

## 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

### a. Target Area and Brownfields

#### i. Overview of Brownfield Challenges and Description of Target Area:

The first Target Area is Washington Wheatley, a predominantly African-American environmental justice neighborhood located in downtown Kansas City, Missouri. At its height, it energized the epicenter of Black culture in Kansas City: the 18<sup>th</sup> & Vine Jazz District, a UNESCO world heritage music site. The neighborhood boundaries are defined by a railroad line and rail-served industries on the north end, and Interstate Highway I-70 on the east. The construction of rail lines and highways diminished and isolated the neighborhood while at the same time attracted businesses that handled and released hazardous substances. In its hey day in the 1940s, population peaked at \_\_\_\_\_ and was more racially mixed.

Beginning in post-war 1950s and every decade since, Washington Wheatley suffered declines in residents, racial diversity, and community wealth caused by the construction of interstate highways, block-busting real estate practices, local business and job relocations, and white flight. Increasing poverty and decreasing population led to the widespread deterioration and abandonment of homes until they became cited as dangerous buildings. In response, the City tore down hundreds of homes in Washington Wheatley, creating one of the city's largest concentrations of vacant lots. Today, despite a high demand for new affordable housing, vacant lots throughout the neighborhood remain idle due to the Brownfield challenges of potential contamination and buried debris. In addition, commercial and industrial brownfield properties on the north and east sides of the neighborhood pose health and environmental risks, cause blight and deter new investment. This grant will cleanup selected vacant lots actively marketed by the City for infill development of affordable housing and will cleanup a large former industrial brownfield site to remove environmental risks and blight in order to attract private investment.

#### ii. Description of the Proposed Brownfield Site(s):

In Washington Wheatley neighborhood, the properties targeted for cleanup consist of 48 vacant residential lots targeted for rapid redevelopment through the City's Housing Accelerator Program. The site also includes the former Benson Mfg. site consisting of two adjacent, vacant industrial properties. All properties are located within 900 feet of each other, and 50% of the vacant lots are located within 300 feet of the former Benson Mfg. properties. The vacant lots are owned by the Land Bank of Kansas City, Missouri and were acquired through tax foreclosure at various times.

A Phase I environmental site assessment (ESA) of the vacant lots completed in October 2024 identified recognized environmental conditions (RECs) including the Benson Mfg. site for metals manufacturing, a printing business, and a paint company, and several historic automotive garages and filling stations in the vicinity. A preliminary limited Phase II ESA report in October 2024 found lead in composite surface soil samples on \_\_\_\_\_ of the 48 lots at concentrations above the January 2024 EPA residential soil lead screening level of 200 mg/kg. These concentrations are typical of data collected on over 265 similar vacant residential lots in Kansas City. Sources of lead for the vacant lots include lead-based paint from former homes; historic emissions of leaded

**Commented [AB1]:** 1.A.i. Overview of Brownfield Challenges and Description of Target Area  
Discuss the brownfield challenges and their impact on the city(ies), town(s), or geographic area(s) targeted by this application. Provide a brief overview of how this grant may help address those challenges and impacts.

Within the city(ies), town(s), or geographic area(s), identify and describe the specific target area(s) where you plan to perform grant activities, such as a neighborhood, district, corridor, or census tract. (Depending on the scope and design of your project, one or more target areas may be presented.)

1.a.i. Overview of Brownfield Challenges and Description of Target Area (5 points)

The extent to which the brownfield challenges are clearly discussed and the degree to which the brownfield challenges impact the city(ies), town(s), or geographic area(s) targeted by this application. The extent to which this grant may help address those challenges and impacts. The extent to which the applicant clearly identifies and describes the specific target area(s) within city(ies), town(s), or geographic area(s) where it plans to perform grant activities.

**Commented [AB2]:** 1.A.ii. Description of the Proposed Brownfield Site(s)

Describe the property(ies) targeted for cleanup, characterizing known contamination and site conditions (including structures), and relevant past and current land uses.

1.a.ii. Description of the Proposed Brownfield Site(s) (10 points)

The extent to which the description of the property(ies) targeted for cleanup provides clear information on the known contamination and site conditions (including structures), and relevant past and current land uses, and the degree of severity of the conditions.

gasoline from U.S. Highway I-70 and arterial streets; and historic lead air emissions from regional smelters, foundries, coal-fired power plants, and other industrial sources.

Research of City historic permit records indicates that approximately \_\_\_ of the 48 vacant lots had structures with basements. City permit codes allow demolition sites to leave basements intact and filled with non-organic material, provided that the top 1 foot is clean soil. This practice was almost universally followed. In 1998, the City began enforcing code provisions that require inspection and abatement of structures for asbestos before demolition. It is likely that vacant lots that had structures removed before 1998 have buried demolition debris mixed with asbestos-containing materials (ACM) such as floor tile or thermal system insulation (TSI). \_\_\_ of the 48 vacant lots had structures with basements that were removed prior to 1998 and may contain buried ACM.

The presence of lead in soils at even relatively low concentrations above the EPA soil screening level poses a severe health risk, as there is no safe level of exposure to lead according to the U.S. Centers for Disease Control (CDC). The first few micrograms of lead in the blood of an infant under 6 years of age cause measurable, irreversible and lifelong damage to developing the brain and multiple organs.

For the Benson Mfg. properties, RECs identified by a Phase 1 ESA were generally the same as those for the vacant lots. A Phase II ESA identified five types of polycyclic aromatic hydrocarbons (PAHs) in surface soils (0 to 3 feet) of approximately 75 percent of the 2.68 acre site area. Detected PAHs included several known or suspected carcinogens at concentrations above the State of Missouri Risk-Based Target Levels (RBTLs) for residential use, non-residential use, and construction worker exposure scenarios. These levels are extremely severe and are by far the highest levels detected in any urban site over the past 27 years of the Kansas City Brownfields program operation. PAHs are produced through combustion of carbon containing fuels and may be the result of the burning of waste wood material at a former lumber yard on the Benson Mfg. site. The Phase II ESA also identified tetrachloroethylene (TCE), a solvent commonly used in metals manufacturing, in subsurface soils in one soil boring. The report recommends a soil gas investigation to determine if volatile organic compounds (VOCs) pose a risk to future site occupants. Full site characterization of both the vacant lots and the Benson Mfg. site will be completed prior to June 15, 2025.

In the Marlborough neighborhood, the site includes 15 vacant residential lots. \_\_\_ of the 15 lots contain lead contamination above the EPA screening level, according to the same preliminary limited Phase II ESA report of October 2024. \_\_\_ of the lots appear to have basements and \_\_\_ were demolished prior to 1998 and may contain buried ACM.

## **b. Revitalization of the Target Area**

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

The proposed site reuse for the vacant lots is infill, affordable housing up to the 80% area median income (AMI) through the Housing Accelerator program. A Request for Proposals (RFP) to developers released by Kansas City specifies *“all housing shall be single family or multi-family homes with at least two bedrooms and at least one thousand square feet of living space; single*

#### **Commented [AB3]: 1.B.i. Reuse Strategy and Alignment with Revitalization Plans:**

Describe the reuse strategy, or projected reuse, for the proposed site(s). Discuss how the reuse strategy/projected reuse aligns with and advances the local government's land use and revitalization plans or related community priorities; and if applicable, how the strategy/projected reuse takes into account that the site is in a federally designated flood plain. Describe how the public (including underserved communities as defined in footnote 12) and project partners were involved in the development of the reuse strategy/projected reuse.

#### **1.b.i. Reuse Strategy and Alignment with Revitalization Plans (10 points)**

The extent to which a reuse strategy or projected reuse is clearly described for the proposed site(s), and the extent to which the reuse strategy/projected reuse clearly aligns with and advances the local government's land use and revitalization plans or related community priorities. When applicable, the extent to which the reuse strategy/projected reuse is an appropriate reuse option for a site in a federally designated flood plain. The degree to which the public (including underserved communities) and project partners have had meaningful involvement in the development of the reuse strategy/projected reuse(s).

*family homes are preferred, but multi-family housing options are eligible depending on lot size and community feedback.” Units must be compatible with the character of the surrounding neighborhood and larger community. Developers are encouraged to use building plans pre-approved by the city to expedite construction and are required to use environmentally friendly and sustainable principles in development and construction wherever possible.*

With regard to the industrial property the City has an agreement with a developer who has proposed a village of approximately 32 single-family cottages and homes with a community meeting room and shared green spaces. The neighborhood has **endorsed** a plan developed by the University of Missouri Kansas City (UMKC) which proposes a business park for nine block area, including the former Benson Mfg. properties and all of the vacant lots. The City supports a site reuse that is consistent with area and neighborhood plans and is supported by the community.

Community meetings were held concerning the Housing Accelerator program on 5/13/24 and 5/15/24.

In addition, the City's Housing Department is working with Washington Wheatley residents to create a plan that will support the Housing Accelerator program. The final plan will identify neighborhood challenges that act as barriers to residential redevelopment, identify who is responsible for addressing those barriers, and make recommendations on how to stimulate residential infill development. Meetings were held with residents on 9/12/24, 10/10/24 and 11/14/24.

**[SPECIFIC DETAILS ARE NEEDED ON COMMUNITY ENGAGEMENT AND INPUT ON THE HOUSING ACCELERATOR INITIATIVE AND THE CITY'S RFP / WISE OWL VENTURE PROPOSALS.]**

ii. Outcomes and Benefits of Reuse Strategy:

The mission of the Housing Accelerator program is to match ready developers with available vacant land and remove barriers to the construction of new affordable housing. The cleanup of vacant lots in this program will directly lead to new private investment and construction of housing units. The pent up demand for affordable housing in Kansas City provides assurances that all new homes will be quickly sold. The program requires sales to owner/occupants, so new families will move into these homes to begin repopulation of abandoned blocks. This in turn will attract retail and commercial services back to the area.

As a result of Kansas City's Climate Protection and Resiliency Plan (adopted 2022) and the \_\_\_\_\_ Energy Code, new homes built in the Target Community will be \_\_\_\_\_ times more energy efficient than existing housing stock, reducing greenhouse gas emissions. The CPRP calls for “building code updates and other legislation and incentives to ensure new buildings are designed to be highly efficient, reducing their GHG emissions; are powered by clean energy; and are designed to withstand anticipated climate change impacts such as extreme heat and flooding.” Building new residential units in the downtown neighborhood of Washington Wheatley will offer new affordable housing that is much closer than its suburban counterparts to regional centers of employment, health care, education and recreation and public transportation, all of which will

**Commented [AB4]:** This needs to be confirmed

**Commented [AB5]:** I.B.ii. Outcomes and Benefits of Reuse Strategy:

Describe how the proposed project or revitalization plans may stimulate economic development in the target area(s) upon completion of the cleanup of the proposed site(s) is complete, and/or how the grant will facilitate the creation of, preservation of, or addition to a park, a greenway, undeveloped property, recreational property, or other property used for nonprofit purposes in the target area(s).

Describe how the proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments. (Climate adaptation/mitigation is defined in Section I.F.)

If applicable, describe how the reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures. (For more information on energy efficiency measures, please refer to the FY25 FAQs and Renewable Energy or Energy-Efficient Approaches in Brownfields Redevelopment Fact Sheet.41)

1.b.ii. Outcomes and Benefits of Reuse Strategy (10 points)

Given the type of community being served (e.g., urban, rural, Tribal, etc.), the degree to which the proposed project or revitalization plans will substantially stimulate economic development in the target area(s) once cleanup of the proposed site(s) is complete and/or the degree to which the grant will facilitate the creation of, preservation of, or addition to a park, a greenway, undeveloped property, recreational property, or other property used for nonprofit purposes in the target area(s). The degree to which these outcomes clearly correlate with the applicant's reuse strategy/projected site reuse(s).

The extent to which the proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.

When applicable, the extent to which the reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy, or will incorporate energy efficiency measures.

serve to lower greenhouse gas emissions. [Will H/A developers be encouraged or incentivized to take additional climate action steps, such as passive home standard, adding to tree canopy, solar roofs, etc.?].

#### A. Strategy for Leveraging Resources

##### i. Resources Needed for Site Characterization:

Phase I and II ESAs of the Housing Accelerator vacant lots are secured through the EPA Region 7 Targeted Brownfields Assessment (TBA) program, as requested by Land Bank on 4/1/24. Funds to complete site characterization, prepare remedial plans, and enroll properties into the Missouri Brownfields Voluntary Cleanup Program are available from the Kansas City Brownfields Community-Wide Assessment Grant (CA No. 4B-97794401) which has a remaining balance of \$354,208, of which approximately is available for \$89,281 for new activities.

##### ii. Resources Needed for Site Remediation:

It is anticipated that the funding requested in this application is sufficient to complete all site remediation of the subject properties. However, extensive buried structures (foundations and basement) and associated hazardous substances present a potentially significant part of the cleanup cost that will likely remain unknown until it is completed. Funding to contribute to the completion of remediation activities is available from approximately \$700,000 of \$1.4 million of post-closure program income (PCPI) received by the City on 10/15/24 through the repayment of brownfield revolving loan fund (RLF) loans issued through Kansas City's first RLF grant, federal cooperative agreement No. BF-97700901.

##### iii. Resources Needed for Site Reuse:

The City has adopted a HUD consolidated action plan that includes \$300,000 of Community Development Block Grant (CDBG) in Washington Wheatley neighborhood for blight removal. In addition, the City submitted an application for a \$7 million HUD PRO Housing grant to remove environmental and other barriers for affordable housing development in Washington Wheatley and two other neighborhoods. Developers responding to requests for proposals for the Housing Accelerator lots and the former Benson Mfg. property are responsible for identifying resources for new housing and other site reuses. However, the City provides grant programs to support housing projects to which developers can apply

#### Resources Needed for Site Characterization, Remediation, and Reuse

Name of Resource	Leverage Category	Secured?	Additional Details
EPA Targeted Brownfield Assessment (TBA)	1.C.i. Site Characterization	Secured	Phase I, II environmental site assessment services
Brownfields Community-Wide Assessment Grant	1.C.i. Site Characterization	Secured	\$89,281 available to complete assessment, design remediation. EPA Agreement 4B-97794401
Brownfields Revolving Loan Fund	1.C.ii. Remediation	Secured	\$700,000 RLF Program Income available to complete cleanup. EPA Agreement BF-97700901

**Commented [AB6]:** Consistent with CERCLA § 104(k)(6)(C)(I), describe your access to funding from other resources (e.g., any other EPA Brownfields resources or public or private resources) and how the grant will stimulate the availability of additional funds for environmental site assessment, remediation, and subsequent reuse for the proposed site(s) by addressing the following criteria below.

**Commented [AB7R6]:**

**Commented [AB8]:** 1.C.i. Resources Needed for Site Characterization: Identify additional assessment funding resources that will be sought in the event that the proposed site(s) needs to be further characterized for the remediation to continue.

1.c.i. Resources Needed for Site Characterization (5 points)

The extent to which the applicant has identified assessment funding resources that will be sought in the event that the proposed site(s) needs to be further characterized. Given the size and extent of contamination of the proposed site(s), the degree to which the resource(s) are relevant and potentially sufficient to complete the site characterization for the remediation to continue.

**Commented [AB9]:** 1.C.ii. Resources Needed for Site Remediation: Identify funding resources that have been secured, have been sought, or will be sought, to contribute to the completion of the remediation. **Attach documentation that substantiates secured commitments of leveraged funding for remediation of the proposed site(s).** (Do not duplicate sources discussed in 3.b. Description of Tasks/Activities and Outputs.)

Alternatively, discuss if the EPA funding requested in this application will be enough to complete the remediation of the proposed brownfield site(s).

1.c.ii. Resources Needed for Site Remediation (5 points)

The relevancy and degree to which secured funding resources will contribute to the completion of the remediation of the proposed brownfield site(s). The degree to which the attached documentation substantiates secured commitments discussed in the Narrative. (Note, a response may not earn full points if the applicant duplicates sources that are listed in 3.b. ...)

**Commented [AB10]:** 1.C.iii. Resources Needed for Site Reuse: Identify funding resources that have been secured, have been sought, or will be sought, to contribute to the completion of the reuse (e.g., demolition activities, redevelopment activities, etc.) for the proposed brownfield site(s). (Do not duplicate sources discussed in 3.b. Description of Tasks/Activities and Outputs.)

HUD Community Development Block Grant (CDBG)	1.C.iii. Reuse Activities	Secured	Consolidated plan adopted by Ordinance _____ provides \$300,000 for blight removal in Washington Wheatley.
HUD PRO Housing Grant	1.C.iii. Reuse Activities	Applied 10/15/24	\$7M grant to Kansas City, MO for vacant lot cleanup and reuse in Washington Wheatley and two other neighborhoods.
Affordable Housing Trust Fund (HTF)	1.C.iii. Reuse Activities	Sought	Select local sales tax proceeds for priority housing projects in Kansas City, MO
Central City Economic Development (CCED)	1.C.iii. Reuse Activities	Sought	Local ¼% sales tax for priority projects in designated census tracts, including Target Area.
Public Improvement Advisory Committee (PIAC)	1.C.iii. Reuse Activities	Sought	Local 1% sales tax capital improvements and other public infrastructure.
HUD 202 Funds (Senior Housing)	1.C.iii. Reuse Activities	Sought	Grants through Kansas City, MO
HUD HOME Funds	1.C.iii. Reuse Activities	Sought	Grants through Kansas City, MO

#### iv. Use of Existing Infrastructure:

The Housing Accelerator and the former Benson Mfg. will reuse existing streets, curbs, sidewalks, sewers, water, in short, the existing city block grid and related public utilities and infrastructure. However, portions of streets and alleyways are impassable or ill-defined due to human activities or natural encroachment and must be improved or replaced. Sidewalk, curbs and gutters sustained decades of deferred maintenance and must be made serviceable or rebuilt. Storm and sanitary sewers servicing the subject properties must be assessed and recommendations developed for service restoration, upgrades or replacements. Inoperative streetlights must be repaired or replaced. Traffic lights, pedestrian crossings, and related safety striping and signage must be brought up to code. Public Improvements Advisory Committee (PIAC) provides 1% local sales tax for capital improvements and can provide infrastructure funds for the target community.

## 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

### a. Community Need

#### i. The Community's Need for Funding:

The Target Area of the Washington Wheatley neighborhood cannot conduct the environmental cleanup or residential development project on its own due to its small population and the low income of residents and stakeholders. The poverty level of the target area is 21.8%, which is more than double the 10.0% level of the Kansas City metropolitan statistical area (MSA). (U.S. Census Bureau, 2018-2022 American Community Survey (ACS) Population By Ratio of Income to Poverty Level). Moreover, according to a study prepared by a local university, the population of Washington Wheatley neighborhood peaked in the 1940s at 11,697 residents. (Washington Wheatley Neighborhood Action Plan, University of Missouri - Kansas City Urban Planning &

#### **Commented [AB11]:** 1.C.iv. Use of Existing Infrastructure

Describe how this grant will facilitate the use of existing infrastructure at the proposed site(s) and/or within the target area(s).

If additional infrastructure needs or upgrades are key to the reuse of the proposed site(s), describe the infrastructure needs/upgrades and funding resources that will be sought to implement that work.

#### 1.c.iv. Use of Existing Infrastructure (5 points)

The extent to which this grant will facilitate the use of existing infrastructure at the proposed site(s) and/or within the target area(s).

When additional infrastructure needs or upgrades are key to the reuse of the proposed site(s), the extent to which the applicant provides a clear description of the infrastructure needs/upgrades and the extent to which the identified funding resources that will be sought to implement the work are relevant to the project.

**Commented [AB12]:** 2.a.i. The Community's Need for Funding. Describe how this grant will meet the needs of the community(ies) (i.e., the city(ies), town(s), or geographic area(s) targeted in this application) that has an inability to draw on other sources of funding to carry out environmental remediation and subsequent reuse in the target area(s) because of the small population and/or low-income of the community.

The extent to which this grant will meet the needs of the community(ies) (i.e., the city(ies), town(s), or geographic area(s) targeted in this application) that has an inability to draw on other sources of funding to carry out environmental assessment or remediation, and subsequent reuse in the target area(s) **because the community has a small population and/or is low-income.** (Note, if the inability to draw on other sources of funding is not because the community has a small population or is low-income, then the response may only earn up to 2 points.)



Design Studio, 2008). The current population is 2,133, which reflects a decline of 82% in the past 80 years. By any measure, this community lacks the resources to support its own revitalization.

## ii. Threats to Sensitive Populations:

### 1. Health or Welfare of Sensitive Populations

In general, sensitive populations in Washington Wheatley are growing and/or more at risk than in the broader community. The neighborhood is becoming younger, more racially diverse, and more residents are female. The most recent demographics through 2022 show children under 5, who are extremely sensitive and at risk for lead exposure, increasing significantly since the 2020 census from 7.0% to 8.1%. Women of child-bearing age, an indicator of the sensitive population of pregnant women, make up 20.6% of the population. Moreover, women overall increased very significantly from 48.0% to 53.0%. While elderly (+65) make up a modest 13.4% of the population, life-expectancy for residents in this zip code is only 66 years, nearly 30 years less than the highest life expectancy zip code in Kansas City. The elderly in Washington Wheatley are greatly at risk since most do not survive into their 70s, 80s or beyond. Finally, houseless populations and several active encampments on the subject properties have been identified. Houseless individuals have included more women and children in recent years, both of whom are even more vulnerable due to continuing direct exposure to contaminants and environmental stressors. The cleanup grant will target the removal of lead, cancer-causing PAHs, and asbestos, all of which threaten the health of these sensitive populations. New housing made possible with cleanup funds will virtually eliminate exposure to these contaminants and address exposure to household dust, mold and particulates that contribute to high asthma rates among all sensitive populations [get incidence data].

### 2. Greater Than Normal Incidence of Disease and Adverse Health Conditions:

According to the Kansas City Health Department, the asthma rate in Washington Wheatley is 14.2%, compared to 10.4% for the city overall. (Kansas City Community Health Assessment, December 2023, <https://storymaps.arcgis.com/stories/83947dae543e4e478b49e582dfe96c81>). Asthma rates are linked to particulate matter and ozone according to AirNow.gov. According to the EJScreen report for this community (<https://ejscreen.epa.gov/mapper/>), particulate matter and diesel particulate matter, likely caused by the adjacent rail line and I-70 highway, are above the 93<sup>rd</sup> percentile, and ozone is above the 89<sup>th</sup> percentile. In addition, rates of leukemia and myeloma, both cancers of white blood cells, are significantly higher in Jackson County than in Missouri, according to Missouri Department of Health and Senior Services (<https://healthapps.dhss.mo.gov/MoPhims/MOPHIMSHome>). The rate of myeloma cancer is 53% higher for men and 40% higher for women in Jackson County than statewide. The exact causes of both leukemia and myeloma are unknown but exposure to chemicals are thought to be a risk factor.

## (3) Environmental Justice

### (a) Identification of Environmental Justice Issues

Washington Wheatley is a profoundly disadvantaged neighborhood. Communities are considered disadvantaged in census tracts that meet the thresholds for at least one category of burden. *Washington Wheatley meets thresholds in five of the eight environmental justice*

#### Commented [AB13]: 2.a.ii. Threats to Sensitive Populations

Applicants are encouraged to use EPA's EJScreen Tool (or other EJ-focused geospatial mapping tools) to better understand the communities that may be adversely and disproportionately affected by environmental or human health harms and risks. Applicants can include data from EJScreen in the Narrative to help characterize and describe the target area(s) and its community(ies). Data from other sources (e.g., studies, census, and third-party reports) can also be included to give a more complete picture of the impacted communities and populations. For more information on using EJScreen data in your Brownfields Grant application, please refer to the FY25 FAQs and a recorded demonstration available on EPA's Brownfields Program website.<sup>43</sup>

Applicants are also encouraged to use the Climate and Economic Justice Screening Tool (CEJST) to identify

#### Commented [AB14]: 2.a.ii.1. Health or Welfare of Sensitive Populations.

Identify sensitive populations<sup>45</sup> in the target area. Describe the health or welfare issues<sup>46</sup> of such groups and discuss how this grant and reuse strategy/projected site reuse(s) will address those issues and/or help identify and reduce threats to the health or welfare of such groups.

2.A.ii.(1) Health or Welfare of Sensitive Populations (5 points)

Commented [AB15R14]: CERCLA 104(k)(5).C.x. The extent to which a grant would address or facilitate the identification and reduction of threats to the health or welfare of children, pregnant women, minority or low-income communities, or other sensitive populations.

#### Commented [AB16]: 2.a.ii.2. Greater Than Normal Incidence of Disease and Adverse Health Conditions.

Describe how this grant and reuse strategy/projected site reuse(s) will address, or help identify and reduce, threats to populations in the target area(s) that suffer from a greater-than-normal incidence of diseases or conditions (including cancer, asthma, or birth defects) that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum.

Commented [AB17]: 2.a.ii.3.a. Describe the environmental justice issues and how they affect an underserved community(ies) and/or disadvantaged community(ies)<sup>47</sup> (as identified in CEJST in the target area(s)). (Environmental justice is defined in Section I.E.)

All applicants except Tribes, eligible Tribal entities, and territories – Additionally, indicate if a proposed site(s) identified in 1.a.ii. Description of the Proposed Brownfield Site(s) is located within a disadvantaged community (as identified by CEJST).

*categories* for all three census tracts that make up this neighborhood, according to the Climate and Environmental Justice Screening Tool (CJEST). The five burdens are: Energy, Health, Housing, Transportation and Workforce development. The severity of these burdens is sobering.

Burden	Percentile	Detail
Diesel particular matter exposure	92nd	Highway and railroad line proximity
Individuals < 200% federal poverty line	96th	
<b>Energy burden</b>	<b>98th</b>	High particulates + inefficient housing
Housing burden	96th	
Pre-1960s housing (lead paint indicator)	96th	84% and 74% pre-1960s in 2 of 3 census tracts
<b>Current asthma among adults</b>	<b>98th</b>	96th percentile or higher for all census tracts
<b>Diabetes among adults</b>	<b>98th</b>	
Unemployment	96th	
Low median household income	96th	
<b>Low life expectancy</b>	<b>99th</b>	<b>64.9 years, 30 years below city maximum</b>

a. Advancing Environmental Justice

b. **Community Engagement**

*To conserve space, you may present information for 2.b.i-2.b.ii in the same response and/or use the suggested table format below.*

i. Project Involvement:

Identify the local organizations/entities/groups that will be involved in and will provide assistance/information to assist you with this project.

Project involvement may be provided by a broad and diverse group of entities including, but not limited to, community-based organizations (e.g., neighborhood groups, citizen groups, business organizations, etc.), as well as community liaisons, property owners, lenders, developers, and the general public.

ii. Project Roles:

Describe the role each identified local organization/entity/group will have in the project including how it will be meaningfully involved in making decisions with respect to the cleanup and future reuse of the proposed site(s).

*Reference Sample Format for List of Organizations/Entities/Groups & Roles*

iii. Incorporating Community Input:

Discuss your plan to communicate project progress to the local community, residents/groups directly affected by the project work, and the local organizations/entities/groups that will be involved in the project, include the frequency

and method(s) you will use (including methods that offer an alternative to in-person community engagement) and how input will be solicited, considered, and responded to.

**(2) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Proposed Cleanup Plan**

Outline the cleanup plan(s) proposed for the site(s). Briefly describe the contaminated media to be addressed, cleanup method(s), and disposal requirements. *(This description can use the same language as submitted in the draft ABCA attachment(s), but the description must be included in the applicant's Narrative.)*

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

Provide a list and description of the tasks/activities required to implement the proposed project. You may respond to this criterion using the sample format for each task/activity.

i. Project Implementation

- Discuss the EPA-funded tasks/activities that will take place to address the proposed site(s).

If you plan to issue a subaward(s), indicate what tasks/activities or services will be provided.

Examples include procuring a Qualified Environmental Professional, submitting and obtaining approval of a Quality Assurance Project Plan, enrollment of the site in the State's Voluntary Cleanup Program, certifying cleanup is complete, coordination with the local health agency on health monitoring activities, etc.

- If applicable, identify tasks/activities that are needed to support or complement the grant that will be contributed by sources other than the EPA grant, such as leveraged resources or funding contributed by your organization. (For example, the applicant does not charge the EPA grant for salary dollars and therefore contributes its own resources to carry out programmatic oversight activities or grant administration.) *(Do not duplicate sources listed in 1.c. Strategy for Leveraging Resources.)*

ii. Anticipated Project Schedule

Discuss the anticipated schedule and timeline for the EPA-funded activities outlined above in 3.b.i. *Project Implementation* during the 4-year period of performance.

EPA may reimburse successful applicants for eligible programmatic pre-award costs incurred up to 90 days prior to award. Applicants may include pre-award costs for eligible activities in their proposed project. Travel expenses associated with brownfields-related training, such as the National Brownfields Training Conference, is an eligible expense. The budget/project period start date must be before the date that any proposed



pre-award costs are incurred. For more information on pre-award costs, please see the [FY25 FAQs](#).

iii. Task/Activity Lead

For each task/activity, identify the lead entity(ies) overseeing the various activities (i.e., the applicant, qualified environmental professional, or other identified entity). If an entity(ies) other than the applicant is the lead, explain why the lead entity(ies) (and not the applicant) is appropriate to oversee the activity(ies). *(Note, the local health agency must be involved in health monitoring activities.)*

iv. Outputs

Identify, and quantify as appropriate, the anticipated outputs/deliverables for each task/activity.

Outputs may include, but are not limited to, cleanup plans, community involvement plans, final Analysis of Brownfield Cleanup Alternatives (ABCA) documents, administrative records, and cleanup completion report or letter. *(Refer to [Section I.D.](#) for an explanation of outputs.)*

**c. Cost Estimates**

Describe how cost estimates for each task were developed per budget category, including direct administrative costs (if applicable) and indirect administrative costs (if applicable). Present costs per unit where appropriate. *(Note, the total amount of direct and indirect administrative costs cannot exceed 5% of the total EPA-requested funds.)*

For information on best practices for preparing budgets for applications for EPA grants, refer to the [Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance](#).<sup>48</sup>

You may use the sample table format below to present how you plan to allocate grant funds for tasks/activities described in [Section IV.E.3.b.](#) by budget category. Replace the task number heading in the sample table with the actual title of the task.

**Only include costs to be covered by EPA grant funds in this table.** Leveraged resources should not be included in the budget table.

Do not distinguish between hazardous substances and petroleum funding requests.

If you are seeking funding to remediate multiple sites, provide either a separate budget table for each site or separate line items within one budget table, which distinguishes each site.

**d. Plan to Measure and Evaluate Environmental Progress and Results**

Discuss your plan and system to track, measure, and evaluate progress in achieving expected project outputs, overall project results, and eventual project outcomes. *(Definitions of outputs and outcomes are provided in [Section I.D.](#))*

**(3) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

*To conserve space, you may present information for 4.a.i -4.a.ii in the same response.*

**i. Organizational Structure:**

Describe the organizational structure you will utilize to ensure the timely and successful expenditure of funds and completion of all technical, administrative, and financial requirements of the project and grant.

**ii. Description of Key Staff:**

Provide a brief discussion of the key staff that will work together to successfully administer the grant, including their roles, expertise, qualifications, and experience.

**iii. Acquiring Additional Resources:**

Describe the system(s) you have in place to appropriately acquire any additional expertise and resources (e.g., contractors or subrecipients) required to successfully complete the project. *(Refer to Section IV of EPA's Solicitation Clauses regarding the difference between contractors and subrecipients.)*

Describe your efforts to promote strong labor practices, local hiring/procurement, or link members of the community to potential employment opportunities in brownfields assessment, cleanup, or redevelopment related to your project in a meaningful and equitable way.

**b. Past Performance and Accomplishments**

If you have ever received an EPA Brownfields Multipurpose Grant, Assessment Grant, Revolving Loan Fund Grant, Cleanup (MARC) Grant, and/or 128(a) Grant, please respond to item i. below. (Do not include information on Targeted Brownfields Assessments, Area-Wide Planning Grants, Job Training Grants, and subawards from another Brownfields Grant recipient.)

If you have never received an EPA Brownfields MARC or 128(a) Grant, but have received other federal or non-federal assistance agreements (such as a grant or cooperative agreement including only receiving an Area-Wide Planning Grant or Job Training Grant), please respond to item ii. below.

If you have never received any type of federal or non-federal assistance agreement or if you have recently received an assistance agreement (including a Brownfields Grant), but have not had an opportunity to demonstrate compliance with the award requirements, please indicate this in response to item iii. below.

**i. Currently Has or Previously Received an EPA Brownfields Grant**

Identify and provide information regarding each of your current and/or most recent EPA Brownfields Grants. Demonstrate how you successfully managed the grant(s), and successfully performed all phases of work under each grant by providing information on the items listed below.

(1) Accomplishments

Describe the accomplishments (including specific outputs and outcomes) achieved under the current/ most recent grant(s) (no more than three), including at a minimum, the number of sites assessed and/or cleaned up. Discuss whether these outputs and outcomes were accurately reflected in the Assessment, Cleanup and Redevelopment Exchange System (ACRES) at the time of this application submission; and if not, please explain why.

(2) Compliance with Grant Requirements

Discuss your compliance with the workplan, schedule, and terms and conditions under the current/most recent grant(s) (no more than three) and discuss your history of timely and acceptable quarterly performance and grant deliverables, as well as ongoing ACRES reporting. Include whether you have made and have reported on progress towards achieving the expected results of the grant in a timely manner. If not, discuss what corrective measures you took and how the corrective measures were effective, documented, and communicated.

For all open EPA Brownfields Grants, indicate the grant period (start and end date), if there are funds remaining, and the plan to expend the funds by the end of the Period of performance as defined in 2 CFR § 200.1.

For all closed EPA Brownfields Grants, indicate if there were funds remaining when the grant closed, the amount of remaining funds, and a brief explanation for why the funds were not expended. Note that if the applicant closed out a Revolving Loan Fund cooperative agreement in accordance with the FY23 RLF Policy Memo, EPA will not penalize the applicant for this action.

– OR –

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

Identify and describe each of your current and/or most recent federally and non-federally funded assistance agreements (no more than three) that are most similar in scope and relevance in terms of structure, community engagement, and/or deliverables to the proposed project. Demonstrate how you successfully managed the agreement(s), and successfully performed all phases of work under each agreement by providing the following information.

(1) Purpose and Accomplishments

Describe the awarding agency/organization, amount of funding awarded, and purpose of the current/most recent assistance agreement(s) you have received.

Discuss the project accomplishments (including specific outputs and outcomes and measures of success) achieved under the current/most recent assistance agreement(s).

(2) Compliance with Grant Requirements

Describe your compliance with the workplan, schedule, and terms and conditions under the current/most recent assistance agreement(s), and discuss your history of timely and acceptable reporting, as required by the awarding agency/organization.

Include whether you have made and have reported on progress towards achieving the expected results of the agreement in a timely manner. If not, discuss what corrective measures you took and how the corrective measures were effective, documented, and communicated.

– OR –

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

Affirm that your organization has never received any type of federal or non-federal assistance agreement (grant or cooperative agreement). Or, discuss how your organization has recently received an assistance agreement, but has not had an opportunity to demonstrate compliance with the award requirements. (Applicants that indicate that they do not have a history of performing assistance agreements will receive a “neutral” 8-point score for this factor. However, failure to indicate anything in response to this sub-criterion may result in zero points.)

### **Leveraging**

Leveraging is generally when an applicant proposes to provide its own additional funds/resources or those from third-party sources (including another federal grant) beyond the EPA grant funds. These resources support or complement the project and are different from Voluntary committed cost sharing as defined in 2 CFR § 200.1. Any leveraged funds/resources and their source must be identified in the Narrative. However, the leveraged funds/resources should not be included in the budget. Costs paid with leveraged funds/resources do not need to be eligible and allowable project costs under the EPA assistance agreement as would be the case for Voluntary committed cost sharing, which is not allowed under this solicitation.

- Leveraging that will materialize during the grant: Leveraging that typically materializes during a Brownfields Grant Period of performance includes resources that are needed to support or complement the grant.<sup>49</sup> Examples include additional public or private funds or in-kind resources for assessment, remediation, and/or subsequent reuse of the site. If applicants describe leveraged funds/resources, EPA expects applicants to make the effort to secure the leveraged resources described in their Narrative. If the proposed leveraging does not materialize during grant performance, then EPA may reconsider the legitimacy of the

award and/or take other appropriate action as authorized by CERCLA § 104(k)(8)(C) and 2 CFR Parts 200 and 1500. The grant workplan must include a statement indicating that the applicant is expected to produce the proposed leveraging consistent with the terms of the announcement and the applicant's Narrative.

- Leveraging that will materialize after the Brownfields Grant has ended: Examples of leveraging that typically materialize after the Brownfields Grant has ended include resources for remediation, infrastructure updates, and reuse.<sup>50</sup>

#### **IV.G. Confidential Business Information**

As discussed in Section IV.D., *Narrative Information Sheet*, EPA recommends that you do not include confidential business information (CBI) in your application. However, if CBI is included, it will be treated in accordance with 40 CFR § 2.203. Applicants must clearly indicate which portion(s) of their application they are claiming as CBI. EPA will evaluate such claims in accordance with 40 CFR Part 2. If no claim of confidentiality is made, EPA is not required to make the inquiry to the applicant otherwise required by 40 CFR § 2.204(c)(2) prior to disclosure.

#### **A. THRESHOLD CRITERIA RESPONSES: (3 Page Limit, Single-Spaced):**

- A statement of applicant eligibility if a city, county, state, or Tribe (see Section III.B.1.)
- Documentation of applicant eligibility if other than a city, county, state, or Tribe; e.g., resolutions, statutes, Intertribal Consortium documentation, or documentation of 501(c)(3) tax-exempt status or qualified community development entity (see Section III.B.1.)
- A statement of the applicant's 501(c)(4) tax-exempt status and, if applicable, legal opinion regarding lobbying activities (see Section III.B.1.)
- Information on previously awarded Cleanup Grants (see Section III.B.2.)
- Documentation of the available balance on an open Multipurpose Grant; or an affirmative statement that the applicant does not have an open Multipurpose Grant (see Section III.B.3.)
- Site ownership information (see Section III.B.4.)
- Basic site information (see Section III.B.5.)
- Status of history of contamination at the site (see Section III.B.6.)

- An affirmative statement that the site meets the definition of a brownfield site (see Section III.B.7.)
- Description of the environmental assessment conducted at the site (see Section III.B.8.)
- Information on whether the site(s) is required to be enrolled in the state or Tribal voluntary response program environmental site assessment performed to date is sufficient (See Section III.B.9.)
- Information on enforcement or other actions or an affirmation that there are no enforcement or other actions (see Section III.B.10.)
- Property-specific determination information or an affirmative statement that a Property-specific determination is not required (see Section III.B.11.)
- Property ownership eligibility information for hazardous substances sites, if applicable (see Section III.B.12.a.)
- Property ownership eligibility information for petroleum sites, if applicable (see Section III.B.12.b.)
- Description of cleanup authority and oversight structure (see Section III.B.13.)
- Community Notification documents (see Section III.B.14.)

The applicant must provide the community with notice of its intent to apply for an EPA Brownfields Cleanup Grant and allow the community an opportunity to comment on the draft application. The community notification ad (or equivalent), public meeting, and other requirements discussed below must be current and related to this specific application. All applicants must meet these requirements. **Failure to demonstrate timely community notification will disqualify the application.** Refer to the FY25 FAQs for examples of acceptable community notification methods.

Applicants that are proposing multiple sites may plan to have a single community notification ad (or equivalent) and meeting to address the multiple sites. However, all target communities must receive the notification and be provided an opportunity to comment on the application.

#### a. Draft Analysis of Brownfield Cleanup Alternatives

The applicant must **allow** the community an opportunity to comment on the draft application, which must include an attached draft Analysis of Brownfield Cleanup Alternatives (ABCA). The draft ABCA(s) must briefly summarize information about:

- The site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered (for each alternative considered and the alternative chosen including information on the effectiveness, the ability of the applicant to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness); and
- the proposed cleanup.

Applicants requesting funding for multiple sites must **include** a draft ABCA for each site. The draft ABCA(s) submitted as part of the application is intended as a brief preliminary document. A suggested outline, with information that the ABCA must contain, can be found in the FY25 FAQs.



If the application is selected for funding, recipients will be required to finalize the ABCA(s) and make it available for additional public review and comment as part of their pre-cleanup activities. (See the Brownfield Programmatic Requirements<sup>31</sup> for more information.)

#### **b. Community Notification Ad**

The applicant must **publish** a community notification ad in the local newspaper or an equivalent means customarily used to communicate to the target community(ies) (e.g., notifying the target community via website, listserv, social media, radio or television broadcast, etc.) **no later than 14 calendar days before** the application is **submitted** to

The community notification ad (or equivalent) must clearly state:

- that a copy of the grant application, including the draft ABCA(s), is available for public review and comment;
- how to comment on the draft application;
- where the draft application is located (e.g., town hall, library, website); and
- the date, time, and location of the public meeting(s).

All target communities, including community members with limited English proficiency and community members with disabilities, must receive the notification and be provided an opportunity to comment on the application.

Refer to the FY25 FAQs for examples of acceptable community notification methods.

#### **c. Public Meeting**

The applicant must **hold** a public meeting to discuss the draft application and **consider** public comments prior to the submittal of this application. A regularly scheduled community meeting where multiple topics are discussed is sufficient to meet this requirement provided there is an opportunity to discuss the draft application. The public meeting may be held in person, virtually, and/or by teleconference, must be accessible to persons with limited English proficiency and persons with disabilities, and must be held prior to the submittal of this application.

From the meeting, the applicant must **produce**:

- the comments or a summary of the public comments received;
- the applicant's response to those comments;
- meeting notes or a summary of the public meeting(s); and
- meeting sign-in sheet/participant list.

In addition to the public meeting, the applicant may choose to host additional outreach sessions via webinars, or other media outlets, to further engage the community and solicit comments on the application.  
EPA.

#### **d. Submission of Community Notification Documents**

The applicant **must attach** the items listed below to the application submitted to EPA:

- *a copy of the draft ABCA(s);*
- *a copy of the newspaper ad (or equivalent) that demonstrates solicitation for comments on the application and that notification to the public occurred at least 14 calendar days before the application was submitted to EPA. An equivalent method may include, for example, a dated image/screen-shot of the website or a copy of the listserv message used to notify the public;*
- *the comments or a summary of the comments received;*
- *the applicant's response to those public comments;*
- *meeting notes or summary from the public meeting(s); and*
- *meeting sign-in sheet/participant list.*

If one or more of the above-requested attachments are not submitted with the application, **please explain why** the requested attachment is not included.

- Discussion on contractors and named subrecipients; or an affirmative statement that a contractor has not been procured and a sub recipient has not been named (see Section III.B.15.)
- A copy of (or link to) the solicitation documents and the signed executed contract as applicable (see Section III.B.15.)