

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

### **a. Target Area and Brownfields**

#### **i. Background and Description of Target Area**

The City of the Village of Douglas (population: 953) is in Allegan County in the southwest portion of Michigan's lower peninsula on the shores of Lake Michigan. First settled by European-Americans in 1851, the City's initial economy revolved around the lumber industry. Lumber production peaked after the Great Chicago Fire of 1871, as Douglas area sawmills became the primary source of the lumber that was used to rebuild the City. After most of the harvestable trees in the area were cleared, the City's economy gradually shifted to become an epicenter for fruit production, with peaches as the primary crop. By the late 1800's the area's abundance of scenic natural resources began to attract people from large urban centers, like Chicago, who were in search of a quiet and peaceful vacation locale. Today, the City continues to thrive as a tourist community offering an eclectic art, food and cultural scene with miles of trails and attractions that include the panoramic views of Lake Michigan.

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

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

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

By engaging the public through several strategic planning initiatives, the City has identified the former Haworth Manufacturing property (the target property) along the Blue Star Highway, in conjunction with the former Miro Orchard site, which is adjacent to the west, as a target area for brownfield redevelopment. These properties are located along the Blue Star Highway, the City's main thoroughfare, approximately a half mile south of the City's downtown area. The Blue Star Highway is also an established commercial

corridor that is comprised of several established businesses that includes restaurants, hotels and lodging, banks, and small retail shops. In addition to these advantages, the size of the target area (nearly 60 acres) have prompted City planners to identify the target area as a prime location for the creation of new, diverse residential housing and mixed-use commercial space. Comprised of over 7 acres of land, redevelopment of the target property into mixed-use commercial space would be the first phase of a two-phase project. The second phase of the development involves the conversion of the former Miro Orchard property into a residential community comprised of approximately 60 townhomes. However, as the City's largest brownfield area, plans to redevelop both the former Haworth Manufacturing property and the Miro Orchard property have stalled. One of the major challenges that has prevented redevelopment of the target property is the known presence of contamination from polychlorinated biphenyls (PCBs).

**ii. Description of the Brownfield Site(s)**

The target property is located at 200 Blue Star Highway, Douglas, Michigan and consists of a single, parcel of approximately 7.18 acres. By 1938, it was initially developed as a small fallow orchard with two small structures. By the 1940s, the property was redeveloped into its current configuration which consists of a 150,300 square foot, one-story industrial building and two utility buildings which were used by various light industrial occupants (no longer in existence) who used the building for plating, buffing, zinc die casting, metal forming, stamping, phosphatizing, and painting metal parts. Between the years of 1976 and 2014, the property was owned and occupied by Haworth Inc. (formerly Haworth Manufacturing) who use the facility for manufacturing furniture. The site has been vacant since 2014, prompting the City of Douglas to acquire the site in 2019 to spearhead efforts to redevelop of the property.

Several environmental assessments have been conducted for the target property over the past five years. In 2015, a Phase I and II Environmental Site Assessment (ESA) was conducted to investigate contamination from volatile organic compounds (VOCs) beneath the building, as well as evaluate pathways related to vapor intrusion. The assessment included the advancement of 10 soil borings in the former die cast pit area (east room) within the target property building, and the subsequent collection of soil samples for analysis of polychlorinated biphenyls (PCBs). The results identified concentrations of PCBs above one part per million (ppm) at three of the boring locations, however, the horizontal and vertical extent of PCB impacts were not defined.

In May 2018, a Remedial Alternatives Evaluation (RAE) was conducted at the target property to evaluate the extent of trichloroethene (TCE) and PCB impacts to determine remedial alternatives to address the risks associated with VOC contaminated groundwater and PCB contaminated soil as it relates to the vapor intrusion and direct contact pathways. The RAE also summarized the results of subsequent site investigations that were conducted between 2015 and 2017 to delineate the horizontal and vertical extent of PCB contaminated soil impacts. These investigations identified soils impacted by PCBs at concentrations ranging from 3.4 parts per million (ppm) to 5,600 ppm, which are above the Toxic Substances Control Act (TSCA) Subpart D Cleanup Standard for low occupancy areas. The horizontal and vertical extent of the PCB impact was determined to be located in proximity to the former die casting/warehouse area of the building, at depths ranging from 1' to 15.5' below ground surface (bgs).

In addition to the overall costs associated with redeveloping target property, the added costs of cleaning up the contamination areas has made the project not cost feasible. After five years of vacancy, the property remains underutilized, is not providing property tax revenues, and is not a factor in the City's economy. To that end, the City acquired the target property in 2019 to explore funding options to implement cleanup activities that would make redeveloping the site cost feasible and better position the target property for redevelopment. In order to address the PCB contaminated areas, it has been determined that it is necessary to demolish the building to access the PCB contaminated areas and implement cleanup activities.

Prior to demolition activities taking place, the abatement of asbestos containing building materials (ACBM) that were identified in a recently conducted ACBM survey must be completed. A total of XX samples of a total of 150 samples collected from different building materials were determined to be asbestos containing. Materials testing positive for asbestos include all floor tile, mastic on the back of the brown floor tile in the east wing addition, air cell pipe insulation in the crawl space, textured ceiling material in the east wing addition, and transite roof shingles.

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**b. Revitalization of the Target Area**

**i. Reuse Strategy and Alignment with Revitalization Plans**

Over the past year, the City has engaged a local developer that has expressed interest in acquiring the property to develop a conceptual site development plan includes the redevelopment of the target property into a commercial mixed-use development that includes, restaurants, entertainment, and live-work space as the first phase of a larger two-phased development. The second phase includes the conversion of the former Miro Orchard property into a residential community comprised of approximately 60 townhomes. Several elements of the initial site design concept address the City's placemaking goals that includes the preservation of the City's reputation as a quiet destination community. These elements include the inclusion of walking trails and pathways that integrate into the City's existing trailways network, the inclusion of open green space, and the construction of dog park. Along Blue Star Highway, site design features directly address the City's goal to reinvent the Blue Star Highway corridor into a safe, pedestrian friendly area by incorporating larger building setback distances, the relocation of parking areas behind the proposed buildings, and implementing streetscape improvements that promote a sense of place.

The City has already allocated resources to retain an environmental consultant to perform environmental assessments as part of the City's acquisition of the target property, perform an asbestos containing materials survey of the existing building, and assess state and local brownfield redevelopment incentives that can be leveraged to assist with cleanup costs and due care response activities. The proposed reuse of the property takes advantage of the target property's location along a well-travelled highway, proximity to the area freeways, overall size in conjunction with former Miro Orchard property (collectively the largest area of developable land within the City limits), and proximity to the Lake Michigan coastline and other natural resource-based attractions. The conceptual site plan will serve as a blueprint of the City's desired reuses for the site, which can be used to market the property to other developers in the event an agreement cannot be reached with their current development partner.

The proposed reuses of the target property are consistent with several local and area planning initiatives that include the City's Master Plan, the Tri-City Master Plan, and the Blue Star Highway Corridor Study. One of the common overarching goals of these planning initiatives is to bolster the local economy by diversifying industries and services that cater to both tourism-based and full-time citizens, while preserving the character of the community. In support of this goal, several objectives have been identified for which the proposed redevelopment aligns. These objectives include: 1) Create inclusive and inviting residential areas that include a multitude of affordable housing types that include mixed housing types of condos, stacked flats, live/work space, townhouses and single-family detached units that attract both seasonal and

permanent homeowners. 2) Ensure housing stock is inclusive of all age groups to encourage long-term, permanent residency within the City, and 3) Support the creation of service-based, mixed uses that include health services, banking, shopping and other industries that would provide future opportunities to provide senior housing. These objectives are echoed within the Tri-Community Master Plan, a regionally based planning initiative that includes the Cities of Saugatuck and Douglas and Saugatuck Township. Specifically, the proposed reuse of the target property achieves the following: 1) Provide a balanced range of diverse housing types at varying densities where public utilities are present or could be quickly provided, and 2) Encourage high quality commercial development adjacent to existing commercial development and are compatible with adjoining uses.

Lastly, the City conducted the Blue Star Highway Corridor Study which was intended to obtain public input to formulate a community vision for the Blue Star Highway, which is the City's main thoroughfare. Reuse of the target area, as well as the former Miro Orchard site, was identified in the study as an opportunity to create a regional business corridor of large-scale retail, eating and drinking establishments, personal service establishments, professional and support offices, and medical facilities that are capable of meeting the needs of year-round residents of the Tri-Community area. Furthermore, the successful cleanup and redevelopment of the target area helps to leverage these planning initiatives to achieve several of HUD's livability and equitable development principles: 1) transportation and utility improvements, 2) equitable housing and recreational opportunities, and 3) improved economic development opportunities.

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

#### **ii. Outcomes and Benefits of Redevelopment Strategy**

Following the completion of cleanup activities, the target property would be sold to a developer, and once redeveloped, generate new property tax revenue, and no longer be a burden to the City's budget. The additional property tax revenue would be used to improve upon services throughout the community. Based on the initial conceptual site design, it is anticipated that the taxable value of the property would significantly increase, generating approximately \$87,500 annually in property tax revenues for the City. For Phase II of the project, which involves the redevelopment of the adjoining former Miro Orchard property into approximately 60 townhomes, it is estimated that an additional \$92,500 in annual city property tax revenues would be generated. The target property is not located within an Opportunity Zone.

Converting the target property into commercial mixed-use including, restaurants, entertainment, and live-work space is estimated to create an estimated 140 jobs related to retail, restaurants, and entertainment, and an additional 85 office related jobs. According to the U.S. Energy Information Administration (EIA), food service and retail related uses average one job per every 567 square feet, and office uses average one job for every 600 square feet.

The redevelopment of the target property, would achieve several regional and local planning initiatives by growing the local economy by providing new commercial mixed-use spaces and is a first step toward diversifying local housing stock by providing affordable housing types that would attract younger working class families.

#### **c. Strategy for Leveraging Resources**

##### **i. Resources Needed for Site Reuse**

The award of an EPA Brownfield Cleanup Grant is intended to provide financial assistance to address the PCB contamination at the target property. Once clean up activities have been completed, several due care response activities that are related to the intended reuse of the target property will still be required to redevelop the target property. Although the grant will not be used to address these activities, its award will make additional funding opportunities at the local and state level viable. These funding opportunities

include several programs that provide incentives to private investors and developers to assist with the cost of redeveloping the property once grant funded cleanup activities are complete. These programs include:

Source	Role
Michigan Brownfield Act Tax Increment Financing	Michigan enables local governments to issue Tax Increment Financing plans for the cleanup and redevelopment of brownfields. Tax revenue generated from brownfield redevelopment creates the tax increment, which is reimbursed to the developer over time. Once cleanup activities under this grant request have been completed, tax increment financing can be used to assist with funding the remaining cleanup and due care response activities. The value of this program is dependent on the final site plan; however, it is estimated to be \$2.6 million over 30 years.
Michigan Environment Great Lakes and Energy (EGLE) Grant and Loans	Provides funding of up to \$1 million in grant and \$1 million in loan funds for environmental cleanup activities at properties with known contamination. The City is eligible to apply for funding directly. Funding can be applied for upon finalization of the development plan, which will be catalyzed by the EPA Cleanup grant.
Obsolete Property Rehabilitation Act	A state tax abatement program that encourages the rehabilitation of obsolete, commercial, and industrial properties by freezing the taxable value of the property at predevelopment values for a period of 12 years. The value of this program is dependent on the final site plan; however, it is estimated to be \$2.5 million over 12 years.
Community Revitalization Program	Funding of up to 20% of the total project investment is available for redevelopment projects that foster economic growth and job creation within a downtown or commercial corridor. These funds can be applied for by the future developer of the property, contingent upon proof of financing.
Private Development Entity	ADD FUNDS THAT HAVE BEEN PUT INTO THE A&E COSTS THUS FAR; HOPEFULLY WE'LL GET THAT LETTER CONFIRMING
City of Douglas	To date, the City has expended \$100,000 to acquire the target property and has allocated another \$37,500 to perform environmental site assessments from their general operating budget.

**ii. Use of Existing Infrastructure**

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

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need**

**i. The Community’s Need for Funding**

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

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

In accordance with the goals and objectives of the City's Master Plan to diversify commercial mixed-use and residential sectors, the target area provides a large tract of developable land within the City that has the potential to generate a significant amount of new property tax revenues. Recognizing this opportunity, the City acquired the target area and has proactively allocated a small portion of their general budget toward the cleanup of the target property. However, the City is unable to generate enough funding to fully engage in cleanup activities at the target property without help from an EPA Brownfield Cleanup Grant.

**ii. Threats to Sensitive Populations**

**(1) Health or Welfare of Sensitive Populations**

Many the City's population consists of the elderly, with over 24% of the City's population is comprised of individuals over the age of 65, which is approximately 8% over the County and state averages. Within a 1-mile radius of the target property, 22% of the population is over the age of 65 which is on the 80<sup>th</sup> percentile in the state (EPA Environmental Justice Mapper (EJSCREEN)).

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

Over 24% of the City's population is comprised of individuals over the age of 65, which is approximately 8% over the County and state averages. According to CDC data between the years of 2010 and 2016, mortality from complications from lung cancer, chronic obstructive pulmonary disease, and liver disease all have all occurred within ages of 55 years old and older, suggesting this segment of the population is more vulnerable to experience the more severe health effect of being exposed to PCBs and asbestos.

Women who are pregnant, and people over the age of 55 are more susceptible to experience health issues related to exposures to PCBs. According to the International Agency for Research on Cancer (IARC), PCBs are a known carcinogen that effects the liver, skin, and reproductive system (generally in women). Exposure to PCBs that occur during pregnancy has been correlated to developmental issues in children that include lowered cognitive ability, immune compromise, and motor control problems. Exposures to asbestos has been directly linked to causing lung cancer.

**(3) Disproportionately Impacted Populations**

In addition to the sensitive populations identified above, the Kalamazoo River, a widely used natural resource-based recreational feature which borders the City to the north, is a Superfund site. River sediments over the 80-mile stretch of river that spans from the City of Kalamazoo top to Lake Michigan, have been impacted by PCBs from the operations of former paper mills. Since 1998, over 450,00 cubic yards of contaminated river sediment has been removed over seven miles of river, however, assessments conducted by the EPA show that additional contamination remains. Although the PCB contamination that occurred at the target property is not related to the contamination within the Kalamazoo River, the cumulative effect from both source areas has the potential to lead to above average exposures to these environmental health threats. Addressing the contamination at the target property would significantly curb exposure rates and reduce the cumulative effect of PCB contamination that is potentially affecting sensitive populations, as well as the entire population of the City as a whole.

**b. Community Engagement**

**i. and ii. Project Involvement and Roles**

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

Organization	Contact	Role & Commitments
Saugatuck-Douglas Area Business Association	David Langley david@saugatuckdoug las.com	Provides economic development support; will provide communication to local businesses to advertise public input/involvement opportunities. Will provide input in decisions for cleanup/redevelopment based on knowledge of the area’s economic needs. Can bring local business owners/residents to community meetings through their extensive contacts.
City of Douglas Brownfield Redevelopment Authority	Greg Harvath, Chair (269) 857-1438	The Douglas BRA will provide a forum for the public to provide input during cleanup and provide input into the cleanup planning process. The BRA will also serve as a technical resource for pursuing state brownfield incentives once cleanup activities have been completed. The public will be given an opportunity to offer feedback on the project at their monthly meetings.
Allegan County Economic Development Commission	Cheri Schultz (269) 673-0205	The Allegan County BRA will serve as a technical resource to the City regarding Provide local and county expertise during the cleanup process and economic planning expertise in support of refining the reuses for the target property.
Barker Brokerage and Development	Dave Barker Djb888@comcast.net (650) 400-7675	An area developer, Barker Brokerage and Development has been cooperatively working with the City to determine the highest and best use for the site. Barker will continue to provide the City input to refine the conceptual site plan, as well as the cleanup up process. Barker has expressed interest in acquiring the target property once cleanup activities have been completed.

**iii. Incorporating Community Input**

All communication will be conducted in a variety of ways to ensure all stakeholders are involved in the planning and implementation of the project. The community will receive notifications through postings at the City Offices, the City’s website and Facebook pages, press releases (online and in print), and updates at City Council and Brownfield Redevelopment Authority (BRA) meetings.

Once awarded, a “kickoff” announcement meeting will be held, which will be followed by routine public meetings at regularly scheduled BRA meetings to update on the cleanup and redevelopment status of the project. These meetings will provide a platform for public comment to provide concerns by residents regarding health, safety, and community disruption posed by the project. These concerns will be recorded by the City to make decisions with project partners on improving the process and performance under the grant. Community input will be appropriately responded to by the grant manager and/or the consultant in a timely fashion.

Since the onset of the COVID-19 pandemic, the City has devised policies that have allowed City operations to continue, which include the holding of City Council meetings, and community meeting. The policies have been effective and will continue to be implemented over the course of this grant. If complications with the COVID-19 pandemic makes meeting in person difficult and/or potentially dangerous, hybrid BRA meetings will be held. A limited number of people will be invited to the meeting while the remaining population may attend the gathering virtually through Zoom, which will be recorded for future viewing.

Commentary will be collected in a variety of methods, including comment cards (if attended in person) digital submissions through Zoom. Input will be used to facilitate discussion among the stakeholders and public, which will then be incorporated into the decision-making process to further refine best reuses for the target property. Public meetings will also be utilized to present potential redevelopment opportunities to interested developers, as well as provide technical assistance regarding additional financial incentives that can be potentially leveraged for the planned redevelopment. To reach residents that may not have the ability to attend public and/or virtual meetings, communication regarding grant updates will be posted on the City’s website, social media platforms, and community wide emails.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Proposed Cleanup Plan**

The selected cleanup alternative involves that remediation of PCB contamination to TSCA Subpart D Cleanup Standards. Prior to cleanup activities commencing, demolition of the building is necessary to facilitate access to the contaminated areas. To that end, the complete abatement and removal of ACM, in accordance with regulations, will be necessary to reduce the human health risk. This requires all contractors that could be potentially exposed to ACM to be licensed abatement firms as regulated by EGLE. Debris will be properly disposed of at a landfill that meets minimum standards under the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines. Following abatement, the buildings will be demolished with demolition materials being disposed of in an appropriate landfill. Once demolition has been completed, PCB contamination in areas that were previously delineated will be cleaned up to comply with the TSCA Subpart D Cleanup Standard. Cleanup activities will involve the excavation and disposal of contaminated soil in an appropriate landfill, backfilling the excavated area with clean fill, and repaving the excavated areas.

**b. Description of Tasks/Activities and Outputs**

Task 1 – Community Involvement and Outreach

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

Task 2 – Cleanup Planning

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

Task 3 – Cleanup Activities

- *Project Implementation (i):* 1) Activities include, creation of an ACM Management plan to minimize the potential release of asbestos fibers during abatement, 2) abatement of ACMs previously



identified in the ACM survey, 3) abatement oversight and air monitoring during abatement activities that includes collecting area, personal, and clearance samples (where appropriate) and monitoring contractor activities to ensure compliance with project specifications and/or regulatory requirements 4) building demolition, which includes the removal of all building materials in accordance with applicable state and Federal regulations 5) implementation of PCB cleanup activities that includes the excavation and disposal of contaminated material, backfilling the excavated areas with clean fill, and repaving of the excavated areas.

- *Schedule (ii):* Quarters 4-11
- *Task/activity Lead (iii):* Environmental consultant
- *Outputs (iv):* 1) ACM Management Plan, 2) Asbestos abatement (quantities abated), 3) Air monitoring reports/data, 4) Oversight reporting, 5) Demolition and disposal (material quantities removed), 5) Contaminated soil removal (volume of material removed), 6) Placement of clean fill (quantity imported), and 6) Surface repaving (area repaved)
- Final ABCA, Bid Package/Solicitation, Pre-Bid Meeting/Site Walkover Attendance List, Bid Tabulation, and recommendation to award.
- *Additional Notes:* Cleanup of the PCB contaminated areas will be compliant with the cleanup standards outlined in TSCA Subpart D and will be conducted in the identified areas that were previously delineated.

**Task 4 – Grant Management**

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

**c. Cost Estimates**

Budget Categories		Project Tasks (\$639,700)				Total
		Task 1	Task 2	Task 3	Task 4	
Direct Costs	Personnel	\$0	\$0	\$0	\$0	\$0
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$5,000	\$0	\$0	\$0	\$5,000
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$0	\$0
	Contractual	\$0	\$6,500	\$488,500	\$0	\$495,000
	Other	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$5,000	\$6,500	\$488,500	\$0	\$500,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
<b>Total Federal Funding</b>		\$5,000	\$6,500	\$488,500	\$0	\$500,000
<b>Cost Share</b>		\$9,000	\$0	\$120,700	\$10,000	\$139,700
<b>Total Budget</b>		\$14,000	\$6,500	\$609,200	\$10,000	\$639,700

**Task 1 – Community Involvement and Outreach:**

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

**Task 2 – Cleanup Planning:**

*Contractual Costs:* 65 hours at an average rate of \$100/hr = \$6,500. This cost includes time necessary for the team to complete cleanup planning, including bidding and scoping the project.

**Task 3 – Cleanup Activities:**

*Contractual Costs:* The creation of an Asbestos Containing Materials Management plan is estimated at \$3,000 (30 hours at an average rate of \$100/hr) and will be performed by the environmental consultant. Asbestos abatement, demolition, PCB cleanup activities, and project oversight (to be overseen by the environmental consultant) will be a paid for with a combination of grant funds and the City's 20% match. This cost is estimated at \$609,200.

**Task 4 – Grant Management:**

This task will be paid as part of the City's 20% match.

**d. Measuring Environmental Results**

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

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

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

Project management and grant administration responsibilities will be handled by the City Manager of the City of Douglas, Mr. Rich LaBombard. As the City Manager, Mr. LaBombard oversees the day to day operations of the City which includes, public works, asset management and overseeing special projects such as road reconstruction, utility improvements, facility improvements and construction of new assets. He has a proven track record of procuring and managing over \$5 million in grants over the past five years, and has demonstrated experience with project management, grant writing, technical writing, energy efficiency, energy conservation and renewable energy.

**iii. Acquiring Additional Resources**

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

**b. Past Performance and Accomplishments**

**iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements**

The City affirms that it has not received any type of federal or non-federal assistance.