

City of Flint, Michigan

*Third Floor, City Hall
1101 S. Saginaw Street
Flint, Michigan 48502
www.cityofflint.com*



Meeting Agenda - Final

Wednesday, March 17, 2021

5:00 PM

*Agenda Amended to Add Resolution Nos.
210063.1, 210064.1 and 210084.1*

ELECTRONIC PUBLIC MEETING

GOVERNMENTAL OPERATIONS COMMITTEE

Eva L. Worthing, Chairperson, Ward 9

*Eric Mays, Ward 1
Santino J. Guerra, Ward 3
Jerri Winfrey-Carter, Ward 5
Monica Galloway, Ward 7*

*Maurice D. Davis, Ward 2
Kate Fields, Ward 4
Herbert J. Winfrey, Ward 6
Allan Griggs, Ward 8*

Inez M. Brown, City Clerk

Davina Donahue, Deputy City Clerk

SPECIAL PUBLIC NOTICE -- ELECTRONIC PUBLIC MEETING

AMENDED PUBLIC NOTICE

In Accordance with the Newly Revised Open Meetings Act FLINT CITY COUNCIL ELECTRONIC PUBLIC MEETING

On Friday, October 5, 2020, the Michigan Supreme Court (MSC) issued an order declaring the Emergency Powers of Governor (EPG) Act as an unconstitutional delegation of legislative authority, which was the primary authority relied on by Governor Whitmer for her COVID-19 related executive orders. Subsequently, Governor Whitmer requested that the MSC clarify that their order does not go into effect until October 30, 2020. On Monday October 12, 2020, the Michigan Supreme Court rejected Governor Whitmer's request to delay the effect of its decision to strike down the EPG. On Tuesday, October 13, 2020, Senate Bill 1108 passed, amending the Open Meetings Act to allow municipalities to hold electronic meetings before January 1, 2021 and retroactive to March 18, 2020. On Friday, October 16, 2020, Governor Whitmer signed into law Senate Bill 1108 amending the Open Meetings Act. On November 15, an order from the Michigan Department of Health and Human Services (DHHS) prohibits gatherings at non-residential venues beginning November 18. Therefore, pursuant to the amended Open Meetings Act and the DHHS order, the following meeting is scheduled electronically:

Flint City Council Committee Meetings (Finance, Governmental Operations, Legislative & Grants) Wednesday, March 17, 2021, at 5 p.m.

The public and media may listen to the meeting online by live stream at <https://www.youtube.com/watch?v=otoVvrx2b4> or through Start Meeting Solution by dialing (617) 944-8177.

1. In order to speak during the PUBLIC SPEAKING PERIOD of each meeting by telephone, participants will also call (617) 944-8177:
 - a. All callers will be queued and muted until the Public Speaking portion of each agenda;
 - b. Public speakers will be unmuted in order and asked if they wish to address the City Council ON ANY SUBJECT;
 - c. Public speakers should state and spell their name for the record and will be allowed two (2) minutes for public speaking during each meeting;
 - d. The speaker will be returned to mute after the 2 minutes have expired;
 - e. After the telephonic public speakers for the last committee meeting are completed, emailed public comments will be read by the City Clerk. All emailed public comments will be timed for 2 minutes;
 - f. Per Rules Governing Meetings of the Council (Rule 7.1 VII), there will only be one speaking opportunity per speaker per meeting.

Consequently, public participants who call in and speak during the public speaking period of the meetings WILL NOT have written comments as submitted read by the City Clerk.

2. The public may send public comments by email to CouncilPublicComment@cityofflint.com no later than 10 minutes prior to the meeting start time of 5 p.m.

3. Persons with disabilities may participate in the meeting by the above-mentioned means or by emailing a request for an accommodation to CouncilPublicComment@cityofflint.com, with the subject line Request for Accommodation, or by contacting the City Clerk at (810) 766-7418 to request accommodation - including but not limited to interpreters.

If there are any questions concerning this notice, please direct them to City Council office at (810) 766-7418.

ROLL CALL

MEMBER REMOTE ANNOUNCEMENT

Pursuant to the newly revised Open Meetings Act, each Council member shall state that they are attending the meeting remotely and shall state where he or she is physically located (county or city and state).

MEMBER CONTACT INFORMATION

Eric Mays - (810) 922-4860; Maurice Davis - mdavis@cityofflint.com; Santino Guerra - sguerra@cityofflint.com; Kate Fields - kfields@cityofflint.com; Jerri Winfrey-Carter - jwinfrey-carter@cityofflint.com; Herbert Winfrey - (810) 691-7463; Monica Galloway - mgalloway@cityofflint.com; Allan Griggs - agriggs@cityofflint.com; Eva Worthing - eworthing@cityofflint.com.

PROCEDURES ON CONDUCTING ELECTRONIC MEETINGS

All boards and commissions must adhere to all laws established under the Michigan Compiled Laws and in accordance with the revisions to the Open Meetings Act adopted in Senate Bill 1108, as passed on October 13, 2020, and signed into law on October 16, 2020.

PUBLIC SPEAKING

COUNCIL RESPONSE

SPECIAL ORDERS

RESOLUTIONS

Public hearings were not held for the following Resolutions (210063.1, 210064.1 and 210084.1). The first two Resolutions need to be postponed until April 7. The last (210084.1) needs to be dropped until a new Public Hearing can be set.

210063.1 Approval/Street Vacation/Decker Street Between Robert T. Longway Boulevard and Kearsley Street

Resolution resolving that Decker Street Between Robert T. Longway Boulevard and Kearsley Street is hereby vacated and discontinued forever as a public street, alley or public ground, and the same is hereby placed on the assessment rolls for the purpose of taxation; AND, resolving that the City Clerk shall, within 30 days of this action, record a certified copy of this resolution with the Register of Deeds for Genesee County and forward a certified copy of said resolution to the State Treasurer. [NOTE: The Ruth Mott Foundation's Applewood Master Plan calls for the construction of a welcome center... which will offer year-round education, conference and exhibit spaces open to the community and broader access to the archives and collection materials that are part of the foundation.]

210064.1 Approval/Street Vacation/Kearsley Street Between Walnut Street and Robert T.

Longway Boulevard (1400 Kearsley Street)

Resolution resolving that Kearsley Street between Walnut Street and Robert T. Longway Boulevard is hereby vacated and discontinued forever as a public street, alley or public ground, and the same is hereby placed on the assessment rolls for the purpose of taxation; AND, resolving that the City Clerk shall, within 30 days of this action, record a certified copy of this resolution with the Register of Deeds for Genesee County and forward a certified copy of said resolution to the State Treasurer. [NOTE: The Ruth Mott Foundation's Applewood Master Plan calls for the construction of a welcome center... which will offer year-round education, conference and exhibit spaces open to the community and broader access to the archives and collection materials that are part of the foundation.]

210084.1 Approval/City of Flint Brownfield Redevelopment Project Authority/Brownfield Plan for the James P. Cole Project (1809 James P. Cole Boulevard)

Resolution resolving that the [Brownfield Plan for the James P. Cole Project (1809 James P. Cole Boulevard)] as submitted is hereby approved and adopted, and a copy of the plan and all amendments thereto shall be maintained on file in the City Clerk's office. [NOTE: Once approved, the Brownfield plan will allow the reimbursement of eligible project expenses from the additional tax revenue realized as a result of the redevelopment. The reimbursement can occur over the life of the plan, which is normally 30 years. The eligible reimbursable expenses are estimated at around \$2,541,508.00.]

APPOINTMENTS

210123 Mayoral Appointment/Department of Public Works (DPW) Director/Michael Brown

Resolution resolving that the Flint City Council approves the recommendation by Mayor Sheldon A. Neeley to appoint Michael Brown as the Director of the Department of Public Works (DPW). [NOTE: Mr. Brown will be paid an annual compensation rate of \$95,000.00 (45.673 per hour).]

DISCUSSION ITEMS

210099 Discussion Item/Community Updates/City of Flint Web Site

A discussion item as requested by Councilperson Mays to discuss what constitutes a community update on the City of Flint's Web site.

210100 Discussion Item/Multi-Member Bodies

A discussion item as requested by Councilperson Mays to discuss multi-member bodies.

210114 Discussion Item/Eighteen (18) Properties in the City of Flint Pilot Program

A Discussion Item as requested by Councilperson Mays to review the 18 properties City Council retained from the Genesee County Land Bank, including a history of the finances for Jefferson School. [Referral Action Date: 2/17/2020 @ Electronic Governmental Operations Committee Meeting.]

210116 Discussion Item/Job Requirements/Salaries

A Discussion Item as requested by Councilperson Galloway to talk about job requirements and salaries for appointees. [Referral Action Date: 2/22/2020 @ Electronic City Council Meeting.]

210118 Discussion Item/Snow Plowing Strategy

A Discussion Item as requested by Councilperson Winfrey-Carter to talk about the city's snow plowing strategy with Transportation Director John Daly. [Referral Action Date: 2/22/2020 @ Electronic City Council Meeting.]

OUTSTANDING DISCUSSION ITEMS

ADJOURN



RESOLUTION NO.: 210123
 PRESENTED: MAR - 3 2021
 ADOPTED: _____

**RESOLUTION APPROVING THE APPOINTMENT OF MICHAEL BROWN AS
 DIRECTOR OF THE DEPARTMENT OF PUBLIC WORKS**

BY THE MAYOR:

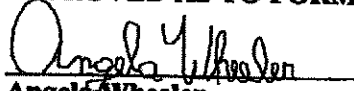
Pursuant to Flint City Charter Section 4-202(D), the Mayor of the City of Flint hereby appoints Michael Brown as the Director of the Department of Public Works.

WHEREAS, the Director of the Department of Public Works shall be paid based on an annual compensation rate of Ninety-Five Thousand Dollars (\$95,000.00/\$45.673 hourly rate) and paid from account #202-442.100-703.000 (25%), 203-442.100-703.000 (25%), 590-536.101-703.000 (25%), and 591-536.100-703.000 (25%), Wages & Salaries. The terms of appointment are attached.

WHEREAS, Mayor Sheldon A. Neeley recommends that Michael Brown as Department of Public Work Director.

NOW THEREFORE BE IT RESOLVED, that the Flint City Council approves the recommendation by Mayor Sheldon A. Neeley to appoint Michael Brown as Director of the Department of Public Works.


APPROVED AS TO FORM:


 Angela Wheeler
 Chief Legal Officer

FINANCE:


 Shelbi Frayer
 Interim Chief Financial Officer

APPROVED BY MAYOR:


 Sheldon A. Neeley
 Mayor

CITY COUNCIL:

 Kate Fields
 Council President

MICHAEL BROWN INTERIM TERMS OF APPOINTMENT

The Mayor of the City of Flint hereby appoints **Michael Brown** as Interim Director of the Department of Public Works in accordance with the provisions of Flint City Charter §§4-203(D) & 1-501.

1. **Scope of Services:** Under the general supervision of the Mayor and City Administrator, the Interim Director of the Department of Public Works duties shall include those enumerated for the Interim Director of the Department of Public Works in the Flint City Code of Ordinances, Chapter 2, Article XVI, Department of Public Works and Utilities, the Interim Director of the Department of Public Works Job Description and other duties that shall from time-to-time be required, in the absolute discretion of the Mayor, or his designee and; he shall be subject to all work rules and policies established by the City of Flint.

2. **Term of Appointment:** This appointment shall commence on March 1, 2021 and shall continue at the will of the Mayor and shall continue at the will of the Mayor for no more than 90 days.

3. **Compensation:** The Interim Director of the Department of Public Works shall be paid a salary based on an annual compensation rate of Ninety-Five Thousand Dollars (\$95,000.00/\$45.673 hourly rate). This salary shall be payable in regular timely installments, in the same manner as other employees of the City of Flint are paid. Such earnings shall be paid from account #202-442.100-703.000 (25%), 203-442.100-703.000 (25%), 590-536.101-703.000 (25%), and 591-536.100-703.000 (25%), Wages & Salaries.

4. **Benefits:** The Interim Director of the Department of Public Works will be provided with fringe equal to those now or hereinafter provided for an exempt employee allocated above Level 23 including, but not limited to health care coverage, dental insurance, life insurance, personal time off, etc.; but expressly excluding membership in the Civil Service System. However, the Interim Director of the Department of Public Works shall be eligible to participate in the City of Flint Hybrid Pension Plan as provided to other appointed officials, which may change from time-to-time. The Interim Director of the Department of Public Works shall be 100% vested at all times, with respect to his own contributions.

For the purposes of providing to the Interim Director of the Department of Public Works the above compensation and fringe benefits, the City of Flint shall place the Interim Director of the Department of Public Works on the City's regular payroll so that all of said compensation and fringe benefits shall be provided to the Interim Director of the Department of Public Works in the same manner as other employees of the City of Flint.

5. **Indemnification and Insurance:** The City of Flint shall indemnify and provide appropriate insurance coverage for the Interim Director of the Department of Public Works for any attorney's fees, reasonable costs, and damage awards incurred by the Interim Director of the Department of Public Works as a result of any malpractice action brought against him by any person as a result of his performance of duties pursuant to her Appointment. To the fullest extent permitted by law, the City of Flint shall defend, pay on behalf of, indemnify and hold harmless the Interim Director of the Department of Public Works against any and all claims, demands, suits, or losses, including, but not limited to, civil rights actions, and providing for all costs connected therewith, and for any damages which may be asserted, claimed, or recovered against

or from the Interim Director of the Department of Public Works by reason of any injuries or damages including losses that may arise as a result of her acts, omissions, faults or negligence in connection with the performance of the terms of her appointment. The City of Flint shall provide appropriate insurance coverage, although, the full indemnification of the Interim Director of the Department of Public Works as articulated above shall not be in any way limited by the insurance coverage chosen by the City of Flint.

6. **Termination:** The City may terminate, without cause, this Agreement (and the resultant employment relationship) with the Interim Director of the Department of Public Works before the expiration set forth herein. In the event that this Agreement is terminated without Good Cause, the Interim Director of the Department of Public Works shall be entitled to accrued PTO.

The City may terminate, for Good Cause, this Agreement (and the resultant employment relationship) with the Interim Director of the Department of Public Works before the expiration set forth herein. In the event that this Agreement is terminated with Good Cause, the Interim Director of the Department of Public Works shall be entitled to accrued PTO.

The Interim Director of the Department of Public Works may voluntarily terminate this Agreement before the expiration of the term set forth herein by providing fourteen (14) days advanced written notice, unless agreed upon otherwise by the Parties. In the event that this Agreement is terminated pursuant to this subsection, the Interim Director of the Department of Public Works shall be entitled to accrued PTO.

Upon the conclusion of the ninety (90) day term, the Interim Director of the Department of Public Works may not be re-appointed for another Interim Director of the Department of Public Works appointment. However, the Interim Director of the Department of Public Works, with City Council consent, may be approved for appointment as Director of the Department of Public Works.

“GOOD CAUSE”. For purposes of this Agreement the term "good cause" is defined as sole proven acts or omissions as follows:

A. Any willful, knowing, grossly negligent, or negligent breach, disregard or habitual neglect of any provision of this Agreement, or any willful, knowing, grossly negligent, or negligent breach, disregard or habitual neglect of any duty or obligation required to be performed by the Interim Director of the Department of Public Works under this Agreement or applicable law.

B. Any misconduct of the Interim Director of the Department of Public Works involving an act of moral turpitude, criminal illegality (excepting minor traffic violations), or habitual violations of the traffic laws, whether or not related to the Interim Director of the Department of Public Works' official duties hereunder.

C. Any willful, knowing, grossly negligent, or negligent misapplication or misuse, direct or indirect, by the Interim Director of the Department of Public Works, of public or other funds or other property, real, personal, or mixed, owned by or entrusted to the City, any agency

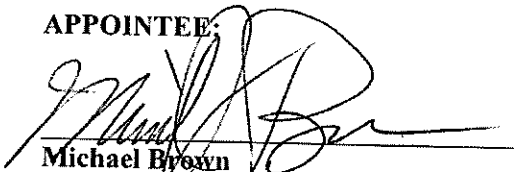
or corporation thereof, or the Interim Director of the Department of Public Works in her official capacity.

7. **Waiver of Claims:** Appointee agrees, in consideration for accepting payment pursuant to this Agreement, that Appointee will not file a lawsuit or claim of any type in any forum against the City for actions arising in any way related to employment by the City, and that if Appointee does, the lawsuit or claim will be immediately dismissed; and, notwithstanding the fact that the terms of this Agreement shall otherwise remain in full force and effect, Appointee will return to the City all of the consideration received from the City as a result of this Agreement, and Appointee will pay to the City all of the costs, expenses, and attorney fees incurred by the City in defending against such a lawsuit or claim. However, nothing in this Agreement shall prevent Appointee from filing suit to challenge this Agreement or to enforce the terms of this Agreement.

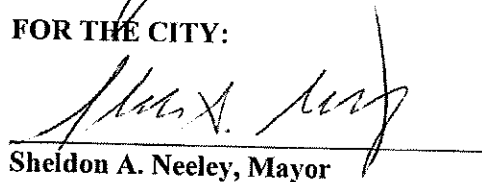
8. **Whole Agreement:** Any additions, deletions or modifications to these terms of appointment must be in writing and signed by both parties. This document, consisting of three (3) pages in its entirety, embodies the entire agreement between the parties hereto.

Dated this 1st day of March 2021.

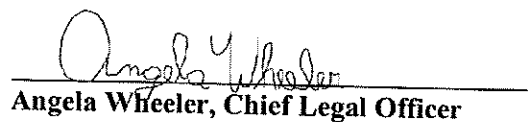
APPOINTEE:


Michael Brown

FOR THE CITY:


Sheldon A. Neeley, Mayor

APPROVED AS TO FORM:


Angela Wheeler, Chief Legal Officer

S:\AWO\Terms of Appointment\M. Brown\2021.02.24 M. Brown Interim Terms of Appointment Director of the Department of Public Works.doc

Michael J. Brown

Professional Experience

2019 – Present **Oakland County**

Operations Supervisor II. In charge of two wastewater plants and the operators on the afternoon shift. Duties include keeping plants running at optimal levels, discipline, troubleshooting equipment problems, repair if possible, running of THP biosolids building and digesters for gas production.

2018-2019

Assistant Principal for Holy Family School Grand Blanc. In charge of discipline and safety of students. Left due to budget cuts.

2015-2018

Teacher for Ignite Program (Mt. Morris) currently stationed at the Atherton AVA as the Mathematics and Chemistry teacher. Teaching/coaching students in their studies and mentoring the 9th and 10th grade students. Left for a full time position.

1996-2011 **City of Flint**

Started as the Wastewater Treatment Plant(WWT) as the Asst. Supervisor and worked my way up to Utilities Administrator. I went from WWTP to Sewer Collections. Added on Water Distribution and ran those two divisions. Later I was promoted to the Utilities Administrator where I reported to the Mayor and his staff and ran or oversaw the WWTP, Water Plant and the Water Service Center. Added to water licenses. Retired in 2011 and begin my teaching career.

1986-1996 **City of Saginaw**

Chief Chemist of the Saginaw WWTP – Responsible for the hiring, training and operations of the Laboratory and Plant. Created plant monthly reports to be sent to the MDEQ and oversaw plant operations in the absence of upper management. Assisted Water Plant personnel for process changes to minimize trihalo-methanes Hold a WWTP A, B, C, D and Water Michigan licenses.

Education

Post Baccalaureate - Baker, Flint MI 2015,
B.S. Secondary Education– Major in Mathematics, Minor in Chemistry

U of M- Flint, Flint MI 1985
BS Chemistry (ACS) minor in Mathematics

Grand Blanc Community High School 1979
College pathway

Holy Redeemer Grade School 1975
2nd – 8th grade

Licenses

Wastewater A, B, C, D

Water S1, D2, F3

State of Michigan Teaching Certificate – Secondary Teaching, certified for Mathematics and Chemistry



CITY OF FLINT

RESOLUTION NO.: 210063.1

PRESENTED: MAR - 3 2021

ADOPTED: _____

RESOLUTION RECOMMENDING THE VACATION OF
DECKER STREET BETWEEN ROBERT T. LONGWAY AND KEARSLEY STREET.

BY THE CITY ADMINISTRATOR:

WHEREAS, Due notice has been given to all persons interested as to the time and place of a hearing in respect to the proposed action of this body to vacate the street, alley or public ground known as Decker Street between Robert T. Longway and Kearsley Street.

WHEREAS, Pursuant to the requirements of section 42-25 of the Flint City Code, a public hearing has been held so that members of the Flint City Council could meet and hear objections to the proposed vacation and discontinuance of the above described street, alley or public ground.

IT IS RESOLVED, that Decker Street between Robert T. Longway and Kearsley Street, is hereby vacated and discontinued forever as a public street, alley, or public ground, and the same is hereby placed on the assessments rolls for the purpose of taxation.

FURTHER RESOLVED, that the City Clerk shall, within thirty (30) days of this action, record a certified copy of this resolution with the Register of Deeds for Genesee County and forward a certified copy of said resolution to the State Treasurer.

APPROVED AS TO FORM:

Angela Wheeler
Angela Wheeler, Chief Legal Officer

ADMINISTRATION:

Clyde Edwards
Clyde Edwards, City Administrator

CITY COUNCIL:

Kate Fields, Council President



CITY OF FLINT

RESOLUTION STAFF REVIEW FORM

TODAY'S DATE: 2/21/21

BID/PROPOSAL# n/a

AGENDA ITEM TITLE: Resolution recommending a Street Vacation of Decker Street between Robert T Longway and Kearsley St.

PREPARED BY Suzanne Wilcox, Director, Department of Planning and Development (Please type name and Department)

VENDOR NAME: n/a

BACKGROUND/SUMMARY OF PROPOSED ACTION:

At its meeting on April 15, 2020, the Flint Planning Commission recommended APPROVAL to vacate Decker Street between Robert T Longway and Kearsley Street. The Ruth Mott Foundation revisited and revised their Applewood Master Plan in 2019. The plan outlines several projects for the Applewood property. The property contains 18 acres within a gated estate and another 16 acres of property outside that also includes the triangle property between Decker and Robert T. The master plan also addresses two acres of adjoining property at 305 Walnut Street that was acquired from the Flint Cultural Center Corporation. The master plan calls for the construction of a welcome center to co-locate foundation staff from downtown offices, and staff that's currently located at Applewood. Within the historic grounds, they will offer year-round education, conference and exhibit spaces open to the community and broader access to the archives and collection materials that are part of the foundation. The assets this project provides are shared parking resources, resources for all Cultural Center campus partners and allows ongoing access to the adjoining view with gallery. This alley vacation request has been reviewed by all applicable City of Flint departments including the City Engineer, Traffic Engineer, Water Service Center, and Planning and Zoning Staff. The City Engineer has recommended that the City retain a street wide easement down the overall length of Decker Street to accommodate any and all utilities running down the street and the Fire Department has recommended modifications to the design for fire safety purposes.

FINANCIAL IMPLICATIONS: The property will be discontinued forever as a public street, alley, or public ground and become the ownership of the adjacent property owner (Ruth Mott Foundation).

BUDGETED EXPENDITURE? YES [] NO [x] IF NO, PLEASE EXPLAIN: n/a

Table with 5 columns: Dept., Name of Account, Account Number, Grant Code, Amount



CITY OF FLINT

			FY19/20 GRAND TOTAL	
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PRE-ENCUMBERED? YES NO REQUISITION NO: 2019-0000000000

WILL YOUR DEPARTMENT NEED A CONTRACT? YES NO
(If yes, please indicate how many years for the contract) YEARS

WHEN APPLICABLE, IF MORE THAN ONE (1) YEAR, PLEASE ESTIMATE TOTAL AMOUNT FOR EACH BUDGET YEAR: (This will depend on the term of the bid proposal) n/a

BUDGET YEAR 1

BUDGET YEAR 2

BUDGET YEAR 3

OTHER IMPLICATIONS (i.e., collective bargaining): n/a

STAFF RECOMMENDATION: (PLEASE SELECT): APPROVED NOT APPROVED

DEPARTMENT HEAD SIGNATURE: [Signature] Director, DPD
(PLEASE TYPE NAME, TITLE)



CITY OF FLINT

210064.1

RESOLUTION NO.: _____

PRESENTED: MAR 3 2021

ADOPTED: _____

RESOLUTION RECOMMENDING THE VACATION OF KEARSLEY STREET BETWEEN WALNUT AND ROBERT T. LONWAY (1400 KEARSELY STREET).

BY THE CITY ADMINISTRATOR:

WHEREAS, Due notice has been given to all persons interested as to the time and place of a hearing in respect to the proposed action of this body to vacate Kearsley Street between Walnut and Robert T Longway (1400 Kearsley Street).

WHEREAS, Pursuant to the requirements of section 42-25 of the Flint City Code, a public hearing has been held so that members of the Flint City Council could meet and hear objections to the proposed vacation and discontinuance of the above described street, alley or public ground.

IT IS RESOLVED, that Kearsley Street between Walnut and Robert T Longway (1400 Kearsley Street), is hereby vacated and discontinued forever as a public street, alley, or public ground, and the same is hereby placed on the assessments rolls for the purpose of taxation.

FURTHER RESOLVED, that the City Clerk shall, within thirty (30) days of this action, record a certified copy of this resolution with the Register of Deeds for Genesee County and forward a certified copy of said resolution to the State Treasurer.

APPROVED AS TO FORM:

Angela Wheeler, Chief Legal Officer

ADMINISTRATION:

Clyde Edwards, City Administrator

CITY COUNCIL:

Kate Fields, Council President



CITY OF FLINT

RESOLUTION STAFF REVIEW FORM

TODAY'S DATE: 2/21/21

BID/PROPOSAL# n/a

AGENDA ITEM TITLE: Resolution recommending a street vacation of Kearsley Street between Walnut and Robert T Longway (1400 Kearsley Street)

PREPARED BY: Suzanne Wilcox, Director, Department of Planning and Development (Please type name and Department)

VENDOR NAME: n/a

BACKGROUND/SUMMARY OF PROPOSED ACTION:

At its meeting on April 15, 2020, the Flint Planning Commission recommended APPROVAL to vacate Kearsley Street between Walnut and Robert T. Longway (1400 Kearsley Street). The Ruth Mott Foundation revisited and revised their Applewood Master Plan in 2019. The plan outlines several projects for the Applewood property. The property contains 18 acres within a gated estate and another 16 acres of property outside that also includes the triangle property between Decker and Robert T. The master plan also addresses two acres of adjoining property at 305 Walnut Street that was acquired from the Flint Cultural Center Corporation. The master plan calls for the construction of a welcome center to co-locate foundation staff from downtown offices, and staff that's currently located at Applewood. Within the historic grounds, they will offer year-round education, conference and exhibit spaces open to the community and broader access to the archives and collection materials that are part of the foundation. The assets this project provides are shared parking resources, resources for all Cultural Center campus partners and allows ongoing access to the adjoining view with gallery. This alley vacation request has been reviewed by all applicable City of Flint departments including the City Engineer, Traffic Engineer, Water Service Center, and Planning and Zoning Staff. The City Engineer has recommended that the City retain a street wide easement down the overall length of Kearsley Street to accommodate any and all utilities running down the street and the Fire Department has recommended modifications to the design for fire safety purposes.

FINANCIAL IMPLICATIONS: The property will be discontinued forever as a public street, alley, or public ground and become the ownership of the adjacent property owner (Ruth Mott Foundation).

BUDGETED EXPENDITURE? YES [] NO [X] IF NO, PLEASE EXPLAIN: n/a

Table with 5 columns: Dept., Name of Account, Account Number, Grant Code, Amount



CITY OF FLINT

			FY19/20 GRAND TOTAL	
--	--	--	----------------------------	--

PRE-ENCUMBERED? YES NO REQUISITION NO:

WILL YOUR DEPARTMENT NEED A CONTRACT? YES NO
(If yes, please indicate how many years for the contract) YEARS

WHEN APPLICABLE, IF MORE THAN ONE (1) YEAR, PLEASE ESTIMATE TOTAL AMOUNT FOR EACH BUDGET YEAR: *(This will depend on the term of the bid proposal)* n/a

BUDGET YEAR 1

BUDGET YEAR 2

BUDGET YEAR 3

OTHER IMPLICATIONS *(i.e., collective bargaining)*: n/a

STAFF RECOMMENDATION: *(PLEASE SELECT)*: APPROVED NOT APPROVED

DEPARTMENT HEAD SIGNATURE: *[Signature]* Director, Dept of Planning and Development
(PLEASE TYPE NAME, TITLE)



RESOLUTION NO.:

210084.1

MAR - 3 2021

PRESENTED: _____

ADOPTED: _____

**RESOLUTION APPROVING CITY OF FLINT BROWNFIELD REDEVELOPMENT
AUTHORITY BROWNFIELD PLAN FOR THE JAMES P. COLE PROJECT**

(1809 James P. Cole)

BY THE CITY ADMINISTRATOR:

On July 28, 1997, the Flint City Council adopted a resolution establishing the Brownfield Redevelopment Authority (Authority) of the City of Flint pursuant to the Brownfield Redevelopment Financing Act 381 of the Public Acts ("Act") of 1996, to promote the revitalization, redevelopment and reuse of certain blighted, tax reverted and functionally obsolete properties.

Under Act 381, the Authority is authorized to develop and propose for adoption by the City Council a brownfield plan for one (1) or more parcels of eligible properties.

Pursuant to the resolution establishing the Authority and the bylaws of the Authority, the Authority has submitted a proposed brownfield plan for 1809 James P. Cole (the Plan).

The required notice of the public hearing on the proposed Plan was given in accordance with section 13 of Act 381, and such hearing held by the City Council on March 8, 2021.

Once approved, the brownfield plan will allow of the reimbursement of eligible project expenses from the additional tax revenue realized as a result of the redevelopment. The reimbursement can occur over the life of the plan which is normally 30 years. The eligible reimbursable expenses are estimated at around \$2,541,508.

IT IS RESOLVED, THAT:

1. **Definitions.** Where used in this Resolution, the terms set forth below shall have the following meaning unless the context clearly requires otherwise:

"Eligible Activities" or "eligible activity" shall have the meaning described in Act 381.

"Eligible Property" means the property designated in the Plan as the Eligible Property, as described in Act 381.

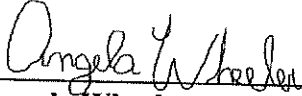
"Plan" means the Plan prepared by the Authority, as transmitted to the City Council by the Authority for approval, copies of which Plan are on file in the office of the City Clerk.

"Taxing Jurisdiction" shall mean each unit of government levying an ad valorem property tax on the Eligible Property.

2. **Public Purpose.** The City Council hereby determines that the Plan constitutes a public purpose.
3. **Best Interest of the Public.** The City Council hereby determines that it is in the best interest of the public to promote the revitalization of environmentally distressed areas in the City to proceed with the Plan.
4. **Review Considerations.** As required by act 381, including consideration of the criteria of "facility" as defined in act 381;
 - a. Portions of the property designated in the Plan meet the definition of Eligible Property, as described in act 381, including consideration of the criteria of "facility" as defined in Act 381;
 - b. The Plan meets the requirements set forth in section 13 of Act 381.

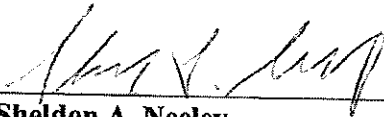
- c. The proposed method of financing the costs of eligible activities is feasible and the authority has the ability to arrange the financing.
 - d. The costs of eligible activities proposed are reasonable and necessary to carry out the purpose of Act 381.
 - e. The amount of captured taxable value estimated to result from adoption of the Plan is reasonable.
5. Approval and Adoption of Plan. The Plan as submitted by the authority is hereby approved and adopted. A copy of the Plan and all amendments thereto shall be maintained on file in the City Clerk's office.
 6. Establishment of Project Fund; Approval of Depository. The Authority shall establish a separate fund for the Eligible Property subject to this Plan, which shall be kept in a depository bank account or accounts in bank or banks approved by the Treasurer of the City. All monies received by the Authority pursuant to the Plan shall be deposited in the Project Fund for the Eligible Property. All monies in the Project Fund and earnings thereon shall be used only in accordance with the Plan and Act 381.
 7. Use of Monies in the project Fund. The monies credited to the Project Fund and on hand therein from time to time shall be used annually to first make those payments authorized by and in accordance with the Plan and any development.
 8. Payment of Tax Increment Revenues to Authority. The municipal and the county treasurers shall, as ad valorem and specific local taxes are collected on the Eligible Property, pay the Tax Increment Revenues to the Authority for deposit in the Project Fund. The payments shall be made not more than 20 days after the Tax Increment Revenues are collected.
 9. Disclaimer. By adoption of this Resolution and approval of the Plan, the City assumes no obligation or liability to the owner, developer, lessee or lessor of the eligible property for any loss or damage that may result to such persons from the adoption of this Resolution and Plan. The City makes no guarantees or representation as to the determinations of the appropriate state officials regarding the ability of the Authority to capture tax increment revenues from the state and local school district taxes for the Plan.
 10. Repealer. All of this resolution and parts of resolutions insofar as they conflict with the provisions of this resolution shall be rescinded.

Approved as to Form:



Angela Wheeler
Chief Legal Officer

ADMINISTRATION:



Sheldon A. Neeley
Mayor

Kate Fields, Council President



CITY OF FLINT

RESOLUTION STAFF REVIEW FORM

TODAY'S DATE: 2/3/2021

BID/PROPOSAL#

AGENDA ITEM TITLE: Brownfield Plan Approval

PREPARED BY Khalfani Stephens
(Please type name and Department)

VENDOR NAME:

BACKGROUND/SUMMARY OF PROPOSED ACTION:

This is a resolution to establish a brownfield plan for 1809 James P. Cole. The project is estimated to be approximately \$14.25 Million and will result in approximately 110K SF of renovated industrial space and 190K of new industrial space. New job creation is TBD.

FINANCIAL IMPLICATIONS: This will reduce the taxes collected for up to 30 years (see attached table)

BUDGETED EXPENDITURE? YES NO **IF NO, PLEASE EXPLAIN:**

Dept.	Name of Account	Account Number	Grant Code	Amount
FY19/20 GRAND TOTAL				

PRE-ENCUMBERED? YES NO **REQUISITION NO:**



CITY OF FLINT

ACCOUNTING APPROVAL: _____ Date: _____

WILL YOUR DEPARTMENT NEED A CONTRACT? YES NO
(If yes, please indicate how many years for the contract) YEARS

WHEN APPLICABLE, IF MORE THAN ONE (1) YEAR, PLEASE ESTIMATE TOTAL AMOUNT FOR EACH BUDGET YEAR: (This will depend on the term of the bid proposal)

BUDGET YEAR 1

BUDGET YEAR 2

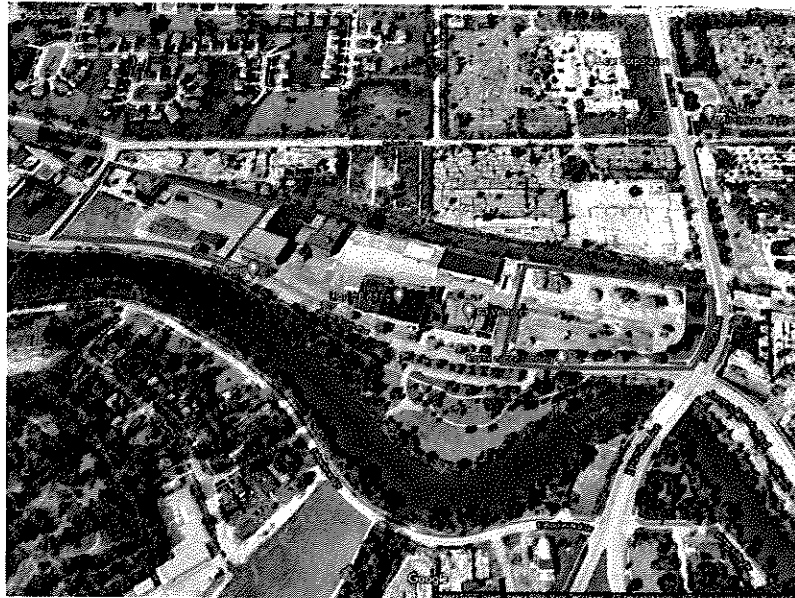
BUDGET YEAR 3

OTHER IMPLICATIONS (i.e., collective bargaining):



STAFF RECOMMENDATION: (PLEASE SELECT): APPROVED NOT APPROVED

DEPARTMENT HEAD SIGNATURE: __Khalfani Stephens, Economic Development Director
(PLEASE TYPE NAME, TITLE)

CITY OF FLINT
BROWNFIELD REDEVELOPMENT AUTHORITY



BROWNFIELD PLAN FOR THE
PROPOSED DUPONT INDUSTRIAL FACILITY
REDEVELOPMENT PROJECT

Prepared for	Prepared By
 <p>DEARBORN CAPITAL Company of Real Estate Financing</p> <p>James P Cole Venture, LLC Attn: Ms. Mona Navitsky c/o Dearborn Capital Partners, LLC 980 North Michigan, Suite 1620 Chicago, IL 60611 Attn: Mr. Brien Wloch; Managing Member M (312) 543-1250 E mona.navitsky@dearcapcre.com</p>	 <p>Mr. Nicholas G. Maloof, RPG President and General Counsel Associated Environmental Services, LLC 40701 Woodward Avenue, Suite 50 Bloomfield Hills, MI 48304 T (248) 203-9898 M (248) 250-2525 E ngm@associatedenvironmental.net W www.associatedenvironmental.net</p>

Plan Preparation Date: **October 31, 2020**

Approved by the Brownfield Redevelopment Authority on: _____

Approved by the Flint City Council on: _____

**CITY OF FLINT
BROWNFIELD REDEVELOPMENT AUTHORITY
BROWNFIELD PLAN**

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I. INTRODUCTION

In order to promote the revitalization of environmentally distressed and blighted areas within the boundaries of the City of Flint, Michigan (the “City”), the City has established the City of Flint Brownfield Redevelopment Authority (the “FBRA”) pursuant to Michigan Public Act 381 of 1996, as amended (“Act 381”).

The primary purpose of this Brownfield Plan (“Plan”) is to promote the redevelopment of and private investment in certain “brownfield” properties within the City. Inclusion of property within this Plan will facilitate financing of environmental response and other Eligible Activities at eligible properties, and will also provide tax incentives to eligible taxpayers willing to invest in revitalization of eligible sites, commonly referred to as “brownfields.” By facilitating redevelopment of brownfield properties, this Plan is intended to promote economic growth for the benefit of the residents of the City and all taxing units located within and benefited by the FBRA.

This Plan is intended to apply to the eligible property identified in this Plan and, if tax increment revenues are proposed to be captured from that eligible property, to identify and authorize the Eligible Activities to be funded by such tax increment revenues.

This Plan is intended to be a living document, which may be modified or amended in accordance with the requirements of Act 381, as necessary to achieve the purposes of Act 381. The applicable sections of Act 381 are noted throughout the Plan for reference purposes.

This Plan describes the project to be completed (see Attachment C) and contains information required by Section 13(2) of Act 381.

II. GENERAL PROVISIONS

A. Description of the Eligible Property (Section 13 (2)(h)) and the Project

The property comprising the eligible property consists of multiple parcel of land that are either contaminated and qualify as a “facility” as that term is defined in Part 201 of NREPA, as amended, are immediately adjacent to the “facility” and/or will be unified with the “facility” parcel(s). **Each parcel is eligible as it is either contaminated and qualifies as a “facility” and/or it is adjacent to and being combined with a parcel that is a “facility.”**

The parcel and all tangible personal property located thereon will comprise the eligible property and is referred to herein as the “Property.”

Attachment A includes a site map of the Property. The Property is located east of Industrial Avenue, south of East Hamilton Avenue, west of James P. Cole Boulevard, and north of East Wood Street. The Property contains one several existing structures. The Property was historically used for industrial activities/purposes since the early 1900’s.

The existing structures and buildings have been mostly unoccupied for several years.

The eligible property will include all tangible personal property to be located on the real property. Parcel information is outlined below.

Address	1809 James P. Cole Boulevard, Flint, Genesee County, MI 48503
Parcel ID	Parcel ID Nos. 41-06-452--014 & 41-06-452-015
Owner	James P Cole Venture, LLC
Legal Description (obtained from ALTA Survey)	SEE ATTACHED ALTA Survey

James P Cole Venture, LLC is the project developer (“Developer”) and owner of the Property.

The proposed Project is comprised of a build-to-suit redevelopment of a 17.99 acre historically industrial property currently containing approximately 110,578 square feet of existing structures. According to information provided to AES, the Property is proposed to be redeveloped into a multi-tenant multi-building industrial park. According to a Site Plan provided by Developer, approximately 110,578 square feet of existing building will remain and undergo renovations with the remaining buildings being demolished to make way for an additional 190,700 square feet of proposed new construction buildings, all on 17.99 acres of improved commercial and industrial land.

The completed development will include two single or multiple tenant structures each of which can be expanded to accommodate growth of an existing tenant or additional tenants within the proposed structures.

The Project will be undergoing site plan and zoning review by the City of Flint Engineering Department and Planning & Development Departments, and is therefore subject to change as part of the approval processes. The Project is currently estimated to be an estimated \$14,250,000.00 (excluding land costs) investment by Developer plus any furniture, fixtures and equipment (FF&E) and other Personal Property of the proposed tenants (Operators).

It is currently anticipated, subject to necessary Planning, Engineering, FBRA and State of Michigan EGLE, MEDC/MSF, and Tax Commission approvals, that construction will begin in the Summer/Fall of 2021, or sooner, subject to approval of Eligible Activities, including retroactive approval of completed Eligible Activities. It is anticipated that the Eligible Activities will be completed within 12-18 months of the start date.

The project description provided herein is a summary of the proposed development at the time of the adoption of the Plan. The actual development may vary from the project description provided herein, without necessitating an amendment to this Plan, so long as such variations are not material and arise as a result of governmental processes, changes in market and/or financing conditions affecting the project and/or are related to the addition or immaterial removal of amenities to the project. All material changes, as determined by FBRA in its reasonable discretion, to the project description are subject to the approval of the FBRA staff and shall be consistent with the overall nature of the proposed development, its proposed public purpose, and the purposes of Act 381.

Census Tract Qualification

The Property is located in a low-income community (LIC) Census Tract (Census Tract No. 26049013600). A low-income community (LIC) Census Tract is defined as, "...a poverty rate of at least 20 percent or with median family incomes that do not exceed 80 percent of area median income..." In addition, the Property is located in a Qualified Opportunity Zone, which means that the area has been targeted by State and Local Governmental Units for development. *Please see the attached CDFI Fund Census Tract Map.*

Based on the information provided by Developer, the Property contains structures and infrastructure that will be demolished and/or partially demolished and removed as part of the planned re-development ("Project"). In addition, the proposed Project will redevelop an underutilized Property that contains multiple impediments to redevelopment. The proposed Project will create temporary construction jobs and is intended to create permanent jobs in an area of Genesee County (Flint) with a high unemployment rate as demonstrated by the Census Tract information.

Attachment C provides a description of the project to be completed at the Property (the "Project"). **Attachment C** also includes details regarding development team, total investment amount, description of project uses number of temporary and permanent jobs,

project renderings, and additional financing incentives (IFT). **Attachment D** includes letters of support for the Project.

B. Basis of Eligibility (Section 13 (2)(h) and Section 2 (o))

The Property qualifies as a “facility” as that term is defined under the natural Resources and Environmental Protection Act (NREPA), P.A.451 of 1994, as amended, based on the presence of soil contamination.

The Property is considered “eligible property” as defined by Act 381, Section 2 because (a) the Property was used for industrial purposes; (b) it is located within the City of Flint, a qualified local governmental unit under Act 381; and (c) the Property is determined to be a “facility” as defined by Act 381.

The Property qualifies as a “facility” and is eligible for Brownfield Redevelopment Incentives pursuant to the Brownfield Redevelopment Financing Act, P.A. 381 of 1996, as amended. The Property is classified as a “facility” due to the presence of soil contamination related to historical use and operation of portions of the Property for industrial purposes.

In addition, based on the condition of the existing structures, the Property could also qualify under either “blighted²” or “functionally obsolete³” status, however, Developer has not moved forward with either or both such designations as the Property already qualifies under Act 381.

Phase I Environmental Site Assessment (ESA)

Applied Ecosystems, Inc. (AEI) was retained by Developer to prepare a Baseline Environmental Assessment (BEA) and published the BEA on September 20, 2016 as of pre-acquisition due diligence and disclosed to MDEQ on December 7, 2016.

According to information presented the BEA, the Property was historically used for industrial activities/purposes by E. I. du Pont de Nemours and Company (DuPont) and predecessor companies since the early 1900’s beginning in 1901 with Flint varnish and Color Works providing paint and varnishes for the carriage industry and converting to automotive paint manufacturing in 1910. DuPont purchased the property in 1918 and operated on-site until 1995. In 1989, DuPont initiating environmental site investigation activities to assess soil and groundwater on the Property.

In 2003 DuPont entered into a Voluntary Corrective Action agreement with MDEQ and actions included:

- Excavation and disposal of contaminated soil;
- Groundwater treatment; and
- Free product removal.

In 2005, a Remedial Action Plan (RAP) was prepared that specified long term groundwater treatment as well as property use restrictions (Deed Restrictions).

In 2015, after 12 consecutive monthly gauging events with no free product present, DuPont submitted a request for a “No Further Action” determination related to free product removal activities

Contamination remaining on-site includes volatile organic compounds (VOCs), semi-VOCs (SVOCs), arsenic, chromium, cobalt and cyanide. Known impacted media include soil and groundwater with exceedances of the volatilization to indoor air (VIA) pathway likely based on the known concentrations of VOCs.

Please see Figures 1 and 2 for Site Location and Aerial Photo Maps.

Based on the documented concentrations of soil and groundwater contamination, concentrations exceed the EGLE Part 201 Generic Residential Cleanup Criteria (GRCC) promulgated under Part 201 of the Natural Resources and Environmental Protection Act (NREPA), 1994 P.A. 451, as amended (Part 201), and therefore the Property meets the definition of a “facility” as defined pursuant to Part 201.

As the Property qualifies as a “facility¹,” it is eligible for Brownfield Redevelopment Incentives pursuant to the Brownfield Redevelopment Financing Act, P.A. 381 of 1996, as amended. In addition, based on the condition of the existing structures, the Property could also qualify under either “blighted²” or “functionally obsolete³” status.

Sample results were compared to current Generic Residential Cleanup Criteria (GRCC) promulgated under Part 201 of the Natural Resources and Environmental Protection Act (NREPA), 1994 P.A. 451, as amended (Part 201). Based on the results of the Phase II ESA the Property meets the definition of a “facility” as defined pursuant to Part 201.

¹Under Part 201 of NREPA, P.A. 451 of 1994, as amended, Section 20101(1)(s) states:

“Facility” means any area, place, parcel or parcels of property, or portion of a parcel of property where a hazardous substance in excess of the concentrations that satisfy the cleanup criteria for unrestricted residential use has been released, deposited, disposed of, or otherwise comes to be located. Facility does not include any area, place, parcel or parcels of property, or portion of a parcel of property where any of the following conditions are satisfied:

- (i) Response activities have been completed under this part or the comprehensive environmental response, compensation, and liability act, 42 USC 9601 to 9675, that satisfy the cleanup criteria for unrestricted residential use.
- (ii) Corrective action has been completed under the resource conservation and recovery act, 42 USC 6901 to 6992k, part 111, or part 213 that satisfies the cleanup criteria for unrestricted residential use.
- (iii) Site-specific criteria that have been approved by the department for application at the area, place, parcel of property, or portion of a parcel of property are met or satisfied and hazardous substances at the area, place, or property that are not addressed by site-specific criteria satisfy the cleanup criteria for unrestricted residential use.
- (iv) Hazardous substances in concentrations above unrestricted residential cleanup criteria are present due only to the placement, storage, or use of beneficial use by-products or inert materials at the area, place, or property in compliance with part 115.
- (v) The property has been lawfully split, subdivided, or divided from a facility and does not contain hazardous substances in excess of concentrations that satisfy the cleanup criteria for unrestricted residential use.
- (vi) Natural attenuation or other natural processes have reduced concentrations of hazardous substances to levels at or below the cleanup criteria for unrestricted residential use.

SEE: [http://www.legislature.mi.gov/S\(1xfrucvrry/w4dlqaeqzmk3\)/mfileg.aspx?page=getObject&objectName=mcl-324-20101](http://www.legislature.mi.gov/S(1xfrucvrry/w4dlqaeqzmk3)/mfileg.aspx?page=getObject&objectName=mcl-324-20101)

²Under MCL 125.2652(2)(e) “Blighted” means property that meets any of the following criteria as determined by the governing body:

- (i) Has been declared a public nuisance in accordance with a local housing, building, plumbing, fire, or other related code or ordinance.
- (ii) Is an attractive nuisance to children because of physical condition, use, or occupancy.
- (iii) Is a fire hazard or is otherwise dangerous to the safety of persons or property.
- (iv) Has had the utilities, plumbing, heating, or sewerage permanently disconnected, destroyed, removed, or rendered ineffective so that the property is unfit for its intended use.
- (v) Is tax reverted property owned by a qualified local governmental unit, by a county, or by this state. The sale, lease, or transfer of tax reverted property by a qualified local governmental unit, county, or this state after the property’s inclusion in a brownfield plan shall not result in the loss to the property of the status as blighted property for purposes of this act.
- (vi) Is property owned or under the control of a land bank fast track authority, whether or not located within a qualified local governmental unit. Property included within a brownfield plan prior to the date it meets the requirements of this subdivision to be eligible property shall be considered to become eligible property as of the date the property is determined to have been or becomes qualified as, or is combined with, other eligible property. The sale, lease, or transfer of the property by a land bank fast track authority after the property’s inclusion in a brownfield plan shall not result in the loss to the property of the status as blighted property for purposes of this act.
- (vii) Has substantial subsurface demolition debris buried on site so that the property is unfit for its intended use.

¹Under MCL 125.2652(2)(s) "Functionally obsolete" means that the property is unable to be used to adequately perform the function for which it was intended due to a substantial loss in value resulting from factors such as overcapacity, changes in technology, deficiencies or superadequacies in design, or other similar factors that affect the property itself or the property's relationship with other surrounding property.

C. Summary of Eligible Activities and Description of Costs (Section 13 (2)(a),(b))

The "Eligible Activities" that are intended to be carried out at the Property are considered "Eligible Activities" as defined by Sec 2 of Act 381, because they include, but are not limited to: (1) Phase I ESA, Phase II ESA and Baseline Environmental Assessment activities; (2) 7a Due Care Activities including Phase II ESA Due Care Investigation Activities and Preparation of pre-development and post-development Due Care Plans or Documentation of Due Care Compliance; (3) Additional Response Activities; (4) Building Demolition Activities including selective exterior and interior demolition and lead, asbestos and hazardous materials abatement; (5) Development and Preparation of Brownfield Plan and Act 381 Work Plan; (6) UST Removal Activities; (7) Remediation Activities including installation of engineering controls and operation & maintenance (O&M) related to the engineering controls; (8) Site Preparation Activities to ready the site for redevelopment including utility disconnection and re-connection, removal and re-location of public utilities, land balancing and rough and finished grading; (9) Infrastructure Activities including the construction of storm water retention/detention ponds and/or systems, and installation of new utilities; and (10) Public Improvements including installation of public utilities, street improvements, deceleration lanes and drive approaches, streetscapes, landscaping and other related activities. In addition, supplementary Eligible Activities that are financial in nature include: (1) Interest on the sums expended to implement the Eligible Activities at a rate of five (5%) per annum; and (2) environmental insurance may be obtained at some during the project development process.

A summary of the Eligible Activities and the estimated cost of each eligible activity intended to be paid for with Tax Increment Revenues from the Property are shown in the table attached hereto as **Attachment E**.

The Eligible Activities described in **Attachment E** are not exhaustive. Subject to the approval of FBRA staff in writing, additional Eligible Activities may be carried out at the Property, without requiring an amendment to this Plan, so long as such Eligible Activities are permitted by Act 381 and the performance of such Eligible Activities does not exceed the total costs stated in **Attachment E**.

Unless otherwise agreed to in writing by the FBRA, all Eligible Activities shall commence within eighteen (18) months after the date the governing body approves this Plan and be completed within three (3) years after approval of the Michigan Strategic Fund work plan, if applicable, or three (3) years after execution of the Reimbursement Agreement (as that term is defined below). Any long-term monitoring or operation and maintenance activities or obligations that may be required will be performed in compliance with the terms of this Plan and any documents prepared pursuant to this Plan.

The Developer desires to be reimbursed for the costs of Eligible Activities. Tax increment revenue generated by the Property will be captured by the FBRA and used to reimburse

the cost of the Eligible Activities completed on the Property pursuant to the terms of a Reimbursement Agreement to be executed by the FBRA and the Developer after approval of this Plan (the "Reimbursement Agreement"), to the extent permitted by Act 381. In the event this Plan contemplates the capture of tax increment revenue derived from "taxes levied for school operating purposes" (as defined by Section 2(oo) of Act 381 and hereinafter referred to as "School Taxes"), the Developer acknowledges and agrees that FBRA's obligation to reimburse the Developer for the cost of Eligible Activities with tax increment revenue derived from School Taxes, or Specific Taxes that are considered School Taxes, (as these capitalized terms are defined by Act 381) is contingent upon the Developer receiving at least the initial applicable work plan approvals by the Michigan Strategic Fund and/or the EGLE, as may be required pursuant to Act 381.

FBRA agrees to retroactively reimburse Developer for all Eligible Activities completed prior to the approval of this Plan and for Eligible Activities completed as described in this Plan from the Local Taxes, or Specific Taxes that are considered Local Taxes, at the percentage ratio that Local Taxes comprise the overall combined Local and School Taxes. To the extent that Developer obtains Act 381 Work Plan approval from EGLE or MEDC/MSF, then the remaining percentage of Eligible Activities will be reimbursed to Developer. If deemed necessary, Developer will provide the FBRA with evidence, reasonably satisfactory to FBRA, that the Developer has the financial means to complete the project without the capture of, and subsequent reimbursement with, the contemplated School Taxes.

This Plan provides for the capture of taxes levied for school purposes (School Tax Capture), comprised of the State Education Tax (SET) and School Operating Tax, from the eligible Property. However, as the approval of School Tax Capture is at the discretion of the EGLE and MEDC/MSF, all Eligible Activities shall be reimbursable from Local Taxes unless School Tax Capture is approved by the agency responsible for the Eligible Activity(ies), then reimbursement will be from a combination of both Local and School Taxes.

The estimated costs outlined in this Plan and listed in **Attachment E** may increase or decrease depending on the nature and extent of any unknown or unanticipated conditions on the Property. As long as the total costs, adjusted by the 15% factor, are not exceeded, the line item costs of the Eligible Activities outlined herein, in the attachments and/or in the Brownfield Plan, may be adjusted between the Eligible Activities after the date this Plan is approved without the need for any additional approval from City of Flint City Council or the City of Flint Brownfield Redevelopment Authority, to the extent those adjustments do not violate the terms of any EGLE or MEDC/MSF approved work plan, if any. If necessary, this Plan may also be amended to add or delete Eligible Activities and the estimated cost of each.

The costs listed in **Attachment E** are estimated costs and may increase or decrease depending on the nature and extent of environmental contamination and other unknown conditions encountered on the Property. The actual cost of those Eligible Activities encompassed by this Plan that will qualify for reimbursement from tax increment revenues

of the FBRA from the Property shall be governed by the terms of the Reimbursement Agreement. No costs of Eligible Activities will be qualified for reimbursement except to the extent permitted in accordance with the terms and conditions of the Reimbursement Agreement and Section 2 of Act 381. The Reimbursement Agreement and this Plan will dictate the total cost of Eligible Activities subject to payment or reimbursement, provided that the total cost of Eligible Activities subject to payment or reimbursement under the Reimbursement Agreement shall not exceed the estimated costs set forth in **Attachment E**. As long as the total costs, adjusted by the 15% contingency under Act 381, are not exceeded, line item costs of Eligible Activities may be adjusted after the date this Plan is approved by the governing body (Flint City Council), to the extent the adjustments do not violate the terms of the approved EGLE or MSF work plan.

D. Estimate of Captured Taxable Value and Tax Increment Revenues (Section 13(2)(c)); Beginning Date of Capture of Tax Increment Revenues (Section 13(2)(f)); Impact of Tax Increment Financing on Taxing Jurisdictions (Section 13(2)(g))

This Plan anticipates the capture of tax increment revenues to reimburse the Developer for the costs of Eligible Activities under this Plan in accordance with the Reimbursement Agreement. A table of estimated tax increment revenues to be captured is attached to this Plan as **Attachment F**.

Tax increments are projected to be captured and applied to (i) reimbursement of eligible activity costs and payment of FBRA administrative and operating expenses, (ii) make deposits into the State Brownfield Redevelopment Fund, and (iii) make deposits into the FBRA's Local Brownfield Revolving Fund, as follows:

Exhibit A
 PROPOSED DUPONT INDUSTRIAL FACILITY
 Brownfield Redevelopment Plan

Section D Capture Summary Table¹			
	Developer P&I	Local RLF	State Brownfield RLF
<u>School Capture</u>			
State Education Tax (SET)	\$222,116.24	\$81,770.29	\$303,887
School Operating Tax	\$1,428,867	\$490,622	
<u>Local Capture</u>			
County Operating	\$404,311	\$148,844	
Library	\$296,155	\$109,027	
Flint Operating	\$555,291	\$204,426	
Public Safety	\$444,232	\$163,541	
Misc. Levies	\$670,747	\$246,930	
Genesee County Parks	\$55,366	\$20,383	
Parks and Rec	\$37,019	\$13,628	
Genesee ISD	\$277,327	\$102,096	
Mass Transit	\$90,483	\$33,310	
Flint Sinking Fund	\$87,366	\$32,163	
CS Mott Operating	\$145,893	\$53,709	
TOTAL	\$4,715,173	\$1,700,449	\$303,887

In addition, the following taxes are projected to be generated but shall not be captured during the life of this Plan:		
<u>Non-Capturable Millages</u>		
Flint School Debt	\$208,789	\$76,864
CS Mott Debt	\$58,491	\$21,533
Public Library Debt	\$134,751	\$49,607
TOTAL	\$402,030	\$148,004

¹All numbers presented are based on gross taxes generated in the Capture side of the TIR Capture Tables and may differ from the actual reimbursement amounts from each millage levy due to allocation percentages and rounding of numbers.

In no event shall the duration of this Plan exceed thirty-five (35) years following the date of the governing body's resolution approving this Plan, nor shall the duration of the tax capture exceed the lesser of the period authorized under subsection (3) and (5) of Section 13 of Act 381 or 30 years. Further, in no event shall the beginning date of the capture of tax increment revenues be later than five (5) years after the date of the governing body's resolution approving this Plan.

E. Plan of Financing (Section 13(2)(d)); Maximum Amount of Indebtedness (Section 13(2)(e))

The Eligible Activities are to be financed solely by the Developer. The FBRA will reimburse the Developer for the cost of approved Eligible Activities, but only from tax increment revenues generated from the Property. No advances have been or shall be made by the City or the FBRA for the costs of Eligible Activities under this Plan.

All reimbursements authorized under this Plan shall be governed by the Reimbursement Agreement. The inclusion of Eligible Activities and estimates of costs to be reimbursed in this Plan are intended to authorize the FBRA to fund such reimbursements and does not obligate the FBRA or the City to fund any reimbursement or to enter into the Reimbursement Agreement providing for the reimbursement of any costs for which tax increment revenues may be captured under this Plan, or which are permitted to be reimbursed under this Plan in the absence of tax increment revenues being generated from the Property. The amount and source of any tax increment revenues that will be used for purposes authorized by this Plan, and the terms and conditions for such use and upon any reimbursement of the expenses permitted by this Plan, will be provided solely under the Reimbursement Agreement contemplated by this Plan.

Unless otherwise agreed upon by the Developer, the FBRA, and the State of Michigan, the FBRA shall not incur any note or bonded indebtedness to finance the purposes of this Plan.

Interest shall be paid under this Plan as provided in the Reimbursement Agreement, provided that to the extent that the Michigan Strategic Fund or Michigan Department of Environment, Great Lakes and Energy (EGLE) does not approve the payment of interest on an eligible activity with School Taxes, interest shall not accrue or be paid under this Plan with respect to the cost of such Eligible Activity from School Taxes. Unless otherwise agreed upon by the Developer, the FBRA, and the State of Michigan, the FBRA will approve interest on the local portion of the reimbursement to the extent that the projected internal rate of return to the Developer does not exceed twenty (20%), as more specifically stated in the Reimbursement Agreement.

Reimbursements under the Reimbursement Agreement shall not exceed the cost of Eligible Activities permitted under this Plan, plus the 15% contingency factor and approved interest.

F. Duration of Plan (Section 13(2)(f))

Subject to Section 13b(16) of Act 381, the beginning date of capture of tax increment revenues for each eligible property shall occur in accordance with the TIF table described in **Exhibit F**. As the tax increment revenue table is an estimate/projection based on certain assumptions, the repayment period may exceed that depicted in the table. In no event, however, shall this Plan extend beyond the maximum term allowed by Section 13(2)(f) of Act 381 for the duration of this Plan.

Furthermore, this Plan, or any subsequent amendment thereto, may be abolished or terminated in accordance with Section 14(8) of Act 381 in the event of any of the following:

a. The governing body may abolish this Plan (or any subsequent amendment thereto) when it finds that the purposes for which this Plan was established have been accomplished.

b. The governing body may terminate this Plan (or any subsequent amendment thereto) if the project for which Eligible Activities were identified in this Plan (or any subsequent amendment thereto) fails to occur with respect to the eligible property for at least five (5) years following the date of the governing body resolution approving this Plan (or any subsequent amendment thereto), provided that the governing body first does both of the following:

(i) gives 30 days' written notice to the Developer at its last known address by certified mail or other method that documents proof of delivery attempted; and

(ii) provides the Developer with an opportunity to be heard at a public meeting.

Notwithstanding anything in this subsection to the contrary, this Plan (or any subsequent amendment thereto) shall not be abolished or terminated until the principal and interest on bonds, if any, issued under Section 17 of Act 381 and all other obligations to which the tax increment revenues are pledged have been paid or funds sufficient to make the payment have been identified or segregated.

G. Effective Date of Inclusion in Brownfield Plan

The Property will become a part of this Plan on the date this Plan is approved by the governing body (City Council).

H. Displacement/Relocation of Individuals on Eligible Property (Section 13(2)(i-l))

There are no persons or businesses residing on the eligible property and no occupied residences will be acquired or cleared, therefore there will be no displacement or relocation of persons or businesses under this Plan.

I. Local Brownfield Revolving Fund ("LBRF") (Section 8; Section 13(2)(m))

The FBRA has established a Local Brownfield Revolving Fund (LBRF). The LBRF will consist of all tax increment revenues authorized to be captured and deposited in the LSRRF, as specified in Section 13(5) of Act 381, under this Plan and any other plan of the FBRA. It may also include funds appropriated or otherwise made available from public or private sources.

The amount of tax increment revenue authorized for capture and deposit in the LBRF is estimated as depicted in the 30 Year Cash Flow Projection Table present in **Attachment F**. All funds, if any, deposited in the LBRF shall be used in accordance with Section 8 of Act 381.

J. Brownfield Redevelopment Fund (Section 8a; Section 13(2)(m))

The FBRA shall pay to the Department of Treasury at least once annually an amount equal to 3 mills of the taxes levied under the state education tax, 1993 PA 331, MCL 211.901 to 211.906, that are captured under this Plan for up to the first twenty-five (25) years of the duration of capture of tax increment revenues for each eligible property included in this Plan. If the FBRA pays an amount equal to 3 mills of the taxes levied under the state education tax, 1993 PA 331, MCL 211.901 to 211.906, on a parcel of eligible property to the Department of Treasury under Section 13b(14) of Act 381, the percentage of local taxes levied on that parcel and used to reimburse Eligible Activities for the Project under this Plan shall not exceed the percentage of local taxes levied on that parcel that would have been used to reimburse Eligible Activities for the Project under this Plan if the 3 mills of the taxes levied under the state education tax, 1993 PA 331, MCL 211.901 to 211.906, on that parcel were not paid to the Department of Treasury under Section 13b(14) of Act 381.

K. Developer's Obligations, Representations and Warrants

The Developer and its affiliates shall comply with all applicable laws, ordinances, executive orders, or other regulations imposed by the City or any other properly constituted governmental authority with respect to the Property and shall use the Property in accordance with this Plan.

The Developer, at its sole cost and expense, shall be solely responsible for and shall fully comply with all applicable federal, state, and local relocation requirements in implementing this Plan, if any.

The Developer represents and warrants that a Phase I Environmental Site Assessment ("ESA"), and if appropriate, a Phase II ESA, Baseline Environmental Assessment, and Due Care Plan or Response Activity Plan, pursuant to Part 201 of Michigan's Natural Resources and Environmental Protection Act (MCL 324.20101 *et seq.*), have been performed on the Property ("Environmental Documents"). Attached hereto as **Attachment G** is the City of Flint's Department of Buildings, Safety Engineering and Environmental acknowledgement of its receipt of the Phase I ESA, Phase II ESA and Baseline Environmental Assessment (BEA).

The Developer intends to include a City of Flint Land Bank Authority, Genesee County Land Bank Authority or State of Michigan Land Bank financing component, to be determined at a later date, depending upon the needs of the Project.

Except as otherwise agreed to by the FBRA, any material breach of a material representation or warranty contained in this Plan shall render the Plan invalid, subject to the Developer's reasonable opportunity to investigate and cure as described in the Reimbursement Agreement. Prior to any such invalidity, FBRA shall provide Developer written notice of the Developer's alleged breach and the opportunity to either refute the allegation or cure the breach within a reasonable period of time. Notwithstanding the foregoing, any irregularity may be waived by the FBRA, Flint City Council, MEDC/MSF or EGLE.

With the approval of this Brownfield Plan, it is the specific intention of the FBRA to authorize and support: (1) the preparation and submittal of an Act 381 Work Plan for approval by EGLE and MEDC/MSF, (2) application for an IFT Abatement under P.A. 198 of 1974, as amended; (3) grant or loan and other available incentives, including EGLE grants and loans, USEPA grants and loans, Genesee County grants and loans, and (3) other possible sources of incentives related to the Eligible Investments made by Developer as part of this project. It is understood that any such tax abatement may extend the currently depicted repayment period and that any such grant award may off-set the need for TIR reimbursement under the Plan or any such loan may use the TIR to repay a loan.

It should be noted that as part of the long term lease arrangement between Developer and Tenant, all proceeds from the Brownfield Plan TIR capture may be assigned to and accrue to the benefit of an entity to be identified in the Reimbursement Agreement which shall be deemed to be the Qualified Taxpayer under the Plan.

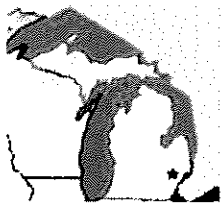
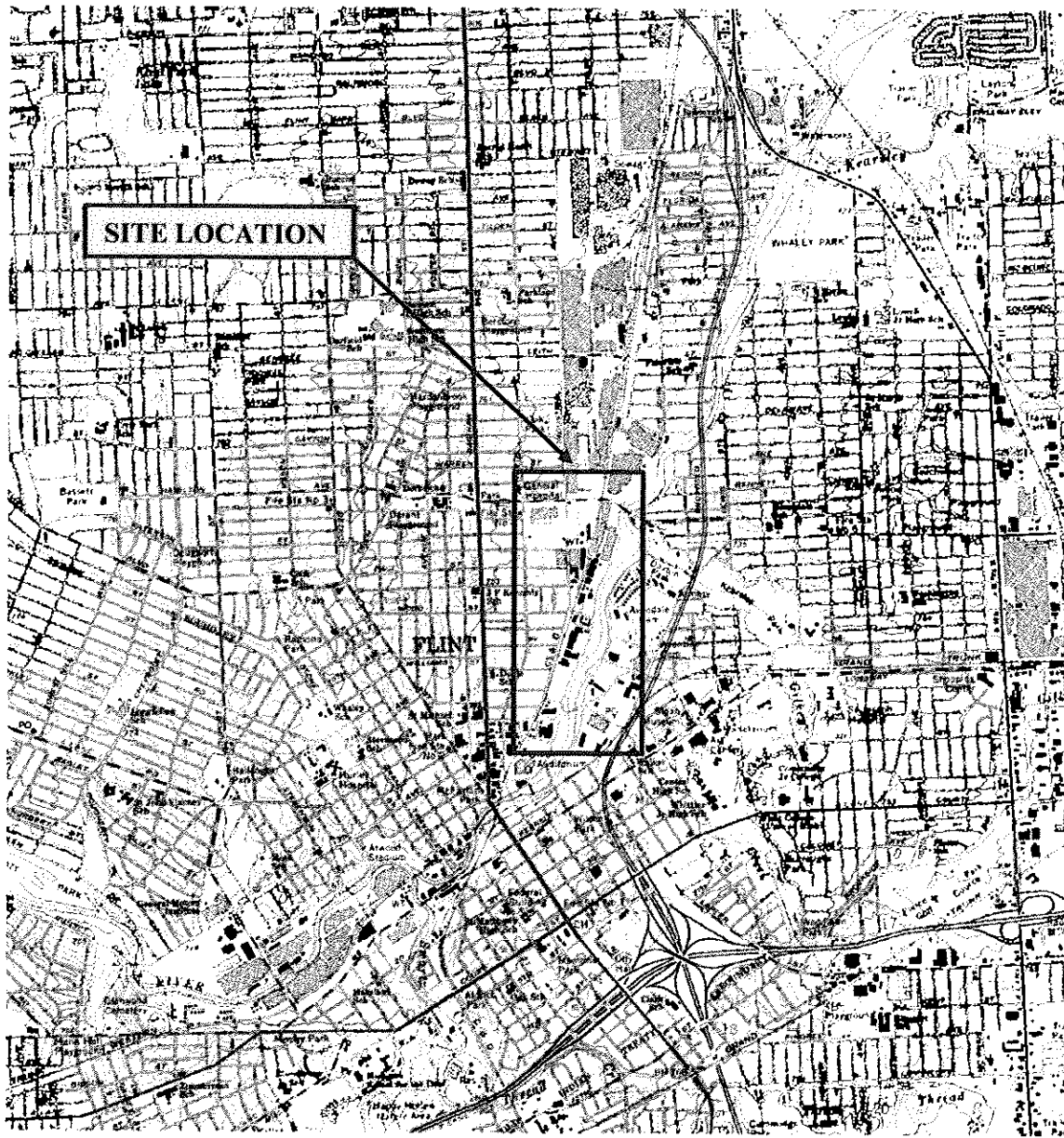
#3708938 v9

III. ATTACHMENTS

Exhibit A
PROPOSED DUPONT INDUSTRIAL FACILITY
Brownfield Redevelopment Plan

ATTACHMENT A

Site Map



REFERENCE
 USGS 7.5 MIN TOPOGRAPHIC QUADRANGLE
 FLINT NORTH, MICHIGAN
 DATED: 1983
 SCALE: 1: 24000



FIGURE 1: SITE LOCATION MAP

Former DuPont Industrial Facility

James P. Cole Boulevard
 Flint, Genesee County, Michigan 48503

PROJECT: 2020041601.01

DATE: 8/28/2020

PREPARED BY: NGM



Environmental Services •
 Land Development • Real
 Estate Consulting

40701 Woodward Avenue, Suite 50
 Bloomfield Hills, Michigan 48304
 Tel (248) 203-9898 Fax (248) 647-0526
 Email: info@associatedenvironmental.net
 Web: www.associatedenvironmental.net

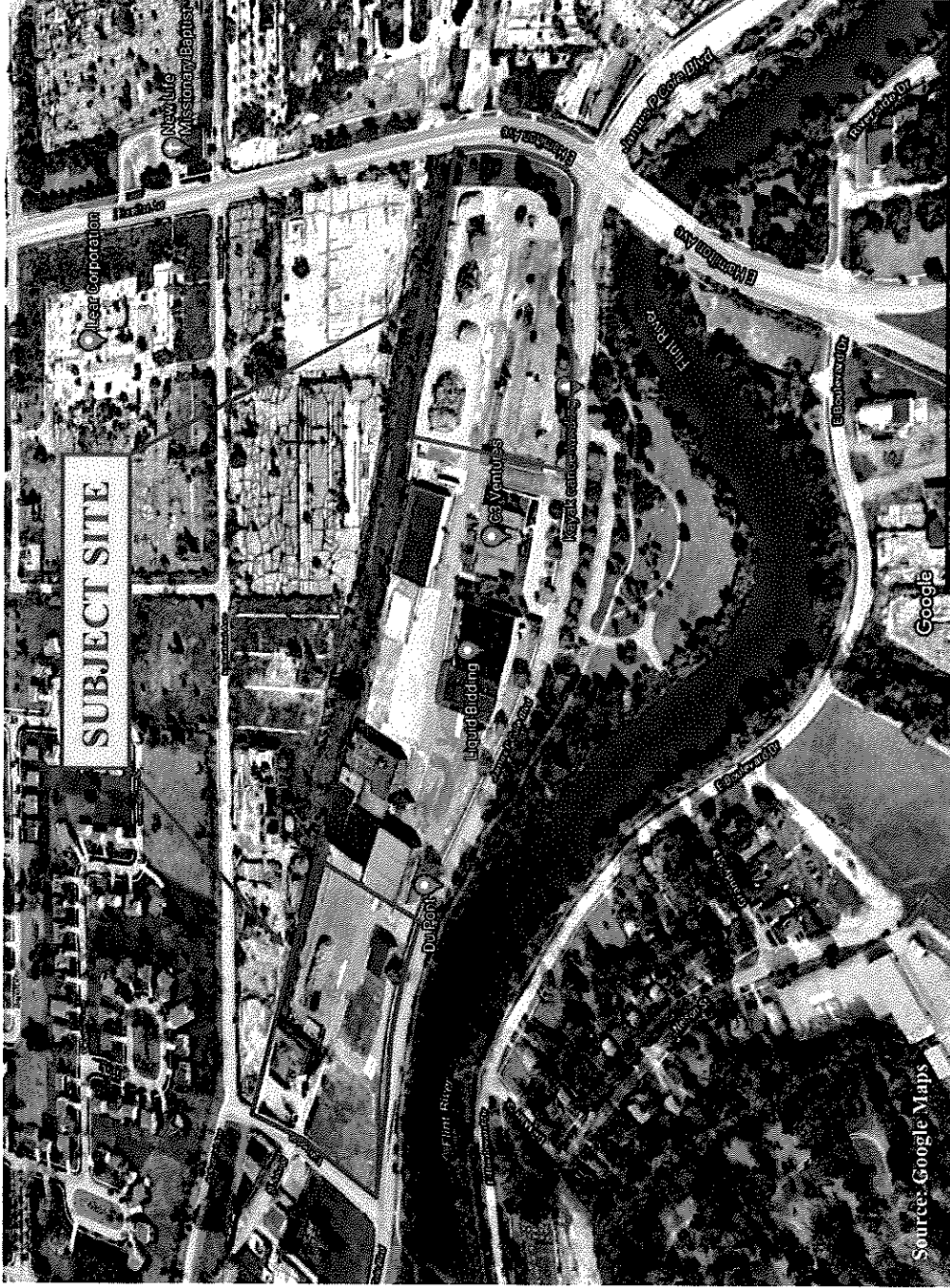


FIGURE 2: AERIAL SITE MAP
Former DuPont Industrial Facility
 James P. Cole Boulevard
 Flint, Genesee County, Michigan 48503

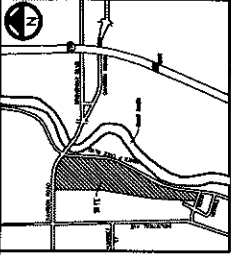
PROJECT: 2020041601.01
 DATE: 8/28/20
 PREPARED BY: NGM

ASSOCIATED ENVIRONMENTAL SCIENTISTS
 Environmental Services •
 Land Development • Real
 Estate Consulting

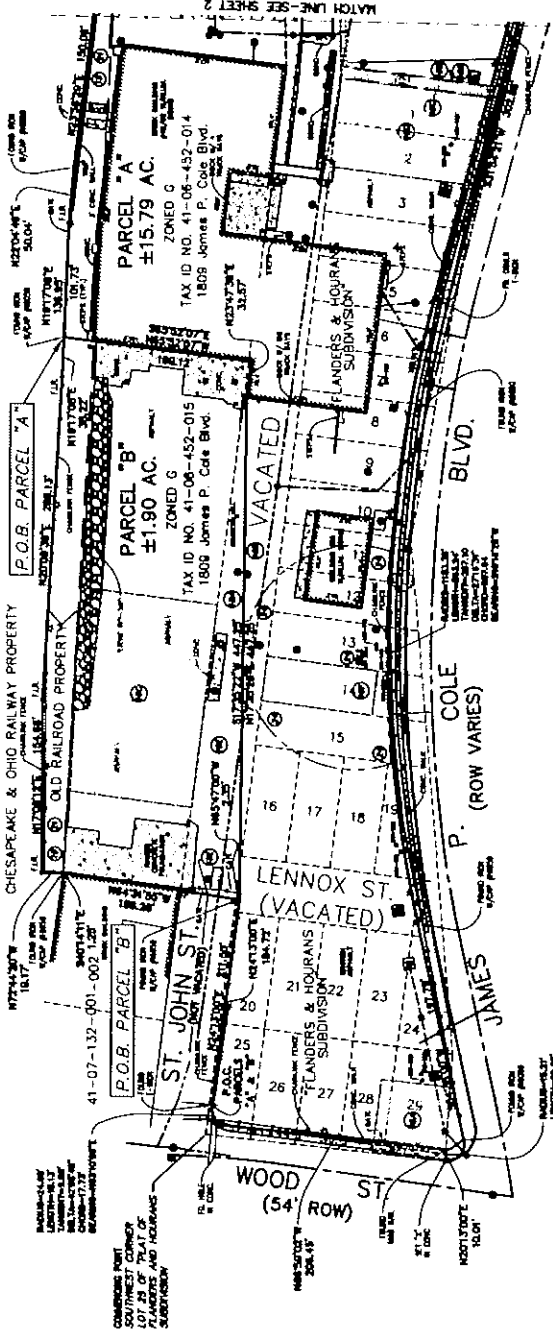
40701 Woodward, Suite 50
 Bloomfield Hills, Michigan 48304
 Tel: (248) 203-9898
 Fax: (248) 647-0526
 E: info@associatedenvironmental.net
 W: www.associatedenvironmental.net

ATTACHMENT B

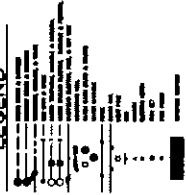
Legal Descriptions of Eligible Property to which the Plan Applies



LOCATION MAP
PART OF SHEET 1



LEGEND



NOTE: ALL UNRESOLVED ASSESSMENTS, AS WELL AS UNRESOLVED, UNPAID LIENS MUST BE RESOLVED BY CONTRACTOR PRIOR TO CONSTRUCTION.

ALTA / ACSM LAND TITLE SURVEY
PART OF THE S&F 141 OF SECTION 6, T4E R7E
CITY OF PLINT, CHENOWETH COUNTY, MICHIGAN

MERIDIAN LAND SURVEYS
3100 23RD AVE SE
SUITE 100
SPRINGFIELD, MICHIGAN 49782



LEGAL DESCRIPTION - MER TITLE COMMENTARY NO. MICHIGAN, EFFECTIVE DATE MAY 17, 2015 BY GT MORGAN THIS SERVICE.

Part Parcel of Parcel B, Cole Street and other adjacent parcels, part of the old Jackson Township, Chenoweth County Michigan, being the land and premises shown on the attached map, including the easements and encumbrances thereon, together with the right of way and easement shown on the attached map for the use and enjoyment of the said parcels, as shown on the attached map, and as the same are more fully described in the accompanying plat, and as the same are more fully described in the accompanying plat, and as the same are more fully described in the accompanying plat, and as the same are more fully described in the accompanying plat.

LEGAL DESCRIPTION - MER TITLE COMMENTARY NO. MICHIGAN, EFFECTIVE DATE MAY 17, 2015 BY GT MORGAN THIS SERVICE.

Part Parcel of Parcel A, Cole Street and other adjacent parcels, part of the old Jackson Township, Chenoweth County Michigan, being the land and premises shown on the attached map, including the easements and encumbrances thereon, together with the right of way and easement shown on the attached map for the use and enjoyment of the said parcels, as shown on the attached map, and as the same are more fully described in the accompanying plat, and as the same are more fully described in the accompanying plat, and as the same are more fully described in the accompanying plat, and as the same are more fully described in the accompanying plat.

- 1. AS OF 7-18-2018 THERE IS NO OBSERVED EVIDENCE OF... (text continues)
- 2. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF... (text continues)
- 3. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF... (text continues)
- 4. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF... (text continues)
- 5. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF... (text continues)
- 6. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF... (text continues)
- 7. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF... (text continues)
- 8. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF... (text continues)
- 9. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF... (text continues)
- 10. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF... (text continues)

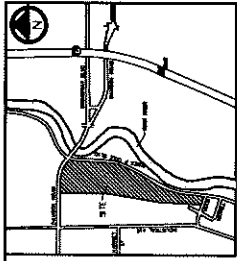
SURVEYOR'S NOTES:

1. AS OF 7-18-2018 THERE IS NO OBSERVED EVIDENCE OF... (text continues)

SURVEYOR'S CERTIFICATE:

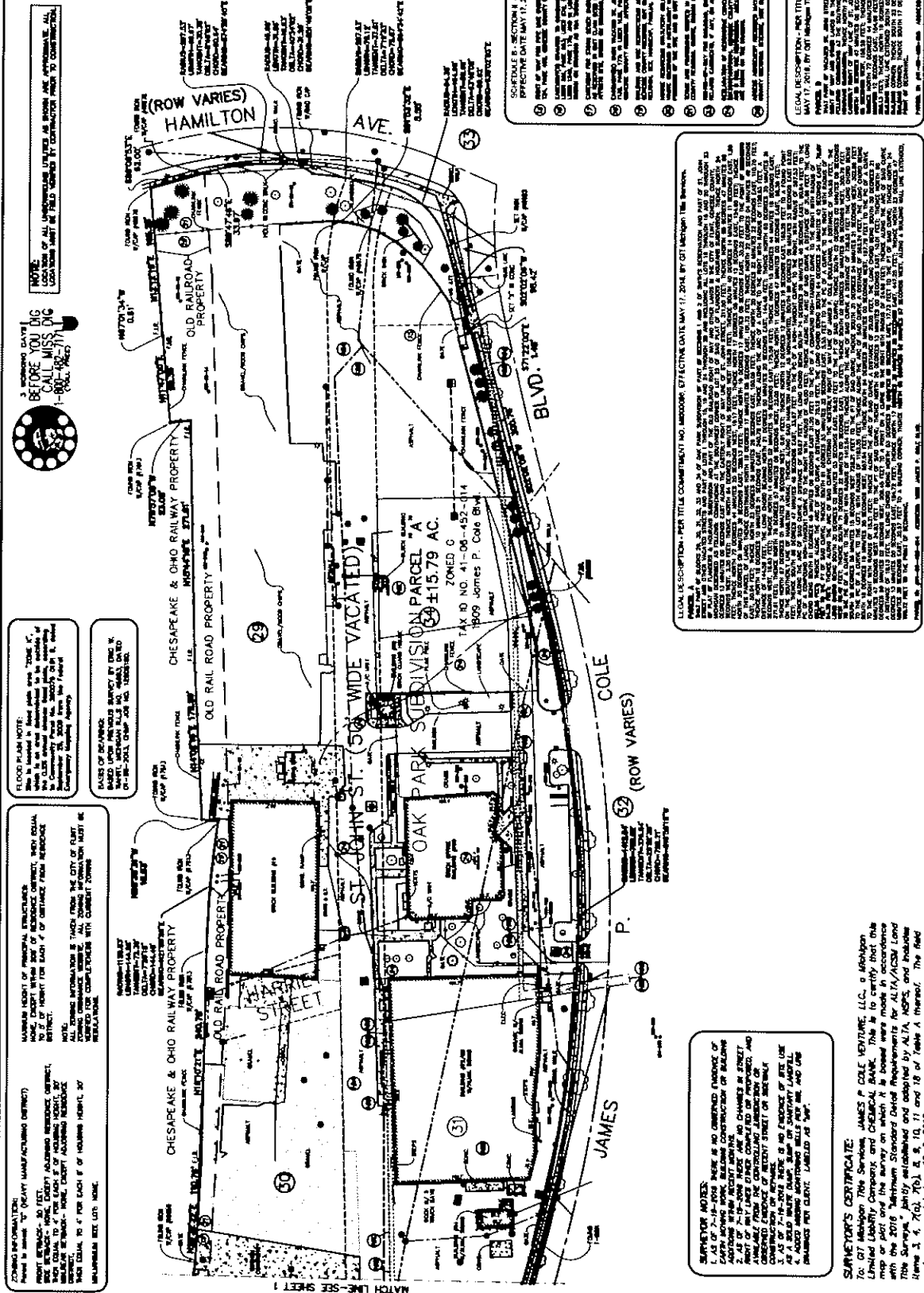
I, OREGON A. McMOORE, a Michigan Licensed Land Surveyor and Professional Engineer, being duly sworn, depose and say that I am the duly qualified and licensed Surveyor and Engineer who prepared the above-placed map. I am duly licensed and qualified to perform the services herein and the work was completed on 12-9-2018.

7/19/2018
OREGON A. McMOORE
Michigan Professional Surveyor No. 49878
DMS



LEGEND

Symbol	Property Line
Symbol	Survey Boundary
Symbol	Right-of-Way
Symbol	Utility Line
Symbol	Other



ALTA / ACSM LAND TITLE SURVEY
PART OF THE BE 14 OF SECTION 6, T18N R10E
CITY OF FLINT, GEMINI COUNTY, MICHIGAN

DATE: MAY 17, 2018
BY: JAMES P. COLE, S.E.
SCALE: AS SHOWN

REVISIONS:

NO.	DATE	DESCRIPTION
1		ISSUED
2		REVISED
3		REVISED
4		REVISED

PAGE: 1 OF 2

MICHIGAN LAND SURVEYORS
Professional Seal
CITY OF FLINT, MICHIGAN

SEAL: JAMES P. COLE, S.E.
No. 2008, State of Michigan

SURVEYOR'S CERTIFICATE:
I, JAMES P. COLE, S.E., a Michigan Land Surveyor, do hereby certify that this is a true and correct copy of the original survey map and plat on which it is based, as made in accordance with the Michigan Standards and Detailed Requirements for ALTA/ACSM Land Title Surveys, as promulgated by the Board of Land Surveyors, and that the same were completed on 5-17-2018.

DATE: 5/17/2018
BY: JAMES P. COLE, S.E.
Michigan Professional Surveyor No. 48678



Not logged in

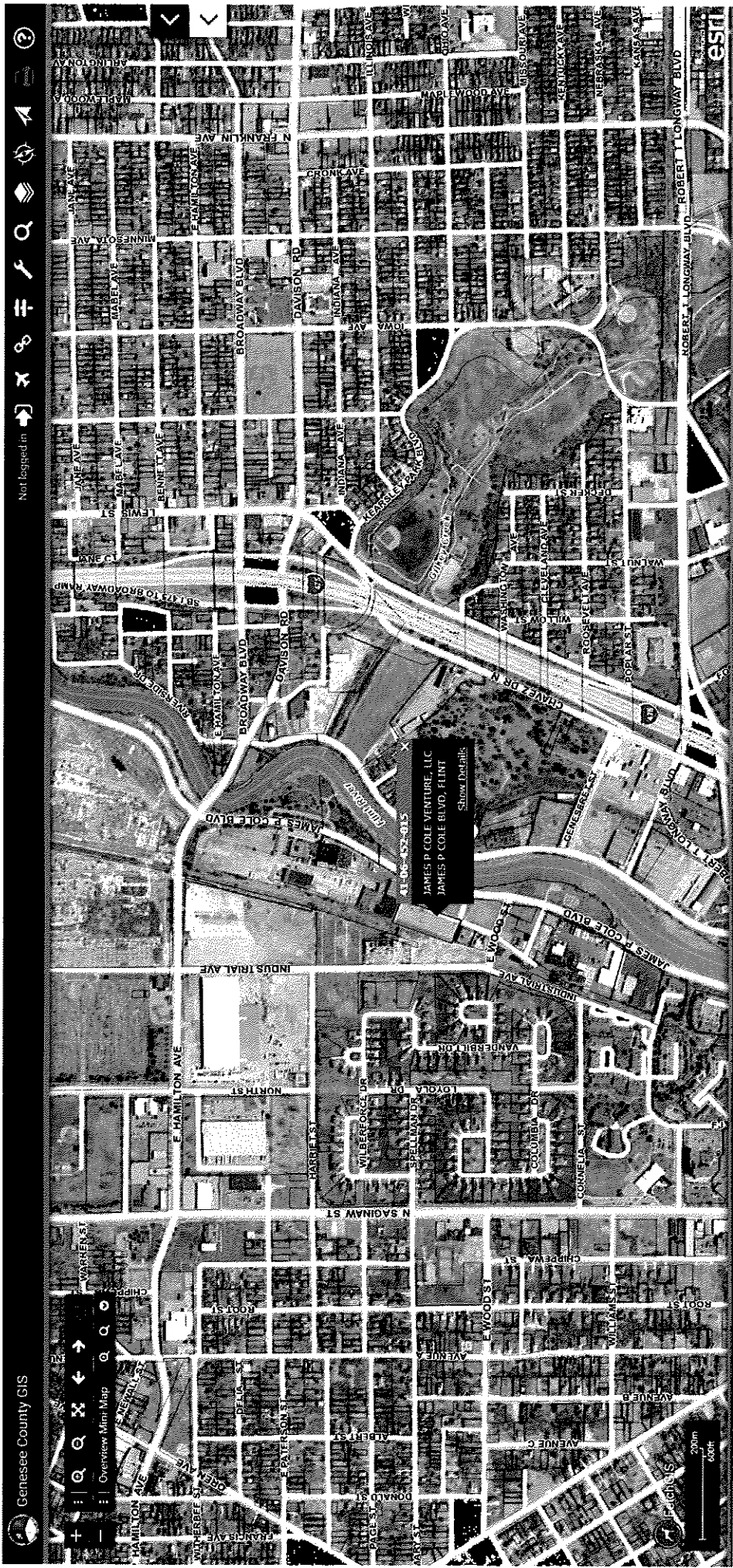
Genesee County GIS

Map navigation controls including zoom in (+), zoom out (-), home, and search icons. Below the icons is a search bar with the text "Overview Mini Map".

11-05-452-018A
JAMES P COLE VENTURE, LLC
 1809 JAMES P COLE BLVD, FLINT
 Show Details

200m
 200ft

esri



Genesee County GIS

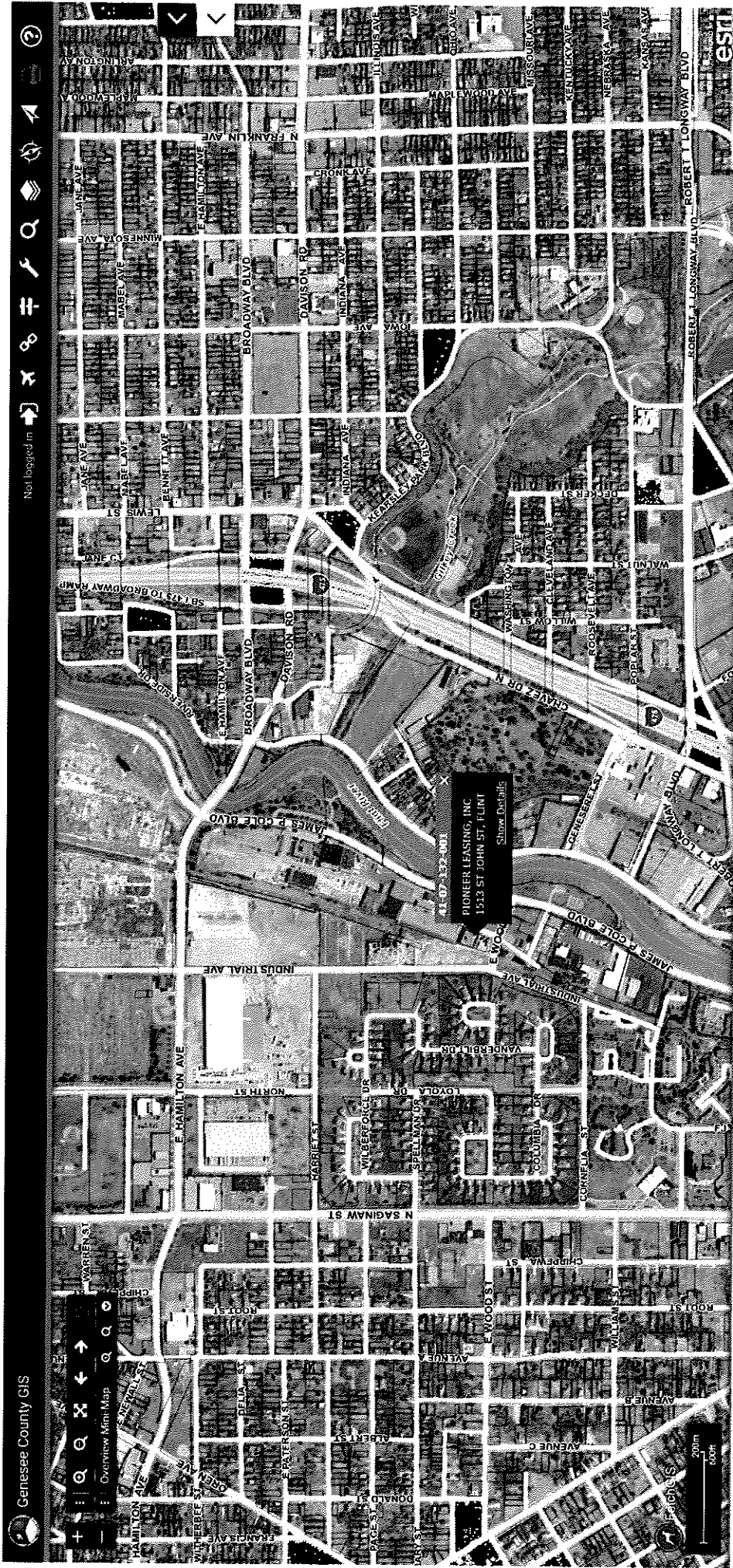
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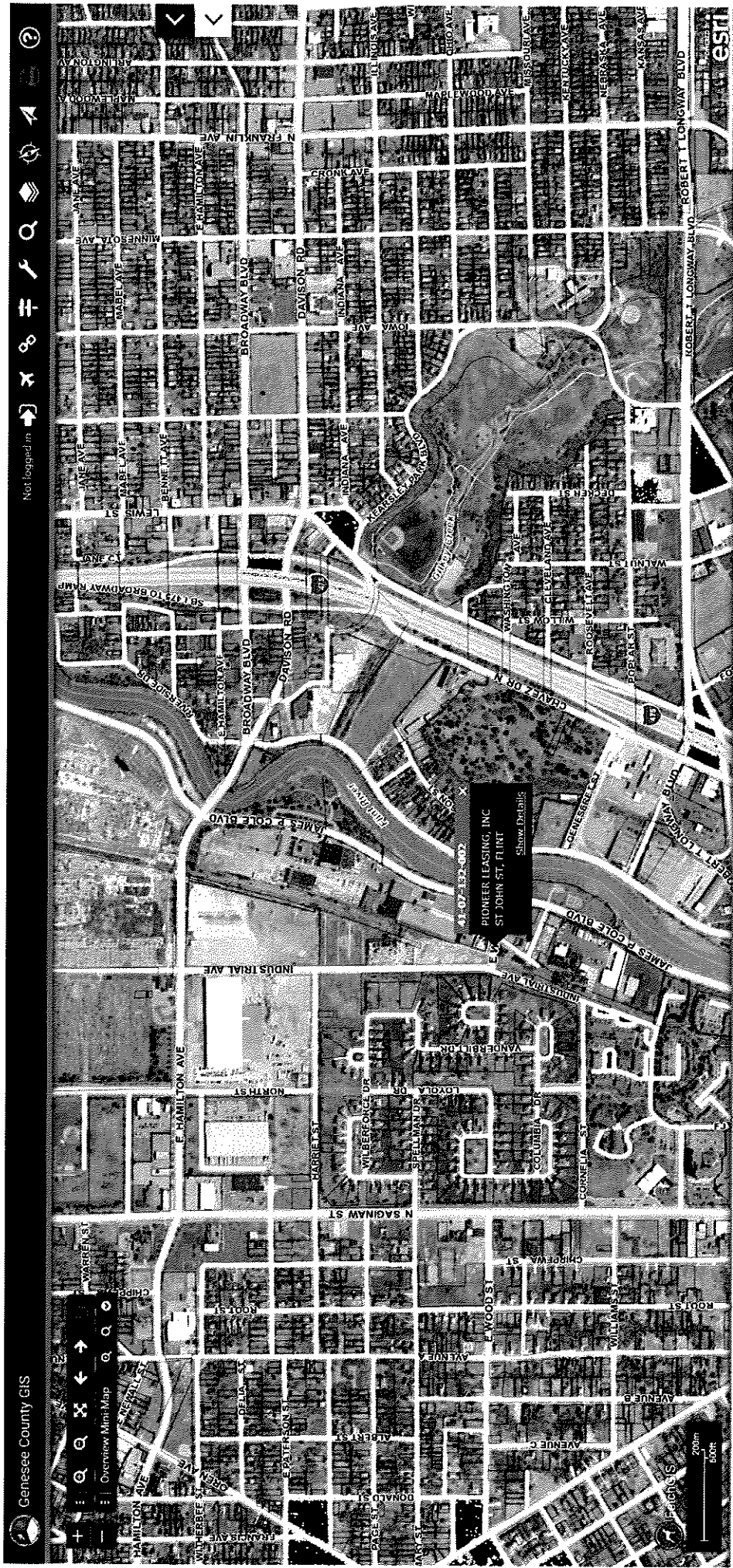
Map navigation icons: Home, Back, Forward, Search, Measure, Layers, Full Screen, Print, Refresh, Stop, Zoom In, Zoom Out, Zoom Reset, Rotate, Orientation, Location Services, Help, and a question mark icon.

Overview Mini Map

200m
650ft

JAMES P COLE VENTURE, LLC
 JAMES P COLE BLVD, FLINT
 Show Details





Not logged in

Genesee County GIS

Overview Mini Map

PIDMEER LEASING, INC
ST JOHN ST, FLIRT
41-07-133-002
Show Details

200m
Back

esri

ATTACHMENT C

Project Description – See attached Project Description

Project Summary

Type of Use:	Industrial
Square Footage:	Approximately 110,578 square feet of existing building will remain and undergo renovations with the remaining buildings being demolished to make way for an additional 190,700 square feet of proposed new construction buildings, all on 17.99 acres of improved commercial and industrial land
Number of Housing Units:	Not Applicable
Total Investment:	\$14,250,000.00 (excluding land costs) by Developer, plus additional investments for Furniture, Fixtures and Equipment (FF&E) will be made by individual Tenants
Additional Incentives:	In addition to Brownfield TIF, Developer is seeking tax abatements, Grants and Loans
Estimated Jobs – Construction:	67.5 FTE Jobs over 10 month estimated construction period
Estimated Jobs – Permanent:	TBD based on tenants recruited for occupancy
Project Timeline:	Developer intends to start redevelopment activities after final approval of all incentives

Attachment C

Brownfield Plan for James P Cole Venture, LLC

Provide a description of the project to be completed at the Property (the "Project")

Include details regarding development team, total investment amount, description of project use, number of temporary and permanent jobs, and additional financing incentives (IFT). See attached for Project renderings.

Project Description

The proposed redevelopment site is the former DuPont Industrial Facility located at 1809 James P. Cole Boulevard in Flint, Genesee County, Michigan 48503 (the "Property").

The Property is a currently proposed to be redeveloped into a multi-tenant multi-building industrial park. According to a site plan provided by Client, approximately 110,578 square feet of existing building will remain and undergo renovations with the remaining buildings being demolished to make way for an additional 190,700 square feet of proposed new construction buildings, all on 17.99 acres of improved commercial and industrial land (the "Project").

The existing structures and buildings have been mostly unoccupied for several years. According to a Site Plan provided by Developer, approximately 110,578 square feet of existing building will remain and undergo renovations with the remaining buildings being demolished to make way for an additional 190,700 square feet of proposed new construction buildings, all on 17.99 acres of improved commercial and industrial land.

The completed development will include two single or multiple tenant structures each of which can be expanded to accommodate growth of an existing tenant or additional tenants within the proposed structures.

The Project will be undergoing site plan and zoning review by the City of Flint Engineering Department and Planning & Development Departments, and is therefore subject to change as part of the approval processes. The Project is currently estimated to be an estimated \$14,250,000.00 (excluding land costs) investment by Developer plus any furniture, fixtures and equipment (FF&E) and other Personal Property of the proposed tenants (Operators).

Developer does not currently employ any employees at the Property as there are no existing operations.

The development of the Project on the Property is comprised of two proposed new buildings (Building #1 and Building #2). The completion of this Project is estimated to create an average of 33.8 Full Time Equivalent (FTE) construction jobs per year during the nine (9) month estimated construction phase (.8 year) for each of the buildings comprising the Project within the City of Flint, Genesee County, Michigan resulting in an estimated total of 67.5 FTE jobs with an annualized construction payroll of \$4,375,800.00 or more per year for the construction phase (estimated \$3,281,850.00 or more per Building for a total Project construction payroll of \$6,563,700.00 using FTE calculations).

As the proposed tenants for the new buildings have not been identified at this time, the actual estimated new full-time jobs being created by the Project are not yet determined. However, using U.S. Energy Information Administration (USEIA), Office of Energy Consumption and Efficiency Statistics, job creation can be estimated based on the proposed building square footage and national ratios for jobs on a per square foot basis. As the two new industrial buildings are proposed to be 90,000 ft² and 100,000 ft² and based on an the USEIA data of "Median square feet per worker" of 1,442 ft², the estimated new jobs per building to be created are 62.4 and 69.3, respectively.

See: <https://www.eia.gov/consumption/commercial/data/2012/bc/cfm/b2.php>

According to Payscale.com, the "Average Production Worker Hourly Pay in Flint, Michigan is \$13.24."

See:

https://www.payscale.com/research/US/Job=Production_Worker/Hourly_Rate/32d28c9e/Flint-MI

Based on the foregoing projections, the estimated new permanent FTE jobs payroll being created by the Project is 62.4 FTE X \$13.24/Hour for 40 hours per week for 52 weeks/year = \$1,718,812.76 and 69.3 FTE X \$13.24/Hour for 40 hours per week for 52 weeks/year = \$1,909,791.96 or a total estimated payroll of **\$3,628,604.72**.

Development Team

Developer/Entity

James P Cole Venture, LLC
Attn: Ms. Mona Navitsky
c/o Dearborn Capital Partners, LLC
980 North Michigan, Suite 1620
Chicago, IL 60611
Attn: Mr. Brien Wloch; Managing Member
M: (312) 543-1250
E: mona.navitsky@dearcapcre.com

Entity Members

Please see the attached Ownership Description

Brownfield Redevelopment Consultant and Primary Point of Contact

Mr. Nicholas G. Maloof, RPG
President and General Counsel
Associated Environmental Services, LLC
40701 Woodward Avenue, Suite 50
Bloomfield Hills, Michigan 48304
T (248) 203-9898
F (248) 647-0526
M (248) 250-2525
E nqm@associatedenvironmental.net
W www.associatedenvironmental.net

Primary Environmental Consultant for Developer

To Be Determined (TBD)

T () -

M () -

E _____

W www. _____

Status of the site planning/permitting process

The Project will be undergoing site plan and zoning review by the City of Flint Engineering Department and Planning & Development Departments, and is therefore subject to change as part of the approval processes. The Project is currently estimated to be an estimated \$14,250,000.00 (excluding land costs) investment by Developer plus any furniture, fixtures and equipment (FF&E) and other Personal Property of the proposed tenants (Operators).

Other Incentives

In addition to Brownfield TIF, Developer intends to apply for Grants, Loans and Job Training incentives.

Tenant(s)/Occupant(s) intend to apply for an Industrial Facilities Tax Abatement under the Plant Rehabilitation and Industrial Development Districts Act, P.A. 198 of 1974, as amended for a 12 year period.

See attached for Project drawings and renderings.

Job Creation and Economic Development

completion of this Project is estimated to create an average of 33.8 Full Time Equivalent (FTE) construction jobs per year during the nine (9) month estimated construction phase (.8 year) for each of the buildings comprising the Project within the City of Flint, Genesee County, Michigan resulting in an estimated annualized construction payroll of \$4,375,800.00 or more per year for the construction phase (estimated \$3,281,850.00 or more per Building for a total Project construction payroll of \$6,563,700.00 using FTE calculations). As the proposed tenants for the Project are unknown, AES projected the estimated number of jobs using U.S. Energy Information Administration (USEIA), Office of Energy Consumption and Efficiency Statistics, job creation can be estimated based on the proposed building square footage and national ratios for jobs on a per square foot basis. AES also obtained and used information on hourly wages from Payscale.com. According to Payscale.com, the "Average Production Worker Hourly Pay in Flint, Michigan is \$13.24. As the two new industrial buildings are proposed to be 90,000 ft2 and 100,000 ft2 and based on an the USEIA data of "Median square feet per worker" of 1,442 ft2, the estimated new jobs per building to be created are 62.4 FTE and 69.3 FTE, respectively. Based on the foregoing projections, the estimated new permanent FTE jobs payroll being created by the Project is 62.4 FTE X \$13.24/Hour for 40 hours per week for 52 weeks/year = \$1,718,812.76 and 69.3 FTE X \$13.24/Hour for 40 hours per week for 52 weeks/year = \$1,909,791.96 or a total estimated payroll of \$3,628,604.72. Please see the tables below for a

Table 1: Construction Phase Job Creation and Direct Economic Impact

Phase of Construction	Job Classification	Typical Hourly Rate	Typical Hours Worked (Weekly)	Typical Annual Salary	Number of Jobs Related to Project (Average per year)	Total Annualized Payroll Related to Project	Duration of Jobs in Years Created by Project (in years based on # months construction)	Full-time Equivalent (FTE) Jobs	Total Project Related Payroll (salary/wages & benefits only)
Building #1: Site Preparation & Vertical Construction	Construction Tradesmen and affiliated workers	\$46.75	40	\$97,240.00	45	\$4,375,800.00	0.8	33.8	\$3,281,850.00
Building #2: Site Preparation & Vertical Construction	Construction Tradesmen and affiliated workers	\$46.75	40	\$97,240.00	45	\$4,375,800.00	0.8	33.8	\$3,281,850.00
Construction Phases Total					90	\$8,751,600.00	0.8	67.5	\$6,563,700.00

Average Hourly = \$46.75
 Average Weekly = \$1,870.00
 Average Annual = \$97,240.00
 Total Annualized Payroll = \$4,375,800.00

Phase
 Site Preparation 1.0
 Vertical Const. 8.0
Total 9.0

Duration (Months)
 1.0
 8.0
9.0

Duration as Fraction of Year
 0.1
 0.7
0.8

Table 2: Post Construction Phase / Permanent Job Creation and Direct Economic Impact

Phase of Operation	Job Classification	Typical Hourly Rate	Typical Hours Worked (Weekly)	Typical Annual Salary	Number of Direct Jobs Related to Project (Average per year)	Total Annual Payroll Related to Project	Duration of Jobs Created by Project	Full-time Equivalent (FTE) Jobs	Total Project Related Payroll (salary/wages only)
Building #1	Warehouse, Production	\$13.24	40	\$27,539.20	62.4	\$1,718,446.08	Permanent	TBD	\$1,718,446.08
Building #1					62.4	\$1,718,446.08			\$1,718,446.08
Building #2	Warehouse, Production	\$13.24	40	\$27,539.20	69.3	\$1,908,466.56	Permanent	TBD	\$1,908,466.56
Building #2					69.3	\$1,908,466.56			\$1,908,466.56
Total Estimated Jobs and Project Payroll (Annually)					131.7	\$3,626,912.64			\$3,626,912.64

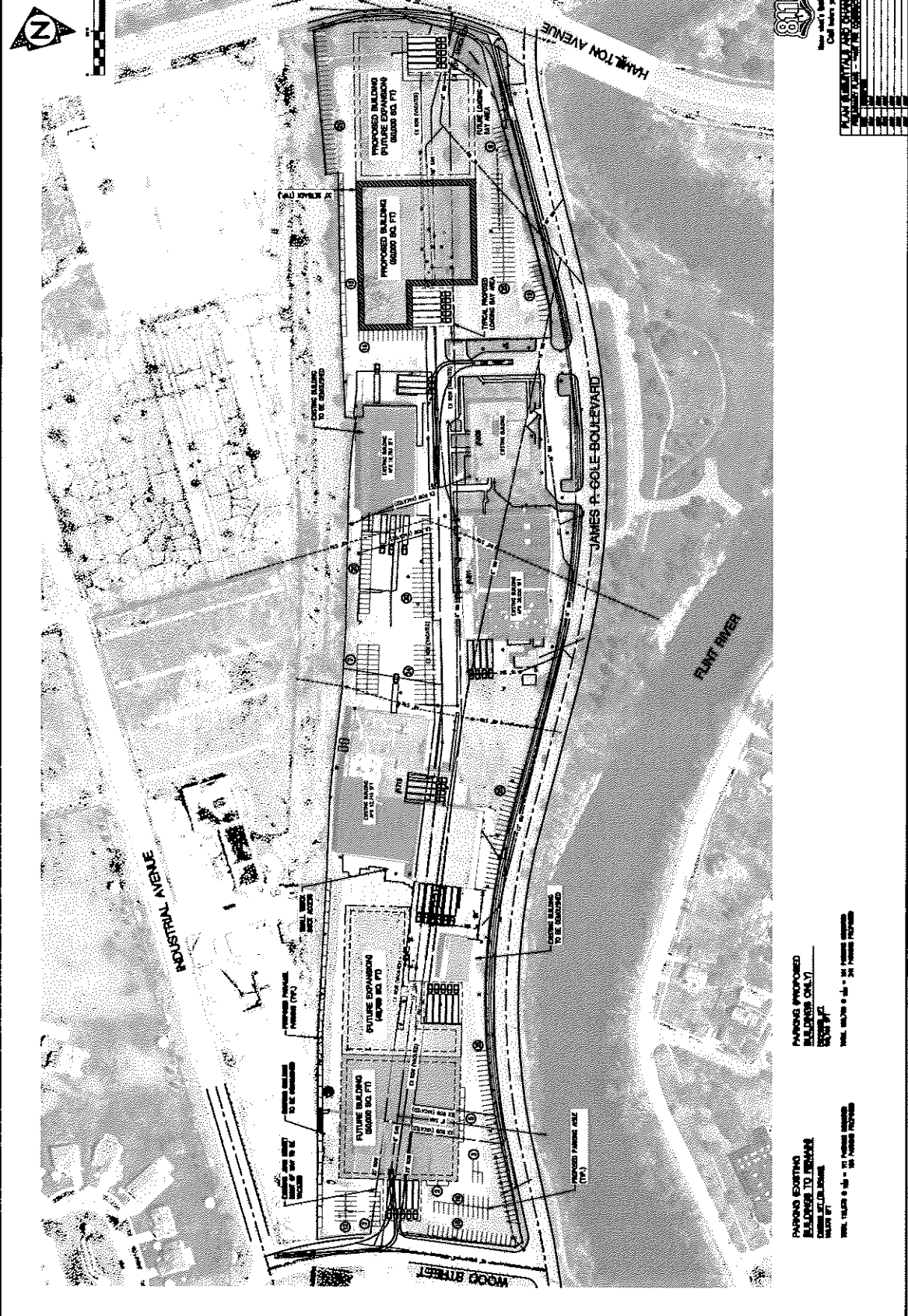
As the proposed tenants for the Project are unknown, AES projected the estimated number of jobs using U.S. Energy Information Administration (USEIA), Office of Energy Consumption and Efficiency Statistics, job creation can be estimated based on the proposed building square footage and national ratios for jobs on a per square foot basis. AES also obtained and used information on hourly wages from Payscale.com. According to Payscale.com, the "Average Production Worker Hourly Pay in Flint, Michigan is \$13.24. As the two new industrial buildings are proposed to be 90,000 ft2 and 100,000 ft2 and based on an the USEIA data of "Median square feet per worker" of 1,442 ft2, the estimated new jobs per building to be created are 62.4 FTE and 69.3 FTE, respectively. Based on the foregoing projections, the estimated new permanent FTE jobs payroll being created by the Project is 62.4 FTE X \$13.24/Hour for 40 hours per week for 52 weeks/year = \$1,718,812.76 and 69.3 FTE X \$13.24/Hour for 40 hours per week for 52 weeks/year = \$1,909,791.96 or a total estimated payroll of \$3,628,604.72. Please see the tables below for a summary of direct economic benefits resulting from the Project.

FLINT RIVER
JAMES P. GOLE BOULEVARD
HAMILTON AVENUE
WOOD STREET
NORTHMAN DRIVE
EXISTING DRIVE
NEW DRIVE
PROPOSED DRIVE
ASPHALT DRIVE
GRAVEL DRIVE
CONCRETE DRIVE
GRAVEL DRIVE
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CONCRETE DRIVE
GRAVEL DRIVE
CONCRETE DRIVE

ROWE PROFESSIONAL SERVICES COMPANY
OPTION 4
 INDUSTRIAL SITE
 FLINT, MICHIGAN
 CONCEPT SITE PLAN

The Rowe Building 52
 340 S. Saginaw St. Suite 200
 Flint, MI 48902
 O (810) 341-7500
 F (810) 341-7573
 WWW.ROWEPSC.COM

REVIEWER: _____
 DATE: _____
 PROJECT MGR: _____
 DATE: _____
 PLAN DATE: FEBRUARY, 2020
 SCALE: 1" = 50'
 DRS
 DAS



PROPOSED BUILDINGS ONLY
 5000 SQ. FT.
 14000 SQ. FT.
 8000 SQ. FT.

EXISTING BUILDINGS TO REMAIN
 10000 SQ. FT.
 10000 SQ. FT.
 10000 SQ. FT.





ATTACHMENT D

Supportive Letters

ATTACHMENT E

Estimated Cost of Eligible Activities Tables

ESTIMATED COST OF ELIGIBLE ACTIVITIES SUMMARY

Description of Eligible Activities	Estimated Cost Bldg#1	Estimated Cost Bldg#2	Activity Total ¹
Brownfield Plan and Act 381 Work Plan			\$30,000.00
Baseline Environmental Assessment Activities	\$22,900.00	\$22,900.00	\$45,800.00
Due Care Activities	\$328,500.00	\$321,500.00	\$650,000.00
Response Activities	\$83,500.00	\$83,500.00	\$167,000.00
Demolition Activities	\$50,000.00	\$225,000.00	\$275,000.00
Infrastructure Improvements	\$472,948.00	\$464,360.00	\$937,308.00
Site Preparation	\$218,200.00	\$218,200.00	\$436,400.00
Sub-Total Site Eligible Activities	\$1,176,048.00	\$1,335,460.00	\$2,541,508.00
FBRA Administration Costs			\$973,411.00
Local Site Remediation Revolving Fund			\$1,044,652.00
Total Estimated Cost to be Funded Through TIF			\$4,559,571.00

¹Does not include 15% Act 381 Contingency

**TABLE 1 - TOTAL PROPOSED EGLE ELIGIBLE ACTIVITY COSTS
BROWNFIELD PLAN
PROPOSED FORMER DUPONT SITE REDEVELOPMENT - Phase 1 (90,000 ft2 bldg)
CITY OF FLINT, GENESEE COUNTY, MICHIGAN**

Eligible Activity Description	Brownfield Property Cost		
DEPARTMENT SPECIFIC ACTIVITIES (MCL §125.2652(2)(I)) ELIGIBLE ACTIVITY COSTS			
Baseline Environmental Assessments (MCL §125.2652(2)(I))	Local TIF Capture Only	State and Local TIF Capture	TOTAL
Phase I Environmental Site Assessment	\$0	\$2,400	\$2,400
Phase II Environmental Site Assessment	\$0	\$15,000	\$15,000
Baseline Environmental Assessment	\$0	\$3,500	\$3,500
7a Due Care Plan	\$0	\$2,000	\$2,000
Due Care Activities (MCL §125.2652(2)(I) and (m))			
Section 7aCA Due Care Plan - Revisions/Documentation of Due Care Compliance	\$0	\$4,500	\$4,500
Additional Due Care Phase II ESA Environmental Due Diligence Activities	\$0	\$40,000	\$40,000
Additional Due Care Phase II ESA Environmental Due Diligence Reporting Activities	\$0	\$3,500	\$3,500
Treatment/Disposal of Contaminated Groundwater During Construction (if necessary)	\$0	\$40,000	\$40,000
Soil Staging, Loading, Transportation, and Disposal	\$0	\$35,000	\$35,000
Soil Verification Sampling (if necessary)	\$0	\$25,000	\$25,000
Soil Backfill (Soil, soil placement & compaction)	\$0	\$5,000	\$5,000
Health & Safety Plan	\$0	\$2,500	\$2,500
Project Management	\$0	\$15,000	\$15,000
Soil Erosion Measures	\$0	\$3,000	\$3,000
Incremental Costs for Greenspace Encapsulation (as necessary)	\$0	\$30,000	\$30,000
Incremental Costs for Encapsulation (Engineering controls for Building and Parking)	\$0	\$50,000	\$50,000
Soil Vapor Assessment and Pilot Test	\$0	\$5,000	\$5,000
Soil Vapor Barrier / Sub-slab Depressurization System	\$0	\$65,000	\$65,000
Work Plans, Engineering, Specifications and Reports	\$0	\$5,000	\$5,000
Response Activities (MCL §125.2652(2)(I) and (oo)(I) and (II))			
Hoist, Trench and Other former Equipment Removal Related Activities (if present)	\$0	\$15,000	\$15,000
UST Removal and Closure (if identified during excavation)	\$0	\$50,000	\$50,000
UST Removal Observation, Sampling and Report (if identified during excavation)	\$0	\$12,000	\$12,000
Work Plans, Engineering, Specifications and Reports	\$0	\$6,500	\$6,500
<i>ENVIRONMENTAL COSTS SUBTOTAL</i>	\$0	\$434,900	\$434,900
TOTAL ELIGIBLE ACTIVITY COSTS PLUS CONTINGENCY AND ADMINISTRATIVE COSTS			
Contingency			
Contingency (15% of Subtotal NOT including completed BEA Activities)	\$0.00	\$61,800	\$61,800
Brownfield Plan, Act 381 Work Plan and Related Documents (MCL §125.2652(2)(o)(I)(D))		\$7,500	\$7,500
<i>ELIGIBLE ACTIVITY COSTS SUBTOTAL</i>	\$0	\$504,200	\$504,200
Agency Administrative Costs			
State Act 381 Work Plan Review (No longer charged by State)	\$0	\$0	\$0
DBRA Administrative and Operating Costs (15% of TIR Annually)	\$0	\$0	\$0
GRAND TOTAL	\$0	\$504,200	\$504,200

TABLE 2 - TOTAL PROPOSED MSF ELIGIBLE ACTIVITY COSTS PROPOSED FORMER DUPONT SITE REDEVELOPMENT - Phase 1 (90,000 ft2 bldg) CITY OF FLINT, GENESEE COUNTY, MICHIGAN	
Eligible Activity Description	Brownfield Property Cost
ELIGIBLE ACTIVITIES (MCL 125.2652(2)(o)) MSF ELIGIBLE ACTIVITY COSTS	
Lead, Asbestos and Mold Abatement (MCL §125.2652(2)(o)(i)(G))	
Pre Demolition Hazardous Materials Environmental Assessment (HMEA)	\$0
Bid Specs and Bid Evaluation (for HazMat Abatement)	\$0
Lead, Asbestos and Mold Abatement Consulting, Management, Design and Planning, Air Monitoring	\$0
Site Security (HazMat Abatement and Demolition)	\$0
Pre Demolition Asbestos, Lead and Hazardous Materials Abatement	\$0
Demolition Activities (MCL §125.2652(2)(o)(i)(F))	
Demolition Engineering, Design and Management, Bid Specs and Evaluation	\$15,000
Demolition of Building (Interior and Exterior, Incl Demo & Disp)	\$0
Demolition of Building (Utility disconnect and removal)	\$0
Demolition of Building (Pavement removal)	\$35,000
Infrastructure Improvements (MCL §125.2652(2)(o)(ii)(B))	
Utility Connection & Installation - New site utilities/Utility relocation (water, sewer, gas, etc.)	\$472,948
Utility Connection & Installation - Retention/Detention	\$0
Public Infrastructure - Storm Sewer	\$0
Public Infrastructure - James P. Cole Right-of-Way	\$0
Public Infrastructure -	\$0
Public Infrastructure -	\$0
Site Preparation (MCL §125.2652(2)(o)(ii)(C))	
Geotechnical Testing & Evaluation	\$20,000
Soil Mitigation activities	\$0
Geotechnically Non-viable Soils Removal	\$0
Site Preparation (Exc., Debris removal, etc.)	\$25,000
Site Preparation (Rough Grading, etc.)	\$132,000
Site Preparation (Finished Grading, etc.)	\$28,200
Site Preparation (Specialized foundations)	\$0
Site Preparation (Sheeting, shoring, etc.)	\$0
Site Preparation - Excavation	\$5,000
Site Preparation - Pumping of Groundwater	\$8,000
<i>MSF ELIGIBLE ACTIVITY COSTS SUBTOTAL</i>	
\$741,148	
TOTAL ELIGIBLE ACTIVITY COSTS PLUS CONTINGENCY	
Contingency (15% of Subtotal)	
\$111,172	
Brownfield Plan, Act 381 Work Plan and Related Documents (MCL §125.2652(2)(o)(i)(D))	
\$7,500	
GRAND TOTAL	
\$859,820	

**TABLE 1 - TOTAL PROPOSED EGLE ELIGIBLE ACTIVITY COSTS
BROWNFIELD PLAN
PROPOSED FORMER DUPONT SITE REDEVELOPMENT - Phase 1 (100,000 ft2 bldg)
CITY OF FLINT, GENESEE COUNTY, MICHIGAN**

Eligible Activity Description		Brownfield Property Cost	
DEPARTMENT SPECIFIC ACTIVITIES (MCL §125.2652(2)(l)) ELIGIBLE ACTIVITY COSTS			
Baseline Environmental Assessments (MCL §125.2652(2)(l))	Local TIF Capture Only	State and Local TIF Capture	TOTAL
Phase I Environmental Site Assessment	\$0	\$2,400	\$2,400
Phase II Environmental Site Assessment	\$0	\$15,000	\$15,000
Baseline Environmental Assessment	\$0	\$3,500	\$3,500
7a Due Care Plan	\$0	\$2,000	\$2,000
Due Care Activities (MCL §125.2652(2)(l) and (m))			
Section 7aCA Due Care Plan - Revisions/Documentation of Due Care Compliance	\$0	\$4,500	\$4,500
Additional Due Care Phase II ESA Environmental Due Diligence Activities	\$0	\$40,000	\$40,000
Additional Due Care Phase II ESA Environmental Due Diligence Reporting Activities	\$0	\$3,500	\$3,500
Treatment/Disposal of Contaminated Groundwater During Construction (if necessary)	\$0	\$40,000	\$40,000
Soil Staging, Loading, Transportation, and Disposal	\$0	\$35,000	\$35,000
Soil Verification Sampling (if necessary)	\$0	\$25,000	\$25,000
Soil Backfill (Soil, soil placement & compaction)	\$0	\$5,000	\$5,000
Health & Safety Plan	\$0	\$2,500	\$2,500
Project Management	\$0	\$15,000	\$15,000
Soil Erosion Measures	\$0	\$3,000	\$3,000
Incremental Costs for Greenspace Encapsulation (as necessary)	\$0	\$30,000	\$30,000
Incremental Costs for Encapsulation (Engineering controls for Building and Parking)	\$0	\$50,000	\$50,000
Soil Vapor Assessment and Pilot Test	\$0	\$5,000	\$5,000
Soil Vapor Barrier / Sub-slab Depressurization System	\$0	\$58,000	\$58,000
Work Plans, Engineering, Specifications and Reports	\$0	\$5,000	\$5,000
Response Activities (MCL §125.2652(2)(l) and (oo)(l) and (ll))			
Hoist, Trench and Other former Equipment Removal Related Activities (if present)	\$0	\$15,000	\$15,000
UST Removal and Closure (if identified during excavation)	\$0	\$50,000	\$50,000
UST Removal Observation, Sampling and Report (if identified during excavation)	\$0	\$12,000	\$12,000
Work Plans, Engineering, Specifications and Reports	\$0	\$6,500	\$6,500
<i>ENVIRONMENTAL COSTS SUBTOTAL</i>		\$0	\$427,900
TOTAL ELIGIBLE ACTIVITY COSTS PLUS CONTINGENCY AND ADMINISTRATIVE COSTS			
Contingency			
Contingency (15% of Subtotal NOT including completed BEA Activities)	\$0.00	\$60,750	\$60,750
Brownfield Plan, Act 381 Work Plan and Related Documents (MCL §125.2652(2)(o)(i)(D))		\$7,500	\$7,500
<i>ELIGIBLE ACTIVITY COSTS SUBTOTAL</i>		\$0	\$496,150
Agency Administrative Costs			
State Act 381 Work Plan Review (No longer charged by State)	\$0	\$0	\$0
DBRA Administrative and Operating Costs (15% of TIR Annually)	\$0	\$0	\$0
GRAND TOTAL		\$0	\$496,150

**TABLE 2 - TOTAL PROPOSED MSF ELIGIBLE ACTIVITY COSTS
PROPOSED FORMER DUPONT SITE REDEVELOPMENT - Phase 1 (100,000 ft2 bldg)
CITY OF FLINT, GENESEE COUNTY, MICHIGAN**

Eligible Activity Description	Brownfield Property Cost
ELIGIBLE ACTIVITIES (MCL 125.2652(2)(o)) MSF ELIGIBLE ACTIVITY COSTS	
Lead, Asbestos and Mold Abatement (MCL §125.2652(2)(o)(i)(G))	
Pre Demolition Hazardous Materials Environmental Assessment (HMEA)	\$0
Bid Specs and Bid Evaluation (for HazMat Abatement)	\$0
Lead, Asbestos and Mold Abatement Consulting, Management, Design and Planning, Air Monitoring	\$0
Site Security (HazMat Abatement and Demolition)	\$0
Pre Demolition Asbestos, Lead and Hazardous Materials Abatement	\$0
Demolition Activities (MCL §125.2652(2)(o)(i)(F))	
Demolition Engineering, Design and Management, Bid Specs and Evaluation	\$15,000
Demolition of Building (Interior and Exterior, Incl Demo & Disp)	\$90,000
Demolition of Building (Utility disconnect and removal)	\$25,000
Demolition of Building (Pavement removal)	\$95,000
Infrastructure Improvements (MCL §125.2652(2)(o)(ii)(B))	
Utility Connection & Installation - New site utilities/Utility relocation (water, sewer, gas, etc.)	\$464,360
Utility Connection & Installation - Retention/Detention	\$0
Public Infrastructure - Storm Sewer	\$0
Public Infrastructure - James P. Cole Right-of-Way	\$0
Public Infrastructure -	\$0
Public Infrastructure -	\$0
Site Preparation (MCL §125.2652(2)(o)(ii)(C))	
Geotechnical Testing & Evaluation	\$20,000
Soil Mitigation activities	\$0
Geotechnically Non-viable Soils Removal	\$0
Site Preparation (Exc., Debris removal, etc.)	\$25,000
Site Preparation (Rough Grading, etc.)	\$132,000
Site Preparation (Finished Grading, etc.)	\$28,200
Site Preparation (Specialized foundations)	\$0
Site Preparation (Sheeting, shoring, etc.)	\$0
Site Preparation - Excavation	\$5,000
Site Preparation - Pumping of Groundwater	\$8,000
<i>MSF ELIGIBLE ACTIVITY COSTS SUBTOTAL</i>	\$907,560
TOTAL ELIGIBLE ACTIVITY COSTS PLUS CONTINGENCY	
Contingency (15% of Subtotal)	\$136,134
Brownfield Plan, Act 381 Work Plan and Related Documents (MCL §125.2652(2)(o)(i)(D))	\$7,500
GRAND TOTAL	\$1,051,194

ATTACHMENT F

TIF Tables

FINAL DRAFT FOR REVIEW AND APPROVAL

Tax Increment Revenue Capture Estimates
Former DuPont Facility Redevelopment
James P. Cole Blvd
Flint, Genesee County, Michigan
October 31, 2020

EXHIBIT A: TIF TABLE

Estimated Taxable Value (TV) Increase Rate	The first year																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Plan Year	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037
Calendar Year	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037
Base Taxable Value	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000
* Base Taxable Value	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000
Estimated New TV	\$ 4,631,250	\$ 4,673,543	\$ 4,724,338	\$ 4,777,582	\$ 4,832,277	\$ 4,887,421	\$ 4,943,015	\$ 4,999,059	\$ 5,055,553	\$ 5,112,507	\$ 5,170,021	\$ 5,228,095	\$ 5,286,729	\$ 5,345,823	\$ 5,405,377	\$ 5,465,391	\$ 5,525,865
Incremental Difference (New TV - Base TV)	\$ 4,597,250	\$ 4,639,543	\$ 4,690,338	\$ 4,743,582	\$ 4,798,277	\$ 4,853,421	\$ 4,909,015	\$ 4,965,059	\$ 5,021,553	\$ 5,078,507	\$ 5,135,921	\$ 5,193,895	\$ 5,252,429	\$ 5,311,523	\$ 5,371,177	\$ 5,431,391	\$ 5,492,165
State Education Tax (SET)	\$ 27,584	\$ 27,861	\$ 28,142	\$ 28,425	\$ 28,712	\$ 29,001	\$ 29,294	\$ 29,592	\$ 29,896	\$ 30,205	\$ 30,519	\$ 30,838	\$ 31,162	\$ 31,491	\$ 31,825	\$ 32,164	\$ 32,508
School Operating Tax	\$ 82,751	\$ 81,588	\$ 80,436	\$ 79,296	\$ 78,167	\$ 77,049	\$ 75,943	\$ 74,849	\$ 73,767	\$ 72,696	\$ 71,637	\$ 70,590	\$ 69,555	\$ 68,532	\$ 67,521	\$ 66,521	\$ 65,532
School Total	\$ 110,335	\$ 109,449	\$ 108,578	\$ 107,721	\$ 106,879	\$ 106,048	\$ 105,232	\$ 104,431	\$ 103,643	\$ 102,867	\$ 102,104	\$ 101,355	\$ 100,619	\$ 99,896	\$ 99,186	\$ 98,488	\$ 97,799
County Operating	\$ 75,105	\$ 75,338	\$ 75,573	\$ 75,811	\$ 76,052	\$ 76,295	\$ 76,541	\$ 76,790	\$ 77,041	\$ 77,294	\$ 77,549	\$ 77,806	\$ 78,065	\$ 78,326	\$ 78,589	\$ 78,853	\$ 79,119
Library	\$ 18,389	\$ 18,574	\$ 18,761	\$ 18,951	\$ 19,143	\$ 19,338	\$ 19,534	\$ 19,732	\$ 19,932	\$ 20,134	\$ 20,337	\$ 20,542	\$ 20,748	\$ 20,956	\$ 21,165	\$ 21,375	\$ 21,586
Fleet Operating	\$ 34,679	\$ 34,827	\$ 34,978	\$ 35,131	\$ 35,286	\$ 35,443	\$ 35,601	\$ 35,761	\$ 35,922	\$ 36,084	\$ 36,247	\$ 36,411	\$ 36,576	\$ 36,742	\$ 36,909	\$ 37,077	\$ 37,246
Public Safety	\$ 27,584	\$ 27,861	\$ 28,142	\$ 28,425	\$ 28,712	\$ 29,001	\$ 29,294	\$ 29,592	\$ 29,896	\$ 30,205	\$ 30,519	\$ 30,838	\$ 31,162	\$ 31,491	\$ 31,825	\$ 32,164	\$ 32,508
Misc. Fees	\$ 81,648	\$ 82,048	\$ 82,449	\$ 82,851	\$ 83,254	\$ 83,658	\$ 84,063	\$ 84,469	\$ 84,876	\$ 85,284	\$ 85,692	\$ 86,101	\$ 86,511	\$ 86,922	\$ 87,333	\$ 87,745	\$ 88,157
Genesee County Parks	\$ 3,438	\$ 3,472	\$ 3,507	\$ 3,543	\$ 3,579	\$ 3,615	\$ 3,651	\$ 3,688	\$ 3,725	\$ 3,762	\$ 3,800	\$ 3,837	\$ 3,875	\$ 3,913	\$ 3,951	\$ 3,989	\$ 4,028
Parks and Rec	\$ 2,299	\$ 2,327	\$ 2,355	\$ 2,384	\$ 2,413	\$ 2,442	\$ 2,471	\$ 2,500	\$ 2,529	\$ 2,558	\$ 2,587	\$ 2,616	\$ 2,645	\$ 2,674	\$ 2,703	\$ 2,732	\$ 2,761
Genesee DIF	\$ 17,221	\$ 17,383	\$ 17,546	\$ 17,710	\$ 17,875	\$ 18,041	\$ 18,207	\$ 18,374	\$ 18,541	\$ 18,708	\$ 18,875	\$ 19,042	\$ 19,209	\$ 19,376	\$ 19,543	\$ 19,710	\$ 19,877
Mass Transit	\$ 5,618	\$ 5,675	\$ 5,732	\$ 5,789	\$ 5,846	\$ 5,903	\$ 5,960	\$ 6,017	\$ 6,074	\$ 6,131	\$ 6,188	\$ 6,245	\$ 6,302	\$ 6,359	\$ 6,416	\$ 6,473	\$ 6,530
Fleet Sinking Fund	\$ 1,180	\$ 1,170	\$ 1,160	\$ 1,150	\$ 1,140	\$ 1,130	\$ 1,120	\$ 1,110	\$ 1,100	\$ 1,090	\$ 1,080	\$ 1,070	\$ 1,060	\$ 1,050	\$ 1,040	\$ 1,030	\$ 1,020
CS Mott Operating	\$ 9,050	\$ 9,150	\$ 9,249	\$ 9,348	\$ 9,447	\$ 9,546	\$ 9,645	\$ 9,744	\$ 9,843	\$ 9,942	\$ 10,041	\$ 10,140	\$ 10,239	\$ 10,338	\$ 10,437	\$ 10,536	\$ 10,635
Local Total	\$ 65,863	\$ 66,379	\$ 66,895	\$ 67,411	\$ 67,927	\$ 68,443	\$ 68,959	\$ 69,475	\$ 69,991	\$ 70,507	\$ 71,023	\$ 71,539	\$ 72,055	\$ 72,571	\$ 73,087	\$ 73,603	\$ 74,119
Non-Capturable Taxes	\$ 12,584	\$ 12,695	\$ 12,806	\$ 12,917	\$ 13,028	\$ 13,139	\$ 13,250	\$ 13,361	\$ 13,472	\$ 13,583	\$ 13,694	\$ 13,805	\$ 13,916	\$ 14,027	\$ 14,138	\$ 14,249	\$ 14,360
Flint School Debt	\$ 3,532	\$ 3,568	\$ 3,604	\$ 3,640	\$ 3,676	\$ 3,712	\$ 3,748	\$ 3,784	\$ 3,820	\$ 3,856	\$ 3,892	\$ 3,928	\$ 3,964	\$ 4,000	\$ 4,036	\$ 4,072	\$ 4,108
CS Mott Debt	\$ 8,052	\$ 8,132	\$ 8,212	\$ 8,292	\$ 8,372	\$ 8,452	\$ 8,532	\$ 8,612	\$ 8,692	\$ 8,772	\$ 8,852	\$ 8,932	\$ 9,012	\$ 9,092	\$ 9,172	\$ 9,252	\$ 9,332
Public Library Debt	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
CS Mott Debt	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Total Non-Capturable Taxes	\$ 12,584	\$ 12,695	\$ 12,806	\$ 12,917	\$ 13,028	\$ 13,139	\$ 13,250	\$ 13,361	\$ 13,472	\$ 13,583	\$ 13,694	\$ 13,805	\$ 13,916	\$ 14,027	\$ 14,138	\$ 14,249	\$ 14,360
TOTAL MILLS	\$ 78,447	\$ 79,074	\$ 79,701	\$ 80,328	\$ 80,955	\$ 81,582	\$ 82,209	\$ 82,836	\$ 83,463	\$ 84,090	\$ 84,717	\$ 85,344	\$ 85,971	\$ 86,598	\$ 87,225	\$ 87,852	\$ 88,479
Total Tax Increment Revenue (TIR) Available for Capture	\$ 100,517	\$ 101,675	\$ 102,833	\$ 103,991	\$ 105,149	\$ 106,307	\$ 107,465	\$ 108,623	\$ 109,781	\$ 110,939	\$ 112,097	\$ 113,255	\$ 114,413	\$ 115,571	\$ 116,729	\$ 117,887	\$ 119,045

FINAL DRAFT FOR REVIEW AND APPROVAL

Tax Increment Revenue Capture Estimates
Former DuPont Facility Redevelopment
James P. Cole Blvd
Flint, Genesee County, Michigan
October 31, 2020

EXHIBIT A: TIF TABLE

Estimated Taxable Value (TV) Increase Rate	Plan Year												TOTAL
	18	19	20	21	22	23	24	25	26	27	28	29	
Calendar Year	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Base Taxable Value	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000	\$ 34,000
Estimated New TV	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652	\$ 5,539,652
Incremental Difference (New TV - Base TV)	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652	\$ 5,505,652
School Capture													
State Education Tax (SET)	\$ 12,705	\$ 12,705	\$ 12,705	\$ 12,705	\$ 12,705	\$ 12,705	\$ 12,705	\$ 12,705	\$ 12,705	\$ 12,705	\$ 12,705	\$ 12,705	\$ 12,705
School Operating Tax	\$ 98,115	\$ 98,115	\$ 98,115	\$ 98,115	\$ 98,115	\$ 98,115	\$ 98,115	\$ 98,115	\$ 98,115	\$ 98,115	\$ 98,115	\$ 98,115	\$ 98,115
School Total	\$ 110,820	\$ 110,820	\$ 110,820	\$ 110,820	\$ 110,820	\$ 110,820	\$ 110,820	\$ 110,820	\$ 110,820	\$ 110,820	\$ 110,820	\$ 110,820	\$ 110,820
Millage Rate													
County Operating	\$ 79,786	\$ 79,786	\$ 79,786	\$ 79,786	\$ 79,786	\$ 79,786	\$ 79,786	\$ 79,786	\$ 79,786	\$ 79,786	\$ 79,786	\$ 79,786	\$ 79,786
Library	\$ 21,803	\$ 21,803	\$ 21,803	\$ 21,803	\$ 21,803	\$ 21,803	\$ 21,803	\$ 21,803	\$ 21,803	\$ 21,803	\$ 21,803	\$ 21,803	\$ 21,803
Flint Operating	\$ 69,881	\$ 69,881	\$ 69,881	\$ 69,881	\$ 69,881	\$ 69,881	\$ 69,881	\$ 69,881	\$ 69,881	\$ 69,881	\$ 69,881	\$ 69,881	\$ 69,881
Public Safety	\$ 32,705	\$ 32,705	\$ 32,705	\$ 32,705	\$ 32,705	\$ 32,705	\$ 32,705	\$ 32,705	\$ 32,705	\$ 32,705	\$ 32,705	\$ 32,705	\$ 32,705
Misc. Levies	\$ 40,381	\$ 40,381	\$ 40,381	\$ 40,381	\$ 40,381	\$ 40,381	\$ 40,381	\$ 40,381	\$ 40,381	\$ 40,381	\$ 40,381	\$ 40,381	\$ 40,381
Genesee County Parks	\$ 4,076	\$ 4,076	\$ 4,076	\$ 4,076	\$ 4,076	\$ 4,076	\$ 4,076	\$ 4,076	\$ 4,076	\$ 4,076	\$ 4,076	\$ 4,076	\$ 4,076
Parks and Rec	\$ 2,735	\$ 2,735	\$ 2,735	\$ 2,735	\$ 2,735	\$ 2,735	\$ 2,735	\$ 2,735	\$ 2,735	\$ 2,735	\$ 2,735	\$ 2,735	\$ 2,735
Genesee SD	\$ 20,417	\$ 20,417	\$ 20,417	\$ 20,417	\$ 20,417	\$ 20,417	\$ 20,417	\$ 20,417	\$ 20,417	\$ 20,417	\$ 20,417	\$ 20,417	\$ 20,417
Misc Transit	\$ 6,641	\$ 6,641	\$ 6,641	\$ 6,641	\$ 6,641	\$ 6,641	\$ 6,641	\$ 6,641	\$ 6,641	\$ 6,641	\$ 6,641	\$ 6,641	\$ 6,641
Flint Linking Fund	\$ 6,432	\$ 6,432	\$ 6,432	\$ 6,432	\$ 6,432	\$ 6,432	\$ 6,432	\$ 6,432	\$ 6,432	\$ 6,432	\$ 6,432	\$ 6,432	\$ 6,432
CS West Operating	\$ 10,741	\$ 10,741	\$ 10,741	\$ 10,741	\$ 10,741	\$ 10,741	\$ 10,741	\$ 10,741	\$ 10,741	\$ 10,741	\$ 10,741	\$ 10,741	\$ 10,741
Local Total	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863
Non-Capture TIF Table													
Flint School Debt	\$ 15,371	\$ 15,371	\$ 15,371	\$ 15,371	\$ 15,371	\$ 15,371	\$ 15,371	\$ 15,371	\$ 15,371	\$ 15,371	\$ 15,371	\$ 15,371	\$ 15,371
CS West Debt	\$ 4,306	\$ 4,306	\$ 4,306	\$ 4,306	\$ 4,306	\$ 4,306	\$ 4,306	\$ 4,306	\$ 4,306	\$ 4,306	\$ 4,306	\$ 4,306	\$ 4,306
Public Library Debt	\$ 9,970	\$ 9,970	\$ 9,970	\$ 9,970	\$ 9,970	\$ 9,970	\$ 9,970	\$ 9,970	\$ 9,970	\$ 9,970	\$ 9,970	\$ 9,970	\$ 9,970
Total Non-Captureable TIFs	\$ 29,647	\$ 29,647	\$ 29,647	\$ 29,647	\$ 29,647	\$ 29,647	\$ 29,647	\$ 29,647	\$ 29,647	\$ 29,647	\$ 29,647	\$ 29,647	\$ 29,647
TOTAL TAXES	\$ 443,510	\$ 443,510	\$ 443,510	\$ 443,510	\$ 443,510	\$ 443,510	\$ 443,510	\$ 443,510	\$ 443,510	\$ 443,510	\$ 443,510	\$ 443,510	\$ 443,510
Total Tax Increment Revenue (TIR) Available for Capture	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863	\$ 413,863

**Tax Increment Revenue Capture Estimates
Former DuPont Facility Redevelopment
James P. Cole Blvd
Flint, Genesee County, Michigan
October 31, 2020**

EXHIBIT A: TIF TABLE

Incremental Taxable Value (TV) Increase Rate	Plan Year	Section D Capture Summary Table	Developer P&I	Local R/F	State Brownfield R/F
Estimated New TV	Estimated New TV	Developer P&I	Local R/F	State Brownfield R/F	
Incremental Difference (New TV - Base TV)	Incremental Difference (New TV - Base TV)	Developer P&I	Local R/F	State Brownfield R/F	
School Capture	Millage Rate	School Capture			
State Education Tax (NET)	6.0000	State Education Tax (NET)	\$ 222,116.24	\$ 81,770.23	\$ 90,682.7
School Operating Tax	31.0000	School Operating Tax	\$ 1,478,867	\$ 490,622	
School Total	24.0000				
Local Capture	Millage Rate	Local Capture			
County Operating	5.4600	County Operating	\$ 494,811	\$ 148,844	
Library	4.0000	Library	\$ 296,155	\$ 109,027	
Flint Operating	7.5000	Flint Operating	\$ 556,203	\$ 204,476	
Public Safety	8.0000	Public Safety	\$ 444,232	\$ 163,541	
Misc. Taxes	9.0000	Misc. Taxes	\$ 270,747	\$ 246,930	
Genesee County Parks	0.7478	Genesee County Parks	\$ 55,864	\$ 20,383	
Parks and Rec	0.5000	Parks and Rec	\$ 17,610	\$ 13,678	
Genesee ISD	3.7457	Genesee ISD	\$ 277,377	\$ 107,096	
Mich Transit	1.2721	Mich Transit	\$ 90,483	\$ 34,800	
Flint Sinking Fund	1.8800	Flint Sinking Fund	\$ 82,868	\$ 31,163	
CS Mont Operating	1.9795	CS Mont Operating	\$ 145,819	\$ 51,709	
Local Total	41.3863	TOTAL	\$ 4,715,173	\$ 1,709,449	\$ 304,987
Non-Capturable Millages	Millage Rate	Non-Capturable Millages			
Flint School Debt	2.42000	Flint School Debt	\$ 298,789	\$ 76,864	
CS Mont Debt	0.79000	CS Mont Debt	\$ 58,491	\$ 21,533	
Public Library Debt	1.82000	Public Library Debt	\$ 134,751	\$ 49,607	
TOTAL MILLS	5.4000	TOTAL	\$ 402,030	\$ 148,004	
Total Tax Increment Revenue (TIR) Available for Capture					

FINAL DRAFT FOR REVIEW AND APPROVAL

Tax Incremental Revenue Reimbursement Allocation Table
 Former DuPont Facility Redevelopment
 James P. Cole Blvd, Flint, Genesee County, Michigan
 October 31, 2020

EXHIBIT A: TIF TABLE

Developer	Maximum Reimbursement	School & Local Taxes	Local-Only Taxes	Total
State	36.00%	\$ 1,093,107		\$ 1,093,107
Local	63.00%	\$ 1,810,816		\$ 1,810,816
TOTAL	99.00%	\$ 2,903,923		\$ 2,903,923
MSF	65%	\$ 1,860,592		\$ 1,860,592

Estimated Total Years of Plan 70

Estimated Carrier	10	11	12	13	14	15	16	17
Administrative Fees								
State Redevelopment Fund								
Local Redevelopment Fund								

	10	11	12	13	14	15	16	17
DEVELOPER								
Local Tax Reimbursement	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592
State Tax Reimbursement	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296
Total Local Reimbursement	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888
DEVELOPER								
Local Tax Reimbursement	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592
State Tax Reimbursement	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296
Total Local Reimbursement	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888
DEVELOPER								
Local Tax Reimbursement	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592	\$ 1,860,592
State Tax Reimbursement	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296	\$ 920,296
Total Local Reimbursement	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888	\$ 2,780,888

Up to five years of captures for LBRF Deposits when eligible activities are reimbursed. May be earned from OCG & Local TIF only.

LOCAL GROWTH REVOLVING FUND LBRF Deposits

FOR LOCAL TAX CAPTURE

LOCAL TAX CAPTURE

TOTAL LOCAL TAX CAPTURE

LOCAL TAX CAPTURE

FOR LOCAL TAX CAPTURE

LOCAL TAX CAPTURE

LOCAL TAX CAPTURE

FOR LOCAL TAX CAPTURE

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FOR LOCAL TAX CAPTURE

LOCAL TAX CAPTURE

LOCAL TAX CAPTURE

FINAL DRAFT FOR REVIEW AND APPROVAL

Tax Incremental Revenue Reimbursement Allocation Table
 Former DuPont Facility Redevelopment
 James P. Cole Blvd, Flint, Genesee County, Michigan
 October 31, 2020

EXHIBIT A: TIF TABLE

	18	19	20	21	22	23	24	25	26	27	28	29	30	TOTAL
Total State Incremental Revenue	\$ 130,819	\$ 132,136	\$ 133,465	\$ 134,808	\$ 136,164	\$ 137,539	\$ 138,938	\$ 140,315	\$ 141,726	\$ 143,152	\$ 144,591	\$ 146,045	\$ 147,514	\$ 3,841,861
State Tax Reimbursement (50% of NET)	\$ 65,409	\$ 66,068	\$ 66,732	\$ 67,404	\$ 68,082	\$ 68,764	\$ 69,451	\$ 70,143	\$ 70,840	\$ 71,542	\$ 72,249	\$ 72,961	\$ 73,678	\$ 1,920,930
State TIR Available for Reimbursement	\$ 65,409	\$ 66,068	\$ 66,732	\$ 67,404	\$ 68,082	\$ 68,764	\$ 69,451	\$ 70,143	\$ 70,840	\$ 71,542	\$ 72,249	\$ 72,961	\$ 73,678	\$ 1,920,930
Total Local Incremental Revenue	\$ 275,989	\$ 277,859	\$ 279,751	\$ 281,667	\$ 283,606	\$ 285,568	\$ 287,544	\$ 289,535	\$ 291,541	\$ 293,562	\$ 295,598	\$ 297,649	\$ 299,715	\$ 7,451,017
Local Tax Reimbursement (50% of NET)	\$ 137,994	\$ 138,929	\$ 139,876	\$ 140,833	\$ 141,792	\$ 142,752	\$ 143,713	\$ 144,675	\$ 145,638	\$ 146,602	\$ 147,567	\$ 148,533	\$ 149,500	\$ 3,725,508
Local TIR Available for Reimbursement	\$ 137,994	\$ 138,929	\$ 139,876	\$ 140,833	\$ 141,792	\$ 142,752	\$ 143,713	\$ 144,675	\$ 145,638	\$ 146,602	\$ 147,567	\$ 148,533	\$ 149,500	\$ 3,725,508
Total State & Local TIR Available	\$ 268,395	\$ 274,977	\$ 283,391	\$ 289,277	\$ 299,370	\$ 309,401	\$ 318,601	\$ 328,678	\$ 339,401	\$ 350,007	\$ 360,840	\$ 371,801	\$ 382,892	\$ 9,518,596
DEVELOPER														
DEVELOPER Reimbursement Balance	\$ (1,903,220)	\$ (2,182,200)	\$ (2,461,095)	\$ (2,739,990)	\$ (3,018,885)	\$ (3,297,780)	\$ (3,576,675)	\$ (3,855,570)	\$ (4,134,465)	\$ (4,413,360)	\$ (4,692,255)	\$ (4,971,150)	\$ (5,250,045)	\$ (20,724,760)
AVAILABLE TIR (AFTER Developer Reimbursement)	\$ 75,175	\$ 56,777	\$ 40,296	\$ 25,287	\$ 10,494	\$ (4,284)	\$ (18,073)	\$ (32,067)	\$ (46,061)	\$ (60,055)	\$ (74,049)	\$ (88,043)	\$ (102,037)	\$ (807,164)
DEVELOPER Interest (5% Annual Interest Rate)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
DEVELOPER Cumulative Interest	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
INTEREST PAYMENTS TO DEVELOPER	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
INTEREST BALANCE OWED TO DEVELOPER	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
CUMULATIVE INTEREST PAYMENTS TO DEVELOPER	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
AVAILABLE TIR (AFTER Developer Reimbursement)	\$ 75,175	\$ 56,777	\$ 40,296	\$ 25,287	\$ 10,494	\$ (4,284)	\$ (18,073)	\$ (32,067)	\$ (46,061)	\$ (60,055)	\$ (74,049)	\$ (88,043)	\$ (102,037)	\$ (807,164)
MSF Non-Environmental Costs	\$ 286,385	\$ 288,378	\$ 290,371	\$ 292,364	\$ 294,357	\$ 296,350	\$ 298,343	\$ 300,336	\$ 302,329	\$ 304,322	\$ 306,315	\$ 308,308	\$ 310,301	\$ 7,753,706
State Tax Reimbursement	\$ 68,412	\$ 69,206	\$ 70,000	\$ 70,794	\$ 71,588	\$ 72,382	\$ 73,176	\$ 73,970	\$ 74,764	\$ 75,558	\$ 76,352	\$ 77,146	\$ 77,940	\$ 1,944,624
Local Tax Reimbursement	\$ 117,972	\$ 119,172	\$ 120,372	\$ 121,572	\$ 122,772	\$ 123,972	\$ 125,172	\$ 126,372	\$ 127,572	\$ 128,772	\$ 129,972	\$ 131,172	\$ 132,372	\$ 3,782,748
Total MSF Reimbursement Balance	\$ (1,237,751)	\$ (1,424,624)	\$ (1,611,497)	\$ (1,798,370)	\$ (1,985,243)	\$ (2,172,116)	\$ (2,358,989)	\$ (2,545,862)	\$ (2,732,735)	\$ (2,919,608)	\$ (3,106,481)	\$ (3,293,354)	\$ (3,480,227)	\$ (13,461,431)
MDAQ Environmental Costs	\$ 100,210	\$ 101,218	\$ 102,227	\$ 103,235	\$ 104,243	\$ 105,251	\$ 106,259	\$ 107,267	\$ 108,275	\$ 109,283	\$ 110,291	\$ 111,299	\$ 112,307	\$ 3,113,706
State Tax Reimbursement	\$ 36,782	\$ 37,152	\$ 37,522	\$ 37,892	\$ 38,262	\$ 38,632	\$ 39,002	\$ 39,372	\$ 39,742	\$ 40,112	\$ 40,482	\$ 40,852	\$ 41,222	\$ 1,048,808
Local Tax Reimbursement	\$ 63,428	\$ 64,066	\$ 64,704	\$ 65,342	\$ 65,980	\$ 66,618	\$ 67,256	\$ 67,894	\$ 68,532	\$ 69,170	\$ 69,808	\$ 70,446	\$ 71,084	\$ 1,975,898
Total MDAQ Reimbursement Balance	\$ (665,479)	\$ (786,897)	\$ (908,315)	\$ (1,029,733)	\$ (1,151,151)	\$ (1,272,569)	\$ (1,393,987)	\$ (1,515,405)	\$ (1,636,823)	\$ (1,758,241)	\$ (1,879,659)	\$ (2,001,077)	\$ (2,122,495)	\$ (7,725,611)
Local Only Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Local Tax Reimbursement	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Local Only Reimbursement Balance	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Annual Developer Reimbursement	\$ 286,385	\$ 288,378	\$ 290,371	\$ 292,364	\$ 294,357	\$ 296,350	\$ 298,343	\$ 300,336	\$ 302,329	\$ 304,322	\$ 306,315	\$ 308,308	\$ 310,301	\$ 7,753,706
LOCAL BROWNFIELD REVOLVING FUND														
State Tax Capture	\$ 36,782	\$ 37,152	\$ 37,522	\$ 37,892	\$ 38,262	\$ 38,632	\$ 39,002	\$ 39,372	\$ 39,742	\$ 40,112	\$ 40,482	\$ 40,852	\$ 41,222	\$ 1,048,808
Local Tax Capture	\$ 174,188	\$ 178,860	\$ 183,532	\$ 188,204	\$ 192,876	\$ 197,548	\$ 202,220	\$ 206,892	\$ 211,564	\$ 216,236	\$ 220,908	\$ 225,580	\$ 230,252	\$ 600,724
Total BRFC Capture	\$ 210,970	\$ 216,012	\$ 221,054	\$ 226,096	\$ 231,138	\$ 236,180	\$ 241,222	\$ 246,264	\$ 251,306	\$ 256,348	\$ 261,390	\$ 266,432	\$ 271,474	\$ 649,532
* Up to five years of capture for BRFC Deposits after el														
Footnotes:														
BRFC Administrative fee is 15% with a \$100,000 cap. TI														
plan's proportionate share of all tax increment revenue														
capture for administrative fees per PA 381.														

ATTACHMENT G

**Environmental Department Acknowledgement and Other Environmental
Documents**



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

September 17, 2018

**ACKNOWLEDGEMENT OF RECEIPT OF A BASELINE ENVIRONMENTAL
ASSESSMENT**

BEA ID: B201802506LA

Legal Entity: James P Cole Venture LLC, 27 Forest Lane, South Barrington,
Illinois 60010

Property Address: 1809 James P Cole Boulevard, Flint, Genesee County, Michigan

On September 13, 2018, the Michigan Department of Environmental Quality (MDEQ) received a Baseline Environmental Assessment (BEA) dated September 10, 2018, for the above legal entity and property. This letter is your acknowledgement that the MDEQ has received and recorded the BEA. The MDEQ maintains an administrative record of each BEA as received.

This BEA was submitted pursuant to Section 20126(1)(c) of Part 201, Environmental Remediation, and/or Section 21323a(1)(b) of Part 213, Leaking Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). A BEA is submitted for the purpose of establishing an exemption to liability for a new owner or operator of property that has been demonstrated to be a facility or property as defined by Section 20101(1)(s) of Part 201, Environmental Remediation, and/or property as defined by Section 21303(d) of Part 213, Leaking Underground Storage Tanks, of the NREPA. Pursuant to Sections 20126(1)(c) and 21323a(1)(b), the conditions of this exemption require the legal entity to disclose the BEA to a subsequent purchaser or transferee of the property.

The BEA is only for the legal entity and property identified in the BEA and on the BEA Submittal Form. Each new legal entity that becomes the owner or operator of this facility must submit their own BEA.

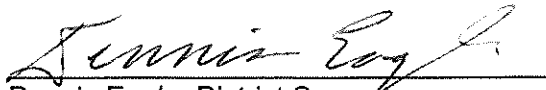
The MDEQ is not making any findings about the adequacy of the submittal or whether the submitter is liable or is eligible to submit. The submitted BEA does not alter liability with regard to a subsequent release, threat of release, or exacerbation of existing conditions that is the responsibility of the legal entity submitting the BEA.

The legal entity, as the owner and/or operator of a facility or property, may have Due Care responsibilities under Section 20107a of Part 201, Environmental Remediation, and/or Section 21304c of Part 213, Leaking Underground Storage Tanks, of the NREPA.

The legal entity may also have responsibility under applicable state and federal laws, including, but not limited to, Part 201, Environmental Remediation; Part 111, Hazardous Waste Management; Part 211, Underground Storage Tank Regulations; Part 213, Leaking Underground Storage Tanks; Part 615, Supervisor of Wells, of the NREPA; and the Michigan Fire Prevention Code, 1941 PA 207, as amended.

Pursuant to Section 20112a(6) of Part 201, Environmental Remediation, the property(s) identified in the BEA will be placed on the inventory of facilities, which is updated daily and posted on the MDEQ's website: <https://secure1.state.mi.us/FacilitiesInventoryQueries>.

Authorized signature:



Dennis Eagle, District Supervisor
Lansing District Office
Remediation and Redevelopment Division
Michigan Department of Environmental Quality
525 West Allegan Street
P.O. Box 30242
Lansing, Michigan 48909
517-614-8544
eagled@michigan.gov

Enclosure

cc: Environmental Consulting & Technology Inc.



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY – REMEDIATION AND REDEVELOPMENT DIVISION, PO BOX 30426, LANSING, MICHIGAN 48909-7926, Phone 517-373-9837, Fax 517-373-2637

FOR DEQ USE ONLY
BEA SUBMITTAL #
BA01302500LA

Baseline Environmental Assessment Submittal Form

This form is for submittal of a Baseline Environmental Assessment (BEA), as defined by Part 201, Environmental Remediation and Part 213, Leaking Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, for the purpose of establishing an exemption to liability pursuant to Section 20126(1)(c) and Section 21323a(1)(b) for a new owner or operator of property that is a facility as defined by Section 20101(1)(s) or Property as defined by Section 21303(d). The BEA report must be conducted either prior to or within 45 days after becoming the owner or operator, whichever is earliest. This form and the BEA report must be submitted prior to or within 6 months of becoming the owner or operator whichever is earliest. A separate BEA is required for each legal entity that is or will be a new owner or operator of the property. To maintain the exemption to liability, the owner and operator must also disclose the BEA to any subsequent purchaser or transferee before conveying interest in the property pursuant to Section 20126(1)(c) and Section 21323a(1)(b). An owner or operator of a facility or Property also has due care obligations under Section 20107a and Section 21304c with respect to any existing contamination to prevent unacceptable exposure; prevent exacerbation; take reasonable precautions; provide reasonable cooperation, assistance, and access to authorized persons taking response activities at the property; comply with land use restrictions associated with response activities; and not impede the effectiveness of response activities implemented at the property. Documentation of due care evaluations, all conducted response activities, and compliance with 7a or 4c need to be available to the MDEQ, but not submitted, within 8 months of becoming the owner or operator of a facility and/or Property.

Section A: Legal Entity Information

Name of legal entity that does or will own or operate the property: <u>James P Cole Venture, LLC</u> Address: <u>27 Forest Lane</u> City: <u>South Barrington</u> State: <u>IL</u> ZIP: <u>60010</u> Contact Person (Name & Title): <u>Ms. Ramona Navitsky - Treasurer</u> Telephone: <u>(312) 543-1250</u> Email: <u>mona.navitsky@dearcapcre.com</u>	Contact for BEA questions if different from submitter: Name & Title: <u>Mr. John D'Addona – Principal Engineer</u> Company: <u>Environmental Consulting & Technology, Inc.</u> Address: <u>2200 Commonwealth Blvd., Suite 300</u> City: <u>Ann Arbor</u> State: <u>MI</u> ZIP: <u>48105</u> Telephone: <u>(734) 769-3004</u> Email: <u>jdaddona@ectinc.com</u>
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Section B: Property Information

Street Address of Property: <u>1809 James P Cole Blvd</u> City: <u>Flint</u> State: <u>MI</u> Zip: <u>48503</u> City/Village/Township: <u>City of Flint</u> Property Tax ID (include all applicable IDs): <u>41-06-452-014 & 41-06-452-015</u> Address according to tax records, if different than above (include all applicable addresses): City: _____ State: _____ Zip: _____ Status of submitter relative to the property (check all that apply): Owner <input type="checkbox"/> Former <input type="checkbox"/> Current <input type="checkbox"/> Prospective <input checked="" type="checkbox"/> Operator <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	County: <u>Genesee</u> Town: <u>7 North</u> Range: <u>7 East</u> Section: <u>6 and 7</u> Quarter: _____ Quarter-Quarter: _____ Decimal Degrees Latitude: <u>43.0324828</u> Decimal Degrees Longitude: <u>83.684671</u> Reference point for latitude and longitude: Center of site <input checked="" type="checkbox"/> Main/front door <input type="checkbox"/> Front gate/main entrance <input type="checkbox"/> Other <input type="checkbox"/> Collection method: Survey <input type="checkbox"/> GPS <input checked="" type="checkbox"/> Interpolation
--	---

Section C: Source of contamination at the property (check all that are known to apply):

Facility regulated pursuant to Part 201, other source, or source unknown <input type="checkbox"/> Part 201 Site ID, if known: _____ Property - Leaking Underground Storage Tank regulated pursuant to Part 213 <input type="checkbox"/> Part 211/213 Facility ID, if known: _____ Oil or gas production and development regulated pursuant to Part 615 or 625 <input type="checkbox"/> Licensed landfill regulated pursuant to Part 115 <input type="checkbox"/> Licensed hazardous waste treatment, storage, or disposal facility regulated pursuant to Part 111 <input type="checkbox"/>	RECEIVED SEP 13 2018 MDEQ - RRD LANSING DISTRICT OFFICE
--	--

Section D: Applicable Dates (provide date for all that are relevant):

Date All Appropriate Inquiry (AAI) Report or Phase I Environmental Assessment Report completed:	MM/DD/YYYY
Date Baseline Environmental Assessment Report conducted:	07/11/2018
Date submitter first became the owner:	09/10/2018
	09/14/2018

Date submitter first became the operator:	09/14/2018
Date submitter first became the operator (if prior to ownership):	N/A
Anticipated date of becoming the owner for prospective owners:	N/A
Anticipated date of becoming the operator for prospective operators:	N/A
If former owner or operator of this property, prior dates of being the owner or operator:	N/A

Section E: Check the appropriate response to each of the following questions:		YES	NO
1.	Is the property at which the BEA was conducted a "facility" as defined by Section 20101(1)(s) or a Property as defined by Section 21303(d)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	Was the All Appropriate Inquiry (AAI) completed in accordance with Section 20101(1)(f) and or 21302(1)(b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.	Was the BEA, including the sampling, conducted either prior to or within 45 days of the date of becoming the owner, operator, or of foreclosure, whichever is earliest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.	Is this BEA being submitted to the department within 6 months of the submitter first becoming the owner or operator, or foreclosing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.	Does the BEA provide sufficient rationale to demonstrate that the data is reliable and relevant to define conditions at the property at the time of purchase, occupancy, or foreclosure, even if the BEA relies on studies of data prepared by others or conducted for other purposes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.	Does this BEA contain the legal description of the property addressed by the BEA?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.	Does this BEA contain the environmental analytical results, a scaled map showing the sample locations, and the basis for the determination that the property is a facility as defined by Section 20101(1)(s) or the basis for the determination that the property is a Property as defined by Section 21303(d)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Section F: Environmental Consultant Signature:

I certify to the best of my knowledge and belief, that this BEA and all related materials are true, accurate, and complete. I certify that the property is a facility as defined by Section 20101(1)(s) or a Property as defined by Section 21303(d) and have provided the sampling and analyses that support that determination. I certify that any exceptions to, or deletions from, the All Appropriate Inquiry Rule are described in Section 1 of the BEA report.

Signature: *John D'Addona, P.E.* Date: September 10, 2018

Printed Name: **John D'Addona, P.E.**

Company: **Environmental Consulting & Technology, Inc.**

Mailing Address: **2200 Commonwealth, Suite 300** City: **Ann Arbor** State: **MI** Zip: **48105**

Telephone: **(734) 769-3004** E-Mail: **jdaddona@ectinc.com**

Section G: Legal Entity Signature:

With my signature below, I certify that to the best of my knowledge and belief, this BEA and all related materials are true, accurate, and complete.

Signature: *Ramona Navitsky* Date: September 7, 2018

(Person legally authorized to bind the legal entity)

Printed Name: **Ms. Ramona Navitsky**

Title and Relationship of signatory to submitter: **Treasurer**

Address: **27 Forest Lane** City: **South Barrington** State: **IL** Zip: **60010**

Telephone: **(312) 543-1250** E-Mail: **mona.navitsky@dearcapcre.com**

Submit the BEA report and this form to the MDEQ District Office for the county in which the property is located. An office map is located at www.michigan.gov/deqrrd.



2200 Commonwealth Blvd., Suite 300, Ann Arbor, Michigan 48105

BASELINE ENVIRONMENTAL ASSESSMENT

**Parcels 41-06-452-014 & 41-06-452-015
JAMES P. COLE BOULEVARD
FLINT, MICHIGAN 48503**

For submission to:
Michigan Department of Environmental Quality
Remediation and Redevelopment Division
Lansing District Office
525 West Allegan Street
P.O. Box 30242
Lansing, Michigan 48909

September 10, 2018

ECT No. 180509-0100

Complex Challenges . . . PRACTICAL SOLUTIONS

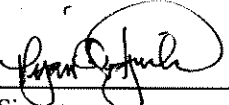
Document Review

The dual signatory process is an integral part of Environmental Consulting & Technology, Inc.'s (ECT's) Document Review Policy No. 9.03. All ECT documents undergo technical/peer review prior to dispatching these documents to any outside entity.

This document has been authored and reviewed by the following employees:

Ryan Higuchi
Author

John D'Addona, P.E.
Peer Review


Signature


Signature

September 10, 2018
Date

September 10, 2018
Date

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September 2016

List of Acronyms

AAI	All Appropriate Inquiry
AKT	AKT-Peerless
AMEC	AMEC Environment & Infrastructure, Inc.
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
BEA	Baseline Environmental Assessment
BGS	Below Ground Surface
CAS	Chemical Abstract Service Number
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
COC	Chain of Custody
CREC	Controlled Recognized Environmental Condition
DC	Direct Contact
ECT	Environmental Consulting & Technology, Inc.
EDR	Environmental Data Resources, Inc.
EP	Environmental Professional
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FINDS	Facility Index System/Facility Registry System
GRCC	Generic Residential Cleanup Criteria
GSI	Groundwater Surface Water Interface
HREC	Historical Recognized Environmental Condition
JPCV	James P. Cole Ventures, LLC
MDEQ	Michigan Department of Environmental Quality
NonGen	Non-generator
NREPA	Natural Resources and Environmental Protection Act
LUST	Leaking Underground Storage Tank
PCB	Polychlorinated biphenyls
PNA	Polynuclear aromatics
PID	Photoionization Detector
PPM	Parts per Million
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
SVIAI	Soil Volatilization to Indoor Air Inhalation
SVOC	Semi-volatile Organic Compounds
SWDBG	State-wide Default Background
SWF/LF	Solid Waste Facilities/Landfill
USCS	Unified Soil Classification System
USGS	United States Geological Survey
UST	Underground Storage Tank
VOC	Volatile Organic Compounds
WDS	Waste Data System

1.0 Introduction and Discussion

This Baseline Environmental Assessment (BEA), as defined by the Environmental Remediation, Part 201 of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended, and the Part 201 Rules promulgated thereunder, has been completed by Environmental Consulting & Technology, Inc. (ECT) on behalf of James P. Cole Venture, LLC (JPCV), for the approximately 17.99-acre property comprised of two (2) parcels of 16.09 acres (Parcel A) located at 1809 James P. Cole Boulevard, and 1.90 acres (Parcel B) located at James P. Cole Boulevard in Flint, Michigan 48503 (herein referred to as the Subject Property). This BEA has been completed pursuant to Section 20126(1)(c) of Part 201 of NREPA PA 451 of 1994, as amended (Part 201).

In conducting this BEA, ECT has considered the results of a historical property use review and a physical reconnaissance performed in general conformance with the scope and limitation of American Society for Testing and Materials (ASTM) Practice E 1527-13. ECT has also obtained and reviewed data from sampling and analytical testing to adequately describe the environmental conditions that exist at the Subject Property at the time of the acquisition by the Submitter.

1.1 Owner/Operator Information

The purchaser of the Subject Property and Submitter of this BEA is James P. Cole Venture, LLC.

1.2 Intended Use of Property

The Submitter intends to redevelop the Subject Property consistent with local zoning and land-use ordinances. Operations on the Subject Property will not require the use of hazardous substances in a manner that would be considered a significant hazardous substance use as defined in Rule 901(o). This is the basis for being able to distinguish the existing contamination from any future release of a hazardous substance on the Subject Property.

1.3 Executive Summary of AAI

On July 11, 2018, AKT-Peerless (AKT), on behalf of JPCV, completed a Phase I ESA in general conformance with the scope and limitations of ASTM Practice E 1527-13 for the Subject Property. The Phase I ESA identified five (5) recognized environmental conditions (RECs) in connection with the Subject Property which are as follows:

REC 1 - *The subject property operated for industrial purposes from 1901 until 1996, specifically as a varnish and spring manufacturer from 1901 until the early 1920s, and then as DuPont from the early 1920s until 1996. Operations on the subject property included the use and/or storage of heavy industrial equipment, various chemicals, various petroleum products, hazardous substances, and/or hazardous wastes.*

Moreover, the subject property was identified on the Waste Data System (WDS) database, the Resource Conservation & Recovery Act - Corrective Action Facilities (RCRAC) database, the Resource Conservation and Recovery Act - Generator Facilities (RCRAGR05) database, the Resource Conservation & Recovery Act Sites with Controls (RCRASC) database, the Resource Conservation & Recovery Act - Non-CORRACTS Treatment, Storage & Disposal Facilities (RCRAT)

database, the Baseline Environmental Assessment (BEA) database, the Biennial Reporting System (BRS) database, the Enforcement and Compliance History Online (ECHOR05) database, the Facility Registration System (FRSMI) database, the Institutional and Engineering Controls Registry (ICEC) database, the Inventory of Facilities (IF) database, Registered Underground Storage Tank (RUST), the Registered Aboveground Storage Tank (RAST) database, the Leaking Underground Storage Tank (LUST) database, and the Toxics Release Inventory (TRI) database.

According to the RUST database, seven USTs were removed from the ground. Additionally, MDEQ RRD file documentation confirmed a release (C-0226-89) of an unknown substance on June 5, 1989. The confirmed release was granted "closure" by the MDEQ on October 13, 1998. The results of subsurface investigations conducted between 1989 and 2015 identified soil and groundwater contamination at the subject property. Several compounds including benzene, ethylbenzene, 1,2,4-trimethylbenzene isomers, xylenes, benzo(g,h,i)perylene, fluoranthene, indo(1,2,3-cd)pyrene, arsenic, chromium, cobalt, and cyanide were identified in on-site soil and groundwater samples exceeding the current MDEQ Part 201 residential cleanup criteria (RCC).

Based on laboratory analytical results, the subject property meets the definition of a facility, as defined in Part 201 of the NREPA, Michigan Public Act (P.A) 451, 1994, as amended. A BEA was subsequently disclosed to the MDEQ based upon the facility designation. In AKT Peerless' opinion, the historical use of the subject property and the presence of known contamination at the subject property represent a REC.

Multiple subsurface investigations were conducted on the subject property between 1989 and 2015 to address previously identified environmental concerns. It is AKT Peerless' opinion, the recognized environmental concerns discussed above have been adequately evaluated and no further subsurface investigation activities are recommended at this time. However, as noted previously, the subject property meets the definition of a facility, as defined in Part 201 of the NREPA, Michigan P.A 451, 1994, as amended. Therefore, AKT Peerless recommends any future owner(s)/ operator(s) prepare a BEA report and conduct a Section 20107(a) Documentation of Due Care Compliance (DDCC) Analysis prior to future use and occupancy."

REC 2 - "The northern adjoining property (902 E Hamilton Avenue) historically operated for industrial purposes since at least 1914 until at least 1999. This adjoining property was identified on the Inventory of Facilities (IF) database and the P.ART 201 database. This adjoining property was also identified on the RUST database with 94 USTs, in which 90 have been removed and 4 are currently in use. This adjoining property was identified on the LUST database with 18 releases, of which 12 are currently listed as "open" by the MDEQ. In AKT Peerless' opinion, the known contamination related to the historical uses of the northern adjoining property and the 12 open releases represents a REC."

REC 3 - "The southwestern adjoining property (1513 St John Street, historically 1517 St John Street) operated as an automotive repair shop since at least 1928 until at least 1967. This adjoining property was identified on the WDS database and the RUST database with one UST, which was removed on January 19, 1999. Additionally, MDEQ RRD file documentation confirmed a release (C-0047-99) of an unknown substance on January 19, 1999. The confirmed release was granted "closure" by the MDEQ on May 16, 1999. In AKT Peerless' opinion, the historical uses of the southwestern adjoining property and historical release represents a REC."

REC 4 - "The western adjoining property (1620 Industrial Avenue) is currently being utilized for the storage of demolition debris. This adjoining property has historically operated for industrial purposes since at least 1902 until at least 1999. This adjoining property was identified on the IF database, the P.ART 201 database, and the BEA database. Additionally, MDEQ RRD file documentation confirmed a release (C-0146-85) of an unknown substance on June 2, 1987. The confirmed release remains "open" with the MDEQ. In AKT Peerless' opinion, the current use of the western adjoining property, the known contamination related to the historical uses of this adjoining property, and the open release represents a REC."

REC 5 - "The western adjoining property (1002 E Hamilton Avenue) has historically operated for industrial purposes since at least 1902 until at least 1999. This adjoining property was identified on the IF database with a BEA. In AKT Peerless' opinion, that the known contamination related to the historical uses of this adjoining property represents a REC."

Based on these findings, AKT recommended further site investigation and/or assessment for RECs 2 through 5 in order to evaluate potential contaminant migration onto the Subject Property.

The Phase I ESA also identified a Controlled Recognized Condition (CREC) in connection to the Subject Property pertaining to the following:

CREC 1 - *“According to information obtained from a review of Michigan Department of Environmental Quality, (MDEQ) file information, a restrictive covenant was set in place for two locations on Parcel A of the Subject Property dated May 29, 2009. The restrictive covenant includes a land use restriction that prohibits the use of the two areas of the subject property that are not in compliance with the limited or site-specific land use category; it also prohibits groundwater use for any purposes, except for wells and devices that are part of an MDEQ-approved response activity. With these considerations, contamination will remain on site at concentrations that exceeds the MDEQ, Part 201/213 (1994 P.A. 451) Residential Risk Based Screening Levels. Consequently, the subject property is a “facility” as that term as defined in Part 201.”*

A copy of AKT’s Phase I ESA is attached hereto as **Appendix A**.

The Submitter is unaware of any abandoned or discarded containers currently present on the Subject Property. Therefore, form EQP4476 is not required as part of this BEA.

1.4 Exceptions or Deletions from AAI Rule

The Phase I ESA included a review of current plat maps, historical plat maps, city directories, aerial photographs, topographic maps, property deeds, tax assessor’s records, building permits, environmental reports, historical sources, and personal interviews conducted with individuals and public officials having knowledge of the Subject Property. A systematic review of environmental databases maintained by state and federal government agencies was also performed as required and defined by ASTM Practice E 1527-13. Accordingly, while ECT is unaware of any limitations or exceptions from the standard practice, it recognizes inherent limitations for Phase I ESAs in general, including but not limited to the elimination of uncertainty, non-exhaustive assessment and variable level of inquiry. Readers of this BEA are directed to Section 1.3 of AKT’s Phase I ESA for an explanation of these limitations (**Appendix A**).

1.5 Discussion of Data Gaps

In accordance with ASTM Practice E 1527-13, the identification of data gaps, as well as comments on their significance on the ability to identify RECs for the Subject Property is required. As stated in Section 9.0 of the Phase I ESA, AKT identified the following deviations or “significant” data gaps, as defined by §312.10 of AAI final rule and §12.7 of ASTM E1527-13 for the Subject Property:

- *“Due to data failure, AKT Peerless was unable to determine the past development or use of the subject property prior to 1898 after review of reasonably ascertainable historical sources. AKT Peerless considers this to be a significant data gap (as defined by ASTM Practice E 1527) which may have impacted AKT Peerless’ ability to identify RECs in connection with the subject property.”*

1.6 Previous Baseline Environmental Assessments

ECT is aware of two (2) previous BEAs that were prepared for the Subject Property. A summary of the data collected in support of these BEAs are as follows:

AMEC Environmental & Infrastructure – February 2013

A BEA was prepared and filed by AMEC Environment & Infrastructure, Inc. (AMEC) on behalf of the Mullins Land Company, LLC in February 2013. The BEA was completed based on the identification of seven (7) RECs from a prior Phase I ESA dated January 2013 that was completed by AMEC. These RECs included:

- The historical use of the subject property for manufacturing of varnishes, paints, and adhesives,
- The historical environmental database listings,
- The presence of an operating groundwater treatment system designed to recover light non-aqueous phase liquid (LNAPL) and contaminated groundwater,
- The recorded deed restriction,
- The historical presence of a railroad west of the subject property,
- The historical presence of automobile component factories and bulk petroleum storage facilities on the western adjoining property, and
- The historical presence of automobile component factories and documented releases on the northern adjoining properties.

As noted by AMEC, DuPont conducted several remedial investigations at the Subject Property that included the advancement of over 150 soil borings, the excavation of approximately 20 test pits, over 40 groundwater monitoring well installations, and the collection of soil and groundwater samples for laboratory analysis. AMEC compared soil and groundwater results to the MDEQ Part 201 Residential Cleanup Criteria (RCC). Soil and groundwater exceedances of these criteria were primarily located in the vicinity of Building 6 and a former UST area, located at the southeast property boundary. Based on these historical analytical testing results, DuPont reportedly excavated and disposed of all contaminated soil above the saturated zone that exceeded the MDEQ's Part 201 industrial direct contact criteria. A groundwater treatment system was also installed around the exterior of Subject Building 6, and two land and resource use restrictions areas were filed for the Subject Property.

Applied Science, Inc. – September 2016

A BEA was prepared and filed by Applied Science, Inc. on behalf of C3 PH, LLC in September 2016. Applied Science noted that DuPont entered into a Voluntary Corrective Action agreement with MDEQ that included the excavation of soil impacted above the MDEQ non-residential direct contact cleanup criteria, as well as the operation of a groundwater treatment system designed to remove contaminated groundwater and free product. In 2015, DuPont requested a no further action status with regard to the free product recovery with respect to the absence of free product for a period of 12 consecutive months.

Contamination was still noted on the Subject Property in soil and groundwater above the MDEQ Part 201 Residential Cleanup Criteria (RCC) for VOCs, SVOCs, arsenic, chromium, cobalt, and cyanide, therefore Applied Science concluded that the Subject Property met the definition of a facility as defined in Part 201 of NREPA, Michigan Public Act 451, 1994, as amended.

1.7 Discussion of Environmental Sampling

AKT's Phase I report identifies a recognized environmental condition pertaining to the Subject Property's prior uses which involved use and/or storage of heavy industrial equipment, various chemicals, various petroleum products, hazardous substances, and/or hazardous wastes. A number of investigations between 1989 and 2015 identified soil and groundwater contaminant concentrations that exceeded generic residential cleanup criteria thereby characterizing the Subject Property as a *facility* as defined in Part 201 of NREPA, Michigan Public Act 451, 1994, as amended. Based on the comprehensive sample results, no further subsurface sampling of known on-site contaminant areas were completed for this BEA.

As a result of the findings in the Phase I ESA, ECT performed a Phase II environmental site investigation on August 20, 2018, on behalf of the Submitter for the purpose of evaluating the potential contamination from offsite sources on the Subject Property prior to its acquisition. Specifically, the following evaluation activities were completed:

1.7.1 Soil Sampling

Direct push drilling services were performed by Fibertec Environmental Services, Inc. (Fibertec) using a track-mounted Geoprobe® Model 6620 drilling rig. The final depths of the borings were determined in the field based on observed subsurface soil conditions, the potential migration pathways associated with the RECs, and the depth to groundwater. Six (6) soil borings, designated as GP-1 through GP-6, were completed to depths of 15 feet below ground surface (bgs), except at boring GP-6 where the boring was advanced to a depth of 10 feet bgs. Soil characteristics at each boring were described and logged by a field geologist in general accordance with the Unified Soil Classification System (USCS) and screened for ionizable volatile organic compounds (VOCs) using a MiniRae 3000 photoionization detector (PID) equipped with a 10.6 electron volt (eV) lamp. The PID had a minimum detection limit of 0.1 parts per million (ppm) and was calibrated daily prior to usage. The locations of the soil borings are depicted on **Figure 3**.

Soil borings GP-1, GP-2, GP-5, and GP-6 were located in areas where the construction of new buildings is proposed. For each of these locations, one (1) discrete soil sample was collected for laboratory analytical testing. The soil samples were collected within ten feet below the ground surface based on elevated PID screening results. If there were negligible differences in PID screening results through the soil column, a sample was collected based on soil types or visual observations or at the bottom of the 10-foot interval. Soil descriptions, sample collection intervals, and PID readings are shown on the soil boring logs provided in **Appendix B**. Soil samples selected for laboratory analyses were placed in an ice-filled cooler for transportation to Fibertec's analytical laboratory. All four (4) of the soil samples were analyzed for VOCs, polynuclear aromatics (PNAs), and 10-MI metals as described below in Section 1.7.3. The soil sampling locations are shown on **Figure 3**.

1.7.2 Groundwater Sampling

Groundwater samples were collected to evaluate the potential for the migration of contamination from an off-site source onto the Subject Property. Shallow groundwater samples were collected from temporary monitoring wells TMW-1 through TMW-6, located at soil borings GP-1 through GP-6, respectively. Groundwater was observed in all six (6) soil borings within the maximum explored depth of 15 feet. Temporary monitoring wells were installed using one-inch disposable polyvinyl chloride (PVC) monitoring wells with 10-slot five-foot screens. The depths of the temporary monitoring wells ranged from 9 to 15 feet bgs, depending on the presence of water-bearing soils observed at the soil boring. Groundwater samples were collected from five of the six temporary monitoring wells. TMW-4, located at GP-4, had insufficient groundwater to produce a groundwater sample. The screened depths of the temporary monitoring wells are included on the soil boring logs provided in **Appendix B**.

Groundwater samples were also collected from existing monitoring wells. Shallow groundwater samples were collected from MW-23S, MW-24S, MW-25S, and MW-26S with depths ranging from 6.6 to 12 feet. Deep groundwater samples were collected from MW-23D, MW-24D, MW-25D, and MW-26D with depths ranging from 68 to 89 feet. Five (5) groundwater samples from temporary monitoring wells (TMW-1, TMW-2, TMW-3, TMW-5, and TMW-6) and three (3) groundwater samples from the existing, deep monitoring wells (MW-23D, MW-24D, and MW-26D) were submitted for analysis for VOCs, PNAs, and 10-MI metals as described below in Section 1.7.3. PCBs were additionally requested for analysis at TMW-1 and MW-24D. Groundwater samples collected for laboratory analyses were placed in an ice-filled cooler for transportation to Fibertec's analytical laboratory. Samples collected from MW-23S, MW-24S, MW-25S, and MW-26S were not submitted for laboratory testing due to the lack of visual and olfactory evidence of contamination. The temporary and existing monitoring well locations are included on **Figure 3**.

1.7.3 Location of Known Contamination

Soil

A table comparing the results of the soil analytical testing to the current Part 201 Generic Residential Cleanup Criteria (GRCC) is included in **Table 1**. The soil sampling locations are shown on **Figure 3**. The analytical laboratory testing reports are included in **Appendix C**. Based on observed soil conditions and a review of the analytical testing results, ECT concluded the following:

- No VOCs were detected in the four (4) soil samples. The samples were collected to evaluate shallow contamination.
- No PNAs were detected in the four soil samples. The samples were collected to evaluate for shallow contamination.
- Metals were detected above laboratory reporting limits in all soil samples (from soil borings GP-1 through GP-4). The samples were collected to evaluate for shallow contamination in the vicinity of proposed buildings. A concentration of arsenic exceeds the state-wide default background (SWDBG), drinking water protection, groundwater surface water interface (GSI) protection, and residential direct contact. Concentrations of total chromium and selenium exceeds the SWDBG and the GSI protection. The concentration of mercury exceeds the GSI protection criterion, but not the SWDBG. Concentrations of barium, cadmium, copper, lead, silver, and zinc did not exceed their respective SWDBG or criteria. Concentrations of metals that exceed the residential criteria limit are discussed below.
 - Arsenic was detected in every sample at concentrations ranging from 1,400 to 9,900 µg/kg. The concentration of arsenic at GP-2 (3-5') exceeds the SWDBG value (5,800 µg/kg), the DW protection (4,600 µg/kg), the GSI (4,600 µg/kg) protection, and the residential direct contact (7,600 µg/kg) cleanup criteria. Under the Part 201 rules, background values for metals may be substituted for GRCC if the background concentrations are higher than the cleanup criteria. The arsenic concentration is above the SWDBG value, but it is below region-specific background values as presented in the Michigan Department of Environmental Quality (MDEQ) *Michigan Background Soil Survey 2005 (Updated 2015)*. MDEQ has begun accepting these regional soil background values based on the empirical average regional background concentration plus two standard deviations. Therefore, the acceptable background value for arsenic in clay soils within the Erie Glacial Lobe is 31,400 µg/kg. Substituting this value for GRCC results in arsenic concentrations not exceeding GRCC.
 - Chromium was detected in all soil samples at concentrations ranging from 4,000 to 27,000 µg/kg. The concentration of chromium collected from GP-1 (3-5') exceeds the SWDBG (18,000 µg/kg) and GSI protection (3,300 µg/kg) criterion. Due to a higher acute toxicity for hexavalent chromium (Cr(VI)) compared to the more commonly occurring trivalent chromium Cr(III), the Part 201 GRCC for chromium are based on the risks associated with Cr(VI). No Part 201 GRCC are established for Cr(III), but there is a SWDBG level for Cr(III) that is set at 18,000 µg/kg. The laboratory analyses performed for the soil samples represents a total chromium concentration, and does not differentiate between Cr(III) and Cr(VI). Unless additional analyses are performed to specifically test for Cr(VI), the conservative approach is to compare the reported concentrations to the Part 201 Cr(VI) GRCC and the Cr(III) background values.
 - Selenium was detected in two (2) soil samples at concentrations ranging from 240 to 630 µg/kg. The concentration of selenium collected from GP-2 (3-5') exceeds the SWDBG (410 µg/kg) and the GSI protection (400 µg/kg) cleanup criteria. The concentrations of arsenic, chromium, and selenium at GP-1 and GP-2 exceed their respective residential criteria.

Groundwater

A table comparing the results of the groundwater analytical testing to the current Part 201 Generic Residential Cleanup Criteria (GRCC) is included in **Table 2**. The soil sampling locations are shown on **Figure 3**.

The analytical laboratory testing reports are included in **Appendix C**. Based on observed groundwater conditions and a review of the analytical testing results, ECT concluded the following:

- Several VOCs were detected in four groundwater samples: TMW-1, TMW-2, TMW-3, and TMW-5. The samples were collected to evaluate for potential contaminant migration onto the subject property. Benzene was detected in two groundwater samples (TMW-1 and TMW-5) at concentrations ranging from 1.2 to 180 µg/L. The concentrations of benzene at TMW-1 exceed the drinking water protection (5.0 µg/L) and GSI protection (12 µg/L) criteria. Isopropylbenzene was detected in one groundwater sample, TMW-1, at a concentration of 32 µg/L. The concentration of isopropylbenzene exceeds the GSI protection (28 µg/L) criterion. Naphthalene (also discussed under PNAs) was detected in one groundwater sample at a concentration of 39 µg/L. The concentration of naphthalene collected from TMW-1 exceeds the GSI protection (11 µg/L) criterion. Trichloroethene was detected in one groundwater samples at a concentration of 5.3 µg/L. The concentration of trichloroethene collected from TMW-3 exceeds the drinking water protection (5.0 µg/L) criterion. Xylenes were detected in one groundwater sample at a concentration of 60 µg/L. The concentration of xylenes collected from TMW-1 exceeds the GSI protection (41 µg/L) criterion. The concentrations of benzene, isopropylbenzene, naphthalene, trichloroethene, and xylenes in two groundwater samples exceed their respective GRCC. Acetone, sec-butylbenzene, ethylbenzene, n-propylbenzene, toluene, trichlorofluoromethane, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB were detected, but the concentrations were below their respective cleanup criteria.
- PNAs were detected in one groundwater sample: TMW-1. Samples were collected to evaluate for potential contaminant migration onto the subject property. Naphthalene (also discussed under VOCs) was detected in one groundwater sample at a concentration of 39 µg/L. The concentration of naphthalene collected from TMW-1 exceeds the GSI protection (11 µg/L) criterion. The concentration of naphthalene in one groundwater sample exceeds the respective residential cleanup criteria. There were no other detections of PNAs.
- Metals were detected above laboratory reporting limits in all groundwater samples, except TMW-1. The samples were collected to evaluate for potential contaminant migration onto the subject property. Concentrations of arsenic, cadmium, and lead exceed the drinking water and GSI criteria. Concentrations of copper exceed the GSI criterion. Concentrations of metals that exceed the residential criteria limit are discussed below.
 - Arsenic was detected in two groundwater samples (TMW-2 and TMW-5) at concentrations ranging from 18 to 25 µg/L. The concentrations exceed the DW (10 µg/L) and the GSI (10 µg/L) criteria.
 - Cadmium was detected in two groundwater samples (MW-23D and MW-26D) at concentrations ranging from 11 to 51 µg/L. The concentrations exceed the DW (5.0 µg/L) and the GSI (2.5 µg/L) criteria.
 - Copper was detected in eight groundwater samples at concentrations ranging from 5.0 to 32 µg/L. The concentrations of copper collected from TMW-2 and TMW-3 exceed the GSI (13 µg/L) criteria.
 - Lead was detected in three groundwater samples at concentrations ranging from 3.0 to 20 µg/L. The concentrations of lead collected from TMW-2 and TMW-3 exceed the DW (4.0 µg/L) and the GSI (14 µg/L) criteria.
 - The concentrations of arsenic, cadmium, copper, and lead exceed their respective residential criteria.

- PCBs were not detected in the two groundwater samples (TMW-1 and MW-24D), which were collected to evaluate for potential contaminant migration onto the Subject Property.

In determining the sample locations and analytical testing parameters described herein, ECT relied upon its best judgment of the hazardous substances most likely to be present with respect to the prior uses of the adjacent properties. Readers should note that the presence of all possible contaminants has neither been confirmed as a part of this assessment, nor is such confirmation a required element of this BEA.

1.7.4 Basis for Concluding Facility Status

A comparison of analytical data obtained as a result of ECT's August 2018 sampling of areas of the Subject Property potentially affected by the migration of contaminants by off-site sources indicates the presence of VOCs, SVOCs and Michigan 10 Metals within the groundwater, and Michigan 10 Metals at concentrations exceeding levels exceeding the corresponding GRCC established for residential uses under the NREPA, 1994 PA 451, as amended. In addition, contamination remains on the Subject Property in both soil and groundwater above the GRCC for VOCs, SVOCs, arsenic, chromium, cobalt, and cyanide as detailed in the BEA report that was prepared by Applied Science, Inc. in September 2016. Accordingly, the Subject Property described herein meets the definition of a "facility" under Part 201 of the NREPA.

2.0 Property Information

2.1 Legal Description

The Subject Property is located on the southwest corner of East Hamilton Avenue and James P. Cole Boulevard, north of East Wood Street in the City of Flint. Parcel A is located at 1809 James P. Cole Boulevard while Parcel B has no address number on James P. Cole Boulevard, Sections 6 and 7, Township 7 North, and Range 7 East of the Flint North Quadrangle Map, in Flint, Genesee County, Michigan 48503. The Parcel ID (Tax ID) numbers for the Subject Property are:

Parcel A – (Parcel ID: 41-06-452-014)

THAT PART OF BLKS 29, 30, 31, 32, 33 AND 34 OF OAK PARK SUBDIVISION OF PART OF SECS 1 & 2 OF SMITH'S RESERVATION AND PT OF VACATED ST JOHN ST AND OTHER VACATED STREETS AND PT OF LOTS 1 THRU 15, 19 AND 24 THRU 29 AND INCL ALL OF LOTS 16 THRU 18 AND 20 THRU 23 OF PLAT OF FLANDERS & HOURANS SUBDIVISION AND PT OF THE OLD RR ROW AND OTHER LANDS DESC AS: COM AT THE SW COR OF LOT 25 OF SD PLAT OF FLANDERS & HOURANS SUBDIVISION; TH N 24 DEG 13' 00" E ALG THE ELY ROW LINE OF ST JOHN ST, 211.50 FT; TH N 65 DEG 47' 00" W, 2.35 FT; TH N 64 DEG 31' 55" W, 158.28 FT; TH S 40 DEG 14' 11" E, 1.25 FT; TH N 72 DEG 44' 20" W, 19.17 FT; TH N 17 DEG 08' 12" E, 154.66 FT; TH N 20 DEG 09' 39" E, 288.13 FT; TH N 19 DEG 17' 08" E, 35.22 FT TO POB OF THIS PARCEL OF LAND; TH CONT N 19 DEG 17' 08" E, 101.73 FT; TH N 22 DEG 04' 49" E, 50.04 FT; TH N 23 DEG 58' 29" E, 150.06 FT; TH N 20 DEG 22' 22" E, 110.76 FT; TH N 18 DEG 10' 21" E, 240.78 FT; TH ALG THE ARC OF A CURVE TO THE RIGHT WITH RADIUS OF 1128.83 FT, A DIST OF 144.58 FT, THE LONG CHORD BEARING N 21 DEG 50' 20" E, 144.48 FT; TH N 65 DEG 35' 31" W, 18.63 FT; TH N 14 DEG 02' 16" E, 175.59 FT; TH N 15 DEG 44' 18" E, 271.61 FT; TH N 78 DEG 57' 09" W, 23.05 FT; TH N 11 DEG 47' 00" E, 98.38 FT; TH N 67 DEG 01' 34" W, 0.61 FT; TH N 12 DEG 12' 29" E, 165.28 FT TO A FOUND PT ON THE SLY LINE OF HAMILTON AVE; TH ALG SD HAMILTON AVE AS MONUMENTED, S 89 DEG 06' 53" E, 62.00 FT; TH S 89 DEG 47' 46" E, 33.97 FT TO THE PC OF A NON-TANGENT CURVE TO THE RIGHT, WITH RADIUS OF 597.53 FT; TH ALG THE ARC OF SD CURVE A DIST OF 60.67 FT, THE LONG CHORD BEING S 74 DEG 59' 40" E, 60.64 FT TO THE PC OF A COMPOUND NON-TANGENT CURVE TO THE RIGHT WITH RADIUS OF 45 FT; TH ALG THE ARC OF SD CURVE A DIST OF 31.86 FT, THE LONG CHORD BEING S 51 DEG 48' 10" E, 31.20 FT TO THE PC OF A COMPOUND NON-TANGENT CURVE TO THE RIGHT WITH RADIUS OF 587.53 FT; TH ALG THE ARC OF SD CURVE A DIST OF 75.12 FT, THE LONG CHORD BEING S 64 DEG 34' 42" E 75.07 FT TO THE PT OF SD CURVE; TH S 61 DEG 53' 52" E, 5.55 FT TO THE PC OF A CURVE TO THE RIGHT WITH RADIUS OF 94.30 FT; TH ALG THE ARC OF SD CURVE ENTERING THE WLY ROW LINE OF JAMES P COLE BLVD, A DIST OF 104.95 FT, THE LONG CHORD BEING S 30 DEG 02' 03" E, 99.62 FT TO THE PT OF SD CURVE; TH S 02 DEG 02' 06" W 98.42 FT; TH S 71 DEG 22' 00" E, 1.45 FT; TH S 02 DEG 02' 06" W, 300.76 FT TO THE PC OF A CURVE TO THE RIGHT WITH RADIUS OF 1412.54 FT; TH ALG THE ARC OF SD CURVE A DIST OF 736.52 FT, THE LONG CHORD BEING S 16 DEG 58' 15" W, 728.21 FT TO THE PT OF SD CURVE; TH S 31 DEG 54' 21" W, 302.86 FT TO THE PC OF A CURVE TO THE LEFT, WITH RADIUS OF 1183.35 FT; TH ALG THE ARC OF SD CURVE A DIST OF 563.24 FT, THE LONG CHORD BEING S 18 DEG 16' 15" W, 557.94 FT; TH S 04 DEG 38' 00" W, 197.79 FT TO THE PC OF A CURVE TO THE RIGHT WITH RADIUS OF 15.21 FT; TH ALG THE ARC OF SD CURVE A DIST OF 29.05 FT, THE LONG CHORD BEING S 59 DEG 21' 47" W, 24.83 FT TO THE PT OF SD CURVE; TH N 20 DEG 13' 00" E, 10.01 FT; TH N 66 DEG 59' 02" W, 206.45 FT TO A PT ON A CURVE TO THE RIGHT WITH RADIUS OF 24.68

FT; TH ALG THE ARC OF SD CURVE A DIST OF 18.13 FT, THE LONG CHORD BEING N 03 DEG 10' 06" E, 17.73 FT TO THE PT OF SD CURVE; TH N 24 DEG 13' 00" E, 184.72 FT; TH N 17 DEG 35' 25" E, 447.25 FT; TH N 23 DEG 47' 39" E, 32.57 FT TO A BLDG CORNER; TH N 65 DEG 52' 07" W, ALG A BLDG WALL LINE EXT, 169.12 FT TO THE POB. CONT 15.79 ACRES. SPLIT

Parcel B – (Parcel ID: 41-06-452-015)

THAT PART OF VACATED ST JOHN ST AND OTHER VACATED STREETS, PT OF THE OLD RR ROW AND OTHER LANDS DESC AS: COM AT THE SW COR OF LOT 25 OF PLAT OF FLANDERS & HOURANS SUBDIVISION; TH N 24 DEG 13' 00" E, ALG THE ELY ROW LINE OF ST JOHN ST, 211.50 FT TO THE POB; TH N 65 DEG 47' 00" W, 2.35 FT; TH N 64 DEG 31' 55" W, 158.28 FT; TH S 40 DEG 14' 11" E, 1.25 FT; TH N 72 DEG 44' 20" W, 19.17 FT; TH N 17 DEG 08' 12" E, 154.66 FT; TH N 20 DEG 09' 39" E, 288.13 FT; TH N 19 DEG 17' 08" E, 35.22 FT; TH ALG A BLDG WALL LINE EXT S 65 DEG 52' 07" E, 169.12 FT TO A BLDG CORNER; TH S 23 DEG 47' 39" W, 32.57 FT TO A BLDG CORNER; TH S 17 DEG 35' 25" W, 447.25 FT TO THE POB. CONT 1.90 ACRES. SPLIT ON 12/06/2005 FROM 41-06-452-013; 2003 PARCEL DIVISION OF 11-06-452-011-9

Site photographs of the Subject Property and the surrounding area are presented in Appendix C of AKT's Phase I ESA (**Appendix A**).

2.2 **Property Boundaries**

The location of the Subject Property is shown on **Figure 1**, Subject Property Location Map and the general layout of the Subject Property is shown on **Figure 2**, Site and Surrounding Properties Map.

2.3 **Site Map**

A scaled site map, showing sample locations, depths is provided as **Figure 3**.

2.4 **Subject Property Location**

The Subject Property is comprised of two (2) parcels of land, comprising approximately 17.99-acres (Parcel A 16.09 acres and Parcel B 1.90 acres), and is located on the southwest corner of East Hamilton Avenue and James P. Cole Boulevard, north of East Wood Street in the City of Flint, Michigan, and has the following common address:

1809 James P. Cole Boulevard
Flint (Genesee County), Michigan 48503

2.5 **Spatial Data**

The Subject Property is located in Sections 6 and 7, Township 7 North, and Range 7 East of the Flint North Quadrangle Map, in Flint, Genesee County, Michigan. A geographic reference point for the Subject Property (Latitude [North]: 43.0324828 - 43° 1' 56.9382", Longitude [West]: 83.684671 - 83° 41' 4.815") was determined by Geosearch as part of the radial search activities and database review performed in support of AKT's Phase I ESA.

3.0 Facility Status

3.1 Known Contamination

Listings of the contaminants identified at the Subject Property by ECT in excess of the corresponding analytical reporting limits are provided together with the corresponding Chemical Abstract Service Numbers (CAS #) in **Table 3** below.

Table 3. Contaminants of Concern

Contaminants of Concern	CAS Number	Criteria Exceeded
Benzene (groundwater)	71432	DW, NRDW, GSI
Isopropylbenzene (groundwater)	98828	GSI
Naphthalene (groundwater)	91203	GSI
Trichloroethene (groundwater)	79016	DW, NRDW
Xylenes (groundwater)	1330207	GSI
Arsenic (groundwater and soil)	7440382	DW, NRDW, GSI, DC
Cadmium (groundwater)	7440439	DW, NRDW, GSI
Chromium (soil)	18540299	GSI
Copper (groundwater)	7440508	GSI
Lead (groundwater)	7439921	DW, NRDW, GSI
Selenium (soil)	7782492	GSI

DW: Drinking Water Protection, NRDW: Non-Residential Drinking Water, DC: Direct Contact, GSI: Groundwater Surface Water Interface

The listing of these contaminants is in addition to the contaminants previously documented in prior BEAs that were prepared by others for the Subject Property. See **Appendices D and E** for copies of these reports.

3.2 Laboratory Data

Copies of the analytical laboratory reports and chain-of-custody (COC) documentation for the samples collected by ECT on August 20, 2018 are included in **Appendix C**.

4.0 BEA Author

The primary author of this BEA was Ryan P. Higuchi, whose contact information is provided as follows:

Ryan Higuchi
Senior Associate Scientist III
Environmental Consulting & Technology, Inc.
2200 Commonwealth Boulevard, Suite 300
Ann Arbor, Michigan 48105
rhiguchi@ectinc.com
Tel. (734) 769-3004

BEA Review and Interpreter of this BEA was John D'Addona, P.E. who is a qualified Environmental Professional (EP) with over 30 years of experience in the environmental industry. His experiences include the management and review of hundreds of Phase I and II ESAs, BEAs, and Due Care Plans. His contact information is as follows:

John D'Addona, P.E.
Principal Engineer
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Tel. (734) 769-3004

5.0 ASTM Phase I ESA and AAI Documentation

A Phase I ESA, completed by AKT, is included as **Appendix A**. The Phase I ESA was completed in general accordance with ASTM Practice E 1527-13. The purpose of ASTM Practice E 1527-13 is to define good commercial and customary practice in the United States of America for conducting an environmental site assessment of commercial real estate properties with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA; 42 U.S.C. §9601) and petroleum products. The objective of Phase I ESAs is to provide all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice as defined at 42 U.S.C. §9601(35)(B) to permit a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability (a.k.a., landowner liability protections). The Phase II ESA investigation was completed in general accordance with ASTM Practice E1903-11, the Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process.

This BEA has been completed pursuant to Section 20126(1)(c) of Part 201 of the Natural Resources and Environmental Protection Act (NREPA) PA 451 of 1994, as amended (Part 201). In the preparation of this BEA, ECT considered hazardous substances as defined by Section 20101(1)(y) and/or regulated substances as defined by Section 21303(g). This BEA follows the suggested format for the "Contents of BEA Report," presented in EQP 4012 (02/2015).

6.0 References

Part 201 of the Natural Resources and Environmental Protection Act, Public Act 451 of 1994, as amended.

ASTM E 1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

ASTM Practice E1903-11, Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process.

Phase I Environmental Site Assessment, Parcels 41-06-452-014 and 41-06-452-015, City of Flint, Michigan prepared by AKT-Peerless, and dated July 11, 2018.

Baseline Environmental Assessment, Former DuPont Automotive Works Site 1555 James P. Cole Boulevard, Flint, Genesee County, Michigan prepared by AMEC Environment and Infrastructure, Inc. and dated January 4, 2013.

Baseline Environmental Assessment, 1555 James P. Cole Boulevard, Flint, Genesee County, Michigan prepared by Antea Group and dated December 7, 2016.

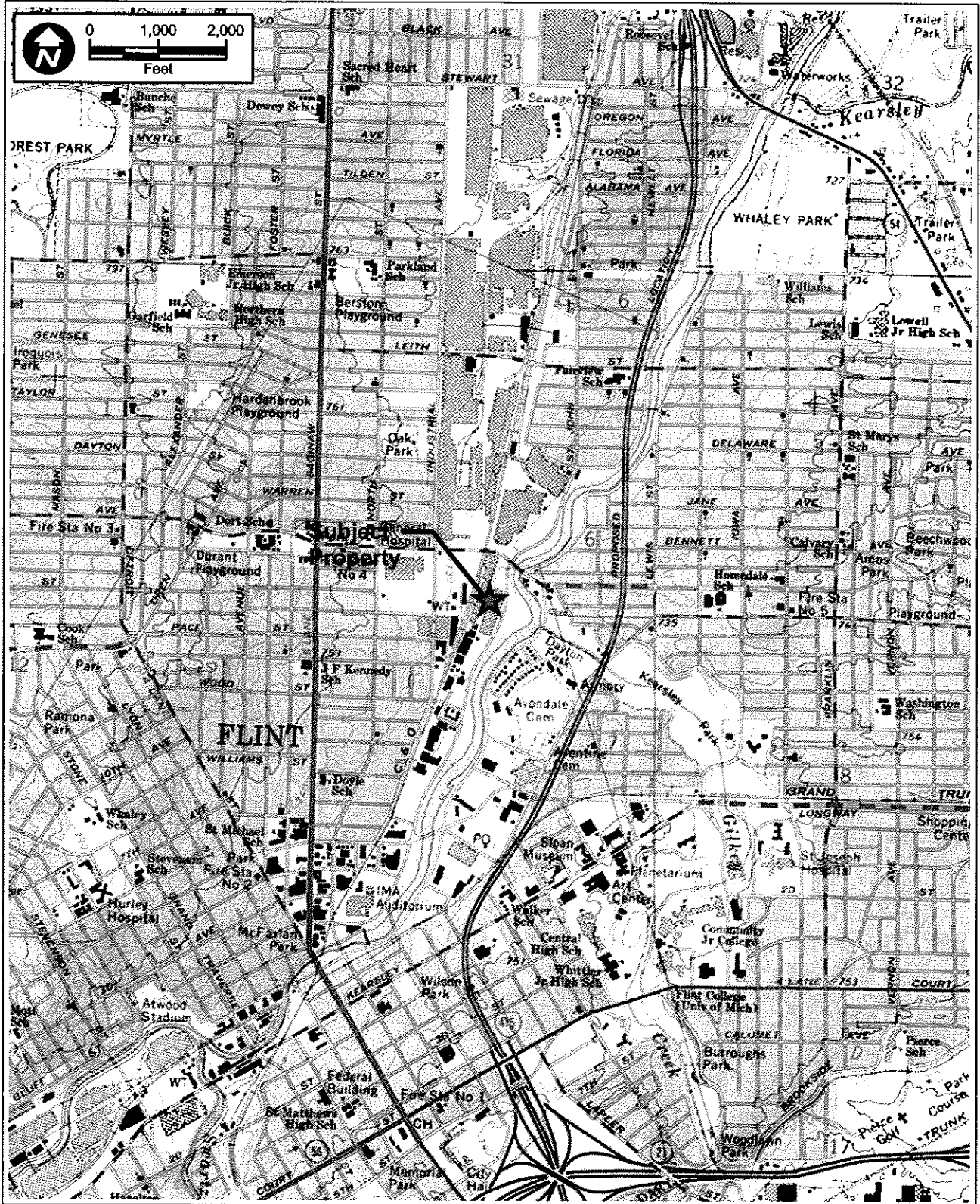


FIGURE 1.
SITE LOCATION MAP
 PARCEL IDs: 41-06-452-014 & 41-06-452-015
 FLINT, MI. 48503

Sources: ECT, 2018.

ECT Environmental
 Consulting &
 Technology, Inc.

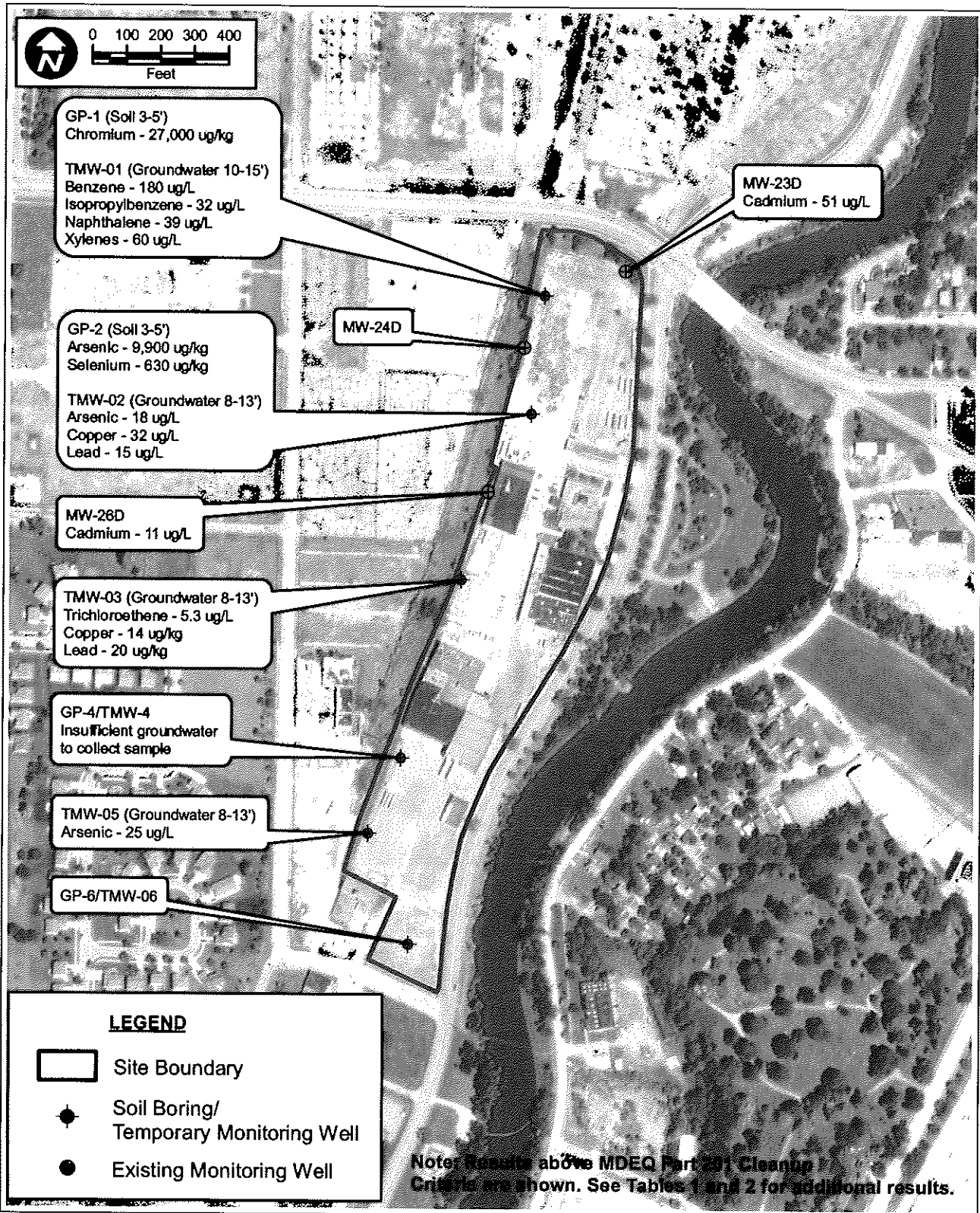


FIGURE 3.
SAMPLE LOCATION MAP
PARCEL IDs: 41-06-452-014 & 41-06-452-015
FLINT, MI. 48503

Sources: ECT, 2018.

ECT Environmental
Consulting &
Technology, Inc.

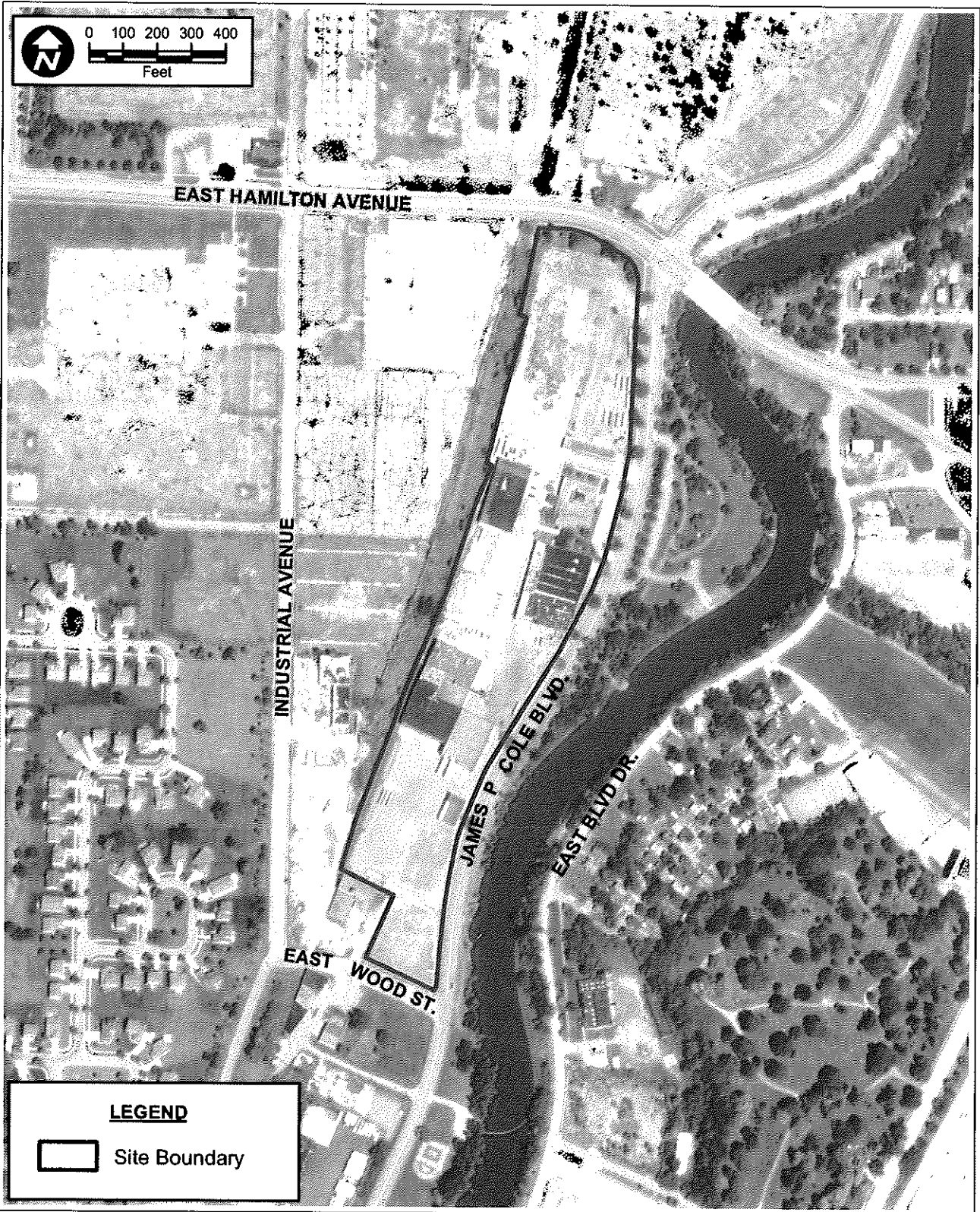


FIGURE 2.
SITE AND SURROUNDING PROPERTIES MAP
PARCEL IDs: 41-06-452-014 & 41-06-452-015
FLINT, MI. 48503

Sources: ECT, 2018.

ECT Environmental
Consulting &
Technology, Inc.

Table 1. Soil Analytical Summary

Former Dupont Facility

Matrix: Soil

Cleanup Criteria: Residential

Page 1 of 1

Chemical Abstract Service #	Part 201 Cleanup Criteria (December 2013)												Sample Location					
	Statewide Default Background	Drinking Water Protection	Groundwater Surface Water Interface	Residential Criteria				Nonresidential				GP-1 (3-5) 8/20/18	GP-2 (3-5) 8/20/18	GP-3 (8-10) 8/20/18	GP-6 (3-5) 8/20/18			
				Soil Volatilization to Indoor Air	Infinite Source Volatile Soil Inhalation	Direct Contact	Soil Saturation Concentration Screening Levels	Direct Contact	Soil Saturation Concentration Screening Levels									
VOCs, ug/kg - Method 8260																		
Benzene	71432	100	240	1,600	13,000	180,000	400,000	400,000	400,000	400,000	nd	nd	nd	nd	nd	nd	nd	
n-Butylbenzene	104518	1,600	ID	ID	ID	2,500,000	10,000,000	10,000,000	10,000,000	8,000,000	nd	nd	nd	nd	nd	nd	nd	
sec-Butylbenzene	135988	1,600	ID	ID	ID	2,500,000	10,000,000	10,000,000	10,000,000	8,000,000	nd	nd	nd	nd	nd	nd	nd	
1,2-Dichloroethane	107062	100	120	2,100	6,200	91,000	1,200,000	1,200,000	1,200,000	420,000	nd	nd	nd	nd	nd	nd	nd	
cis-1,2-Dichloroethene	156692	1,400	12,000	22,000	180,000	640,000	640,000	640,000	640,000	640,000	nd	nd	nd	nd	nd	nd	nd	
trans-1,2-Dichloroethene	156695	2,000	9,400	23,000	280,000	1,400,000	1,400,000	1,400,000	1,400,000	1,400,000	nd	nd	nd	nd	nd	nd	nd	
Ethylbenzene	100414	1,500	360	87,000	720,000	140,000	140,000	140,000	140,000	140,000	nd	nd	nd	nd	nd	nd	nd	
Tetrachloroethene	127184	1,000	220	11,000	170,000	88,000	88,000	88,000	88,000	88,000	nd	nd	nd	nd	nd	nd	nd	
Toluene	108883	16,000	5,400	250,000	2,800,000	250,000	250,000	250,000	250,000	250,000	nd	nd	nd	nd	nd	nd	nd	
1,1,1-Trichloroethane	71556	4,000	1,800	250,000	3,800,000	460,000	460,000	460,000	460,000	460,000	nd	nd	nd	nd	nd	nd	nd	
Trichloroethene	79016	100	580	1,000	11,000	500,000	500,000	500,000	500,000	500,000	nd	nd	nd	nd	nd	nd	nd	
1,2,3-Trimethylbenzene	526738	NA	NA	NA	NA	NA	NA	NA	NA	NA	nd	nd	nd	nd	nd	nd	nd	
1,2,4-Trimethylbenzene	95636	2,100	570	110,000	21,000,000	110,000	110,000	110,000	110,000	110,000	nd	nd	nd	nd	nd	nd	nd	
1,3,5-Trimethylbenzene	108678	1,800	1,100	94,000	16,000,000	94,000	94,000	94,000	94,000	94,000	nd	nd	nd	nd	nd	nd	nd	
Vinyl chloride	75014	40	40	270	4,200	3,800	3,800	3,800	490,000	34,000	nd	nd	nd	nd	nd	nd	nd	
Xylenes	1330207	NA	820	150,000	48,000,000	150,000	150,000	150,000	150,000	150,000	nd	nd	nd	nd	nd	nd	nd	
other VOCs	Varies	5,600	820	150,000	48,000,000	150,000	150,000	150,000	150,000	150,000	nd	nd	nd	nd	nd	nd	nd	
FNAs, ug/kg - Method 8270																		
Acenaphthene	83329	300,000	8,700	190,000,000	81,000,000	41,000,000	130,000,000	130,000,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Acenaphthylene	208968	5,900	ID	1,600,000	2,200,000	1,600,000	1,600,000	1,600,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Anthracene	120127	41,000	ID	1,000,000,000	1,400,000,000	230,000,000	230,000,000	230,000,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Benzo(a)anthracene	56553	NA	NLL	NLV	NLV	20,000	80,000	80,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Benzo(a)pyrene	50328	NA	NLL	NLV	NLV	2,000	8,000	8,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Benzo(b)fluoranthene	205992	NA	NLL	ID	ID	20,000	80,000	80,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Benzo(g,h,i)perylene	191242	NA	NLL	NLV	NLV	2,500,000	2,500,000	2,500,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Benzo(k)fluoranthene	207089	NA	NLL	NLV	NLV	200,000	800,000	800,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Chrysene	218019	NA	NLL	ID	ID	2,000,000	2,000,000	2,000,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Dibenz(a,h)anthracene	53703	NA	NLL	NLV	NLV	2,000	8,000	8,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Fluoranthene	206440	730,000	5,900	1,000,000,000	740,000,000	46,000,000	130,000,000	130,000,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Fluorene	86737	390,000	5,300	590,000,000	130,000,000	27,000,000	87,000,000	87,000,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Indeno(1,2,3-cd)pyrene	193395	NA	NLL	NLV	NLV	20,000	80,000	80,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
2-Methylnaphthalene	91576	NA	4,200	2,700,000	1,500,000	8,100,000	26,000,000	26,000,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Phenanthrene	85018	56,000	2,100	2,800,000	160,000	1,600,000	5,200,000	5,200,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Pyrene	129000	480,000	ID	1,000,000,000	650,000,000	29,000,000	84,000,000	84,000,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Metals, ug/kg - Method 6020, 7471																		
Arsenic	7440382	4,600	4,600	NLV	NLV	7,600	37,000,000	37,000,000	NA	NA	9,900	1,900	1,900	1,400	8,200	8,200	19,000	
Barium	7440393	1,300,000	440,000	NLV	NLV	37,000,000	130,000,000	130,000,000	NA	NA	64,000	4,100	4,100	4,000	5,300	5,300	3,100	
Cadmium	7440439	1,200	3,000	NLV	NLV	550,000	2,100,000	2,100,000	NA	NA	240	nd	nd	nd	nd	nd	nd	
Chromium (Total)	Varies	6,000	3,300	NLV	NLV	2,500,000	9,200,000	9,200,000	NA	NA	14,000	4,000	4,000	4,000	5,300	5,300	3,100	
Copper	7440508	32,000	75,000	NLV	NLV	20,000,000	73,000,000	73,000,000	NA	NA	16,000	3,500	3,500	3,500	2,000	2,000	2,000	
Lead	7439921	21,000	2,500,000	NLV	NLV	400,000	900,000	900,000	NA	NA	11,000	2,000	2,000	2,000	2,000	2,000	2,000	
Mercury	Varies	1,700	50	48,000	52,000	160,000	580,000	580,000	NA	NA	82	nd	nd	nd	nd	nd	nd	
Selenium	7782492	410	400	NLV	NLV	2,600,000	9,600,000	9,600,000	NA	NA	630	240	240	240	2,000	2,000	2,000	
Silver	7440224	1,000	100	NLV	NLV	2,500,000	9,000,000	9,000,000	NA	NA	nd	nd	nd	nd	nd	nd	nd	
Zinc	7440666	47,000	170,000	NLV	NLV	170,000,000	630,000,000	630,000,000	NA	NA	16,000	14,000	14,000	14,000	19,000	19,000	19,000	

Note:

ID = insufficient data to develop criterion

na = not analyzed

nd = not detected

NLL = not likely to leach

NLV = not likely to volatilize

Assumptions:

hardness estimate for receiving waters = 150 mg/L protective for surface water that is used as a drinking water source

Table 2. Groundwater Analytical Summary
Former Dupont Facility

Matrix: Groundwater
Cleanup Criteria: Residential
Page 1 of 1

Chemical Abstract Service #	Residential Criteria (December 2013)				Sample Location								
	Drinking Water Protection	Nones: Drinking Water	Groundwater Surface Water Interface	Indoor Air Inhalation	Groundwater Contact	TMM-1 (10-15) 8/20/18	TMM-2 (8-13) 8/20/18	TMM-3 (9-14) 8/20/18	TMM-5 (8-13) 8/20/18	TMM-5 (4-9) 8/20/18	MW-23D 8/20/18	MW-24D 8/20/18	MW-26D 8/20/18
VOC, ug/L - Method 8260													
Acetone	730	2,100	1,700	1,000,000,000	31,000,000	79	nd	nd	nd	nd	nd	nd	nd
Benzene	5.0	5.0	12	5.60	11,000	180	nd	nd	1.2	nd	nd	nd	nd
n-Butylbenzene	80	230	ID	ID	5,900	nd	nd	nd	nd	nd	nd	nd	nd
sec-Butylbenzene	80	230	ID	ID	4,400	1.8	nd	nd	nd	nd	nd	nd	nd
1,2-Dichloroethane	5.0	5.0	6.0	9,600	19,000	nd	nd	nd	nd	nd	nd	nd	nd
cis-1,2-Dichloroethane	70	70	620	93,000	200,000	nd	nd	nd	nd	nd	nd	nd	nd
trans-1,2-Dichloroethane	100	100	470	85,000	220,000	nd	nd	nd	nd	nd	nd	nd	nd
Ethylbenzene	74	74	18	110,000	170,000	5.8	nd	nd	nd	nd	nd	nd	nd
Isopropylbenzene	800	2,300	28	56,000	56,000	32	nd	nd	nd	nd	nd	nd	nd
Naphthalene	91203	1,500	11	31,000	31,000	39	nd	nd	nd	nd	nd	nd	nd
n-Propylbenzene	80	230	ID	ID	15,000	26	nd	nd	nd	nd	nd	nd	nd
Tetrachloroethane	127184	5.0	11	25,000	12,000	nd	nd	nd	nd	nd	nd	nd	nd
Toluene	108883	790	270	530,000	530,000	25	2.3	nd	1.3	nd	nd	nd	nd
1,1,1-Trichloroethane	79016	5.0	29	660,000	1,300,000	nd	nd	nd	nd	nd	nd	nd	nd
Trichlorofluoromethane	75694	2,600	NA	1,100,000	22,000	nd	nd	5.3	nd	nd	nd	nd	nd
1,2,3-Trimethylbenzene	626738	NA	NA	NA	NA	9.1	nd	5.6	nd	nd	nd	nd	nd
1,2,4-Trimethylbenzene	956536	63	17	56,000	56,000	2.0	nd	nd	nd	nd	nd	nd	nd
1,3,5-Trimethylbenzene	109678	72	45	61,000	61,000	3.0	nd	nd	nd	nd	nd	nd	nd
Vinyl chloride	75014	2.0	1.0	1,100	1,000	nd	nd	nd	nd	nd	nd	nd	nd
Xylenes	1330207	280	41	190,000	190,000	60	nd	nd	nd	nd	nd	nd	nd
Other VOCs													
PVA, ug/L - Method 8270													
Acenaphthene	83329	1,300		4,200	4,200	nd	nd	nd	nd	nd	nd	na	nd
Acenaphthylene	208968	52	ID	3,900	3,900	nd	nd	nd	nd	nd	nd	na	nd
Anthracene	120127	43	ID	43	43	nd	nd	nd	nd	nd	nd	na	nd
Benzo(a)anthracene	56553	2.1	8.5	NLV	NLV	nd	nd	nd	nd	nd	nd	na	nd
Benzo(b)fluoranthene	50328	5.0	5.0	NLV	NLV	nd	nd	nd	nd	nd	nd	na	nd
Benzo(k)fluoranthene	205892	1.5	1.5	ID	ID	nd	nd	nd	nd	nd	nd	na	nd
Benzo(g,h)perylene	191242	1.0	1.0	ID	ID	nd	nd	nd	nd	nd	nd	na	nd
Benzo(a)pyrene	207069	1.0	1.0	NA	NA	nd	nd	nd	nd	nd	nd	na	nd
Chrysene	218019	1.6	1.6	NLV	NLV	nd	nd	nd	nd	nd	nd	na	nd
Dibenz(a,h)anthracene	53703	2.0	2.0	ID	NLV	nd	nd	nd	nd	nd	nd	na	nd
Fluorene	86737	880	12	2,000	2,000	nd	nd	nd	nd	nd	nd	na	nd
Indeno(1,2,3-cd)pyrene	193395	2.0	2.0	ID	NLV	nd	nd	nd	nd	nd	nd	na	nd
2-Methylaphthalene	91576	260	750	19	25,000	39	nd	nd	nd	nd	nd	na	nd
Naphthalene	91203	520	1,500	11	31,000	nd	nd	nd	nd	nd	nd	na	nd
Phenanthrene	85018	52	150	2.0	1,000	nd	nd	nd	nd	nd	nd	na	nd
Pyrene	129000	140	140	140	140	nd	nd	nd	nd	nd	nd	na	nd
Metals, ug/L - Method 6020, 7470													
Arsenic	7440382	10	10	10	4,300	nd	18	nd	25	nd	nd	nd	nd
Barium	7440383	2,000	2,000.0	670	14,000,000	nd	150	nd	140	nd	nd	nd	nd
Cadmium	7440439	5.0	5.0	2.5	190,000	nd	nd	nd	nd	nd	51	nd	11
Chromium (Total)	18540298	100	100	13	460,000	nd	nd	nd	nd	nd	nd	nd	nd
Copper	7440508	1,000	1,000.0	13	7,400,000	nd	32	nd	5.0	nd	nd	6.2	6.4
Lead	7439921	4.0	4.0	14	ID	nd	15	nd	3.0	nd	nd	nd	nd
Mercury	Varies	2.0	0.0013	56	56	nd	nd	nd	nd	nd	nd	nd	nd
Selenium	7782452	50	50	5.0	970,000	nd	nd	nd	nd	nd	nd	nd	nd
Silver	7440224	34	68	0.20	1,500,000	nd	nd	nd	nd	nd	nd	nd	nd
Zinc	7440666	2,400	5,000	170	110,000,000	nd	nd	64	nd	nd	88	nd	nd
PCBs, ug/L - Method 6020, 7471													
Polychlorinated biphenyls (PCB)	1335353	0.50	0.50	0.20	3.3	nd	na	na	na	na	na	na	na

Notes:
ID = insufficient data to develop criterion
NA = not available
nd = not detected
NLV = not likely to volatilize

Assumptions:
hardness estimate for receiving waters = 150 mg/L
protective for surface water that is used as a drinking water source