provide a platform for residents to share input on health, safety, and community disruption posed by the project. The city will record these concerns to help make decisions on improving the process and performance under the grant. Community input will be appropriately responded to by the grant manager or environmental consultant. To reach residents who may not attend public meetings, communication regarding grant updates will be posted on the city's website, social media platforms, community-wide emails, or mailers, and an option to provide comments electronically or attend virtually will be made available.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Once EPA approves the project work plan and enters into a cooperative agreement with the City, the City will begin procuring a qualified environmental consultant. The selected consultant will have experience with the cleanup activities outlined in the work plan, community outreach, and relevant state and federal regulations. Procurement of the qualified environmental consultant will be conducted using EPA's procurement guidelines and the established City's purchasing and procurement policies. This includes publishing a Request for Proposal that will be widely distributed to qualified firms with specific guidelines and deadlines. The city will review each response, select the most qualified candidate, and enter into a master services agreement with the selected consultant.

The selected cleanup alternative involves utilizing a risk-based self-implementing cleanup approach for the PCB contamination based on the intended reuse of the proposed brownfield site and target area using the TSCA Subpart D Cleanup Standards for high occupancy uses. With respect to the location of the proposed brownfield site, directly adjacent to the Huron River, the conceptual plan for the proposed brownfield site includes residential reuse and passive uses that include stormwater management areas, walking trails, parks, green space, and common areas, all of which are considered high occupancy uses. Before the commencement of cleanup activities, a self-implementing TSCA PCB Cleanup work plan will be prepared for EPA review and approval (the state of Michigan does not have its own TSCA program). EPA's review of the plan is expected to be a timely process (generally 8 to 12 months); however, the entire project is anticipated to fall within the four-year grant period. Based on preliminary sampling data collected from the proposed brownfield site, cleanup activities are expected to include the disposal of approximately 565 tons of hazardous contaminated soil, 11,135 tons of non-hazardous contaminated soil, and the import and placement of approximately 11,700 tons of clean backfill material. Contaminated materials will be transported to a licensed facility that meets applicable disposal requirements. In addition, cleanup activities include oversight by an environmental consultant to ensure compliance with all applicable regulations. Environmental verification sampling of the excavated areas will be completed using other funding sources procured by the City (see Section 1.g – Resources Needed for Site Reuse).

Description of Tasks/Activities and Outputs

Task 1: Community Involvement
b. *Project Implementation:* Includes preparing and implementing a Community Involvement Plan outlining all community participation activities, including resident notifications, cleanup schedules, project updates, and a direct line of communication for submitting questions and concerns. At a minimum, three public meetings will be held (pre, interim, and post cleanup) to solicit input, educate, and update the community on cleanup progress. This task also includes the attendance of two staff members at the EPA National Brownfield Conference.
c. Anticipated Project Schedule: Community Involvement Plan and pre-project public meeting: Quarter 2, interim public meeting: Quarter 7, post cleanup public meeting: Quarter 12
d. Task/Activity Lead: City of Ypsilanti with support from the environmental consultant.
e. Outputs: Community Involvement Plan, community involvement meetings, presentation materials, meeting minutes documenting the outcomes of each meeting.
Task 2: Cleanup Planning
b. *Project Implementation:* Includes the finalization of the Analysis of Brownfield Cleanup Alternatives (ABCA), the preparation of a Section 106 Historical Review to document the potential past use of the proposed brownfield site by Native Americans, a Section 7 Threatened and Endangered Species Review, and the development and approval of a self-implementing TSCA PCB Cleanup work plan for high occupancy uses, preparation of bids and specifications, solicitation of competitive pricing, and the development of a Quality Assurance Project Plan (QAPP). Both the Section 106 Historic Review and the Section 7 Threatened and Endangered Species Review are required by the EPA as part of its Brownfield Cleanup Grant requirements. The self-implementing TSCA PCB Cleanup work plan will include volume calculations using environmental site characterization data that was

previously completed using other grant sources procured by the City. It is anticipated that the approval process of the self-implementing TSCA PCB Cleanup work plan will take approximately one year and require the submittal of several drafts and ongoing correspondence with EPA TSCA staff before final approval is issued. Attendance of a pre-bid meeting and site walkover will be mandatory for qualified contractors to submit competitive pricing. Retaining a qualified contractor will abide by EPA Guidelines and the City's established procurement process.
c. *Anticipated Project Schedule:* Final ABCA: Quarter 2, Section 106 and Section 7 Review: Quarter 3, QAPP: Quarter 4, Self-Implementing TSCA PCB Cleanup Work Plan: Quarters 2-7, Plans, Specifications, Contractor Selection and Documentation: Quarter 8
d. *Task/Activity Lead:* City of Ypsilanti with support from the environmental consultant.
e. *Outputs:* Final ABCA, Section 106 and Section 7 review, Approved Self-Implementing TSCA PCB Cleanup Work Plan, QAPP, Pre-Bid Meeting/Site Walkover Attendance List, Bid Tabulation and Recommendation to Award.
Task 3: Cleanup Activities
b. *Project Implementation:* Activities include the implementation of the self-implementing TSCA PCB Cleanup work plan that involves the excavation, transport and disposal of contaminated soil at an approved disposal facility, temporary sheeting and shoring, contaminated groundwater disposal, the import and placement of clean fill material, environmental oversight, and the installation and maintenance of appropriate surface cover. Environmental verification sampling of the excavated areas will be completed using other funding sources procured by the City. Once cleanup activities have been completed, a final cleanup report that summarizes the cleanup activities, environmental verification sampling results, disposal documentation, and remaining due care obligations will be prepared by the environmental consultant. In addition, the City will ensure that the cleanup activities conducted by the contractor are compliant with federal wage requirements in accordance with the Davis-Bacon Act.
c. *Anticipated Project Schedule:* Quarters 8-10
d. *Task/Activity Lead:* City of Ypsilanti with support from the environmental consultant and cleanup contractor.
e. *Outputs:* 1) Removal and disposal of approximately 565 tons of hazardous PCB contaminated soil, 11,135 tons of non-hazardous PCB contaminated soil, 250 linear feet of temporary sheeting and shoring, the disposal of 75,000 gallons of contaminated groundwater, and the placement of approximately 11,700 tons of clean backfill (quantity imported). Other outputs include a final cleanup report which will summarize daily observation reports, project photos, disposal documentation, Davis-Bacon Act compliance documentation.
Task 4: Grant Administration
b. *Project Implementation:* Includes the preparation and submittal of required quarterly and annual progress reports, input of project data into ACRES, and preparation and submittal of a final project report.
c. Anticipated Project Schedule: Progress reports will be submitted quarterly over the course of the cooperative agreement. A final project report will be prepared and submitted prior to the end of the agreement.
d. Task/Activity Lead: City of Ypsilanti with support from the environmental consultant.
e. Outputs: 12 Quarterly progress reports (assuming project is completed in three years), final project report.

f. Cost Estimates

Budget Categories		**Project Tasks ($1,902,260)**				
		Task 1	Task 2	Task 3	Task 4	**Total**
		Community Involvement	Cleanup Planning	Cleanup Activities	Grant Administration	
Direct Costs	Personnel	$0	$0	$0	$0	$0
	Fringe Benefits	$0	$0	$0	$0	$0
	Travel	$5,500	$0	$0	$0	$5,500
	Equipment	$0	$0	$0	$0	$0
	Supplies	$0	$0	$0	$0	$0
	Contractual	$13,000	$51,500	$195,600	$28,500	$288,600
	Construction	$0	$0	$1,608,160	$0	$1,608,160
	Other	$0	$0	$0	$0	$0
Total Direct Costs		$18,500	$51,500	$1,803,760	$28,500	$1,902,260
Indirect Costs		$0	$0	$0	$0	$0
Total Budget		$18,500	$51,500	$1,803,760	$28,500	$1,902,260

(Total Direct Costs + Indirect Costs)					

Task 1 – Community Involvement:

Contractual Costs: Preparation of the Community Involvement Plan is estimated to require 22.25 hours at $135/hour for an estimated cost of $3,000. Preparation and presentation for three community outreach meetings, which include consultant time to assist the city with these tasks, is approximately $3,330/meeting, 24.5 hrs./meeting at an average rate of $135/hr. = $10,000. A total of $5,500 is budgeted for attendance at the EPA Brownfield Training Conference in 2027 for two City staff. This includes registration fees ($350/person), a per-diem ($450/person over 4 days), lodging ($1,300/person over 3 nights), and air travel ($650/person). Personnel costs incurred by the City will be provided as in-kind services.

Task 2 – Cleanup Planning:

Contractual Costs: The total estimated cost to complete cleanup planning activities is $51,500, which includes the following: finalizing the ABCA, preparing the memorandum of decision/equivalency memorandum, establishing an administrative record preparing a self-implementing TSCA PCB Cleanup Work Plan, a Section 106 Historical Review, a Section 7 Threatened and Endangered Species Review, preparation and submittal of the QAPP, and preparation of specifications and competitive bidding of the project. The cost of finalizing the ABCA is estimated to require 26 hours, at an average rate of $135/hr., for an estimated cost of $3,500. The cost of preparing the memorandum of decision/equivalency memorandum and establishing an administrative record, as required by EPA, is estimated to require 22.25 hours, at an average rate of $135/hr., for an estimated cost of $3,000. The cost of preparing and submitting a TSCA PCB Cleanup Work Plan for EPA TSCA approval is estimated at approximately 174 hours at an average rate of $135/hr. for an estimated cost of $23,500. The preparation and submittal of a Section 106 Historical Review is estimated to require 48 hours, at an average rate of $135/hr. for an estimated cost of $6,500. The preparation and submittal of a Section 7 Threatened and Endangered Species Review is estimated to require 26 hours, at an average rate of $135/hr. for an estimated cost of $3,500. The cost of preparing the QAPP is estimated at approximately 26 hours, at an average rate of $135/hr. for an estimated cost of $3,500. The cost of preparing specifications, bidding, and selecting a qualified contractor to complete the cleanup activities is estimated at 74 hours, at an average rate of $135/hr. for an estimated cost of $8,000.

Task 3 – Cleanup Activities:

Contractual Costs: The total estimated cost of cleanup activities that will be paid with grant funds is $1,803,760, which include both construction and contractual costs. Construction costs, which includes the excavation, transportation, and disposal cost of 565 tons of hazardous PCB contaminated soil ($218,500 based on a unit cost of $386/ton) and 11,135 tons of non-hazardous PCB contaminated soil ($624,000 based on a unit cost of $56/ton). Other construction activities include an estimated 250 linear feet of temporary sheeting and shoring for the excavation areas adjacent to the Huron River ($28,750 based on a unit cost of $115/linear foot), the pumping and disposal of an estimated 75,000 gallons of contaminated groundwater within the excavation areas ($60,000, based on a unit cost of $0.80/gallon), and the placement of 11,700 tons of clean backfill ($468,000, based on a $40/ton). Total construction costs are estimated to be $1,608,160 which includes a 15% contingency (approximately $209,760) to cover unforeseen conditions. Contractual costs totaling an estimated $195,600 include environmental oversight, which generally ranges from 10-15% of the total cost of cleanup activities, ($177,600, averaging $2,960/day over 60 days), preparation of the Final Cleanup Report estimated to be $12,500 (92.5 hours at an average rate of $135/hr.), and Davis-Bacon compliance documentation estimated to be $5,500 (40.5 hours at an average rate of $135/hr.). The cost of post removal verification sampling will be funded using other grant sources and is not included in this grant request.

Task 4 – Grant Administration:

The city will oversee this task, with reporting assistance from the environmental consultant. The estimated cost for this task is $28,500 over the duration of the grant. This cost assumes that 12 quarterly reports will be prepared throughout the grant, that regular updates will be submitted to EPA ACRES, that a final project report will be prepared, and that additional EPA forms will be completed. Costs include environmental consultant support (approximately 211.25 hours at $135/hr.). Personnel costs incurred by the City will be provided as in-kind services.

g. Plan to Measure and Evaluate Environmental Progress and Results

The City will track several metrics to evaluate the grant's outputs and outcomes and determine whether it is fulfilling its intended purpose. The City will measure progress by holding monthly progress meetings with the qualified environmental consultant and contractor throughout the grant. Outputs related to community involvement tasks include the number of community involvement meetings held, attendance documentation, and meeting summaries. Progress will be tracked during cleanup activities by preparing daily observation reports and site photos. Outputs will also include the excavated and

disposed of quantities of contaminated materials, the number of temporary jobs created for cleanup activities, and the preparation of a final cleanup report documenting cleanup activities. Through the final site plan approval process, additional outcomes include the number of acres redeveloped, temporary construction jobs created, permanent jobs created, new residents relocating to the site, and total dollars leveraged from other funding sources and private investment will be reported; however, it is anticipated that these outcomes may not be available until after the cooperative agreement has expired.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Structure and b. Description of Key Staff

Ms. Katie Jones, the City's Community, Economic Development Manager, & Equity Manager, will be responsible for the day-to-day project management, grant administration, and financial management of the grant. Ms. Jones has over 15 years of experience and has secured and managed millions of dollars from federal, state, and private funding sources. She oversees the entire grant lifecycle, from proposal writing and budgeting to compliance monitoring and reporting. She ensures that all projects meet their goals and deliver tangible benefits to the communities served. She holds a master's degree in public affairs from the University of Michigan Ford School of Public Policy and is a lifelong resident of Ypsilanti. Mr. Andrew Hellenga, the City Manager, will provide support to Ms. Jones as needed over the course of the grant. Before stepping into the role of City Manager, Mr. Hellenga held key positions within the City of Ypsilanti, including City Clerk, Deputy City Clerk, and Downtown Development Coordinator. These roles provided him with extensive knowledge of municipal operations and a comprehensive understanding of how to effectively serve the public. Mr. Hellenga holds a master's degree in public administration, complemented by graduate certificates in public management and land-use planning.

c. Acquiring Additional Resources

Once EPA approves the project work plan and enters into a cooperative agreement with the City, the City will immediately begin the procurement process to retain a qualified environmental consultant. The desired consultant will be experienced in conducting various types of brownfield cleanup activities, as outlined in our cleanup plan, along with community outreach experience and familiarity with the applicable state and federal regulations.

As described in Section 3, Task 2 – Cleanup Planning, the City, with assistance from the qualified environmental consultant, will prepare project specifications and publish a Request for Proposal with allotted guidelines and deadlines to solicit competitive pricing from qualified contractors. The selected contractor will be experienced in conducting cleanup activities specific to those outlined in the EPA approved Self-implementing TSCA PCB Cleanup Work Plan, and familiar with the appropriate state and federal regulations.

Past Performance and Accomplishments

d. Currently Has or Previously Received an EPA Brownfields Grant

1. Accomplishments

In FY 2009, the city was awarded an EPA Brownfield Cleanup grant totaling $600,000. The grant was divided into three cooperative agreements totaling $200,000 each, all located in the Water Street Development Project Area. The first project funded cleanup activities at the former parcel located at 103 S. River Street, in addition to a subgrant provided by the Downriver Community Conference (DCC). The grant outputs and outcomes included the demolition of a concrete floor slab, which provided access for the removal and disposal of approximately 1,030 tons of contaminated soil. The second project funded cleanup activities at the former parcel located at 20 E. Michigan Avenue, including the removal and disposal of 5,268 tons of contaminated soil and 11,000 gallons of contaminated groundwater. The third project funded cleanup activities at the former parcels located at 34, 38, and 40 E. Michigan Avenue and 14 S. River Street and included the removal of approximately 520 tons of contaminated soil and building debris from the site. The outputs and outcomes for all three projects are reflected in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) (ACRES IDs: 109285, 109141, and 109284). Please note that these projects which occurred in Areas 1 and 2 described in Section I.a, are not included as part of the proposed brownfield site. No cleanup activities, funded by an EPA Brownfield Cleanup Grant or otherwise, have occurred at the proposed brownfield site identified in this grant request.

2. Compliance with Grant Requirements

Grant funds previously awarded to the city were successfully managed and completed in FY 2011. The city successfully complied with all grant requirements by submitting on-time approved work plans, schedules, quarterly, final, and ACRES reporting. All grant funds were expended upon closure of the grant.

FY 2026 EPA Brownfield Cleanup Grant Application

City of Ypsilanti, Michigan

Threshold Criteria

1. **Applicant Eligibility:**
    a. The eligible entity is the City of Ypsilanti, which is a General-Purpose Unit of Local Government as defined under 2 CFR 200.64.
    b. Not applicable

2. **Previously Awarded Cleanup Grants:** The proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds:** Not applicable.

4. **Site Ownership:** The City of Ypsilanti is the sole owner of the property located at 4 Water Street, Ypsilanti, Michigan 48197. Tax assessment is provided as an attachment to this application.

5. **Basic Site Information:**
    a. Site Name: Water Street Redevelopment Area
    b. Site Address: 4 Water Street, Ypsilanti, Michigan 48197

6. **Status and History of Contamination at the Site:**
    a. Hazardous substances contaminate the proposed brownfield site.
    b. The target area was originally developed in the late 1800s and formerly consisted of dozens of individual tax identification parcels. Between the 1880s and 1980s, land use included residential dwellings, foundries, lumber yards and mills, bulk petroleum, and coal storage, a Detroit United Railway (DUR) storage yard later used as a metal junk yard, manufacturing, railroads and sidings, former gravel pit(s) and/or marshland infilled with non-native material, automobile service and repair, dry cleaners, printers, restaurants, grocers, and public parks. The site currently consists of vacant land.
    c. Environmental Site Assessments conducted on the property have identified concentrations of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and polychlorinated biphenyls (PCBs) above state and/or federal regulatory criteria.
    d. The proposed brownfield site was historically mined for sand and gravel to support the construction of local railroads around 1900 and then subsequently used as a dumping area for solid waste from the former DUR storage yard (located north of the proposed brownfield site), as well as construction and demolition debris. PCBs have been detected

in soil to depths of up to 9 feet, with some concentrations exceeding 50 ppm—levels considered hazardous under TSCA.

7. **Brownfield Site Definition:**
    a. The site is not listed or proposed for listing on the National Priorities List.
    b. The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued or entered into by parties under CERCLA.
    c. The property is not subject to the jurisdiction, custody, or control of the United States government.

8. **Environmental Assessment Required for Cleanup Grant Applications:**
The following table summarizes the environmental assessments conducted at the proposed brownfield site in the Water Street Redevelopment Area (the target area).

Name of Report	**Date of Report**
Environmental Site Assessment (Gilbert Park Property)	November 2000
Environmental Site Assessment (Ypsilanti Iron and Metal Company, Parcel #28, 102 Parsons Street)	November 2000
Phase II Environmental Site Assessment (Water Street Redevelopment Project)	March 2003
Baseline Environmental Assessment (Parcel 28,102 Parsons Street)	April 2004
Phase I Environmental Site Assessment (Water Street Flats, Approximate 3.14-Acre Property)	March 2014
Phase I Environmental Site Assessment (Water Street Flats ROW)	April 2014
Phase II Environmental Site Assessment (Water Street Flats, Approximate 3.14-Acre Property)	April 2014
Phase II Environmental Site Assessment (Water Street Redevelopment Area)	April 2016
Draft Limited PCB Site Characterization Report (A Portion of Former Gilbert Park, Historical Parcel 39)	November 2024

Area 3 (the proposed brownfield site), as defined in this USEPA Cleanup Grant application, consists of former Parcel 39 and the southern portion of former Parcels 26, 28, and 39. Previous investigations pertaining to these former parcels are summarized below.

In November 2023, sampling in support of a comprehensive Environmental Site Assessment of a proposed brownfield site, which horizontally and vertically delineated the extent of PCB contaminated soil, was completed. Soil borings were advanced on a ten-foot by ten-foot sampling grid, where one soil sample per one foot depth interval was collected at each boring location throughout the 9 feet of fill material encountered.

Sampling results indicated the presence of PCBs at detectable concentrations throughout the 9-foot interval across the entire proposed brownfield site, with concentrations ranging from less than one ppm to greater than 100 ppm. Samples that were collected in the northern and easternmost areas of the proposed brownfield site generally contained PCBs at concentrations greater than 50 ppm between the 1'-6' foot depth interval. Below 6 feet of the ground surface, PCB concentrations were generally not detected or were less than one ppm. Subsurface soils consisted of sand with traces of clay and gravel plus non-native fill material, including ash, asphalt, brick, ceramic, coal, glass, and wood debris to depths ranging from one foot to nine feet below ground surface. Based on these physical observations, the assessment concluded that the proposed brownfield site had been subject to historical landfilling/dumping with construction/demolition debris.

Sampling, data analysis tables, and graphical depictions of the horizontal and vertical extent of PCB contamination have been completed and used to prepare the scope of the cleanup activities subject to this grant request. A draft of the report is in progress.

9. Site Characterization:

c. The site is not eligible to be enrolled in a voluntary response program or State or Tribal equivalent oversight program.

i. The attached letter from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) states that no voluntary response program exists.

ii. No additional assessment of PCBs is needed to characterize the site for remediation work to begin sufficiently. If funding is awarded, EPA will be provided with information that demonstrates compliance with this requirement by June 15, 2026.

10. Enforcement or Other Actions:

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which the Brownfield Grant funding is sought.

11. Sites Requiring a Property-Specific Determination:

The property requires a "Property-Specific Determination" from EPA to be eligible for Brownfield Grant funding because the following special class of property applies:

- Properties where there has been a release of polychlorinated biphenyls (PCBs) and all, or part, of the property is subject to TSCA remediation.

Required Information for a "Property-Specific Determination".

1. Basic Site Identification: Water Street Redevelopment Area located at 4 Water Street, Ypsilanti, Michigan 48197
2. Eligible Entity Identification: The eligible entity is the City of Ypsilanti, which is a General-Purpose Unit of Local Government as defined under 2 CFR 200.64.

3. A property-specific determination is required because there has been a release of polychlorinated biphenyls (PCBs) and all, or part, of the property is subject to TSCA remediation.
4. Previously conducted assessments have identified the presence of PCB contamination on the site.
    1. Protection of Human Health and the Environment
        - Funding from an EPA Brownfield Cleanup Grant will be used to remove PCB contaminated soil to achieve TSCA Subpart D Standards for High Occupancy Uses. The removal, disposal, and placement of clean backfill will eliminate the direct contact pathway, thereby eliminating human health risks.
        - Specific environmental improvements as a result of funding from an EPA Brownfield Cleanup Grant include the removal of an estimated 11,700 tons of PCB contaminated soil.
        - The removal of PCB contaminated soil is the primary target of cleanup activities, however, additional contaminants that include but are not limited to heavy metals including lead, volatile organic compounds, and semi-volatile organic compounds.
        - The removal of PCB contaminated soil will eliminate the risks posed to human health and the environment. It will position the property for redevelopment into residential and passive recreational uses, which is consistent with the City of Ypsilanti's Master Plan.
    2. Promote Economic Development or the Creation of, Preservation of, or Addition to Parks, Greenways, Undeveloped Property, other Recreational Property, or other Property Used for Non-Profit Purposes
        - The economic development activities that can reasonably be expect as a result of the funding include: 1) the creation of an estimated 60 new townhome units, 54 single family homes, and 180 affordable apartment units resulting in an estimated 370 new residents, and 2) the creation of approximately 42,500 square feet of retail spaces, 40,800 square feet of new office space, the both of which is estimated to create 98 new jobs. The redevelopment of the target area and proposed brownfield site is estimated to generate approximately $2,380,000 in new property tax revenue.
        - The redevelopment of the target area and proposed brownfield site will contribute to the community-wide redevelopment and revitalization goals of the City's Master Plan. These goals include: 1) responsibly dealing with the legacy of polluted sites, 2) protecting the watershed from further contamination, 3) creating diverse and accessible housing options, 4) integrating placemaking and streetscape design features, and 5) creating

opportunities to make the area more accessible by foot or bike to connect to nearby services. The project also addresses the Ypsilanti Economic Development Action Plan goal of improving the general environment and quality of life by 1) prioritizing vacant, underutilized nonresidential properties for redevelopment that use innovative design concepts consistent with smart growth principles and 2) remediating potential brownfield sites to make land available for redevelopment.

- Given the adjacency of the Huron River to the south of the proposed brownfield site, cleanup activities will also support the creation of a stormwater detention area designed using sustainable best management practices.
- The redevelopment will also include a stormwater detention area designed using sustainable best management practices intended to offset the effects of climate change. Specifically, the detention area will reduce the impact of peak stormwater discharges during wet-weather rain events and mitigate the effects of channel degradation of the nearby Huron River. The basin will be stabilized with native wetland vegetation that has high transpiration rates, provides habitat for local wildlife, and can filter nonpoint-source pollutants commonly associated with urban stormwater runoff. Preliminary estimates indicate that the detention area could store up to 600,000 gallons of stormwater.

5. Funding to implement cleanup activities at the proposed brownfield site is not available; however, the City has procured funding from other sources to implement assessment activities (cleanup activities are not eligible under these sources).
6. The City acquired the target area and proposed brownfield site through railroad abandonment, sale, eminent domain, and tax default, and is not responsible for the contamination at the site.

12. Threshold Criteria Related to CERCLA/Petroleum Liability:

a. Property Ownership Eligibility – Hazardous Substance Sites

ii. Exemptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability

1. Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

Per CERCLA Section 104(k)(3)(E), the City of Ypsilanti is a public entity (such as a state or local government) that acquired the property prior to January 11, 2002 and is eligible for a brownfields grant that may be used to address contamination at the property, as the City did not cause or contribute to the release or threatened release of hazardous substances at the property.

a. The property was originally comprised of 40 smaller, individual tax parcels that were acquired through railroad abandonment, sale, eminent domain, and tax default.

b. Prior to parcel consolidation, the property was comprised of 40 smaller, individual tax parcels that were acquired on multiple dates between 1998 and 2001.
c. Contamination from hazardous substances at the site occurred before the City acquired the property.
d. The City has not caused or contributed to any release of hazardous substances at the site.
e. The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

13. Cleanup Authority and Oversight Structure:

a. The project will not be enrolled in a voluntary state response program, as no program exists in the state of Michigan. Therefore, a cleanup work plan that is compliant with TSCA Subpart D will be prepared and submitted to EPA for approval. The plan will ensure that cleanup activities are protective of human health and the environment. Once a cooperative agreement is awarded, the City will issue an RFP to retain the services of a qualified environmental consultant with the technical capability to prepare an EPA approved TSCA Subpart D Cleanup plan, manage and oversee cleanup activities, and ensure compliance with TSCA and the grant requirements. Selection and procurement of the qualified environmental consultant will comply with the fair and open competition requirements specified in 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.
b. The City owns and has full access to the entire target area, of which the proposed brownfield site is a part. No additional access from neighboring properties is needed to access the proposed brownfield site to conduct cleanup activities.

14. Community Notification:

a. Draft Analysis of Brownfield Cleanup Alternatives

A draft of the Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the project. The draft ABCA, along with the draft application, was made available to the community for comment. The draft ABCA briefly summarizes the following:

- The site and contamination issues, cleanup standards, and applicable laws,
- The cleanup alternatives considered, which include information on the effectiveness, the ability to implement, and the resilience to address potential adverse impacts caused by extreme weather events, cost, reasonableness, and
- The proposed cleanup alternative

If selected for funding, the City will finalize the ABCA and make it available for public review and comment as part of the pre-cleanup activities.

b. Community Notification Ad

A notification ad was published in the Washtenaw County Legal News notifying the target community of the availability of the draft grant application and ABCA on the City's website. The ad ran from January 6, 2026, to January 20, 2026 and provided information

on how to comment on the draft application, and identified the date, time and location of the public meeting.

c. Public Meeting
On January 20, 2026, the City of Ypsilanti City Council held a public hearing on the draft application as part of their regularly scheduled City Council Meeting. The meeting was held in person in the City Council chambers, at One South Huron, Ypsilanti, Michigan, 48197. Virtual accommodation was also available using the Zoom Meeting platform.

d. Submission of Community Notification Documents
The following documents are attached:
    - A copy of the draft ABCA
    - A copy of the advertisement in the Washtenaw County Legal News that demonstrates solicitation for comments on the application and that the notification to the public occurred at least 14 days before the application was submitted to the EPA.
    - A summary of the comments received
    - The City's response to the comments received
    - Meeting notes from the public meeting held on January 20, 2026

15. Contractors and Named Subrecipients:
Not applicable.

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

GRETCHEN WHITMER
GOVERNOR

PHILLIP D. ROOS
DIRECTOR

December 16, 2025

VIA EMAIL

Katie Jones
Manager, Strategic Communications
Economic Development & Equity
City of Ypsilanti
1 South Huron Street
Ypsilanti, Michigan 48197

Dear Katie Jones:

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) acknowledges that the city of Ypsilanti plans to conduct the cleanup of a brownfield site and is applying for an FY26 EPA Brownfields Cleanup Grant.

The city of Ypsilanti is developing an application requesting site-specific federal Brownfields Cleanup funding for the Ypsilanti Water Street Development Site located at 4 Water Street, Ypsilanti, Michigan.

EGLE affirms that the Ypsilanti Water Street Development site:

i. Is not eligible to be enrolled in the State voluntary response program because no such program or equivalent oversight program exists.

If you need further information about this letter or other 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

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

cc: Ryan Higuchi, AKT Peerless
Heather Smith, EGLE
Sheryl Doxtader, EGLE