

**NARRATIVE PROPOSAL AND PROJECT DESCRIPTION
CITY OF KENTWOOD, MICHIGAN**

THRESHOLD CRITERIA FOR ASSESSMENT GRANTS

- A. Applicant Eligibility
The City of Kentwood is a General Purpose Unit of Local Government in the State of Michigan
- B. Letter from State Environmental Authority
The Michigan Department of Environmental Quality (MDEQ) prepared a letter of acknowledgement regarding the City of Kentwood's intention to apply for a \$200,000 Community-Wide Hazardous Substance Brownfields Assessment Grant. A copy of the MDEQ letter is appended as Attachment A.
- C. Site Eligibility and Property Ownership Eligibility
The City of Kentwood is requesting a Community-Wide Brownfields Assessment Grant. Consequently, site eligibility and property ownership eligibility criteria are not applicable.

RANKING CRITERIA FOR ASSESSMENT GRANTS

A. Assessment Grant Proposal Budget

Budget Categories	Project Tasks					Total
	Task 1 City Programmatic expenses	Task 2 Community Outreach	Task 3 Site Inventory	Task 4 Site Assessment	Task 5 Cleanup Planning	
Personnel	\$3,000	\$3,200	\$2,000			\$8,200
Travel	\$2,400		\$500			\$2,900
Supplies	\$5,000	\$500	\$500			\$6,000
Contractual		\$1,000	\$9,300	\$167,000	\$4,600	\$181,900
Legal				\$1,000		\$1,000
Total Grant Budget	\$10,400	\$4,700	\$12,300	\$168,000	\$4,600	\$200,000

Task 1: Programmatic Costs

The City of Kentwood (City) anticipates programmatic expenses associated with the Assessment Grant will be approximately \$10,400. These include City personnel costs associated with planning, coordinating, and conducting operational meetings and other programmatic activities (\$3,000); and travel expenses associated with one staff member's attendance at three annual U.S. EPA Brownfields Conferences (\$2,400). The City also intends to use its existing Geographic Information System (GIS) capabilities to support its brownfields program. Existing base maps and databases can be used to support creation of a brownfields overlay for the City's existing GIS. However, to effectively support the additional brownfields activities, the City's existing GIS will require the following additional supplies: 1) one laptop computer (\$2,000); and 2) one plotter/large format printer (\$3,000).

Task 2: Community Outreach

The City anticipates community outreach costs associated with the Assessment Grant will be approximately \$4,700. This estimate includes personnel costs associated with community coordination and outreach meetings (\$3,200); contractual costs for advertising (\$1,000); and supplies associated with preparing, printing, and mailing community notices (\$500). To ensure the public remains informed and involved, the City will also provide in-kind additional staff resources, estimated to be \$3,000 to \$5,000, needed to conduct environmental outreach meetings, draft press releases, update the City's website as new information is generated, and other activities to complete the community outreach programs.

The City will encourage community participation and provide opportunities for public interaction in the brownfields program. For example, during the site inventory process, the City will solicit input from local neighborhood and business associations regarding sites of concern. The City will incorporate this community feedback into the site selection criteria, and will also communicate the results of assessment activities to residents. During cleanup and redevelopment planning, the City will inform local stakeholders of plans; solicit feedback on community concerns, needs, and desires; and coordinate with the local health department to help educate residents on the nature of the identified contamination and remedial activities that will occur.

In general, community outreach and involvement activities will include the following:

- Prepare and distribute public notices and informational materials.
- Conduct brownfields information and education presentations.
- Solicit community input regarding identification and prioritization of sites of concern; and process, evaluate, and incorporate public feedback into the site selection process.
- Provide the community and local stakeholders information regarding redevelopment and cleanup planning, including public health concerns.
- Solicit community/stakeholder input regarding redevelopment and cleanup planning, and incorporate public feedback into the planning process.

Task 3: Site Inventory and Selection

The City anticipates site inventory costs associated with the Assessment Grant will be approximately \$12,300. This estimate includes personnel costs (\$2,000) and travel expenses (\$500) for identifying and documenting sites; collecting, evaluating, and entering site information into the GIS database; and developing a site prioritization system.

Sites will be identified through database searches, community nominations, Freedom of Information Act (FOIA) requests, and ground surveys. The City will hold public meetings to provide local neighborhood and business associations an opportunity to identify sites of concern for potential inclusion in the nomination process. Site data will be documented on forms designed to facilitate an efficient transition into the GIS database. The City will develop prioritization criteria, and priority sites will be nominated for Phase I & II Environmental Site Assessments (ESAs). Prioritized sites will be evaluated for eligibility for use of Assessment Grant funds and other state and federal brownfields redevelopment support programs. The City will retain an environmental consultant to assist with these activities (\$9,300). The City needs a digital camera (\$500) to photo-document sites during brownfields inventory and assessment.

Task 4: Site Assessment

The City anticipates site assessment costs associated with the Assessment Grant will be approximately \$168,000. The City will retain a qualified environmental consultant to conduct the environmental assessment tasks (\$167,000). This cost is based on conducting approximately ten Phase I ESAs at an average cost of \$2,800 each, six Phase II ESAs at an average cost of \$20,000 each, and preparing five Michigan Voluntary Cleanup Program (VCP) liability protection reports (i.e., Baseline Environmental Assessments) at an average cost of \$3,800 each.

The City also anticipates the need for legal services to assist in preparing and negotiating site access agreements (\$1,000).

The site assessments will comply with the requirements of All Appropriate Inquiry (AAI), American Society for Testing and Materials Standard 1527-05, and requirements of the Michigan VCP (Part 201 of the Michigan Natural Resources and Environmental Protection Act of 1994, PA 451, as amended). The site assessments will evaluate environmental liability issues associated with CERCLA and the Michigan VCP, identify risks to human health and the environment, and provide the framework for cleanup and/or redevelopment planning. The City will communicate the site assessment results to the community via public meetings, website, and notices. If the site assessments identify public health threats, the local health department will be contacted to assist with public notification.

Task 5: Cleanup Planning

The City anticipates cleanup planning costs associated with the Assessment Grant will be approximately \$4,600. The City will conduct cleanup planning for sites with good potential for redevelopment, or to facilitate proposed projects. The cleanup planning activities may include the following:

- Prepare Brownfield Plans and Work Plans to facilitate tax increment financing (TIF) under the Michigan Brownfield Redevelopment Act (Act 381 of 1996, as amended).
- Evaluate and document environmental responses and/or engineering/institutional controls needed to protect public health, as required by CERCLA and the Michigan VCP.
- Assess and develop cleanup alternatives consistent with redevelopment plans.

B. Community Need

1. The City of Kentwood (City) is a first-tier suburban community of Grand Rapids, Michigan, located in southern Kent County. The City was established in 1967 and currently encompasses an area of 21.04 square-miles. The City is a land-locked community, bounded by several townships and the Cities of Grand Rapids and Wyoming. According to the 2000 U.S. Census data, the total population of Kentwood was 45,255. Of this number, Caucasians represented 80.9% (36,599) of the total population. Minority populations within the City included African Americans at 9.1% (4,115), Asians at 5.6% (2,550), and Hispanics at 3.9% (1,757).

Prior to 1967, the City was part of a larger area officially designated as Paris Township (est. 1839); industry during this period consisted of sawmills, tanneries, blacksmiths, and gypsum mining. Industrial development expanded during the late 1970s, with more than 30 companies developing new facilities in the City. These industries included Keeler Brass Works, C&F Stamping, Yamaha Corporation (metal plating of musical instruments), Steelcase Corporation (furniture), and other various assembly plants, manufacturers, tool and die companies, and packaging operations. By 2000, the City's largest employment sector was industrial (42% of total employment).

As the City entered the new millennium, U.S. and Michigan manufacturing declined, companies relocated, and many plants closed, leaving behind vacant and underutilized brownfield properties. In 2000, the City's unemployment rate was 1.9%, and the employed labor force consisted of 28,051 residents (U.S. Department of Labor – Bureau of Labor Statistics). From 2000 to 2007, as industry declined, 2,181 (almost 5% of population) jobs were lost. As of July 2007, the City's unemployment rate had climbed to 5.9%.

Additionally, between 1990 and 2000, individuals living in poverty increased from 1,870 to 2,817 residents. Families living in poverty also rose from 367 to 573 during this period. Since 2000, the City has seen steady decreases in revenue sharing from the State of Michigan. Between FY 2001 and 2008, the City lost nearly \$5.8 million in shared state revenue. This has hampered the City's ability to provide needed services to its residents and address the community's brownfields.

The Assessment Grant will provide much needed funding to encourage the redevelopment of vacated brownfields, thereby improving local economic conditions, which will generate new tax revenue for the City's service budget, put residents back to work, and improve property values and homeowner equity.

African Americans living within the City's northern industrial corridor (Census tract #12603) are disproportionately low income and represent a sensitive population. According to the 2000 Census data, 25% (1,114) of the African American population in Kentwood resides in rental housing units. Many of these rental properties are situated near former manufacturing facilities. For example, Wingate Apartments, a low-income rental property, is situated adjacent to the abandoned Keeler Brass Works site, which is contaminated with heavy metals, including lead. Pheasant Ridge Apartments is a Section 8 rental property located across the street from the former Autostyle Plastics site, which is contaminated with methyl ethyl ketone (MEK), acetone, and toluene. Children who reside in these apartment complexes all attend the Hamilton Elementary School, which is located across the street from the former Autostyle Plastics and close to a former Yamaha Corporation of America plant (metal plating of musical instruments). Since 2003, the school's Michigan Educational Assessment Program (MEAP) test scores were consistently below the State of Michigan average. According to the Kentwood District Schools 2005-2006 Annual Report, the overall MEAP proficiency percentage for Hamilton Elementary School was 10% below the statewide proficiency percentage. Of particular concern was the school's writing proficiency, which was 15% lower than the state average. This African American population represents a distressed population disproportionately affected by nearby brownfields. The Assessment Grant will help identify threats to this population and encourage redevelopment of these brownfield sites, which will reduce health risks, generate jobs, and generate new tax revenue to assist the City in providing needed services to this sensitive minority population.

The elderly population residing within the City's northern industrial corridor also represents a sensitive population. Castle Villa, an elderly condominium housing community, is situated across the street from the Keeler Brass Works site. This site is contaminated with heavy metals, which could potentially pose an adverse risk to the elderly, who often suffer from compromised immune systems. The Assessment Grant will also help identify threats to this elderly community and encourage redevelopment of these brownfield sites, which will reduce health risks and generate new tax revenue to assist the City in providing needed services to this disproportionately affected elderly population.

The City's natural, undeveloped land is experiencing increased development pressure, even as existing brownfield properties remain underutilized. A 2006 study conducted by the Kentwood Planning Department identified nearly three million square feet of vacant building space at brownfield sites; these properties already have the infrastructure (e.g., water, sewer, electricity, etc.) in place to support efficient reuse. According to Kentwood's 2005 Master Plan, less than 2,700 acres of the total 13,408-acre land base remains undeveloped. The majority of these 2,700 acres contain existing parks, nature preserves, wetlands, or floodplains. The City desires to leave these natural features undeveloped for the benefit of the local ecosystem and the recreational and aesthetic qualities they provide residents. The Assessment Grant funds will provide incentives for developers to reuse existing brownfield properties, thereby supporting preservation of greenspace in the community.

The City is also faced with the challenge of improving the physical appearance of its gateway corridors. These areas contain many former and/or existing automobile repair shops, dry cleaners, and other operations that have used hazardous substances. Many of these businesses are housed in derelict buildings. The City's Master Plan calls for redeveloping these gateway brownfields with mixed-use buildings that incorporate greenspace into the project (green roofs may count toward the greenspace square footage requirements). The Assessment Grant will strengthen the City's ability to effectively market these properties, by addressing the real or perceived environmental contamination from previous hazardous substance use.

2. The Assessment Grant will benefit the City by providing funding to reduce environmental health risks to citizens and improve economic conditions through brownfields redevelopment. The City plans to use Assessment Grant money to identify and assess its abandoned industrial sites, as well as other smaller former commercial operations that used hazardous substances, such as dry cleaners, printers, and paint companies.

Due to Michigan's current fiscal crisis, there are no state funds available for these initial assessment activities; if these funds were available, they could only be used on properties where contamination had already been identified. State brownfield redevelopment funds that would ordinarily be available for cleanup planning activities are also frozen. Local brownfield redevelopment support money is available through the Act 381 TIF program, but only after a site is demonstrated to be contaminated and redevelopment of properties generate additional tax revenues; no state or local funds support initial site assessment efforts needed to demonstrate that a site is contaminated.

The City would realize the following benefits from an Assessment Grant:

- Increased capacity to solicit and process feedback from the community in the identification of brownfield sites in their neighborhoods.
- Development of a brownfields inventory to support redevelopment planning and site marketing.
- Support for major elements of the City's economic and community development priorities, which include the redevelopment of abandoned brownfields to attract high technology industry and research & development (R&D) industries.
- Environmental assessment to identify health threats to sensitive populations and stimulate and support redevelopment and hazard control at abandoned and underutilized manufacturing plants.
- The reduction of environmental and ecological threats to the community.
- The elimination of eyesores, hazards, and economic decline due to the brownfields within the City.
- The creation of new businesses and job opportunities for residents, especially in low-income areas disproportionately impacted by the City's brownfields, simultaneously increasing the City's economic and tax base.
- Support for converting blighted or abandoned parcels into market areas or public commons.
- Support for greenspace preservation and park creation/expansion, by assessing environmentally impacted properties targeted for those uses.

3. The impact of brownfields on the City began with the decline of the industrial sector, which resulted in the creation of numerous abandoned or underutilized environmentally impacted sites, the loss of over 2,000 jobs, and decreased tax revenues. Environmental impact at several of the larger abandoned manufacturing sites, such as Keeler Brass and Steelcase, are largely un-documented. Based on their previous industrial operations, these sites likely present health threats to the community through contamination by lead, other heavy metals, and solvents, especially to lower income sensitive populations that live in these areas. Many smaller commercial enterprises, such as dry cleaners and vehicle repair centers, which supported the rise of industry in the 1970s, have also closed, leaving behind real or perceived environmental challenges to redevelopment.

These properties, containing small and large, functionally obsolete and often dangerous buildings and known or suspected contamination, no longer generate tax revenue for the City, do not provide jobs, represent a potential threat to the health of nearby residents and school children, and put additional strain on the City's resources by requiring extra policing. Without the environmental assessments to adequately characterize these brownfields, redevelopment to alleviate those impacts is significantly inhibited.

According to the MDEQ's VCP inventory, there are nine documented sites of environmental concern within Kentwood's boundaries. These are sites where there has been a significant release of a hazardous substance(s) in excess of the Michigan VCP cleanup criteria. A preliminary study conducted by the City identified over 50 additional brownfields sites in the community.

The majority of the City's brownfields are situated in the northern industrial corridor within close proximity to residential areas, such as Wingate Apartments (low-income housing), and Pheasant Ridge Apartments (Section 8 low-income housing) and Castle Villa Condominiums (elderly housing), and schools, such as Hamilton Elementary. These sites include stamping plants, plastics manufacturing, and tool and die operations that historically used significant quantities and varieties of hazardous substances. Michigan's declining manufacturing economy is forcing more of the City's plants to close, thereby reducing the tax base, halting economic activity, and generating more brownfields for redevelopment. The environmental conditions at most of these sites have not been adequately assessed, leaving nearby residents unaware of the potential health risks. The environmental due diligence and assessment requirements and costs (for which there are no other available funds) for prospective purchasers and lessees have also inhibited the reuse of the City's brownfields. Assessment Grant support monies will assist in identifying the nature and extent of contamination at these sites; identify potential health threats to neighboring residents; act as a catalyst for developer interest in many of these brownfield properties; and provide financial support for environmental due diligence and cleanup/redevelopment planning to help "balance the playing field" with respect to greenspace options.

Brownfields may also be impacting Plaster Creek, which flows through the City's northern industrial corridor. The City is actively acquiring land and easements within the Plaster Creek floodplain to develop a more comprehensive trail network to link all of the City's parks. A lack of funding has inhibited the City's ability to assess the nature of contamination that adjacent industries have introduced to the creek and to assess specific properties for acquisition into the system. Assessment Grant funds would support assessment of the Plaster Creek floodplain and target properties in the watershed, thereby improving ecological conditions and preserving greenspace as the City expands its park system.

C. Site Selection Process

1. The City will initiate the site selection process by using the Assessment Grant to expand its initial brownfield inventory activities. This will involve identifying current and former manufacturing sites in the City, locating additional commercial sites through searches of available data sources (Michigan Part 201 Contaminated Sites, historic city directories, MDEQ FOIA requests, etc.), soliciting community nominations, and on-ground surveys.

Local groups, such as neighborhood associations, parent-teacher organizations, and business groups, will be invited and encouraged to nominate sites for inclusion in the inventory. The City will hold public meetings to inform citizens of the process, and solicit input from residents regarding their knowledge of local brownfields. The City will encourage its citizens to voice their concerns over real or perceived health threats associated with these brownfields. Community nominations will be supplemented with field surveys to identify potential brownfields throughout the City. The City will and/or contractor personnel will conduct field surveys using the identification criteria developed at the beginning of the process.

Data (e.g., historical and current uses of hazardous substances) for each potential site will be collected on information forms and entered into the City's GIS database. The City will then develop site selection criteria for application of Assessment Grant funds. The following criteria will be the foundation of the site selection process:

- Impact on the community as a whole, specific neighborhoods, sensitive populations, and environmental justice.
- Level of potential threats to human health and the environment.

- Site development potential (desirability and redevelopment feasibility)
- Developer interest in the site.
- Market value.
- Availability and reliability of information from previous environmental investigations.
- Title status.
- Site accessibility.

The appropriate data needed to support evaluation of each criterion will then be defined and collected for each site in the inventory process. This process likely will proceed in a two-step manner, with initial screenings used to develop a list of priority sites in an efficient and timely manner, followed by collection of more detailed information to support final site selection. These criteria and related data will be incorporated into the brownfields GIS overlay.

Sites nominated for selection will be compared to the EPA eligibility criteria to determine their eligibility status for funding. Eligibility determinations will be prepared and submitted to the EPA to verify eligibility of each site prior to expenditure of assessment funds.

2. The City previously initiated its brownfields program by developing a preliminary list of approximately 50 known or suspected brownfield sites within its boundaries. Due to economic constraints, the City has not had the resources to conduct additional coordinated inventories; gather historical information about site use, chemical use, or environmental conditions; prioritize site for additional data collection or redevelopment; or conduct environmental assessments for identified brownfield sites. However, it has become obvious to the City that the presence and impact of the numerous significant brownfields within the community are impeding its ability to achieve the following brownfields program goals: identify and address community health and environmental protection issues, control site environmental issues through response and reuse, economically revitalize the community, and preserve/expand greenspace.

Based on the number of sites in its initial brownfields inventory, the City laid the foundation of its brownfields program by establishing a Brownfield Redevelopment Authority (BRA) to facilitate tax increment financing of environmental response costs needed to prepare brownfields in the City for redevelopment. Now the City is seeking Assessment Grant funding for activities that will strengthen its "brownfields infrastructure," develop a comprehensive brownfield inventory, and proactively assess selected sites to help protect the community, raise developer awareness and interest, and encourage/support redevelopment, all of which will move its brownfields program forward.

3. The use of Assessment Grant funds to assess privately owned sites will require either a site access agreement or acquisition of the property. Assessment of private property will likely occur under one of the following four scenarios: 1) the owner and/or prospective purchaser requests financial assistance to support the due diligence and liability management components of a specific property transaction prior to redevelopment, wherein access is readily provided; or 2) the owner, prospective purchaser, or new, non-labile owner/developer requests assistance in characterizing the nature and extent of contamination to support cleanup and redevelopment; 3) the owner agrees, or can be convinced, to conduct the assessment to help prepare the property for redevelopment or sale; or 4) the current owner refuses to cooperate and provide access. In the first three scenarios, voluntary access will be provided, often through a formal access agreement.

In cases where the City prioritizes a particular property for assessment, even a recalcitrant owner often can be convinced to allow such a third party assessment on his/her property. Commonly, these owners feel that the absence of information about environmental conditions is in their best interest. However, because CERCLA and Michigan environmental law allow a new owner to acquire and redevelop contaminated property without liability for the existing contamination, owners of impacted property can often be convinced that it is in their best economic interest to characterize a brownfield to facilitate transfer to a new owner.

In cases where the City identifies the assessment and redevelopment of a brownfield as a priority, the City may seek to acquire the site. In these cases, the City may decide to acquire the site directly, have it acquired by its BRA or Economic Development Corporation (EDC), or establish a separate municipal nonprofit corporation, as provided by Michigan law, to acquire and hold title to the property during the assessment and subsequent preparation and marketing for redevelopment.

D. Sustainable Reuse of Brownfields

1. Many of the City's brownfields consist of abandoned industrial buildings and empty commercial structures. All of these brownfields are currently serviced by infrastructure (e.g., water and sewer, electricity, natural gas, and roads) sufficient to support their redevelopment and reuse. Many of the buildings associated with the City's brownfields are structurally sound and only require remodeling and updating to be ready for reuse. Using the Assessment Grant to support redevelopment of these brownfields will reduce the amount of energy and resources required for extending utilities to undeveloped areas and constructing new buildings.

The City has implemented a master pond program, which reduces the amount of open space needed for site-specific storm water retention. Using the Assessment Grant to assess the City's brownfields will help identify uncontrolled areas of surface contamination likely to impact storm water runoff, which flows into Plaster Creek. Cleanup planning will allow the City to initiate short-term controls to minimize the adverse environmental health effects and long-term controls through brownfields redevelopment site planning. These redeveloped brownfields will then be incorporated into the City's master pond program, which will save energy and reduce resource consumption by preserving undeveloped property.

The "Gathering Places" initiative was created in an attempt to achieve a greater sense of community within the City. The former Kentwood landfill, now Lamberts Park, has undergone over a decade of cleanup to facilitate the development of a future "Central Park." This area is also seen as a potential catalyst for creating a future "municipal campus" and public greenspace in the City. In an attempt to lead by example, the City has constructed several municipal buildings near the landfill property.

Where public funds are used to support brownfields redevelopment, such as those from the Assessment Grant, the City will have additional leverage to require/encourage the inclusion of sustainability, energy efficiency, and greenspace preservation design components through the site planning and site plan approval process.

2. Brownfield redevelopment promoted by the use of Assessment Grant funds will result in significant economic benefits to the City and its citizens. The removal and redevelopment of vacant or underutilized brownfield sites and buildings will reduce the disproportionate impact on home values in the area and stimulate a resulting increase in equity asset value. Redevelopment of abandoned industrial properties will also support the City's efforts to market these properties to biotechnology and R&D companies, which will generate jobs, increase tax revenue, and foster the creation of new support businesses. These impacts will be most beneficial in the northern industrial corridor where low income, jobless, and minority populations are particularly impacted by the City's brownfields. New developments associated with brownfield sites will also incorporate the creation and/or preservation of greenspace, which is required by City ordinance.

Assessment Grant funds also will be targeted at assessment of brownfield properties within the City's gateway corridors to encourage/support redevelopment to generate increased economic activity, create sustainable businesses, and improve community image. Kentwood recently teamed with the City of Wyoming and the Interurban Transit Partnership (ITP) to conduct a Charrette that focused on redevelopment of brownfields and underused commercial properties along its gateway corridors. By partnering with Wyoming to create a larger focus area, Kentwood seeks to revitalize these business districts with new residential and commercial developments. ITP proposes to extend rapid transit services along these corridors, providing residents and visitors with improved access to dining, shopping, and leisure activities.

The development of new businesses and services will also improve walkability for residents in adjacent neighborhoods, reducing vehicular traffic and fuel consumption. Additional greenspaces, including tree plantings, landscaping, and park/neighborhood connectors, will improve the appearance of the district

3. Assessment Grant funds that support brownfield redevelopment will increase the City's vitality in the following ways:

- Significantly reduce threats to the environment and human health posed by vacant industrial properties.
- Provide the City with leverage to require energy efficiency and sustainable New Urbanism principles be incorporated into redevelopment projects.
- Integrate affordable housing into residential brownfield redevelopments.
- Support the City's efforts to link recreational and park areas.
- Support the creation and/or preservation of greenspace associated with brownfield redevelopment projects.

Kentwood has adopted a "Conservation Oriented Development" program into their Master Plan. This sustainable, New Urbanism development technique results in clustering buildings, preserving open space, retaining open space connectedness, enhancing walkability in developed areas, connecting developments to open spaces with trails, creating community spaces, using natural and/or historic features as focal points for development, utilizing and enhancing green infrastructure, and creating public amenities such as farmers' markets, community centers, and picnic shelters. Other developments that have utilized concepts similar to the Conservation Oriented Development include the Bailey's Grove and Ravines mixed-use developments. These projects retained open space, created connections to existing trail systems, and incorporated elements of New Urbanism and walkability similar to those within Conservation Oriented Developments. The Assessment Grant will provide the City with leverage to promote the use of Conservation Oriented Development throughout its brownfield redevelopment projects.

Use of Assessment Grant funds to encourage and support brownfields redevelopments will be an important stimulus for achieving these community goals. Both redevelopment of brownfields and improvement of community image will stimulate job growth, expand the City's tax base, and attract new residents and visitors. Increased housing and retail options are expected to attract service and retail development, revitalizing the community and further improving the tax base. Improvement of Plaster Creek and extensions of existing nature trails along the creek will preserve nature areas. These improvements in turn will encourage residents to enjoy the natural amenities in Kentwood.

E. Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purpose

The City contains approximately 2,700 acres of parks, nature preserves, wetlands and floodplains. The City's Master Plan makes preservation of wooded areas and protection of floodplains and wetlands a top priority. Several high-quality wooded areas remain along Plaster Creek, enhancing the quality of life in nearby neighborhoods. The City has 23 existing and planned parks totaling 393 acres, the majority of which contain older growth hardwoods.

The City is actively acquiring land within the Plaster Creek floodplain for trail and park use, and seeks to develop a more comprehensive trail network to link all of the City's parks. Additionally, the City is working toward achieving the Michigan Department of Natural Resources and National Recreation and Park Association standard of ten acres of parkland per 1,000 residents. The Assessment Grant will provide an incentive for developers to target previously developed brownfield properties, and give the City leverage to discourage development of natural areas within the City.

The City is focused on maintaining its parks and open spaces, and the availability of Assessment Grants to conduct environmental evaluations of target properties to be acquired will greatly assist in that effort.

The Kentwood Parks and Recreation Department is responsible for maintaining the existing 5.5 miles of trails and constructing an additional 10 miles of future trails within the City. The City is engaged in a project to expand its East-West Trail system to connect Kentwood's existing parks; this trail system will also be expanded to provide residents with improved pedestrian access to the library and Paul Henry Trail system. Kentwood is working to partner with the City of Wyoming to connect the East-West Trail with Wyoming's North-South Trail, west of Division Avenue. This trail system will make the Buck Creek area accessible to residents and visitors while protecting the ecosystem from further impact. The City has encouraged developers to designate conservation easements to preserve open space for residents to ensure these areas are never developed. Acquisition of the land and easements needed to successfully accomplish these goals is hindered by the lack of funds in the City's budget to conduct needed environmental assessments to support acquisition due diligence and identify and evaluate potential human health threats, especially where these trail extensions traverse or adjoin the City's brownfields; Assessment Grant funds will fill that funding gap.

The City will continue working with West Michigan Environmental Action Council (WMEAC) and Grand Valley Metro Council (GVMC) to maintain additional greenspace created as the result of brownfield redevelopment projects supported by the Assessment Grant. The City will be responsible for long-term maintenance of these greenspaces. The City will not permit the creation of additional greenspace that cannot be maintained or protected from potential environmental threats.

Redevelopment projects that use Assessment Grant or other public funds will be required by the City Planning Commission to include greenspace elements as prescribed by ordinance. Use of Assessment Grant funds to evaluate environmental conditions on these properties and support due diligence efforts if the City acquires the land, combined with the City's site plan review and approval processes for future development in this area, will ensure that this additional greenspace is preserved. Within its Planned Unit Development Ordinances, the City will require that future property owners maintain the greenspace generated through redevelopment of these targeted properties. The City will also ensure, through the site plan review process, that brownfield redevelopment plans enhance greenspace connectivity and do not interfere with existing or proposed greenspaces, trails, or greenspace connections.

F. Pre-Award Community Notification

1. The City prepared a public notice (see Attachment B) describing this Assessment Grant application and the activities associated with using grant funds. The public notice was posted at City Hall and also on the City website. The Assessment Grant application was also posted on the City website, and hard copies were made available upon request at the City Planning Department. The City solicited input from the community by requesting written or verbal comments be addressed to the Economic Development Director. The City also contacted various nonprofits and neighborhood associations within close proximity to known or suspected brownfield sites. Based on the City's experience with its minority residents, no specific communication barriers have been identified during public meetings, with the exception of the Asian population. Several members of the Division Avenue Business Association are of Asian descent.

The Association has relied upon Mr. Tai Lai, a local businessman fluent in several Asian languages, to act as a translator during Association meetings. The City has also relied upon Mr. Lai to assist in communication of city issues to members of the Asian community. Mr. Lai's services were also requested to assist the Asian community in understanding the City's Assessment Grant application and will be employed to assist with all other community notification and outreach efforts related to the Assessment Grant program. The City received no public comments regarding this application.

Following notice of an Assessment Grant award by the EPA, the City will announce the award to the community through a press release to the local newspaper, notice on the City's website, and advertisement on the local cable access television station.

The City will also coordinate with the Right Place, Inc. and the Grand Valley Metro Council to assist with the community notification process. The primary post-award community input program will be focused on preparation of the grant Work Plan and final budget.

After a draft Work Plan and budget are prepared, they will be made available to the public and community organizations, and comments on the drafts will be solicited. The Work Plan document will be posted on the City's web site, and hard copies will be made available at City Hall to ensure access for those without appropriate information technology availability, knowledge, or experience. The document availability and solicitation of comments will be announced to the public via the City web site, local cable television, press release to local news media, and newspaper notice.

The City will also notify specific key community groups, such as the Chamber of Commerce and Division Avenue Business Association, to reach area businesses, and additional local citizen and neighborhood organizations that can reach other interested parties. Public comments will be accepted in writing and will be publicly discussed during a City Commission meeting. The draft Work Plan will be modified as appropriate in response to relevant comments, and all comments and respective responses will be summarized in the final Work Plan.

2. The variety of notification media (web, local cable television, local news media, newspaper, direct contact) was chosen to provide communication to the greatest number of citizens and address all levels of education, literacy, and information access habits, both written and oral.

The only non-native language issue (Asian) was identified and will be addressed as discussed above. This ensures that both the interested general public in Kentwood and the organizations and communities most likely to be impacted by the redevelopment plans are provided an opportunity to comment on the grant application and Work Plan.

3. A comment period of seven days was allotted for the grant application. While shorter than desired, the comment period was limited by the grant application deadline and the City's ability to produce a draft application sooner. Post-award comment periods of at least 30 days will be used for solicitation of community input related to the Work Plan and any other activity involving formal public input.

The City will solicit public comment by reaching out to affected residents in the community. For example, the City will conduct public meetings in coordination with community organizations, such as the Hamilton Elementary School PTO, Castle Villa Apartments, and the Division Avenue Business Association, at schools, the downtown business district, or at other City facilities that best serve the public interest.

4. All pre-application and post-award public comments received will be reviewed and documented. Applicable and relevant comments will be incorporated into the Assessment Grant Application, Work Plan, etc. Written responses to all comments, whether incorporated into the applicable document or not, will be documented in the respective document. Final documents will be made available to the public on the City's web site and at City Hall.

G. Ongoing Community Involvement

1. Ongoing community involvement efforts will include periodic dissemination of information about the City's brownfields program in general, and community involvement at each stage of assessment, cleanup, and redevelopment at each targeted brownfield site. Periodic dissemination of programmatic information will occur through public meetings of the City's Brownfield Redevelopment Authority and City Commission, where project progress will be reported and discussed in an open forum.

Information also will be disseminated through the City's website, newsletters, direct notice to community organizations (written, telephone, emails, etc.), local newspaper, and other outreach programs.

These notification procedures and outlets will be used for all outreach programs discussed in this section. The City's approaches to non-English language issues were described above.

At the beginning of the Assessment Grant program, the City will continue its outreach efforts to residents and solicit input during the site inventory process from the following community organizations: The Pheasant Ridge, Wingate, and Castle Villa neighborhoods, Hamilton Elementary School PTO, The Right Place, Inc., GVMC, WMEAC, the Land Conservancy of West Michigan, the Wyoming-Kentwood Chamber of Commerce, Division Avenue Business Association, and the Kentwood Economic Development Corporation. Specifically, notices will be sent to each group and public meetings will be held to solicit information identifying brownfields in the community and solicit historical use and environmental incident information about identified sites.

During subsequent phases of the program, the types of involvement will vary; although the same methods and groups discussed above will be involved. When sites are identified for assessment, the primary information flow will be outward to the community, notifying local stakeholders about assessment activities that will occur, providing results of the assessments, and explaining health and environmental impacts of findings. If potential health threats to the community are identified, the county health department will become a partner in community involvement and education (see Section H.2 below). When cleanup and/or redevelopment planning is initiated for a site, more intensive involvement activities, including explanations of plans and rationales and solicitation of comments and feedback on those plans, will be implemented. The intensive "information out, feedback in" process will continue throughout the cleanup and redevelopment decision-making process.

2. The City has existing partnerships with the City of Wyoming, City of Grand Rapids, Kent County, ITP, MDEQ, Grand Valley Metro Council, WMEAC, and The Right Place, Inc. The City of Kentwood will continue working with economic development organizations, such as The Right Place, Inc., to market brownfield sites following assessment activities. During redevelopment of brownfield sites (municipal and private developments), the City will consult with the Grand Valley Metro Council and the West Michigan Chapter of the U.S. Green Building Council concerning the utilization of sustainable/green building approaches and techniques; the City will request these groups educate and advise during the site plan review process associated with redevelopment. During redevelopment activities, the City will also work with the Michigan Department of Natural Resources (MDNR) to ensure that all activities are protective of Plaster Creek ecosystems.

The City will also build on its existing partnership with the MDEQ to help ensure appropriate assessment and cleanup and development of brownfield sites. These programs will be conducted in compliance with the rules and guidance promulgated by the MDEQ pursuant to Michigan's VCP. Partnering with MDEQ district and headquarters staff will be important for acquisition of technical support, resolution of regulatory or procedural issues, and interpretation of rules and guidance documents. When tax increment financing is used to reimburse costs of environmental activities associated with brownfields, Work Plans for the environmental response actions must be reviewed and approved by the MDEQ prior to implementation. The MDEQ will also review and approve Remedial Action Plans (RAPs) for sites where response actions are completed.

3. Progress of the overall Assessment Grant project, and projects at specific sites, will be communicated to the public and relevant community groups using the tools discussed in sections F and G above. As previously mentioned, the City will request that Mr. Tai Lai, a local businessman fluent in several Asian languages, act as a translator for the Asian business community during meetings with the City. African-American, Hispanic, and other minority groups in the City have not requested specific non-English services for past meetings or communication with the City.

In all cases, adequate public notice will be provided for all meetings and other outreach programs.

4. The primary community-based partners are as follows:
- **Castle Villa Condos:** Jack Spaak, 616-285-001.
 - **Wingate Apartments:** Karen Gorman, 616-942-0140.
 - **Pheasant Ridge Apartments:** Laura Glynn, 207-780-8050.
 - **Kent County Health Department:** David Kraker, 616-632-6900. Provide environmental health education, testing, and community monitoring.
 - **Division Avenue Business Association:** Tom Brann, 616-534-5421. Promote economic improvements to district.
 - **Wyoming/Kentwood Chamber of Commerce:** John Crawford, 616-531-5990. Promote local business development.
 - **The Right Place, Inc.:** Rick Chapla 616-771-0555. Promote economic revitalization, urban redevelopment.
 - **Grand Valley Metro Council:** Don Stypula, 616-776-7604. Community coordination, municipal services.
 - **West Michigan Sustainable Business Forum:** Kelley Losey, 616-975-4716. Promote sustainable development practices.
 - **West Michigan Environmental Action Council:** Rachel Hood, 616-451-3051. Land conservation, environmental protection, and water resource programs.

H. Reduction of Threats to Human Health and the Environment

1. Abandoned and uncharacterized brownfields can pose threats to human health and the environment by allowing uncontrolled access to a contaminated site, while at the same time the public is unaware of contamination and related exposure risks. These threats can be mitigated through site assessments designed to identify the presence of contamination and define its nature and extent, followed by direct remediation and/or redevelopment to reestablish site control through engineering and/or institutional controls.

The State of Michigan and the EPA have entered into a Memorandum of Understanding (MOU) concerning brownfields redevelopment. The MOU acknowledges the primacy of Michigan's Part 201 VCP for brownfield sites not on the National Priorities List (NPL), nor subject to a Consent Order. Under Michigan's brownfields VCP, initial Phase I and Phase II ESA results are used to establish the baseline levels of existing site contamination for which a new owner/developer can obtain an exemption from liability, and to comply with applicable Bona Fide Prospective Purchaser (BFPP) requirements of AAI.

These are major factors in encouraging the acquisition and redevelopment of brownfields and concomitant reduction of threats from contamination. Site assessment results are compared to the VCP risk-based cleanup criteria to determine which exposure pathways must be addressed to protect human health and the environment.

In Michigan, where exacerbation of contamination may be an issue during development and future use, a VCP "Due Care" obligation to protect human health is placed on all owners of contaminated sites in Michigan. Pre-development environmental response actions, construction activities, and future site use must be designed to satisfy imminent and continuing obligations to protect the health of site users and third parties and prevent exacerbation of contamination. Assessment results are used in the site development planning process to identify and design an appropriate combination of environmental response actions, construction procedures, and engineering and institutional controls to satisfy VCP Due Care obligations. Ongoing operations, maintenance, monitoring requirements, and site use restrictions are documented in a Remedial Action Plan or Due Care (environmental response action) Plan as required by the VCP. If known or suspected off-site exposure issues are identified, the VCP requires notification of the MDEQ, which has responsibility for addressing such risks at properties owned by non-labile parties. Off-site health issues also typically involve the local health department.

The former Keeler Brass Works site can be used as a hypothetical redevelopment project to illustrate the reduction of threats through redevelopment initiated using Assessment Grant funds. Results of initial Phase II site assessment activities conducted with Assessment Grant funds may reveal the presence of lead, a common contaminant at brass foundries, in surface soil at levels above Michigan VCP residential contact criteria, and chlorinated solvents in subsurface soil at levels above vapor intrusion criteria. Since no hazardous substances were proposed for the redeveloped site, this data would be sufficient to obtain liability protection under the Michigan VCP's Baseline Environmental Assessment program. However, this data would not adequately define the extent of contamination and risk to human health during future use; therefore, an additional VCP Due Care (environmental response) investigation would be conducted using Assessment Grant funds.

Results from this environmental response assessment at Keeler Brass may indicate high levels of lead across a large part of the site, and a large subsurface area contaminated with chlorinated solvents at levels that would pose a threat to inhabitants of buildings on the site. Since the property is near a residential area, the local health department and MDEQ will be notified to inform residents of the issues, assess lead levels in local yards, and conduct blood lead levels in neighborhood children. The development would be configured so that impervious surfaces (building and parking areas) or at least two feet of clean soil covered areas of the property where surficial contamination posed human direct contact threats. The areas of highest chlorinated solvent contamination would be excavated and disposed of in a licensed landfill. If a new building were constructed over this area, a vapor barrier and sub-slab depressurization system would be integrated into the construction. To prevent exacerbation of contamination, all excess soil generated during redevelopment would be disposed in a licensed landfill. These actions would satisfy the VCP Due Care environmental response and AAI BFPP continuing obligation requirements. As a result of using Assessment Grant funds on this site, a significant neighborhood health threat would be identified and addressed, threats to human health and the environment would be mitigated, and the site would be safely redeveloped.

2 The Kent County Health Department (KCHD) will continue to be involved in protecting public health and the environment during the City's assessment, cleanup, and redevelopment of brownfield sites. If contamination discovered through assessment of brownfields has the potential to negatively impact the health of local populations (especially as related to off-site exposures that would not be the responsibility of a non-liable developer), the City will notify the MDEQ and KCHD; these entities will then team with the City as project partners. Based on previous discussions with the KCHD, no disease or symptomatic clusters indicative of environmental health issues or related target contaminants associated with brownfields have been identified in the City.

Therefore, the KCHD generally will not be contributing to the site prioritization and initial assessment phases of brownfield redevelopment projects. When contamination is discovered on brownfield sites, the cleanup criteria established by the MDEQ under the Michigan VCP will be used to identify and address on-site health and environmental threats posed by contamination identified on these sites. The expertise and experience of KCHD will be called upon to help identify/verify off-site health threats posed by identified contamination; identify related toxicological issues and perform risk evaluations (with assistance from ATSDR as needed); design and conduct notification/education programs; and coordinate health testing of sensitive populations (e.g. blood-lead tests in children near contaminated sites, like foundries) if migration of contamination from a brownfield site is confirmed.

I. Leveraging of Additional Resources

1. The City has access to the following options for obtaining additional funds to complete site assessments for liability management, risk assessment, and cleanup planning at brownfield sites where Assessment Grant funds are used:

1. Additional EPA Assessment Grant – if site risk issues and/or redevelopment schedules permit, the City may apply for additional Assessment Grant funding.

2. MDEQ Superfund Section, EPA Brownfields Redevelopment Assessment Grant (Superfund) – MDEQ staff can perform up to 12 assessments per year on brownfield properties identified by local units of government.
3. Developer equity or developer cash repaid with TIF.
4. Michigan Brownfield Redevelopment Grants and Loans Program – payment up to \$1,000,000/site for assessments, hazardous materials (HAZMAT) abatement, demolition, and environmental response costs at contaminated brownfield sites
5. Michigan Brownfield Redevelopment Tax Increment Financing (TIF; Act 381) Program – reimbursement for costs of assessments, environmental responses, demolition, and HAZMAT abatement, at contaminated brownfield sites.
6. City Brownfield Revolving Loan Fund (Michigan TIF program) – payment for assessments, HAZMAT abatement, demolition, and environmental response costs.
7. City General/Bond Funds – Budgeted general funds or bond proceeds (general, or site specific secured by TIF) may be used for assessments, HAZMAT abatement, demolition, environmental response costs, at designated brownfields.
8. Other sources (Kentwood Revolving Loan Fund, the Kentwood Foundation, WMEAC, the Frey Foundation, the Wege Foundation, and WMEAC) that might provide funds for specific types of sites, such as greenspace preservation and parks/recreation creation.

2. In order to successfully redevelop a brownfield site where Assessment Grant funds are used, additional funds for the following activities likely will be needed: environmental risk management (cleanup and/or engineering controls), asbestos/lead abatement, demolition, infrastructure improvements, and site preparation needed to address issues related to previous uses

The Michigan brownfields redevelopment “toolbox” that can tapped for leveraging Assessment Grant dollars to fill redevelopment funding gaps includes source numbers 3 through 8 listed in I.1 above, plus the following additional sources:

1. EPA Brownfields Cleanup Grant – up to \$200,000 per site for grantee-owned property.
2. Foundations and Nonprofit Organizations – [The Right Place, Inc., West Michigan Strategic Alliance, West Michigan Sustainable Business Forum, and other organizations that may be a source of funds for specific types of sites, such as greenspace preservation and parks/recreation creation].
3. Other leveragable sources of funds for offsetting additional costs of brownfields redevelopment – Community Development Block Grants (CDBG), Michigan Business Tax Credits (10% of investment), New Market Tax Credits, Michigan Industrial Development Tax Abatement, Michigan Local/State Property Tax Abatement.

For example, the former Keeler Brass Works site could become a \$10,000,000 redevelopment project. The following brownfield redevelopment activities/costs could be required for the project: asbestos abatement - \$200,000; building demolition - \$800,000; environmental response costs - \$1,000,000; infrastructure and site preparation (fill soil removal) - \$1,200,000. The following funding sources could be used to offset these costs: asbestos abatement/demolition - \$1,000,000 state brownfield redevelopment loan repaid with TIF; environmental response costs - \$500,000 from EPA BRLF Grant loan repaid with TIF and \$500,000 from EPA BRLF Grant or community bond issue repaid with TIF; infrastructure and site preparation - \$1,000,000 from developer repaid/offset with \$300,000 TIF and \$700,000 Michigan Business Tax credit for developer.

J. Programmatic Capability

1. The City's brownfields program is currently in its infancy, and needs access to Assessment Grant funds to help move it toward maturity. The City will use the Assessment Grant to improve its brownfields program, which will result in the improved, more sophisticated, management "infrastructure" needed to support future, more aggressive brownfields redevelopment projects. These larger projects typically require leveraging and management of larger and more sophisticated federal and state brownfield financing programs. The City intends to retain a qualified environmental consultant (through a competitive procurement process) to assist in managing the activities funded by the Assessment Grant, and to conduct the environmental assessment tasks. The selected consultant will have demonstrated extensive experience with, and understanding of, the EPA Assessment Grant program, the Michigan Part 201 program, and the various other state and federal brownfields programs from which funds can be leveraged to facilitate successful brownfields redevelopment projects.

2. The city has received and managed several federal grants, including Metropolitan Enforcement Team Grants, totaling over \$342,000 since 2003; Local Law Enforcement Block Grants of over \$49,000 from 2002-2006; Edward Byrne Memorial Justice Assistance Grants of \$15,245 in 2005; Bureau of Justice Assistance Grant of over \$9,000 in 2004-2006; FEMA grants of \$660,120 from 2004-2006; Hazard Mitigation Planning Grant of \$32,044 from 2004-2005; and the COPS in Schools grant of \$125,000 in 2000-2004.

The City has not received adverse audit findings from an OMB Circular A-133 audit, an audit conducted by a federal, state, tribal, or local government inspector or similar organization.

3. The City has not been a previous recipient of an EPA Brownfields cooperative agreement.

4. The City's goal for its brownfields program is to reduce environmental threats to the community and improve economic conditions. The City will orient this goal to match the EPA's expected outcomes, which include creating new jobs and greenspaces, and leveraging additional funding through the reuse of brownfields. First, the City will evaluate project achievements against those incorporated into the grant application and Work Plan. Second, the City will determine if the project has resulted in an improved functioning of the BRA (i.e., successful management, acquisition, and leveraging of brownfield financial incentives). Third, the City will document the following project elements and, with the assistance of the BRA, determine if each element meets their collective goals. The City will be diligent in measuring the outcomes from use of the Assessment Grant funds. The following Assessment Grant outcomes will be tracked and documented on a regularly updated project spreadsheet:

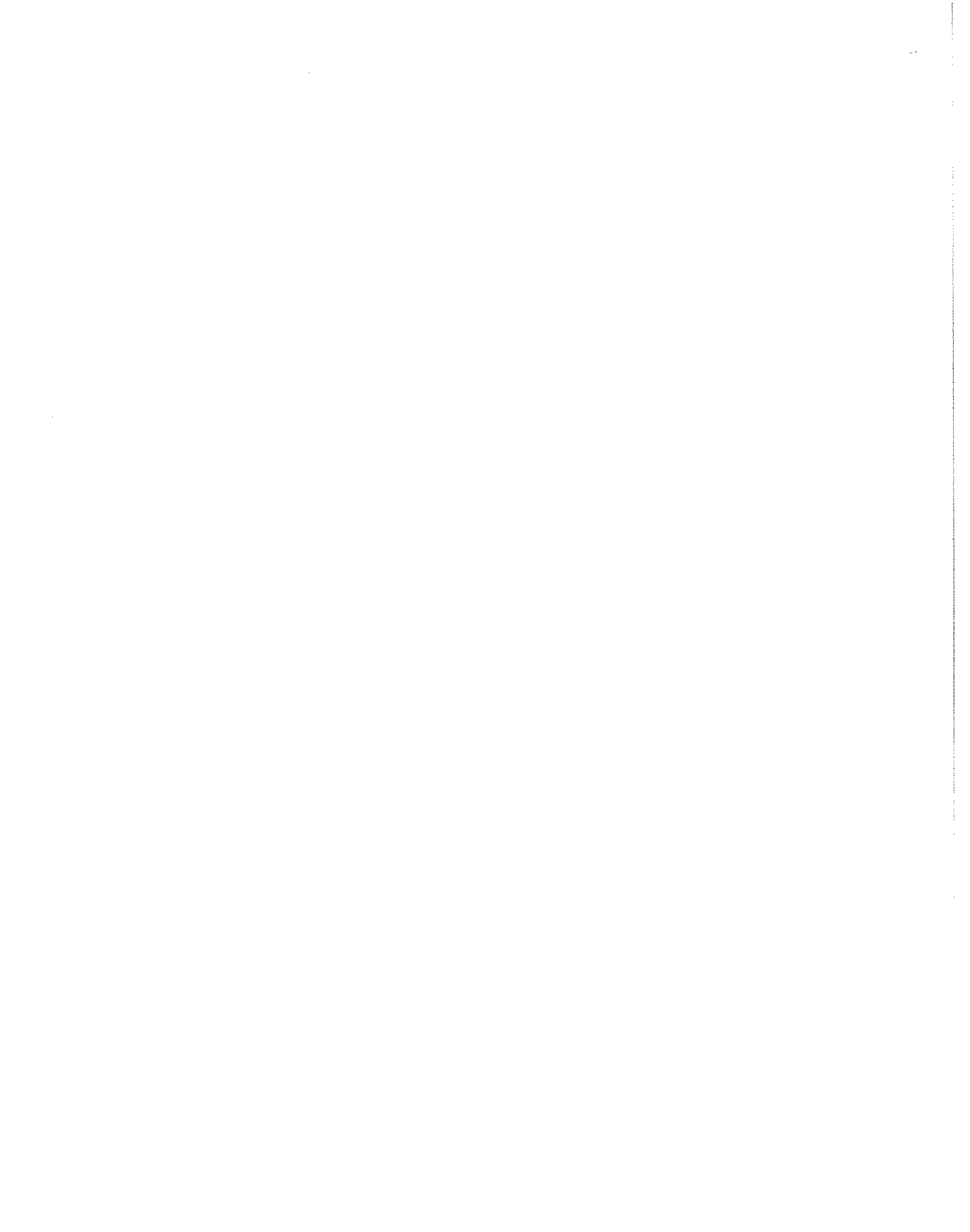
- Number of sites assessed.
- Number of sites identified with off-site risks.
- Number of response actions at identified sites.
- Number of title transfers facilitated.
- Number of sites redeveloped.
- Redevelopment investment value.
- New jobs and tax revenue generated.
- Additional acres of parks and green space created/preserved.

The following Assessment Grant outputs also will be tracked and documented:

- Number of Phase I ESAs.
- Number of Phase II ESAs completed.
- Number of sites where cleanup planning was conducted.

ATTACHMENT A

Letter from State Authority





JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

September 27, 2007

Ms. Lisa Golder
Economic Development Director
City of Kentwood
4900 Breton Avenue, SE
P.O. Box 8848
Kentwood, Michigan 49518-8848

Dear Ms. Golder:

SUBJECT: Letter of Acknowledgement Regarding the United States Environmental Protection Agency (EPA) Brownfield Grant Proposal to Conduct Community Wide Assessments at Hazardous Substances Contaminated Sites

This letter is in response to your request for acknowledgement of the city of Kentwood's proposal to the EPA for a brownfield grant under Title II, Subtitle A, of the Small Business Liability Relief and Brownfields Revitalization Act of 2002 (the Brownfields Law). The Michigan Department of Environmental Quality, Remediation and Redevelopment Division, has reviewed the information you provided and supports the city of Kentwood's proposal based on the following information.

The city of Kentwood is requesting \$200,000 to perform community wide assessments at hazardous substances contaminated sites to support redevelopment efforts. The applicant is considered eligible for these grants as a general purpose unit of local government as defined in 40 CFR Part 31.3.

The proposal by the city of Kentwood should facilitate returning formerly productive properties back to the tax rolls for the city. This grant will improve the quality of life for Kentwood's residents by protecting their natural resources and strengthening their local economy. If you have any questions or need additional information, you may contact the Brownfield Redevelopment Coordinator, Mr. Ronald Smedley at 517-373-4805, or you may contact me.

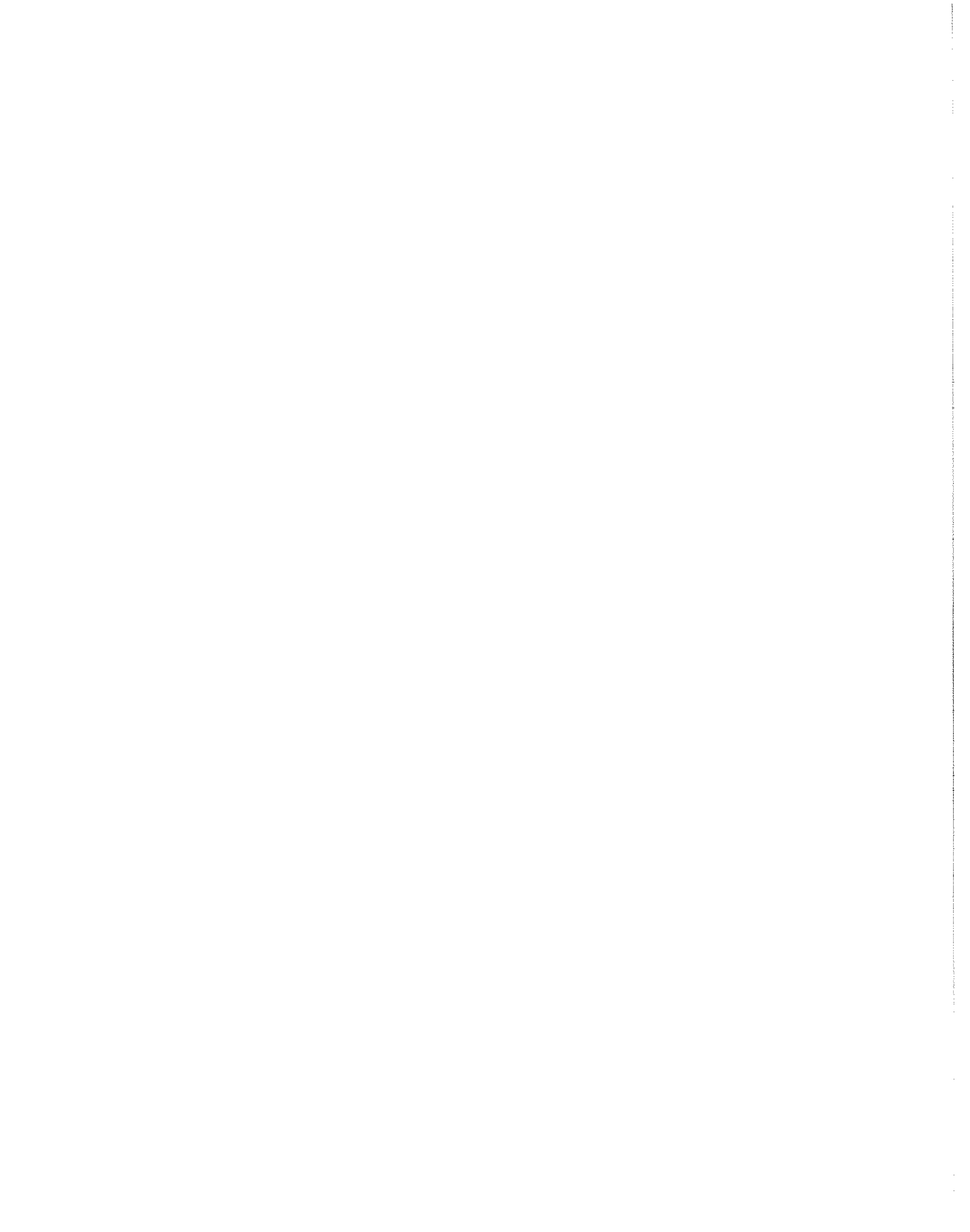
Sincerely,

Robert Reisner
Chief, Funding and Support Unit
Remediation and Redevelopment Division
517-335-6843

cc: Ms. Deborah Orr, USEPA Region V

ATTACHMENT B

Public Notifications





PUBLIC NOTICE

To the Residents and Taxpayers of the City of Kentwood, Kent County, Michigan:

NOTICE OF AN APPLICATION BY THE CITY OF KENTWOOD
FOR
A UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
BROWNFIELDS ASSESSMENT GRANT

Please take notice that the City of Kentwood has prepared an application to the United States Environmental Protection Agency (U.S. EPA) for a Brownfields Assessment Grant. The Assessment Grant would provide \$200,000 in funding to inventory, characterize, assess, and conduct planning and community involvement related to brownfield sites in our city. A draft form of this application is available for public review and comment prior to its submission to the U.S. EPA at the Planning Department of the City of Kentwood, 4900 Breton Avenue SE from October 5, 2007 through October 11, 2007. In addition, the draft application can be found on the city's website at: www.ci.kentwood.mi.us. Please provide comments in writing to:

Lisa Golder, Economic Development Planner
City of Kentwood
4900 Breton Avenue SE, P.O. Box 8848
Kentwood MI 49518-8848

Inquiry regarding the above matter may be made by calling Lisa M Golder, City of Kentwood at (616) 554-0709.