R05-26-C-009

AUBURN HILLS

1. **Applicant Identification:** The City of Auburn Hills with the address of 1827 N. Squirrel Road, Auburn Hills, Michigan 48326

2. **Website URL:** www.auburnhills.org

3. **Funding Requested:**
   a. **Grant Type:** Single Site Cleanup
   b. **Federal Funds Requested:** $2,099,100

4. **Location:** Auburn Hills, Oakland County, Michigan

5. **Property Information:** Kayak Point Redevelopment Project
   2041 Auburn Road, Auburn Hills, Michigan 48326

6. **Contacts:**
   a. **Project Director:** Ms. Stephanie Carroll, Economic Development Manager, will serve as the Project Director for this proposal. Ms. Carroll's contact information is as follows:
   Phone: (248) 364-6802, Email: scarroll@auburnhills.org
   Address: 1827 North Squirrel Road, Auburn Hills, Michigan 48326.
   b. **Chief Executive/Highest Ranking Elected Official:** Mr. Eugene Hawkins, III serves as the Mayor of the City. Mr. Hawkins' contact information is as follows:
   Phone: (248) 370-9400, Email: ehawkins@auburnhills.org,
   Address: 1827 N. Squirrel Road, Auburn Hills, Michigan 48326.

7. **Population:** 26,047 (ACS 2024)

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.	**3-4**
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.	**2,3**
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 Auburn Hills (population 26,047 per 2024 Census data), located in Oakland County in southeastern Michigan's Lower Peninsula, is the geographic focus of this Cleanup Grant application. The City's development is closely tied to the historic growth of the Detroit metropolitan area as a national center for automotive manufacturing. As a result, Auburn Hills contains a significant concentration of industrial and commercial centers, including high-technology and automotive manufacturing facilities, and is currently home to more than 80 international corporations representing 32 countries, including the U.S. headquarters of Stellantis North America (formerly Chrysler) and BorgWarner, a global automotive supplier with production facilities in 24 countries. The City also includes key educational and commercial assets, such as three institutions of higher education, including Oakland University, and Great Lakes Crossing Outlets, one of Michigan's largest destination retail centers.

The region has experienced long-term economic disruption associated with the decline of the automotive and manufacturing sectors. Since the Great Recession in 2008, Southeast Michigan has lost more than 44,000 manufacturing jobs (SEMCOG), with Oakland County experiencing a 1.1 percent decline in manufacturing employment between 2010 and 2023 (2023 Census data). 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.

Despite these regional trends, Auburn Hills has demonstrated economic resilience due to the diversity of its employment base. While surrounding communities experienced significant manufacturing job losses, Auburn Hills recorded a 39.1 percent increase in manufacturing employment (2023 Census data). This economic stability, combined with the City's natural resources, park amenities, retail centers, and overall quality of life, has supported sustained population growth. Over the past eight years, Auburn Hills' population increased by 11.3 percent, significantly outpacing growth in Oakland County (3.2 percent) and the State of Michigan (1.5 percent) (2023 Census data). Residents aged 65 and older now comprise approximately 14.7 percent of the population, a share expected to increase over the next decade. Since 2015, the senior population has grown by 34.9 percent, compared to 21.4 percent in Oakland County, indicating a strong pattern of aging in place.

In response to projections that the population of residents aged 65 and older will double by 2035, the City of Auburn Hills has taken proactive steps to support aging in place. Auburn Hills was the first city in Michigan to partner with the American Association of Retired Persons (AARP) through the AARP Age-Friendly Communities Network, which assists local governments in creating communities that are safe, accessible, and supportive for residents of all ages. As part of this initiative, the City engaged directly with older residents, who identified a critical need for affordable housing with age-friendly design features that promote independence and expressed strong interest in new senior housing opportunities within the City.

Meeting this need has become increasingly challenging due to limited available land. More than 75 percent of Auburn Hills' 16.6 square miles are developed for commercial and industrial uses, leaving few parcels of sufficient size to accommodate a senior housing community. One of the only remaining suitable areas is located within the Clinton River District in Census Tract 1406 (the target area), near the City's southern boundary. This area is largely built out and is primarily zoned for single-family residential and business park uses.

The Kayak Pointe Redevelopment Area, an 11.1-acre vacant parcel located within the target area and bisected by the Clinton River, represents a rare opportunity to address this identified housing need. However, redevelopment of the site has been impeded by undocumented fill contaminated with polychlorinated biphenyls (PCBs). Cleanup of contaminated soils is required to eliminate potential exposure risks and enable safe reuse of the property. The cost of remediation has prevented private investment and stalled redevelopment. Funding through an EPA Brownfields Cleanup Grant would remove this barrier, protect public health, support the safe reuse of an underutilized property, and facilitate the redevelopment of the site for affordable, age-friendly senior housing consistent with EPA Brownfields Program objectives.

b. Description of Proposed Brownfield Site

The proposed brownfield site consists of 11.1 acres of vacant, vegetated land bisected by the Clinton River. Historically, the site was used primarily for overflow parking for the former Pontiac Silverdome and several small restaurants. For more than 20 years, the property has remained vacant, generated minimal to no tax revenue, become an eyesore, and continues to pose environmental risks. The City acquired the site through tax foreclosure in 2017 and began evaluating redevelopment opportunities.

Environmental investigations identified the presence of undocumented fill soils, including foundry sand up to 16 feet below ground surface, likely imported around the same time the Pontiac Silverdome was constructed in the 1970s. Soil

sampling detected polychlorinated biphenyls (PCBs), with concentrations exceeding 50 parts per million (ppm) at several locations, classifying the contamination in these areas as hazardous under Toxic Substances Control Act (TSCA).

Consistent with the City's commitment to provide quality parks and recreational amenities that take advantage of the natural resources that the Clinton River provides, the City identified the 3.2-acre portion of the proposed brownfield site south of the Clinton River as an ideal location to construct a public kayak launch. For the remaining 7.9 acres north of the river, the City has determined that it's a prime location for future mixed-use development. As a first step toward achieving these goals, the City conducted additional sampling to vertically and horizontally delineate the extent of the PCB contaminated soils in support of preparing a self-implementing TSCA PCB Cleanup Work Plan. However, high cleanup costs have stalled progress, and available financing tools such as tax increment financing, state grants and local tax abatements, are insufficient to fund cleanup activities on their own. EPA Brownfields Cleanup Grant funding is therefore needed to remediate contamination so the City can move forward with its plans to construct the kayak launch and prepare the northern portion of the site for redevelopment.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

The construction of a mixed-use development that includes 100 new, affordable senior housing units and 26,500 square feet (SF) of ground floor commercial space on the northern portion of the proposed brownfield site directly addresses several of the action plan items identified in the City's Age-Friendly Action Plan and achieves the City's goal to support an aging population. These items include: *1) Encourage developers to consider affordable housing developments for older residents, 2) Increase the awareness of age-friendly housing options available within the City, and 3) Improve the walkability of Auburn Hills, including bike paths and trails.*

The proposed construction of a kayak launch and park on the southern portion of the proposed brownfield is prime opportunity to directly address several initiatives identified in Auburn Hills' Riverwalk Master Plan including: *1) providing a network of trails, paths and sidewalks that allow people to walk or bike to the Downtown Core, and to various park amenities, 2) providing a range of active and passive park spaces and features for all ages and abilities in the Riverwalk Park system, and 3) increasing access to the river for fishing, canoeing and kayaking.* 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*.

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 senior housing, attracting new residents within the city and creating spaces that provide walkable connections to area parks and amenities. The construction of a kayak launch on the southern portion of the proposed brownfield site would create a public recreational access point to the Clinton River.

Environmental sustainability, water quality, land stewardship, and aesthetics have long guided the City's recreational planning. Over the past three years, the City has invested more than $3.8 million in maintaining and enhancing parks and recreational resources. Tree-lined walking and biking paths connect neighborhoods to numerous parks, making the City one of the region's most walkable communities. As part of the proposed brownfield redevelopment, 750 linear feet of new sidewalks are planned to connect the proposed kayak launch and park to the City's extensive pedestrian network serving neighborhoods, schools, businesses, and shopping areas.

The outcomes and benefits of the development of the northern portion of the proposed brownfield site are summarized in the table below.

Target Area Reuse	Outcomes and Benefits	Tax Implications
Commercial Retail	• Four retail spaces totaling an estimated 26,500 SF • Creation of 23 new jobs*	Est. Taxable Value Increase: $1.24 million Annual Tax Revenue Increase: $58,100
Senior Living Apartments	• 100 affordable senior living apartment units • Housing for an additional 150 new residents	Est. Taxable Value Increase: $3.46 million Annual Tax Revenue Increase: $194,500

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

The redevelopment will also include a stormwater detention area designed to capture stormwater runoff from paved areas. By using sustainable best management practices intended to offset the effects of climate change, the detention area will reduce the effects of peak stormwater discharges during wet-weather rain events and mitigate channel degradation in the nearby Clinton River. These best management practices would include the use of native wetland vegetation that have high transpiration rates, provide habitat for 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 400,000 gallons of stormwater. Additional best management practices can also be employed to vegetate and stabilize the banks of the Clinton River channel and reduce the bank erosion.

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 Proposed brownfield side (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 Space, Senior Living Apartments (north)	55	160 lbs.	1,050 lbs.	1,210 lbs.
Kayak Launch (south)	27	82 lbs.	535 lbs.	617 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 of Auburn Hills Brownfield Redevelopment Authority (BRA) has established a Local Brownfield Revolving Fund (LBRF) pursuant to Michigan's Brownfield Financing Act. The LBRF is capitalized through the capture of a portion of tax increment revenues generated by successfully completed brownfield redevelopment projects within the City. If awarded an EPA Brownfields Cleanup Grant, the BRA will commit $100,000 from the LBRF to directly support the proposed cleanup activities.

While this local contribution demonstrates the City's commitment to redevelopment, LBRF resources are limited and dependent on the successful completion of other brownfield projects currently underway. As a result, available LBRF funds are insufficient to cover the substantial costs associated with the removal and proper disposal of PCB-contaminated soils at the proposed brownfield site. EPA Cleanup Grant funding is therefore critical to closing the financing gap, eliminating environmental hazards, and enabling safe redevelopment consistent with EPA Brownfields Program goals.

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**
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.

Michigan Department of Natural Resources Recreation Passport Grants	Reuse	Unsecured	The objective for the program is to provide funding to local units for the development of public recreation facilities. This includes the development of new facilities and the renovation of old facilities.
Michigan Community Revitalization Program	Remediation, Reuse	Unsecured	The focus of the MCRP is to encourage and promote structural renovations and redevelopment of brownfield and historic preservation sites located in traditional downtowns and high-impact corridors. MCRP provides gap financing in the form of performance-based grants, loans, or other economic assistance for eligible investment projects in Michigan.
Auburn Hills Local Brownfield Redevelopment Fund	Remediation	Secured	Funded using tax increment financing from other successful brownfield projects within the City, the fund supports brownfield cleanup activities through low interest loans or grants. If awarded, the authority will allocated $100,000 in support of cleanup activities.
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 has 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. 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 population and decreased state revenue share 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 15.17% while operating expenses increased by 14.6% (Auburn Hills 2025-2026 Amended Budget Report). Although revenues from project property taxes are expected to rise by 3.7%, it is not enough to offset the 21.8% loss of state revenue share. Rising operational expenditures are primarily related to the increase costs for public safety services, planned capital improvement projects, debt service, and reduced income from permits and fees. Proactive budget planning has allowed the City to maintain a sufficient general fund, which has been reallocated to offset reduction in revenues and maintain fiscal responsibility (Auburn Hills 2025-2026 Amended Budget Report).

Within Census Tract 1406 (the target area), the presence of the proposed brownfield site has likely had a negative impact on nearby residential properties. The average value of residential properties within Census Tract 1406 is approximately 12.5% below the City's average and two-thirds of the County-wide average. The poverty rate within Auburn Hills is slightly higher than the county average (6.9% compared to 6.4%), and within Census Tract 1406, 2.3% of the households are receiving public assistance compared to 1.8% of the households within the City. Large tracts of developable land are not available within the city limits, reducing opportunities to increase property tax revenues from new development within the City. The City's revenues are required to maintain existing services to support a growing population (11.3% increase over the past 8 years) (ACS, 2023). Therefore, the City is unable to fully fund cleanup activities at the proposed brownfield property without assistance from an EPA Brownfield Cleanup Grant.

b. Health or Welfare of Sensitive Populations

The target area includes disproportionately high concentrations of sensitive populations, which increases their susceptibility to adverse impacts from contamination exposure. The following table shows the percentages of minority, low-income, and senior populations in the target area census tract compared to the City, County, and state (2023 Census data).

	CT 1406	City	County	State
Children (Under 18)	22.7%	15.3%	19.8%	20.8%
Percent of Low-Income Population*	16.7%	19.1%	14.7%	14.2%
Women of Childbearing Age (15-44)	47.3%	46.9%	37.9%	37.4%

Percent of Population Aged 55+	19.2%	26.1%	32.1%	18.2%

*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 (Oakland County – $34,944).

According to the health statistics published by the County Health Rankings and Roadmaps (www.countyhealthrankings.org), Oakland County exceeds the state average for preventable hospital stays per 100,000 persons by approximately 6.1% and has a higher daily density of fine particulate matter (7.5 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

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. Data published by the Michigan Department of Health and Human Services (MDHHS, 2021) indicates that the cancer-related mortality rate is the leading cause of death in the County, especially among individuals aged 50 or older. Although the incidence of liver and skin-related cancer in Oakland County is consistent with the State, the incidence of reproductive system-related cancers is slightly higher in Oakland County than the state's rate (MDHHS, 2021).

Underlying health vulnerabilities further exacerbate these risks. Asthma prevalence in Oakland County (15.5%) 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 described in Section 2.b (Health or Welfare of Sensitive Populations), disproportionately impacted populations exist within the City and Census Tract 1406, and may be exposed to adverse environmental impacts associated with the proposed brownfield site. This Cleanup Grant will help eliminate those hazards by remediating PCB-contaminated soils, thereby reducing potential health risks, improving property conditions, and supporting economic recovery in the area.

As detailed in Section 1.d (Outcomes and Benefits of the Reuse Strategy), redevelopment of the target area and proposed brownfield site will respond to the needs of a growing senior population by creating additional affordable senior housing and supporting complementary commercial retail space. The project is expected to generate approximately 23 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.
Clinton River Watershed Council (CWRC)	An organization dedicated to the health and improvement of the Clinton River through the use of technical data, stewardship, and citizen involvement	Jennifer Hill jennifer@crwc.org	CRWC will advise the city to identify opportunities to improve the quality, natural habitat, and recreational value of the Clinton River (bisects the proposed brownfield site).

Oakland County Brownfield Redevelopment Authority (OCBRA)	OCBRA administers the Oakland County brownfield program, manages brownfield plans for communities that do not have a brownfield authority, and administers an EPA Brownfield Assessment grant	Brad Hansen hansenb@oakgov.org	OCBRA will provide technical assistance for local brownfield planning initiatives.
Auburn Hills Rotary Club	The rotary is a service club for service-minded individuals to provide humanitarian service and promote high ethical standards within the communities it serves.	Lisa Kiefer [redacted]	Provide assistance to the City by providing citizen input on park improvements for the southern area of the proposed brownfield property that will be developed as a kayak launch
Friends of the Clinton River Trail (FCRT)	FCRT is a volunteer, nonprofit, citizen group committed to promoting the Clinton River Trail as a safe and enjoyable destination.	Josh Eichenhorn [redacted]	Provide assistance to the City in identifying and recommending opportunities to integrate the proposed pathway on brownfield property into the Clinton River Trail network.
Auburn Hills Chamber of Commerce	The chamber's mission is to foster economic prosperity by supporting the Auburn Hills business community.	Jean Jernigan jjernigan@auburnhillschamber.com	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 proposed brownfield site that involve commercial uses.

g. Incorporating Community Input

The City will engage target area residents and the surrounding community through multiple communication channels, including press releases, public notices, postings at City offices and local libraries, the City website, and social media. 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 the process of 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 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 adjacency of the proposed brownfield site to the Clinton River, the conceptual reuse of the proposed brownfield site includes passive recreational uses south of the river, and a mixed-use residential development north of the river; all of which are considered high occupancy uses. Before the commencement of cleanup activities, a risk-based, 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 the sampling data collected from the proposed brownfield site, cleanup activities are expected to include the disposal of approximately 1,030 tons of hazardous contaminated soil, 9,315 tons of non-hazardous contaminated soil, and the import

and placement of approximately 10,345 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 and environmental verification sampling of the excavated areas.

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 Auburn Hills 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 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 Auburn Hills 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 verification sampling and oversight, and the installation and maintenance of appropriate surface cover. 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 Auburn Hills with support from the environmental consultant and cleanup contractor.
e. *Outputs:* 1) Removal and disposal of approximately 1,030 tons of hazardous PCB contaminated soil, 9,315 tons of non-hazardous PCB contaminated soil, 200 linear feet of temporary sheeting and shoring, the disposal of 250,000 gallons of contaminated groundwater, the placement of approximately 10,345 tons of clean backfill (quantity imported), and the laboratory analysis of an estimated 132 soil verification samples. Other outputs include a final cleanup report which will summarize daily observation reports, project photos, disposal documentation, and 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 Auburn Hills 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**				
		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	$53,500	$209,100	$28,500	$304,100
	Construction	$0	$0	$1,789,500	$0	$1,789,500
	Other	$0	$0	$0	$0	$0
Total Direct Costs		$18,500	$53,500	$1,998,600	$28,500	$2,099,100
Indirect Costs		$0	$0	$0	$0	$0
Total Budget (Total Direct Costs + Indirect Costs)		$18,500	$53,500	$1,998,600	$28,500	$2,099,100

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 $53,500, 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 $10,000.

Task 3 – Cleanup Activities:

Contractual Costs: The total estimated cost of cleanup activities that will be paid with grant funds is $1,998,600, which include both construction and contractual costs., Construction costs, which includes the excavation, transportation, and disposal cost of 1,030 tons of hazardous PCB contaminated soil ($397,580 based on a unit cost of $386/ton) and 9,315 tons of non-hazardous PCB contaminated soil ($521,640 based on a unit cost of $56/ton). Other construction activities include an estimated 200 linear feet of temporary sheeting and shoring for the excavation areas adjacent to the Clinton River ($23,000 based on a unit cost of $115/linear foot), the pumping and disposal of an estimated 250,000 gallons of contaminated groundwater within the excavation areas ($200,000, based on a unit cost of $0.80/gallon), and the placement of 10,345 tons of clean backfill ($413,800, based on a $40/ton). Total construction costs are estimated to be $1,789,500, which includes a 15% contingency (approximately $233,400) to cover unforeseen conditions. Contractual costs totaling an estimated $209,100 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) and laboratory costs associated with post removal verification sampling ($13,500 based on a total of 135 samples at unit cost of $100/sample). Other contractual costs include the 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.)

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

Stephanie Carroll, the City's Economic Development Manager, will be responsible for the day-to-day project management, grant administration, and financial management of the grant. Ms. Carroll has over 27 years of experience supporting economic growth, business development, and community advancement. Throughout her career, she has worked closely with public and private partners to strengthen local economies and create sustainable development opportunities. Stephanie brings extensive expertise in grant writing, successfully securing funding to support infrastructure improvements, workforce development initiatives, and community-focused projects. Her deep understanding of economic development strategies, combined with her ability to navigate complex funding processes, has made her a trusted resource for organizations seeking long-term impact. Known for her strategic thinking, diligence, and collaborative leadership style, Stephanie has consistently driven results while fostering strong relationships with stakeholders. She remains committed to advancing economic vitality and supporting initiatives that benefit both businesses and the broader community.

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

f. Never Received Any Type of Federal or Non-Federal Financial Assistance Agreements

The City of Auburn Hills has never received any type of federal or non-federal financial assistance agreement (grant or cooperative agreement).

FY 2026 EPA Brownfield Cleanup Grant Application

City of Auburn Hills, Michigan

Threshold Criteria

1. **Applicant Eligibility:**
   - **a.** The eligible entity is the City of Auburn Hills, 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:** The City of Auburn Hills does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership:** The City of Auburn Hills is the sole owner of the property located at 2041 Auburn Road, Auburn Hills, Michigan 48326. Documentation is provided as an attachment to this application.

5. **Basic Site Information:**
   a. Site Name: Kayak Point Redevelopment Area
   b. Site Address: 2041 Auburn Road, Auburn Hills, Michigan 48326

6. **Status and History of Contamination at the Site:**
   a. The site is contaminated by hazardous substances.
   b. Historically, the proposed brownfield site was vacant land as early as 1937. Between 1957 and 1983 the site was listed as the Auburn Heights Trailer camp and later used for overflow parking for the former Pontiac Silverdome. By 1993, the property was listed as Country Kitchen. At the time the City of Auburn Hills acquired the property through tax foreclosure in 2017, the property was vacant with no structures.
   c. Environmental Site Assessments conducted on the property have identified concentrations of metals, and polychlorinated biphenyls (PCBs) above state and/or federal regulatory criteria.
   d. Undocumented fill soils, consisting primarily of foundry sand, were encountered to depths of up to 18.5 feet below ground surface (bgs). The placement of these materials is believed to be associated with the site's historical use as an overflow parking area for the Pontiac Silverdome sports arena, which was constructed in the 1970s. Based on this history, the fill soils have likely been in place for approximately 30 to 40 years.

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 provides a summary of the environmental assessments that have been conducted at 2041 Auburn Road, Auburn Hills, Michigan (the target area).

Name of Report	**Date of Report**
Phase I Environmental Site Assessment	August 2018
Soils Investigation (Geotechnical)	January 2019
Phase II Environmental Site Assessment	February 2019
Supplemental Phase II Environmental Site Assessment	December 2019
Limited Subsurface Investigation	June 2021

The site, as defined in this USEPA Brownfield Cleanup Grant application, is an 11.1-acre, single parcel of undeveloped land. Previous investigations pertaining to the site are summarized below.

<u>August 2018 Phase I Environmental Site Assessment by Applied Environmental</u>
In August 2018, Applied Environmental completed a Phase I Environmental Site Assessment (ESA) of the proposed brownfield site on behalf of Opdyke Medical, PLLC. Based on the findings of the Phase I ESA, it was the opinion of Applied Environmental that no further inquiry into the environmental condition of the site was required.

<u>January 2019 Soils Investigation by McDowell & Associates</u>
McDowell & Associates (McDowell) conducted a geotechnical soil investigation of the proposed brownfield site in January 2019. McDowell & Associates' soil investigation consisted of the completion of four soil borings (borings 1 through 4). McDowell noted that on January 7 and 8, 2019, Borings 1 and 2, which were originally drilled in 2016, were extended from their 2016 depths of 15.5 feet and 20 feet down to depths of 60.5 feet and 30 feet below ground surface (bgs), respectively. Additionally, borings 3 and 4 were drilled in 2016 down to depths of 15.5 feet and 20.5 feet bgs, respectively. McDowell noted that the borings generally encountered foundry sand type fill soils over highly organic peat and marl swamp type soils, which in turn, overlie native granular soils. Groundwater was encountered in all four of the borings at depths of ranging from 4 feet to 6 feet bgs.

McDowell concluded that the fill soils, consisted mostly of foundry sand over highly organic soils were found in the borings down to 18.5 feet bgs. McDowell also noted that the site was reported to have been used as an overflow parking area for the former Silverdome sports arena, which was constructed in the 1970s, and thus it appears the site soils have been in place for at least 30-40 years.

February 2019 Phase II ESA by Applied Environmental

Applied Environmental (Applied)conducted a subsurface investigation of the site in February 2019. The purpose of Applied's investigation was to determine the absence/presence of subsurface contamination associated with foundry sand documented in geotechnical borings completed in January 2019. Applied's subsurface investigation consisted of the completion of three soil borings to the maximum depth of 12 feet bgs.

During the completion of the soil borings groundwater was encountered in all three soil boring locations at depths ranging from 7 to 8 feet bgs. A total of four soil samples and two groundwater samples were submitted for laboratory analysis for volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PNAs), polychlorinated biphenyls (PCBs), and 10 Michigan metals. The investigation was intended to determine the absence or presence of contamination associated with the foundry sand material discovered at the Site. The investigation summarized the following results relative to PCB contamination:

- Soil analytical results indicated that chromium total was detected at concentrations above Michigan Department of Environment, Great Lakes, and Energy (EGLE)Generic Residential Drinking Water Protection (DWP) Criteria and Groundwater Surface Water Interface Protection (GSIP) Criteria. Additionally, Applied Environmental noted that PCBs were detected at concentrations above the federal Toxic Substances Control Act (TSCA) screening levels, however they did not indicate which screening levels they compared the PCBs to.
- Groundwater analytical results indicated that PCBs were detected at concentrations above Generic Residential EGLE Drinking Water (DW) Criteria and Groundwater Surface Water Interface (GSI) Criteria.

May 2019 through December 2019 Summary of Evaluation Activities by AKT Peerless

AKT Peerless completed an initial PCB evaluation of the proposed brownfield site between May 30, 2019 and December 12, 2019. On May 30, 2019 and May 31, 2019 AKT Peerless visually surveyed the northern and central portions of the site and placed boring location markers throughout the site based on the survey maps for the Site. Many of locations were placed in the northern portion of the site based on a development plan for the site that has since been abandoned. Nonetheless, the spatial distribution of the borings were deemed adequate to evaluate this area of the site. The following is a summary of the boring and sampling plan:

- June 3, 2019 - a total of 27 borings were advanced, AKT-1 through AKT-27, on the northern portion of the Site. A total of 54 soil samples were submitted for laboratory analysis for

PCBs and 2 soil samples were submitted for unleaded gasoline parameters (ULGs). The analysis of ULGs was based on an "odor" identified by the geotechnical engineer in the same location of these borings. A gasoline station operates just north and upgradient of the Site.

- June 4, 2019 - a total of 41 borings were advanced, AKT-28 through AKT-68, on the northern portion of the Site. A total of 54 soil samples were submitted for laboratory analysis for PCBs and 2 soil samples were submitted for ULGs. The rational for the ULG analysis is the same as the above. All four samples analyzed for ULGs were in the general location of the geotechnical boring which exhibited an "odor" or were placed closer to the adjoining gasoline station.
- June 5, 2019 - a total of 41 borings were advanced, AKT-69 through AKT-109, on the central portion of the Site. A total of 41 soil samples were submitted for laboratory analysis for PCBs.
- June 6, 2019 - a total of 28 borings were advanced, AKT-110 through AKT-137, on the central portion of the Site. A total of 28 soil samples were submitted for laboratory analysis for PCBs.
- June 7, 2019 - a total of 4 borings were advanced, AKT-138 through AKT-141, and 3 temporary monitoring wells were installed, AKT-138/TW through AKT-140/TW, on the central portion of the Site. Additionally, AKT Peerless collected 5 sediment samples, Sed-1 through Sed-5, from the Clinton River which runs through the Site. A total of 7 soil samples, 3 groundwater samples, and 5 sediment samples were submitted for laboratory analysis for PCBs.
- November 18, 2019 - a total of 24 borings were advanced, AKT-142 through AKT-165, and 9 semi-permanent monitoring wells were installed, AKT-142/TW, AKT-146/TW, AKT-151/TW, AKT-156/TW, and AKT-161/TW though AKT-165/TW, on the central portion of the Site. Additionally, a total of 5 borings, AKT-1-S through AKT-5-S were advanced, and 5 semi-permanent monitoring wells, AKT-1-S/TW through AKT-5-S/TW, were installed on the southern portion of the Site. On the central portion of the Site, a total of 27 soil samples (including 3 duplicate samples), were submitted for laboratory analysis. Ten samples were submitted for laboratory analysis for PCBs, PNAs, target 23 metals, and hexavalent chromium; ten samples were submitted for laboratory analysis for PCBs; six samples were submitted for laboratory analysis for PCBs, PNAs, and priority 23 metals; and one soil sample was submitted for laboratory analysis for PCBs, PNAs, Priority 23 metals, and hexavalent chromium. On the southern portion of the Site, a total of 6 soil samples (including 1 duplicate sample) were submitted for laboratory analysis. Five samples were submitted for laboratory analysis for PCBs, PNAs, and priority 23 metals and one sample was submitted for laboratory analysis for PCBs, PNAs, priority 23 metals, and hexavalent chromium.
- On November 19, 2019 - a total of 34 borings were advanced, AKT-7-S through AKT-15-S, AKT-18-S, AKT-35-S through AKT-48-S, AKT-55-S through AKT-71-S, and AKT 78-S, and 3 semi-permanent monitoring wells, AKT-11-S/TW, AKT-44-S/TW, and AKT-55-S/TW, were

installed on the southern portion of the Site. A total of 39 soil samples, (including 5 duplicate samples) were submitted for laboratory analysis. 11 samples were submitted for laboratory analysis for PCBs, PNAs, priority 23 metals, and hexavalent chromium and 28 samples were submitted for laboratory analysis for PCBs. Furthermore, a total of 10 groundwater samples (including 1 duplicate) from the central portion of the Site were submitted for laboratory analysis of PCBs, PNAs, and priority 23 metals.

- November 20, 2019 - a total of 7 borings were advanced, AKT-49-S through AKT-54-S, and AKT 73-S, on the southern portion of the Site. A total of 8 soil samples (including 1 duplicate sample) were submitted for laboratory analysis. Two samples were submitted for laboratory analysis for PCBs, PNAs, priority 23 metals, and hexavalent chromium; five samples were submitted for laboratory analysis for PCBs; and one sample was submitted for laboratory analysis for PCBs, PNAs, and priority 23 metals. A total of 9 groundwater samples (including 1 duplicate) from the southern portion of the Site were submitted for laboratory analysis for PCBs, PNAs, and priority 23 metals.
- December 12, 2019 - a total of 32 borings were advanced, AKT-6-S, AKT-16-S, AKT-17-S, AKT-19-S through AKT 34-S, AKT-61-S through AKT-64-S, AKT-66-S through AKT-68-S, AKT-70-S, AKT-72-S, and AKT-74S through AKT-77-S, and 3 semi-permanent monitoring wells, AKT-6-S/TW, AKT-21-S/TW, and AKT-32-S/TW, were installed on the southern portion of the Site. A total of 36 soil samples (including 4 duplicate samples) were submitted for laboratory analysis. Six samples were submitted for laboratory analysis for PCBs, PNAs, target 23 metals, and hexavalent chromium; 26 samples were submitted for laboratory analysis for PCB; three samples were submitted for laboratory analysis for PCBs, PNAs, and target 23 metals; and one sample was submitted for laboratory analysis for PCBs and target 23 metals. A total of 4 groundwater samples (including 1 duplicate) from the southern portion of the Site were submitted for laboratory analysis of PCBs, PNAs, and target 23 metals.

Based on review of the data collected for the northern portion of the Site, PCBs were identified within 4 soil samples at concentrations exceeding the EPA Action Level for Low Occupancy (AKT-17 (6'-7'), AKT-35 (3-4'), AKT-40 (1.5'-2.5'), and AKT-50 (1-2')). For the central portion of the Site, PCBs were identified within 3 soil samples at concentrations exceeding the EPA Action Level for Low Occupancy (AKT-71 (0.5'-1.5'), AKT-143 (0.5-2.5'), and AKT-162 (2-3')). Additionally, PCBs were identified within 4 groundwater samples at concentrations exceeding the EPA Navigable Water Cleanup Levels (AKT-138/TW, AKT-139/TW, AKT-161/TW, and AKT-162/TW).

Furthermore, aluminum, arsenic, cobalt, iron, manganese, nickel, selenium, and silver were identified in soil samples above EGLE non-residential cleanup criteria (NRCC) for DWP and/or GSIP criterion. Aluminum, barium, cadmium, copper, iron, lead, magnesium, nickel, sodium, and zinc were identified in groundwater samples above the EGLE NRCC for DW criteria and/or GSI criteria and PCBs were identified in groundwater samples above the EGLE GSI criteria.

For the southern portion of the Site, PCBs were not identified within soil samples at concentrations exceeding the EPA Action Level for Low Occupancy. PCBs were identified within 3 groundwater samples at concentrations exceeding the EPA Navigable Water Cleanup Levels (AKT-2-S/TW, AKT-3-S/TW, and AKT-44-S/TW). Furthermore, aluminum, antimony, arsenic, cadmium, cobalt, iron, magnesium, manganese, total mercury, nickel, selenium, and silver were identified in soil samples above the EGLE NRCC for DWP and/or GSIP criteria. Aluminum, barium, cadmium, copper, iron, lead, magnesium, nickel, silver, sodium, and zinc were identified in groundwater samples above the EGLE NRCC for DW criteria and/or GSI criteria and PCBs were identified in groundwater samples above the EGLE GSI criteria.

Because the concentrations of PCBs in soil exceed the federal TSCA, Subpart D Cleanup Standards (25,000 µg/kg for low occupancy), AKT Peerless recommended a self-implementing cleanup including excavation and disposal of PCB contaminated soils, as well as, capping of certain areas of the Site in accordance with the requirements of 40 CFR §761.61(a).

June 2021 AKT Peerless' Limited Subsurface Investigation

AKT Peerless conducted a limited subsurface investigation on the Site to delineate several areas of PCB impacted areas above EGLE direct contact criteria. 60 soil borings on the northern, central, and southern portions of the site were advanced. Each area (hot spot) was delineated to the north, south, east, and west with the exception of the hot spots along the Clinton River where delineation north and south was not accessible. 167 soil samples were collected from the northern portion of the site, 84 soil samples from the central portion of the site, and 30 soil samples from the southern portion of the site. All samples were submitted for laboratory analysis for PCBs. Listed below are each hot spot that had a PCB exceedance above EGLE direct contact criteria (i.e.: 16,000 µg/kg) for non-residential properties and the corresponding soil borings that were drilled in an effort to delineate each hot spot.

Southern portion of the site:

- Hot spot AKT-3-S/Dup-1-S: Soil borings AKT-3-S/TWA, AKT-170, AKT-171, AKT-172 were drilled to12 feet bgs where foundry sand, silt, and sand were encountered.
- Hot spot AKT-16-S: Soil borings AKT-16-SA, AKT-166, AKT-167, AKT-168, AKT-169 were drilled to12 feet bgs where clay, silt, and sand were encountered.

Central portion of the site:

- Hot spot AKT-162/TW: Soil borings AKT-162/TWA, AKT-209, AKT-210, AKT-211 were drilled to 16 bgs where clay, foundry sand, sand, and peat were encountered.
- Hot spot AKT-153: Soil borings AKT-153A, AKT-173, AKT-174, AKT-175, AKT-176 were drilled 12 feet to 16 feet bgs where clay, gravel, foundry sand, sand, and peat were encountered.
- Hot spot AKT-100: Soil borings AKT-100A, AKT-177, AKT-178, AKT-179, AKT-180 were drilled to 12 feet bgs where gravel, sand, and foundry sand were encountered.

- Hot spot AKT-143: Soil borings AKT-143A, AKT-187, AKT-188, AKT-189, AKT-71A were drilled to 12 feet bgs where clay, sand, and foundry sand were encountered.
- Hot spot AKT-71: Soil borings AKT-71A, AKT-143A, AKT-190, AKT-145A, AKT-186 were drilled to 12 feet bgs where sand and foundry sand were encountered.
- Hot spot AKT-145: Soil borings AKT-145A, AKT-71A, AKT-185, AKT-186, AKT-190 were drilled to 12 feet bgs where sand and foundry sand were encountered.

Northern portion of the site:

- Hot spot AKT-50: Soil borings AKT-50A, AKT-186, AKT-191, AKT-192, AKT-193 were drilled 12 feet to 16 feet bgs where clay, foundry sand, and sand were encountered.
- Hot spot AKT-26: Soil borings AKT-26A, AKT-181, AKT-182, AKT-183, AKT-184 were drilled 12 feet to 16 feet bgs where gravel, sand, peat, and foundry sand were encountered.
- Hot spot AKT-17: Soil borings AKT-17A, AKT-194, AKT-195, AKT-196, AKT-197 were drilled 16 feet to 20 feet bgs where silt, sand, clay, peat, cobbles, and foundry sand were encountered.
- Hot spot AKT-35: Soil borings AKT-35A, AKT-199, AKT-201, AKT-202, AKT-203 were drilled 20 feet to 24 feet bgs where silt, peat, marl, clay, and foundry sand were encountered.
- Hot spot AKT-40: Soil borings AKT-40A, AKT-198, AKT-204, AKT-205, AKT-208 were drilled 20 feet to 24 feet bgs where silt, peat, clay, marl, and foundry sand were encountered.
- Hot spot AKT-39: Soil borings AKT-39A, AKT-199, AKT-AKT-200, AKT-205, AKT-206, AKT-207 were drilled 20 feet to 28 feet bgs where silt, clay, peat, marl, gravel, and foundry sand were encountered.

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. There is sufficient level of site characterization from the environmental assessments performed to date for the remediation work to begin on the site.

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 follow 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":

- Basic Site Information: Kayak Point Redevelopment Area, 2041 Auburn Road, Auburn Hills, Michigan, 48326
- Eligible Entity Information: The City of Auburn Hills
- 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.
- 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 both High and Low Occupancy Uses (as applicable). 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 the funding from an EPA Brownfield Cleanup Grant include the removal of an estimated 10,345 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 may also be removed.
    - The removal of PCB contaminated soil will eliminate the risks posted to human health and the environment and will position the property for redevelopment into mixed-uses and recreational uses that are consistent with the City of Auburn Hills' planning initiatives.
- Promote Economic Development or the Creation of, Preservation of, or Addition to Parks, Greenways, Undeveloped Property, or other Recreational Property, or Other Property Used for Nonprofit Purposes
    - A description of the economic development activities that can be reasonable expected as a result of funding are summarized below:

Target Area Reuse	Outcomes and Benefits	Tax Implications
Commercial Retail/Small Restaurant Space	• Four retail spaces totaling an estimated 26,500 SF • Creation of 23 new jobs*	Est. Taxable Value Increase: $1.24 million Annual Tax Revenue Increase: $58,100
Senior Living Apartments	• 100 affordable senior living apartment units • Housing for an additional 150 new residents	Est. Taxable Value Increase: $3.46 million Annual Tax Revenue Increase: $194,500

- Redevelopment of the brownfield property will contribute to the community-wide redevelopment and revitalization plans outlined in several planning documents. These

include achieving the goals and objectives identified in the City's Master Plan, the Age-Friendly Action Plan, and the Riverwalk Master Plan. High cleanup costs have stalled progress toward achieving these goals, rendering available financing tools such as tax increment financing, state grants and local tax abatements, insufficient to fund cleanup activities on their own. EPA Brownfields Cleanup Grant funding is therefore needed to remediate contamination so the City can move forward with its plans to construct the kayak launch and prepare the northern portion of the site for redevelopment.

- Ground floor commercial retail/restaurant space is planned as part of the mixed-use redevelopment for the northern portion of the site, which would be capable of accommodating 4 tenants, minimum.
- EPA Brownfield Cleanup funding would be used to remediate the site and allow the City to move forward with developing the southern 3.2 acres of the site into a City park and kayak launch.
- The southern 3.2 acres will be redeveloped by the City into a public park and kayak launch, offering area residents the opportunity to take advantage of the Clinton River's natural resources.
- As part of the proposed brownfield redevelopment, 750 linear feet of new sidewalks are planned to connect the proposed kayak launch and park to the City's extensive pedestrian network serving neighborhoods, schools, businesses, and shopping areas.
- The southern 3.2 acres of the site will be redeveloped by the City and operated and maintained as a city park.

12. Threshold Criteria Related to CERCLA/Petroleum Liability:

a. Property Ownership Eligibility – Hazardous Substance Sites

i. Exemptions to CERCLA Liability

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

Per CERCLA Section 104(k)(3)(E), the City of Auburn Hills is a public entity (such as a state or local government) that acquired the property via tax delinquency 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 acquired through tax delinquency.
b. The site was acquired by the City of Auburn Hills on July 26, 2017.
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 the cleanup and 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 that has the technical capability to prepare an EPA approve TSCA Subpart D Cleanup plan, manage and oversee cleanup activities, and ensure compliance with TSCA, as well as the grant requirements. Selection and procurement of the qualified environmental consultant will be in compliance with the fair and open competition requirements specified in 2 CFR Part 200, 2 CFR Part 1500 and 40 CFR Part 33.

14. Community Notification:

a. Draft Analysis of Brownfield Cleanup Alternatives
   An Analysis of Brownfield Cleanup Alternatives (ABCA) draft was prepared for the project. The draft ABCA, in addition to 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 appliable laws,
   - The cleanup alternatives considered, which includes information on the effectiveness, the ability to implement, and the resilience of the alternative to address potential adverse impacts caused by extreme weather events, cost, and 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 Oakland Press 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 22, 2026, and also 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 22, 2026, the City of Auburn Hills held a public hearing to discuss the draft application as part of their regularly scheduled Brownfield Redevelopment Authority meeting. The meeting was held in person at the City Offices, located at 1827 North Squirrel Road, Auburn Hills, Michigan. 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 Oakland Press 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 22, 2026
- Meeting sign-in sheet

15. Contractors and Named Subrecipients:

Not applicable.

GRETCHEN WHITMER
GOVERNOR

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

PHILLIP D. ROOS
DIRECTOR

December 16, 2025

VIA EMAIL

Stephanie Carroll
Economic Development Manager
City of Auburn Hills
1827 N. Squirrel Road
Auburn Hills, Michigan 48326

Dear Stephanie Carroll:

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

The city of Auburn Hills is developing an application requesting site-specific federal Brownfields Cleanup funding for the Kayak Point Development Site located at 2041 Auburn Road, Auburn Hills, Michigan.

EGLE affirms that the Kayak Point 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
Michelle Bakun, EGLE
Cheryl Wilson, EGLE