

COMMUNITY RELATIONS PLAN

USEPA Cleanup Grant Program Calhoun County, Michigan Cooperative Agreement BF-00E02883-0

1.0 OVERVIEW

The purpose of this Community Relations Plan (CRP) is to outline how Calhoun County (the County) has involved and will continue to involve affected citizens, local officials, and local organizations in the decision-making process regarding the environmental response efforts at the brownfield property utilizing the U.S. Environmental Protection Agency (USEPA) Brownfields Cleanup Grant to fund eligible environmental response activities. The County was awarded a \$500,000 USEPA Cleanup Grant in September 2020. The grant will be used to fund environmental response activities to address a mound of impacted soil.

The County will have the responsibility for implementing and managing project community involvement as described in this CRP. Active residents and institutions in the community are essential resources for the success of the CRP because they hold positions of responsibility within the community. The County perceives these citizens and organizations as key points of contact and communication. The success of the environmental remediation and subsequent redevelopment of the site relies on informed citizen involvement in each step of the environmental response process.

2.0 SPOKESPERSONS AND DOCUMENT REPOSITORY

The spokesperson for this project is Ms. Jennifer Bomba, Community Development Director for Calhoun County. Contact information is noted below:

Ms. Jennifer Bomba
Community Development Director
Calhoun County
315 W Green Street
Marshall, Michigan 49068
Telephone: 269-781-0817
E-mail: jbomba@calhouncountymi.gov

The Document Repository, which contains the Administrative Record for this project, is located at the following location:

Calhoun County
Community Development Office
315 West Green Street
Marshall, Michigan 49068
Telephone: 269-781-0817

The Administrative Record can be accessed by personal request at the public counter of the Calhoun County Community Development Office. The Community Development Office is open Monday through Thursday 8:00 a.m. to 5:00 p.m. and Friday 8 a.m. to 12 p.m. Comments can be submitted via email to Jennifer Bomba, in writing to the attention of Jennifer Bomba at the address above, or verbally by prior appointment with Jennifer Bomba.

3.0 SITE DESCRIPTION AND HISTORY

The targeted site (Site) is the vacant southeastern portion of the parcel that includes the Calhoun County Justice Center, in Battle Creek, Calhoun County, Michigan. It is located near the intersection of Elm Street and East Michigan Avenue and encompasses approximately 2 acres. The Site is known as “The Mound” because it is characterized as an approximately 50-foot by 350-foot mound that is an average of 15 feet in height. The Site was developed by 1919 with rail lines and a “gateman tower” associated with an adjoining railyard/roundhouse. During this time period, the adjoining sites were developed as a lumber/coal yard, automotive parts manufacturing operation, and a bulk oil storage site. The rail lines remained on the Site until the late 1980s/early 1990s, when the Site became vacant. Between 1993 and 1994 during construction of the Calhoun County Justice Center, soil was moved from the area of the justice center building site and piled on the Site in a mound. The Site has remained vacant land since this time as the mound has prevented any type of site use or redevelopment.

4.0 NATURE OF THREAT TO PUBLIC HEALTH AND ENVIRONMENT

The known impact at the Site is likely associated with the historical on-site operations and the placement of the impacted soil on the Site. It has also likely been impacted by historical operations on adjoining sites. The soil mound on the Site consists of an upper layer of topsoil that is underlain by sand fill with debris (concrete, brick, railroad ties, etc.). The fill material in the soil mound is impacted with cis-1,2-dichloroethene, trichloroethene, naphthalene, arsenic copper, lead, mercury, selenium, silver, and zinc. The soil present directly below the soil mound is also impacted with many of the same constituents. Groundwater on the Site is impacted with cis-1,2-dichloroethene, trichloroethene, and vinyl chloride.

5.0 COMMUNITY PROFILE

The Site is located in the City of Battle (the City), which is the largest city in Calhoun County (County). Battle Creek, known as Cereal City, is located in the southern portion of Lower Michigan, approximately half-way between Chicago and Detroit. The City began developing in the late 1800s when railroads allowed manufacturing companies to ship their industrial and agricultural products all over the country. Around this time, Dr. Kellogg developed a ready-to-eat breakfast food made of baked wheat kernels. A few years later, a former patient C.W. Post developed Grape Nuts cereal. The idea caught on, inspiring a “cereal boom” and a subsequent manufacturing boom in the City.

In the past 20 years, Battle Creek’s economy has been hit hard by the out-sourcing of manufacturing jobs. A 2019 Housing and Community Development Ecosystem Assessment identifies Battle Creek as a small “legacy city”. These legacy cities are cities across the rust belt and New England states that once had thriving manufacturing-based economies that created good job opportunities, a solid middle-class lifestyle, and vibrant communities. These legacy cities have subsequently struggled with poverty, neighborhood disinvestment, and a labor force that does not match employer needs. Battle Creek, with help from the County and various economic development groups, has focused on revitalizing its downtown core. A component of this revitalization is addressing the entry corridor sites that serve to connect the urban core to the surrounding neighborhoods and act to bring visitors and residents into the downtown. The Site is located in the Elm Street Gateway target area, which is one of the City’s downtown entry corridors. This 0.15 square-mile area is located on the southeast side of the downtown district along the main east-west road (Michigan Avenue) that runs through downtown Battle Creek. The target area is surrounded by the Battle Creek River as well as municipal government buildings, single family housing and light industrial operations.

6.0 CHRONOLOGY OF COMMUNITY INVOLVEMENT

The County has been working with the City, local economic development agencies, and the public to understand the needs of downtown Battle Creek and how they can best revitalize the area. They conducted interviews with local business owners and residents, held design workshops, completed a market analysis, and analyzed extensive data on existing conditions. Those involved noted that the “impression of emptiness” in and around the downtown core was keeping residents and visitors from patronizing the area. This process and the outcomes/goals are summarized in the 2018 Battle Creek Master Plan and the subsequent 2018 Downtown Plan, which include similar goals of promoting investment in the city core and elevating the downtown area as a community focal point and a premier place to work, live, play, and invest. The cleanup and redevelopment of the Site aligns directly with the Land Use Plan included in the 2018 Battle Creek Master Plan that identifies the Site and surrounding area as a production and employment center and neighborhood commercial area. The public and various City organizations (Battle Creek Unlimited, Battle Creek Area Chamber of Commerce, and others) were involved in the development of the Downtown Plan and the identification of the area of the Site as a key downtown gateway. These interested parties also identified investment in the city core as the first goal in the 2018 Battle Creek Master Plan.

Community involvement in the potential cleanup of the Site began in 2019, when the County announced its intent to apply for a Cleanup Grant through the Environmental Protection Agency (EPA). This announcement was made in the two newspapers of record for Calhoun County and included information directing the public to the location where they could review the grant application and draft Analysis of Brownfield Cleanup Alternatives (ABCA). A public meeting was then held to discuss the draft grant application and draft ABCA. No public comments were received either before or during the public meeting; therefore, no changes were made to the grant application or draft ABCA.

The Cleanup Grant was awarded in 2020; however, the Covid-19 pandemic delayed work on the project. The County is now in the position to utilize the awarded grant and community involvement activities will begin as described in this CRP. The details of the continuing community involvement from this point forward are discussed in Section 8 and will include a public meeting to “kick-off” the project, announcement of a two-week public review of the draft ABCA, preparation of a written response to all comments received regarding the ABCA, updating and finalization of the ABCA, creation of a Document Repository to hold the project Administrative Record, and then additional public meetings at project milestones. As noted in Section 8, the Administrative Record will be supplemented with new documents produced throughout the project period. In addition, local organizations, neighborhood groups, religious organizations, etc. who will be impacted by the project will be identified and encouraged to participate in the ABCA review process and subsequent project meetings.

Calhoun County believes community involvement is an important component of any successful project and will continue to reach out to its citizens for their comments as the Cleanup Grant project moves forward to completion.

7.0 KEY COMMUNITY CONCERNS

Like many other communities in Michigan founded on a manufacturing economy, over the past few decades, the County’s demographics have shifted toward lower income populations. Property tax and income tax revenues are the main sources of income for the County and the City, and these revenues are not keeping up with inflation or municipal expenses. On the income tax front for the County and the City, the 2008-2009 recession came after decades of downsizing and closing of industrial employers. Manufacturing jobs still account for approximately 24 -25% of the jobs in the County and the City¹; however, the median income in the County is not keeping up with inflation. This means that income tax revenues are also not keeping up with inflation rates and are not making up for losses in other revenue streams. Research conducted to support the 2018 Battle Creek Master Plan predicted continued population decrease through at least 2020, which will likely mean a further decrease in income tax revenue. This decrease in available property and income tax revenue has impacted the County and the City of Battle Creek’s operating budgets. This means that though both entities are solvent, they have very limited funds available to support brownfields remediation and redevelopment.

¹ 2013-2017 American Community Survey

The largest health and welfare concerns are the ongoing disinvestment in the Site area and uncontrolled exposures to contaminated soil, groundwater, and soil gas. The southern portion of the site area is a residential neighborhood of predominantly low-income minority residents. The residents that remain are those that cannot afford to leave. The impoverished and sensitive populations in the Site target area bear the impact of numerous brownfields in this small area. Only recently have efforts and funds been available to make improvements in this struggling neighborhood.

Brownfields threats to the health and welfare of the sensitive populations that live near the Site will be reduced by removal of the impacted mound material and development of the resulting area with a modern operation that incorporates engineering and/or institutional controls to further limit exposures. In addition to improving the health of residents, the redevelopment of the Site will reduce blight, thereby reducing the negative perception of the target area. This will draw residents and businesses back into this gateway target area, triggering additional redevelopment that will improve the health and welfare of the target area. This will help reverse the “impression of emptiness” around the downtown core. Reinvestment in the Site and other properties in the target area will increase the value of the land and buildings and improve the tax base. This will benefit residents and the County and City, which depend on tax revenues to operate.

8.0 CONTINUED COMMUNITY INVOLVEMENT

The County is committed to maintaining community involvement during the Cleanup Grant project. Community involvement activities will include project information dissemination; public meetings; and maintenance of the public repository of key documents for the project. These activities are discussed in the following paragraphs.

The County will host an initial public kick-off meeting to acquaint the community with the project. At this meeting, the County will summarize the Cleanup Grant award and the project plan and will inform the public how they can access important information about the project. Project information will be shared with the public through the County’s website as well as where information will be posted throughout the project. They will also notify the public of the location of the Document Repository. This initial meeting will also define how the public can communicate with the County during the project. The County will announce to the public when the draft ABCA is available for review and that hard copies can be accessed at the Document Repository location and an electronic version can be downloaded from the County’s website. The draft ABCA will be available for review and comment for a two-week period. During this two-week period, the public can provide comments in writing at the Document Repository location, via email to Jennifer Bomba, or can set up an appointment with Jennifer Bomba to discuss their comments verbally.

Once the two-week ABCA review period is completed, the County will collect all the received public comments and prepare a written response to any significant and appropriate comments. They will also document any changes that are made to the ABCA or proposed cleanup plan based on the public comments. This written response and the finalized ABCA will be posted on the County’s website and be placed in the Document Repository as part of the Administrative

Record. The County will also place other relevant Site documentation (e.g., site investigation reports) into the Document Repository at this point.

The County will then notify the public via their website and an advertisement in the local newspaper that the written response to the public comments, finalized ABCA, and other Site documents are available in the Document Repository. Any additional documents generated during completion of the project will be placed in the Document Repository once finalized.

The County will communicate progress of the cleanup activity milestones at public meetings that will be held at the Toeller Building, 190 East Michigan Avenue, Battle Creek, Michigan 49014. This will include a meeting when a contractor is selected to complete the work, a meeting once the work has begun, and a meeting following project completion. The meeting dates, times, and locations will be posted on the County's website at least one week prior to the meeting date. At each of these meetings, the County will provide an update on the project progress and provide time for public comment on the project. As applicable, presentation materials used at the meetings will be archived and placed in the Document Repository and posted on the County's website.