(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

The Washington Wheatley Target Area is a residential neighborhood of 262 acres located 3 miles east of downtown Kansas City, Missouri. Washington Wheatley is overwhelmingly challenged by its **vacant brownfield properties.** Once a densely populated and thriving community, Washington Wheatley has experienced massive reductions in numbers of residents and structures in the past 65 years. In 1940, Washington Wheatley was home to **11,697**[1] residents. In the following decades, the neighborhood experienced extensive depopulation and rising poverty levels. In 1956, federal construction of **Highway I-70** cut through the neighborhood, isolating residents and subjecting them to noise and pollution while hastening the exit of remaining residents who had the means and opportunity to escape. As poverty increased, Washington Wheatley homes and businesses deteriorated. By 2022, only **2,133**[2] residents remained. As the neighborhood emptied it was increasingly exposed trash, traffic, industry, vice and crime.

Vacant homes piled up in the neighborhood and led to mass demolitions. From 2003 – 2008 the City demolished an average of 115 homes per year, and **approximately 36% of those demolitions occurred Washington Wheatley** alone.[3] Today, **43% of all properties in the neighborhood are vacant,** the most of any neighborhood in Kansas City. Hundreds of derelict houses and industrial buildings were torn down, leaving behind a toxic legacy. The neighborhood's proximity to historic industrial and commercial uses, as well as growing awareness of the dangers of lead paint, have led many residents, local community development organizations and developers in recent years to view these vacant lots with suspicion as possible brownfields. In the last two years, environmental assessments confirmed these suspicions, finding **widespread lead contamination on over 60% of 217 properties sampled**. Lead's many destructive outcomes are starkly evident in the neighborhood: poverty, poor health, violence and shortened life spans. Despite high demand for new affordable housing, developers are wary of lead, asbestos and buried foundations that may hide more contamination. Now that contamination on vacant properties has been confirmed in the neighborhood, redevelopment activity has stalled pending anticipated cleanup action. The grant will remove contamination in soil and buried rubble, and make clean land available for new, safe housing and other investments to help revitalize the neighborhood.

b. Description of the Proposed Brownfield Site

This grant addresses the Washington Wheatley Additional Vacant Lots Site. The Site consists of 126 vacant residential parcels, nearly all of which were previously developed with homes. The average lot size is 4,026 square feet (sf) and the total area is approximately 12.53 acres. Many lots contain illegal dumping, dense overgrowth and several lots have homeless camps. Phase I environmental site assessments (ESAs) in 2025 identified recognized environmental conditions (RECs) including lead-based paint (LBP), asbestos-containing materials (ACM) in soils and buried debris; metals, and various historic automotive and drycleaner facilities. Phase II (ESAs) in 2025 found **lead contamination on 47% of vacant lots sampled** above the EPA residential screening level of 200 mg/kg and **a maximum concentration of 4,950 mg/kg**. Historic records indicate that all the former houses likely had basements and, based on local experience,

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[1] Historic 1940 census records compiled by tracts by UMKC Urban Design Studio, 2008.

[2] 2018-2022 American Community Survey (ACS) 5-Year Estimates.

[3] Washington Wheatley Neighborhood Action Plan 2008 University of Missouri, Kansas City, Department of Architecture, Urban Planning & Design

these basements are probably still buried and filled with debris. The former houses were built before 1978, when ACM and LBP were commonly used and allowed by regulations. Permit records indicate that 35 of the demolitions occurred prior to 1998, when pre-demo asbestos inspections and abatement were not required, and therefore may contain buried ACM. All basements potentially contain PCB caulk, LBP and other hazardous wastes.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

The Vacant Lots Site will be developed into affordable, single-family homes through the Kansas City Housing Accelerator program. Approved builders will buy lots for $1 and units must be compatible with the surrounding neighborhood and employ sustainable building practices. This strategy advances t**he Heart of the City Area Plan** which recommends building neighborhoods in keeping with their historic character and increasing density to support economic development and transportation goals. It also follows guidance in the **KC Spirit Playbook 2023 Comprehensive Plan** to increase housing near employment centers and reuse abandoned properties and brownfields. The city is committed to working with the neighborhood and the developer to produce a site reuse that is consistent with the Area Plan and supported by residents.

Led by a city councilmember, the neighborhood association president and vice president joined local redevelopment agencies, minority-owned businesses, and other partners (see table below, item 2.b.) to discuss vacant lots and develop the Housing Accelerator program in **meetings held on 9/29/23, 12/5/23, 2/5/24 and 3/25/24**. Meetings were then held with residents on 5/13/24 and 5/15/24 to introduce program and invite input. In January 2025, the City also developed a Washington Wheatley Neighborhood Redevelopment Action Plan to identify barriers to infill development and assign action items to overcome those barriers. Residents attended meetings on 9/12/24, 10/10/24 and 11/14/24 to learn about, and provide critical input into the plan. The City Council adopted the plan as an amendment to the Heart of the City area-wide plan on 4/3/2025. In addition, the City Council on 5/15/25 adopted a resolution establishing the Vacant Land Activation Initiative to develop coordinated, comprehensive strategies for transforming vacant land of all ownership types into community assets through administrative and legislative approaches. Through staff of multiple departments working collaboratively, and extensive community engagement, the City is developing a strategic plan to improve and facilitate the disposition and redevelopment of vacant land and an implementation plan is anticipated to go to City Council in February 2026. The Washington Wheatley Vacant Lots Site would be a pilot project to implement the strategic plan and recommendations of the Vacant Lot Activation Initiative.

d. Outcomes and Benefits of Reuse Strategy

The cleanup of the vacant lots is expected to leverage new home construction with an **estimated total value of $19 million**. Developers through the Housing Accelerator program are required to start building 1/3 of their units within 18 months. Pent up demand for affordable housing ensures that new units will be sold and occupied quickly, which will help attract commercial/retail services back to the community.

The Housing Accelerator program requires "***environmentally friendly and sustainable principles in development design and construction wherever possible***." With the adoption of the **2021 International Energy Conservation Code (IECC)** and the **2022 Kansas City Climate Protection and Resiliency Plan (CPRP)**, new development in Washington Wheatley will be: lower in carbon usage; more energy efficient; and more ready for solar, EV and electrical

appliances compared to existing residential and commercial buildings. Developers will also be encouraged to use native plants and green infrastructure. Building in Washington Wheatley – close to regional jobs, health care, education and transit centers – will reduce vehicle miles traveled and related greenhouse gas emissions, thereby advancing CPRP climate mitigation goals.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

Further assessment of the Site is needed. Surface lead results from 5 point composite samples on 9 properties were below the EPA RSL of 200ppm, but within the relative standard of deviation for the study (10% or 20ppm). Retesting these properties using Incremental Sampling Methodology (ISM) would provide a more reliable and precise measurement of the actual representative concentrations on these properties and support a defensible determination whether or not to conduct remediation activities. Additional site characterization is also needed for 9 additional properties where hazardous substances were identified above state or federal action levels, and 18 more lots could not be sampled due to overgrowth but are located in areas of widespread lead contamination. The estimated cost of site characterization for these 36 properties, including overgrowth removal, is $159,000. Projected program income of three issued loans by the Kansas City Revolving Loan Fund (RLF) program for FY26 through FY29 is $361,000/yr of which $180,000/yr is unreserved. These funds will be sufficient to cover the costs.

f. Resources Needed for Site Remediation

In the unlikely event that the maximum number of properties in the Site require full remediation, the total project cost would exceed grant funds by $410,000. The City is confident that the unreserved projected program income of $180,000/yr or $720,000 during the project period, will be sufficient to cover additional project remediation costs.

g. Resources Needed for Site Reuse

[ENTER UPDATED INFORMATION REGARDING GRANTS, LOANS, OR OTHER INCENTIVES FOR REDEVELOPMENT OF VACANT LOTS IN WASHINGTON WHEATLEY]. The City has identified $600,000 in sales tax revenue set aside for public infrastructure to complement investments in the redevelopment of Washington Wheatley vacant lots. Grants from the City's Central City Economic Development (CCED) sales tax program and Housing Trust Fund (HTF), both robust sources of funding for development in an incentive area that includes Washington Wheatley, will also be available to support affordable housing and economic development on the Site.

h. Use of Existing Infrastructure

The project will reuse, repair and improve the existing City infrastructure grid serving both Sites. The combined sanitary/stormwater sewer system will be evaluated for service restoration, upgrades or replacement to handle increased demand and to comply with the City's combined sewer overflow (CSO) plan and 2010 consent decree. Portions of relevant streets and alleyways are impassable and will be rebuilt and repaved. Many sidewalks, curbs and gutters have deteriorated and will be repaired or replaced. Traffic lights, pedestrian crossings and signage will be brought up to code. This work will be funded, in part or wholly, by a 1% local sales tax for public infrastructure that provides over $30 million annually for the City.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community's Need for Funding

Washington Wheatley has no significant resources for this cleanup project due to its small population and low income. The neighborhood association is a non-profit and lacks meaningful assets or revenue. The neighborhood cannot draw on other resources to fund cleanup or reuse of the Sites. The population of 2,133 cannot afford the tax levies that would be needed to create a neighborhood improvement district (NID) to fund the project.

b. Health or Welfare of Sensitive Populations

Children under 5, a highly sensitive group for lead, are 8.1% of residents. Women aged 15-49 who could be pregnant, another high risk group for lead, are 20.6% of the population. The elderly (+65 years) who make up 13.4% of the population are more sensitive to contamination and at further risk as **life-expectancy in this zip code (64127) is 66 years, nearly 30 years lower than the City's maximum**. Houseless persons, identified in the Target Area, are vulnerable due to their chronic exposure to contaminants and environmental stressors. The grant will remove lead, PAHs, and asbestos in the environment which threaten the health of these sensitive populations. New housing will reduce the health risks of indoor lead dust and mold in older housing that impact this vulnerable group. The grant will develop an EJ plan to identify other risks to sensitive populations.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

The zip code shared by Washington Wheatley (64127) has the City's **highest number of lead-poisoned children under 6 years old** and the **6th highest lead poisoning rate (12.1%)**, nearly 5 times the national rate (2.5%).[4] In the census tract shared by Washington Wheatley, **the asthma rate is 14.2%**[5], compared to 9.4% in Missouri.[6] According to EJScreen, particulate matter, a cause of asthma, is above the 93rd percentile in Washington Wheatley. In the county shared by Washington Wheatley (Jackson), **the rate of myeloma is 53% higher for men and 40% higher for women** than for Missouri.[7] The grant will directly reduce the risk of child lead poisoning by removing lead from soils. Asthma will be reduced by building new housing. If possible, factors that contribute to a higher incidence of other diseases will be identified by the grant's EJ Plan.

d. Economically Impoverished/Disproportionately Impacted Populations

The poverty level in the Washington Wheatley Target Area is 21.8%, more than double the 10.0% level of the Kansas City metropolitan statistical area (MSA). Lead contamination, found on 65% of all vacant lots tested, has likely contributed to the high rate of child lead poisoning in this neighborhood. Lead in children under 6, at even relatively low levels, lowers IQ, school performance, and lifetime earnings, and increases risks of cardiovascular and neurodegenerative diseases, and criminal arrests as adults.[8] [9] Many of the burdens noted in Washington Wheatley are consistent with the known effects of lead poisoning.

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[4] KC Community Health Assess. https://storymaps.arcgis.com/stories/83947dae543e4e478b49e582dfe96c81.
[5] Ibid.
[6] Asthma in Missouri 2021 fact sheet, Missouri Department of Health and Senior Services (DHSS).
[7] Missouri DHSS https://healthapps.dhss.mo.gov/MoPhims/MOPHIMSHome.
[8] Lead Poisoning, Lanphear et al., N Engl J Med 2024; 391:1621-1631.
[9] Association Of Prenatal and Childhood Blood Lead Concentrations With Criminal Arrests In Early Adulthood, Wright et al. Public Library of Science (PLOS) Medicine (2008).

The cleanup and reuse of the Site will remove dangerous lead and other contaminants concentrated in Washington Wheatley. Remediation of properties that become new homes and yards for families will give the next generations of children in this neighborhood the chance to reach their full potential, thereby **breaking the cycle of lives damaged and shortened by lead poisoning.** It will address the burden of poor housing by providing new clean and safe units.

Community Engagement

e. Project Involvement & f. Project Roles

The following individuals and organizations will be involved in the proposed project.

Partner	Mission	Point of Contact	Project Roles
Washington Wheatley Neighborhood Assn.	Preserve neighborhood integrity by creating an equitable community	Kay White, President whitekay45@gmail.com	Input on cleanup and redevelopment plans
Community Builders of Kansas City	Nonprofit urban core developer, transforming communities.	Emmet Pierson, CEO epierson@cb-kc.org	Development and project consultant
Seton Center	Social services (dental, food, rent, etc.) for families and seniors	Stacy Mayer, CEO chelsea.fernandez@setonkc.org	Resident and family support services
Economic Development Corporation of KC (EDC)	Promoting development, job creation and community investment	Daniel Moye, dmoye@edckc.com	Property tax abatement; incentives
KD Academy	24/7 childcare & learning center for alternative-shift workers	Myron McCant, mmccant62@yahoo.com	Childcare/early learning services

The neighborhood association will be directly involved in shaping and approving Site reuse plans. Seton Center will work to meet the health and vital needs of current and future residents. Community Builders and EDC will assist Site developers with advice and incentives.

g. Incorporating Community Input

The City's plan to communicate project progress to residents and community partners is to: 1) provide brief, non-technical summaries of the project and work completed on a quarterly basis; 2) make in-depth materials and resources available to those who want a better understanding of the issues and options; 3) provide bilingual materials to those who need them; and, 4) utilize the normal monthly neighborhood meeting times and places familiar to residents and partners. The City will provide a virtual hybrid meeting alternative for those who prefer not to attend in-person, and make recordings and meeting minutes available to those who cannot attend virtually.

(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

To facilitate efficient management and supervision of cleanup activities and waste materials generated thereby, vacant properties in the Site will be grouped into four Operating Units (OUs) each containing a maximum of 30 to 32 properties. Cleanup activities will be phased and progress from OU-1 to OU-4 during the project period. A single Remedial Action Plan (RAP) will be proposed and govern all Site properties. Cleanup of each OU will remove contaminated surface soil to an average depth of 1 foot, and remove buried foundations and debris, including ACM and other hazardous wastes, to a further depth of up to 5 feet. Excavated materials will be sorted and managed as: (1) special waste containing lead, ACM, PAHs, etc. for disposal at a Subtitle D permitted landfill; (2) construction and demolition (C&D) waste for disposal at a C&D landfill; (3) concrete, limestone, etc. for on-site crushing and reuse to reduce landfill space consumption; (4) recoverable metals and architectural salvage for recycling; and (5) municipal solid waste. A toxicity characteristic leaching procedure (TCLP) test will be performed to verify that special

wastes meet disposal facility specifications. Dust will be monitored and controlled with water spray. Air sampling will be performed for asbestos fibers. Soil track-out will be controlled by decontaminating equipment and cleaning streets each workday. Remediation activities will continue until contaminants of concern meet applicable cleanup levels and all buried debris is removed. Aggregate produced by on-site crushing will be used as backfill to the extent allowed by the oversight agency. Backfill will be tested to verify lead is below 100 mg/kg and compacted in lifts. The Site will be seeded and silt fencing installed to prevent erosion in accordance with a Stormwater Pollution Prevention Plan (SWPPP). Site characterization activities will be completed by June 15, 2025 and may identify VOCs, polyaromatic hydrocarbons or shallow subsurface lead contamination that requires cleanup. The City has successfully implemented similar cleanup plans for the 63rd & Prospect Avenue Redevelopment Site and the Mattie Rhodes Art Center, both reported in ACRES.

Description of Tasks/Activities and Outputs
(Responses to Items (3)b. – (3)e. are presented in the table below)

Task 1: Community Engagement
b. Project Implementation • **EPA-funded activities:** 1. Develop Community Engagement Plan (CEP) 2. Host or attend public meetings at least quarterly at an appropriate local site, with a virtual participation option. 3. Progress reports, ACRES database, grant compliance, track outputs/outcomes. • **Non-EPA grant resources needed to carry out task/activity:** KCMO staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
c. Anticipated Project Schedule (for EPA funded Activities Only): Begin quarterly public meetings 1st quarter. By 3rd quarter, hire community engagement facilitator. By end of Year 2, approve CEP plan. In Years 3 & 4, present results of Site cleanup activities to community.
iii. Task/Activity Lead: City is lead on Task 2.
iv. Outputs: 16 public meetings; one CEP; 16 quarterly reports; 2 ACRES property profiles.
Task 2: Cleanup
i. Project Implementation • **EPA-funded activities:** 1. Mobilize equipment and secure areas for excavation, loading and stockpiling activities. 2. Excavate, transport and dispose of contaminated soils and C&D waste. 3. Sort, crush and reuse concrete, limestone, etc.to reduce carbon footprint and landfill use. 4. Control dust with water spray and prevent track-off by decontaminating tires and tracks. 5. Backfill with verified clean soils compacted in lifts. • **Non-EPA grant resources needed to carry out task/activity:** KCMO staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
ii. Anticipated Project Schedule (for EPA-funded Activities Only) Procure bids and sign cleanup contracts for all OUs by 3rd quarter, Year 1. Conduct cleanup activities in four phases (OU-1 through OU-4), starting 4th quarter, Year 1 ending 2nd quarter Year 4.
iii. Task/Activity Lead: City is lead on Task 3
iv. Outputs: 126 remediated and/or confirmed ready to reuse properties, 11.8 acres.

Task 3: Cleanup Oversight
i. Project Implementation • **EPA-funded activities:** 1. Procure QEP, Enroll Site in Missouri Brownfields Voluntary Cleanup Program (BVCP).

2. Finalize RAP, develop Quality Assurance Project Plan (QAPP), review work plans. 3. Air monitoring for asbestos, monitor excavation for ACM, TCLP tests for disposal. 4. Prepare closeout reports and liaison with BVCP on No Further Action (NFA) letters. • **Non-EPA grant resources needed to carry out task/activity:** KCMO staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
ii. Anticipated Project Schedule (for EPA-funded Activities Only) Procure QEP within 90 days after grant award. Enroll Site into BVCP by 2nd quarter. Bid specifications, final RAP and QAPP by 4th quarter. Cleanup Oversight 1st to 4th quarters, Year 2. "No Further Action" (NFA) letter by 2nd quarter, Year 3.
iii. Task/Activity Lead: City is lead on Task 4.
iv. Outputs: One approved RAP; up to four NFA letters, one for each OU.

Task 4: Administrative Costs
i. Project Implementation • **EPA-funded activities for both Sites:** 1. Track and ensure compliance with grant terms and conditions. 2. Maintain financial management systems for grant activities and drawdown grant funds. 3. Prepare revisions to budget, scopes of work, program plans, as needed. 4. Submit financial, MBE/WBE, and closeout reports, other than final performance report. • **Non-EPA grant resources needed to carry out task/activity:** City staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
ii. Anticipated Project Schedule: Start activities 1st quarter and continue through end of term.
iii. Task/Activity Lead: City is lead on Task 1.
iv. Outputs: 8 semi-annual MBE/WBE reports; four annual and one final financial report(s)

f. Cost Estimates

Grant Budget Table

Budget Categories		**Project Tasks ($)**				
		Task 1: Community Engagement	Task 2: Cleanup	Task 3: Cleanup Oversight	Task 4: Admin Costs	**Total**
Direct Costs	Personnel	11,191	136,716	15,537	74,312	**237,756**
	Fringe Benefits	4,937	56,988	6,521	30,649	**99,095**
	Travel	7,124				**7,124**
	Equipment					
	Supplies	5,176				**5,176**
	Contractual			200,000		**200,000**
	Construction		3,408,849			**3,408,849**
	Other: VCP Fees, Ads, Training Fees	14,600		27,400		**42,000**
Total Direct Costs		**43,028**	**3,602,553**	**249,458**	**104,961**	**4,000,000**
Indirect Costs		0	0	0	0	0
Total Budget		**43,028**	**3,602,553**	**249,458**	**104,961**	**4,000,000**

Task 1, Community Engagement (both Sites) - $41,963

- Personnel: Coordinator (required reporting, community meetings, manage CEP) 240hrs x $46.63/hour (hr) = $11,191.
- Fringe Benefits: Coordinator, 240hrs x $20.57/hr = $4,937.

- Travel: 2 conferences x 2 persons x ($670 air + $700 hotel + $411 per diem) = $7,124.
- Supplies: 2 laptops @ $1,100ea. + $511 meeting supplies + signage $1,400 = $4,111.
- Other: Ads, 4 meetings/yr x 4ys x $425/ad x 2 local newspapers = $13,600.
- Other: conference registration fees, 2 persons x 2 conferences x $250ea = $1,000.

Task 2, Cleanup - $3,602,553

- Personnel: Coordinator (procurement, cleanup oversight, grant compliance) 1,200hrs x $46.63/hr = $55,956); Project Manager (procurement, contract administration, project management) 2,400hrs x $33.65/hr = $80,760. Total = $136,716.
- Fringe Benefits: Coordinator 1,200hrs x $20.57/hr = $24,684); Project Manager 2,400hrs x $13.46/hr = $32,304. Total = $56,988.

Construction - $3,408,849

- Surface soil remediation: 83 vacant lots x 4,113 ave. square feet (sf) per grid x 1 foot (ft) depth = 341,402 cubic feet (cf) ÷ 27 cf/cubic yard (cy) = 12,645 cy x 1.4 tons/cy = 17,702 tons x $108.81/ton = $1,926,188.
- Part 2 - Basement removal (with ACM): 45 basements x 166.667 cy buried debris x 1.4 tons/cy = 7,500 tons x $130.81/ton (ACM) = $981,077.[10]
- Part 3 - Basement removal (no ACM): 26 basements (estimated without ACM) x 166.667 cy buried foundations & debris per lot x 1.4 tons/cy = 4,333 tons x $115.75/ton (C&D) = $501,584. Total (1+2+3) = $1,926,188.

Task 3, Cleanup Oversight - $249,458

- Personnel: Coordinator (QEP management, voluntary cleanup program) 160hrs x $46.63/hr = $7,461; Project Manager (QEP procurement /contract admin.) 240hrs x $33.65/hr = $8,076. Total = $15,537.
- Fringe Benefits: Coordinator 160hrs x $20.57/hr = $3,291; Project Manager 240hrs x $13.46/hr = $3,230. Total = $6,521.
- Contract – QEP: 1,250hrs x $160/hr = $200,000
- Other – VCP: $200 enrollment fee + $6,000 oversight fees = $6,200.

Task 4, Administrative Costs - $104,961

- Personnel: Coordinator (grant compliance, budget revisions, financial reports, closeout) 480hrs x $46.63/hr = $22,382; Fiscal Officer (accounting, financial reports, payments, draw downs, grant closeout) 1,500 hrs x $34.62/hr = $51,930. Total = $74,312.
- Fringe Benefits: Coordinator 480hrs x $20.57/hr = $9,874; Fiscal Officer 1,500 hrs x $13.85/hr = $20,775. Total = $30,649.

Indirect Costs. Not Applicable.

g. Plan to Measure and Evaluate Environmental Progress and Results

Progress on outputs and outcomes will be tracked in quarterly reports, in ACRES. Projects will be reviewed monthly by Office staff and the QEP to identify and resolve any issues impeding performance. Outputs will be evaluated annually against work plan goals for the 4-year period.

Output	Measure	Goal
Community Meetings	Numbers of meeting minutes prepared	16 minutes

[10] On-site crushing for both Sites, est. $40,000 per week, is expected to have no net impact on project costs.

Land Cleaned	Acres of cleanups completed	6.34 acres
Properties Ready for Reuse	Number of "No Further Action" Letters	48 letters
EJ Community Plan	Delivery of completed plan	1 plan
Outcome	**Measure**	**Goal**
Properties Sold to Developers	Number of properties sold	126 properties
Building Permits Issued	Number of permits issued	50 permits
Redevelopment Leveraged	Amount of Public/Private funds leveraged	$18,900,000

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Structure & b. Description of Key Staff:

Grant funds and activities will be managed by the City's Brownfields Office (Office). The Brownfields Manager, Andrew Bracker, will oversee the program and Office to ensure all grant funds are appropriately spent and all work plan objectives and grant terms and conditions are successfully met. Mr. Bracker has 27 years of experience in these roles and has successfully managed over $27 million of EPA Brownfield funds. Scott Levin, Brownfields Development Specialist, has 28 years of professional environmental experience, and served nearly two years performing project management, contract administration, and ACRES database maintenance. The City is currently hiring a Brownfields Fiscal Officer to provide accounting services and ensure compliance with grant financial requirements. The Office will use the City's financial system to administer and track grant funds, manage purchase orders, payments and fund draws. The City will contract with a QEP for technical assistance to design, procure, and oversee all remediation work.

iii. Acquiring Additional Resources:

Remediation contractors will be procured by sealed bids using the City's procurement system to manage the bid process. The City's Department of Civil Rights and Equal Opportunity will assist in maximizing opportunities to hire locally and ensuring compliance with wage and labor requirements. Good faith efforts to offer contract opportunities to disadvantaged businesses will be employed and documented. The City will procure QEP services through a competitive solicitation.

Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

Accomplishments under the City's current Brownfield grants include: 6 sites assessed, 1 site effectively cleaned up; one site redeveloped; $44,000,000 of redevelopment leveraged, and 25 jobs created. Not all of these outputs are reflected in the Assessment, Cleanup and Redevelopment Exchange System (ACRES). The City plans to reflect all progress in ACRES by the end of 2nd quarter 2026.

(2) Compliance with Grant Requirements

For open grants, substantial progress has been made and reported towards meeting all goals of all work plans on schedule, except for the site-specific assessment grant which was suspended for 18 months while EPA and HUD resolved an eligibility issue. A pipeline of assessment and RLF projects were added in 2023-24 through a Call for Projects and are currently in process. All quarterly reports have been submitted when due or within an agreed time extension. Financial status and MBE/WBE reports have not always been submitted on time but have been submitted

when requested. Corrective measures included hiring a Brownfields Development Specialist on 2/12/23 and recruiting a Fiscal Officer to increase institutional capacity. Open grants include: 1) Community-Wide Assessment (4B-97794401), 9/1/22 to 8/31/26; 2) Site-Specific Assessment (4B-97794301), 9/1/22 to 8/31/26; 3) Coalition RLF (BF-97782201), 9/1/20 to 8/31/26; 4) Supplemental RLF (4B-97798101), 9/1/22 to 8/31/29; and, 5) Supplemental Coalition RLF (4B-97798201) 9/1/22 to 8/31/29. Funds remain on all open grants which the City plans to expend through the completion of existing pipeline projects. Total unspent funds on 17 closed grants = $128,489 out of $9,173,826 awarded. $109,998 unspent ARRA RLF funds were due to a lack of eligible petroleum projects.