

**FY 2007 BROWNFIELDS RLF GOOD EXAMPLES OF
RESPONSES TO RANKING CRITERIA**

Criteria A: Budget

Provide the proposed budget for your proposal, including a detailed description and narrative of each task. Typical tasks might include “Community Involvement,” “Establishing the Revolving Fund,” “Operating the Revolving Fund,” “Cleanup Planning,” “Health Monitoring,” and “Overseeing Site Cleanup.” The narrative must provide a basis for the tasks. The budget also must reflect your cost share. The budget must show the distribution of funds, including cost estimates for each of the proposed activities. Please note that the sample budget below provides for separate budgets for loans and subgrants. An RLF grant recipient may not make a cleanup Subgrant that exceeds \$200,000 per site.

As mentioned previously on page 10, an RLF grant recipient must use at least 60 percent of the awarded funds to capitalize and implement a revolving loan fund. An RLF grant recipient also may use its funds to award subgrants to other eligible entities, including nonprofit organizations, for Brownfields cleanups on sites owned by the subgrantee; however, an RLF grant recipient may use no more than 40 percent of the awarded funds for cleanup subgrants and may not *subgrant* to itself. An RLF grant recipient may not make a cleanup subgrant that exceeds \$200,000 per site. In the case of a coalition, the RLF grant recipient may subgrant to other coalition members. Unlike loans, cleanup subgrants do not require repayment. An RLF grant recipient also may use the funds to guarantee, in whole or part, loans made by third-party lenders for eligible cleanup.

If your proposal is requesting both hazardous substance and petroleum funding, please provide two separate budgets to reflect the amount of hazardous substance and petroleum funding and the tasks associated with the funding.

A local government may use up to 10 percent of its grant funds for monitoring the health of populations exposed to one or more hazardous substances, pollutants, or contaminants from a Brownfield site and monitoring and enforcement of any institutional control used to prevent human exposure to any hazardous substance, pollutant, or contaminant from a Brownfield site. To effectively oversee assessments and cleanups, local governments may use grant funds (subject to the 10 percent limit) for other related program development and implementation activities (e.g., writing local Brownfield-related ordinances). Activities planned for the 10 percent category must be included in a separate budget task.

Sample Format for Budget

Budget Categories	Project Tasks for Loans (at least 60 percent of amount requested)				
(programmatic costs only)	[Task 1]	[Task 2]	[Task 3]	[Task 4]	Total
Personnel					
Fringe Benefits					
Travel ¹					

Equipment ²					
Supplies					
Contractual ³					
Loans					
Other (specify) _____					
Subtotal:					
Cost Share					
Budget Categories	Project Tasks for Subgrants (no more than 40 percent of amount requested)				
(programmatic costs only)	[Task 1]	[Task 2]	[Task 3]	[Task 4]	Total
Personnel					
Fringe Benefits					
Travel ¹					
Equipment ²					
Supplies					
Contractual ³					
Subgrants					
Other (specify) _____					
Subtotal:					
Cost Share					
Total					
Total Cost Share					
<p>¹ Travel to Brownfield-related training conferences is an acceptable use of these grant funds.</p> <p>² EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for RLF grants.</p> <p>³ Applicants must comply with the procurement procedures contained in 40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48.</p>					

Budget Example 1

The City proposes to operate an RLF of \$1,000,000, with \$900,000 for sites affected by hazardous substances and \$300,000 for sites affected by petroleum. The City's petroleum funds will be used at Brownfield sites not eligible for reimbursement from the States Petroleum Environmental Cleanup Fund Award (PECFA). Subgrant amounts will not exceed \$200,000 per site.

As previously mentioned, the City will utilize 40% of the funds to make subgrants to eligible applicants for cleanup activities. 60% of the funds will be used to provide loans. The City's cost share of 20% will be \$200,000. The majority of programmatic costs shown are devoted to eligible direct costs such as printing, advertising, supplies or other costs involved with each of these tasks. Travel costs may also be used for education such as attendance at Brownfield conferences as appropriate and eligible.

All charged costs will comply with eligible and allowable costs per EPA guidelines of approved costs.

Specific task description and the proposed budget are detailed below.

Task 1. Community Involvement – Advertising, mailings and other activities to seek comment and provide information of the RLF. The City will provide a comprehensive community involvement program, beginning with public notification. The program will emphasize and actively seek public involvement, public input, and the development of local and extended partnerships. Funds will be used to provide for City representation at community meetings. The meetings will be designed to educate and inform neighborhood organizations, citizens' groups, borrowers, nonprofits, developers, community leaders, the general public, potentially interested developers, real estate professionals, area business, and other stakeholders regarding the RLF. Brownfield redevelopment experts will be invited to speak at the meetings. Additionally, a RLF website will be created and linked to various other appropriate websites.

Task 2. Establish RLF – Preparation of the loan/subgrant guidelines, procedures and other legal documents. The City will involve various legal sources in establishing legally binding documents that meet with both City and EPA guidelines. The personnel line item represents costs associated with the development of the business plan for the RLF, defining objectives, loan processes, roles of various staff members, and internal audit and report schedules, refining our loan application, marketing plan, and legal documents for the program.

Task 3. Marketing – Development of marketing materials, an information brochure, web page and other outreach activities. The City will promote the availability of the fund through citizen and agency outreach activities and through formal marketing efforts. The City will promote the program on its web site and through news releases sent to trade publications and local media. Members of the newly formed RLF Steering Committee will compile a list of local and state organizations to target and will ask those organizations to assist with information dissemination. Property owners of the sites included in the U.S. EPA-funded Brownfield inventories will also be notified of the availability of the RLF through individual letters. The City will hold an RLF public meeting and open house for interested property owners and developers to kick off the

program following an initial promotions blitz. At this meeting, City officials will provide copies of the RLF application and will walk through the application and program process step by step.

Task 4. Operation of RLF – Loan/subgrant processing, prepare financial and monitoring reports, develop support access and excel worksheets, screen applicants and other operation function. The City will operate the fund with the assistance of the Finance Department and a newly formed RLF Steering Committee. The RLF Steering Committee will provide both input and oversight functions on the programmatic and loan servicing activities throughout the lifetime of the fund. The RLF Steering Committee will work with the City to solicit fund participants, evaluate applications based on Brownfield cleanup and fiscal eligibility and ranking criteria, process loan paperwork, distribute and collect payments, and complete all financial reporting activities.

Task 5. Site Assessment and Remediation/cleanup Loans and Subgrants – Prepare Phase I/II assessments and cleanup guidelines or agreements in coordination with other agencies. Award subgrants and loans. Monitor cleanup activities and insure cleanup guidelines are completed. The City will follow federal, state and local competitive procurement requirements to contract with an environmental consulting firm to complete remediation oversight activities on behalf of the City to ensure that the borrower is fulfilling their commitments for effective and environmentally responsible cleanup activities. The City’s contractor will complete general remediation oversight to ensure activities comply with plans and regulations and complete administrative functions, such as reviewing invoices, and claims based on environmental activities and authorizing payments. City Officials and their consultant will work closely with Ohio EPA and U.S. EPA to complete and administer these activities.

Project Tasks for Loans-Hazardous Substance						
Budget Categories	Task 1 Community Involvement	Task 2 Establish RLF	Task 3 Market RLF	TASK 4 Operate RLF	Task 5 Site Assessment/ Cleanup Loans	Total
Travel	150	150	750	750	150	1,950
Equipment						
Supplies	1,125	225	2,250			3,600
Contractual		2,250	2,250	3,000	45,000	52,500
Other/Loans					391,950	391,950
Cost Share					90,000	90,000
Subtotal	1,275	2,625	5,250	3,750	527,100	540,000

Project Tasks for Grants-Hazardous Substance						
Budget Categories	Task 1 Community Involvement	Task 2 Establish RLF	Task 3 Market RLF	TASK 4 Operate RLF	Task 5 Site Assessment/ Cleanup Loans	Total
Travel						

Equipment						
Supplies	375		375			750
Contractual		750	750	1,500	24,000	27,000
Other/Loans					272,250	272,250
Cost Share					60,000	60,000
Subtotal	375	750	1,125	1,500	356,250	360,000

Project Tasks for Loans-Petroleum						
Budget Categories	Task 1 Community Involvement	Task 2 Establish RLF	Task 3 Market RLF	TASK 4 Operate RLF	Task 5 Site Assessment/ Cleanup Loans	Total
Travel	50	50	250	250	50	650
Equipment						
Supplies	375	75	750			1,200
Contractual		750	750	1,000	15,000	17,500
Other/Loans					160,650	160,650
Cost Share					30,000	30,000
Subtotal	425	875	1,750	1,250	175,700	180,000

Project Tasks for Grants-Petroleum						
Budget Categories	Task 1 Community Involvement	Task 2 Establish RLF	Task 3 Market RLF	TASK 4 Operate RLF	Task 5 Site Assessment/ Cleanup Loans	Total
Travel						
Equipment						
Supplies	125		125			250
Contractual		250	250	500	8,000	9,000
Other/Loans					110,750	110,750
Cost Share					20,000	20,000
Subtotal	125	250	375	500	118,750	120,000

Total Project						1,200,000
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Criteria B: Community Need

1. Provide a detailed description of the target community (or communities) that the RLF program will benefit. Include demographic information for the target community and indicators, such as the poverty rate, unemployment rate, special community situations (e.g., population size), or other environmental justice factors that support community need relating directly to this project (e.g., low-income and/or minority communities; sensitive populations, such as children and pregnant women; or communities disproportionately impacted by environmental factors). Identify the source for this information.

Note: Applicants may target a specific community (or communities) within their jurisdiction. However, EPA will award RLF grants on a jurisdiction-wide basis.

2. Explain how the targeted community will benefit from this grant. If the current proposal targets a community previously targeted by an EPA Brownfields cooperative agreement, please justify the need for additional funding.

3. Characterize the impact of Brownfields on your target community (or communities) by describing the extent of Brownfields (e.g., size, number, location) and the economic, health, and/or environmental impacts of the Brownfields.

Community Need Example 1

PROVIDE A DETAILED DESCRIPTION OF THE TARGET COMMUNITY (OR COMMUNITITES) THAT THE RLF PROGRAM WILL BENEFIT

The Community Renewal Tax Relief Act of 2000 (P.L. 106-554) authorized the U.S. Department of Housing and Urban Development (HUD) to designate “Renewal Communities.” During “Round One,” HUD designated 40 Renewal Communities throughout the nation, including the City. Similar to the former City Empowerment Zone (EZ) Program, the Renew Community Program is targeted towards the poorest communities demonstrating the greatest need for economic revitalization.

The City’s Renewal Community area includes 97% of the census tracts in the original Empowerment Zone and an expanded area of neighborhoods, all of which are designated as Community Development Impact Area (CDIA). The CDIA’s are areas where the household median income is substantially below that of the City. In 2004, the City received a five-year extension to retain \$50 million in remaining EZ funds under the Title XX program. The level of economic distress in the Redevelopment Community is evidenced by the following: 1) The poverty rate of the Redevelopment Community is 37.7% compared to 27% for the City, and nearly 70,000 citizens in the Redevelopment Community fall below the poverty line; 2) 75% of school age youth qualify for the federal free lunch program; 3) Over 77% of all low-income households in receive welfare assistance, which represents 65% for the total county.

According to the 2000 Census, key demographics of the BeltLine TAD include:

- Population: 107,500 people and 42,615 households; approximately 25% of the City’s population.
- Race: 45% white, 45% black and 10% other.

- 34% of households are homeowners, compared to 43% citywide and 67% for the metropolitan area.
- Median household income is approximately the same as for the City overall, at \$35,000 in 2000.
- 51% earn less than 80% of regional Area Median Income (AMI) of \$40,718; 39% earn less than 60% of AMI.
- Approximately 13% of housing units are vacant, compared to 10% citywide and 5% for the region.

According to the 2005 Census estimates, key demographics of the Economic Development Priority Areas include:

- The median household income in the north part is \$20,969 and \$31,624 in the south part, while the average household income for the entire City is \$32,640.
- The population of the four new TAD areas is 108,809, representing 23% of the City's population.
- The median home value in the new TAD areas is \$101,822 and median household income is \$29,230.
- Race: approximately 88% African Americans, 8% White, 2% Latino, and 1% other.

EXPLAIN HOW THE TARGETED COMMUNITY WILL BENEFIT FROM THIS GRANT

The City is one of the fastest growing metropolitan areas in the United States. By 2030 it is projected to grow by an additional 2.3 million people to a total population of over 4 million, fueling an economy that is projected to add 1.7 million jobs. This project offers an attractive alternative to urban and suburban sprawl, positively impacting the way the City will mature as a great city. It will enrich the City's quality of life with parks, trails, transit and economic development, and potentially set a national standard for transformative investment, sustainable growth and equitable development.

The redevelopment of Brownfield properties offers many specific benefits:

- Reduction in hazardous substances and unsafe conditions, thereby protecting human health and the environment.
- Prevention of future Brownfield sites through incorporation of sustainable development practices.
- Promotion of a vibrant and healthy community by catalyzing redevelopment in areas serving low income populations.
- Increase in workforce affordable housing by an estimated 5,600 units over the live of the project.
- Greater stakeholder participation in community-wide redevelopment efforts;
- Creation of economic benefits through redevelopment incentives. Over the 25-year period of the BeltLine project community benefits will include:
 - The City and County tax base is projected to increase by \$20 billion through transformation of underutilized properties into productive parts of the City's tax roles. The additional tax revenue provides funds for reinvestment in the community.

- Public/private partnership to leverage government spending. The project has already leveraged and will continue to drive significant private support, including philanthropic funding (more than \$3 million to date as well as an ongoing \$60 million capital campaign) and significant pro bono technical expertise from various not-for-profit organizations including the Trust for Public Land and the PATH Foundation.
- Creation of a projected 30,000 additional permanent jobs and 48,000 temporary construction jobs. These jobs will provide a tremendous employment and training opportunity for inner city residents.

CHARACTERIZE THE IMPACT OF BROWNFIELDS ON THE TARGET COMMUNITY

Encouraging the reuse of Brownfield properties through planning and economic incentives is critical to promoting smart and sustainable growth. The City has an estimated 950 Brownfields ranging in size from less than 1 to over 100 acres. A Geographic Information System mapping project completed in 2001, identified 136 potential Brownfield sites in the Renewal Community. Additionally, recently completed redevelopment studies and tax allocation district redevelopment plans have identified 20 additional potential Brownfields sites that are impediments to redevelopment within the Economic Development Priority Areas. Typically, these sites are either old industrial sites or have become locations for illegal dumping of construction debris, tires, hazardous substances and petroleum products, such as motor oil and transmission fluid. Often these sites are adjacent to residential areas and represent a prohibitive cost for development or the conversion into Greenspace and parks.

Based on the City's Sustainable Brownfield Program, funded under an EPA Community-wide Assessment Grant, there are over 200 potential sites in the BeltLine area, totaling 1000 to 1700 acres. While some remediation has occurred as part of redevelopment activities in the northeast, there are heavy concentrations in the south and northwest, where market conditions have not been able to support redevelopment. Communities in the Economic Development Priority Areas and BeltLine Redevelopment Area are handicapped by these Brownfields, resulting in continued neighborhood decline and disinvestment, impacts to soil, groundwater and surface water by hazardous substances and polluted storm water runoff, the potential for direct contact, groundwater contamination, the presence of trash, debris, tires and other waste that poses a threat to human health and the environment. The RLF program will provide an opportunity to prioritize sites targeted for remediation. Remedial actions performed during site redevelopment, which will reduce the amount of impacted source material and possible contaminant migration, will improve land quality, reducing the exposure to human receptors and ecological systems to contaminants and protecting human health and the environment.

The City has successfully used tax increment financing to convert the 138-acre, abandoned Steel mill site into the thriving mixed-use Steel Station development in the Midtown area of the City. The project used \$243 million in tax increment financing to offset remediation costs and to build infrastructure to support further development. To date, nearly \$1.6 billion in new construction and private investment has occurred at Steel Station resulting in the creation of approximately 2000 jobs.

Criteria C: Business Plan for RLF Program

1. Describe your business concept and the main loan/subgrant product(s) you will offer borrowers/subgrantees. Include loan structure; interest and repayment rates; 5-year timeline for loans and subgrants and a plan for long-term revolving of the fund; complimentary products/services you or a partner will offer; program incentives (e.g. EZ, EC or RC benefits, tax credits, TIF) and how the balance of projected loans and subgrants will promote the long-term availability (including the ability to revolve) of the RLF.

2. Present your market analysis, including your target market. Detail the types of borrowers and subgrantees (e.g. small businesses, developers, nonprofits, local governments), and the territory (e.g. particularly distressed neighborhoods, industrial corridors) and/or types of sites (e.g. abandoned gas stations, industrial properties, sites enrolled in an existing local land recycling program) you plan to reach.

Note: Applicants may target a specific market. However, EPA will award RLF grants on a jurisdiction-wide basis.

3. Describe your process for selecting projects, including sites, and borrowers and/or subgrantees. Include how you will develop criteria for project selection, and how you will ensure that site, subgrantee and borrower eligibility determinations are made in accordance with the Brownfields Law. If you plan to award subgrants under RLF, describe how you will take the following into consideration¹²:

- a) The extent to which the subgrant will facilitate the creation of, preservation of, or addition to a park, greenway, undeveloped property, recreational property, or other property used for nonprofit purposes;
- b) The extent to which the subgrant will meet the needs of a community that has an inability to draw on other sources of funding for environmental remediation and subsequent redevelopment of the area in which a Brownfields site is located because of the small population or low income of the community;
- c) The extent to which the subgrant will facilitate the use or reuse of existing infrastructure; and
- d) The benefit of promoting the long-term availability of funds from a revolving loan fund for Brownfields remediation.

4. Present both the management and operational teams that will oversee and implement all phases of work under this grant, including fund management and environmental cleanup responsibilities. Include information on the qualifications of staff and institutions the applicant may use for environmental, financial, analytical, legal and record keeping activities to ensure both the safety of cleanups and the use of prudent lending practices. Successful management of an RLF program requires a dedicated project manager and staff; in most cases, at least 50 percent of a single staff person's time is required for the first several years. Demonstrate how you will meet this need.

¹ RLF cooperative agreement recipients must take into consideration when awarding a subgrant.

² Applicants should not address these considerations if they do not plan to award subgrants; this will not affect an applicant's score under this section.

Business Plan for RLF Program Example 1

DESCRIBE YOUR BUSINESS CONCEPT AND THE MAIN LOAN/SUBGRANT PRODUCT(S) YOU WILL OFFER BORROWERS/SUBGRANTEES. ...

The purpose of the RLF is to spur economic revitalization and the creation of Greenspace along the BeltLine and within targeted commercial and mixed-use corridors in the City. Loans and grants will support the following types of projects:

- Community based remediation projects leading to redevelopment opportunities or quality of life enhancements.
- Creation of Greenspace and transit from Brownfields along the BeltLine and within the Economic Development Priority Areas.
- Adaptive reuse of underutilized or abandoned industrial sites.
- Grassroots remediation projects leading to redevelopment and quality of life enhancements.

The plans to allocate up to 85% of the RLF grant toward loans and sub-grants and the remainder to programmatic costs. The City is committed to developing a sustainable program while encouraging the development of a market for Brownfields investment. This approach will allow the initial funds to revolve, so that subsequent loans can be partially or wholly financed through loan repayments.

Loan and Sub-grant Products:

Direct Loans: The main loan product offered is fixed low interest bearing notes (between 0 – 5%). These gap loans will be made for remediation projects where the developer has 50-80% of the funding secured.

Grants: Sub-grants may be awarded to public or not-for-profit borrowers after consideration of the fiscal solvency of the borrower and nature of the project. The City is targeting projects in the City's Economic Development Priority Areas and the BeltLine area. Priority will be given to projects where Brownfield remediation costs are impediments to commercial redevelopment, provision of affordable housing, or creating new Greenspace and parks.

Loan Structure: Loan agreements will be structured with enough flexibility to maximize borrower success, as well as ensure the sustainability of the RLF. Loan terms, interest rates and duration, will be based upon the borrower's ability to service debt. The loans will be for between \$20,000 to \$500,000 and repayment terms will be between 3 and 7 years.

Borrowers' repayments will be scheduled on a semi-annual basis. Deferments will be offered to those borrowers with less access to capital or whose projects create affordable housing units or have substantial job creation potential. Deferments will be a maximum of two years and loan balances will be re-amortized within the remaining term of the loan. Also, a portion of the loan may be discounted as a work completion incentive. No prepayment penalty is associated with this program.

Timeline: The City plans on closing 2 to 5 loans along with several sub-grants each year over the RLF grant term. Repayments will begin to flow to the City in 2120 enabling the program to move toward a true revolving loan fund with an adequate capital base to independently support loans in the range of \$50,000 - \$500,000 by 2012.

Complimentary products/services: The City may use Tax Increment Financing (TIF) or other local development tools to support Brownfield redevelopment activity including tax credits and abatements. Local funds may be expended in areas surrounding Brownfields for infrastructure improvements to multiply the cleanup impacts support for additional redevelopment. The incentives to the coalition include:

- Renewal Community tax credits for environmental remediation and the Commercial Revitalization Deduction.
- Tax Increment Financing through the Tax Allocation Districts for Brownfields, incentives, workforce affordable housing incentives and infrastructure funding.
- Urban Enterprise Zone program property tax abatements.
- State Brownfield Program
- City Greenspace Opportunity Bonds,
- 501(c)3 bond financing.

MARKET ANALYSIS

Types of borrowers and sub-grantees eligible for the RLF include: 1) Developers; 2) Non-profits supporting Greenspace and affordable housing; 3) City and other governmental bodies and agencies; 4) City Housing Authority; 5) City BeltLine, Inc.; and 6) The City Development Authority and its subsidiaries.

The RLF will accept applications for any brownfield in the City. Priority will be given to projects within the BeltLine Tax Allocation District (TAD) for one of the City's Economic Development Priority Areas, as described in the Project description and shown in Attachment 8. The types of sites eligible for RLF funding include: 1) abandoned industrial sites; 2) Abandoned gas stations; 3) Sites where illegal dumping has occurred; 4) Sites with buried construction debris and discarded tires; and/or 5) Sites in the State Brownfield Program.

SELECTION PROCESS

City Development Authority (CDA) will coordinate with the City Brownfield Assessment Grant program to identify sites citywide. CDA and the City are committed to utilizing assessment resources on properties with the greatest potential for reuse/redevelopment and that have community support. We will encourage nomination of sites from a wide variety of community representatives and organizations including citizens, various City departments charged with acquiring property, and the various organizations discussed in the community involvement section of this proposal. In marketing the RLF to potential borrowers and sub-grantees, CDA will consider: 1) Site location; 2) Past and current site use; 3) Proposed future site use; 4) Current property owners disposition/willingness to sell and allow site access; 5) Anticipated economic impact to the city and the community; 6) Likelihood to mitigate risk to human health and the environment; and 7) likelihood to encourage additional nearby redevelopment. Sites will be

evaluated and ranked according to the aforementioned site selection criteria. Highly ranked sites will be included in the assessment program and selected based on their relative score.

Site Selection: CDA will select sites based on project readiness and the level of priority in the community. Applicants must present a project that is ready according to the following criteria: 1) Property must be owned by the borrower; 2) Property must contain either petroleum or hazardous substance contamination and/or construction debris or discarded tires that present a public health hazard; 3) Property must not be on the National Priorities List or under current enforcement of the EPA; and 5) All assessment reports (Phase I, Phase II, and/or Asbestos Survey) and a Remedial Action Plan must be complete for the property. Assessment reports must comply with either the most up to date ASTM and/or State EPD guidelines.

Borrower and Sub-grantee Selection: Borrowers and sub-grantees must also present that they meet the following criteria before receiving RLF loan funds or grants: 1) Borrower must be in good financial standing, current on all property taxes and other obligations with the City and demonstrated ability to repay the loan and complete the project successfully; 2) Sub-grantee has a financial inability to complete a project on its own; 3) Borrower/Sub-grantee is not responsible for the contamination at the property according to the Brownfields Law; 4) Borrower/Sub-grantee intends to redevelop the property for a use other than the activity, which caused or contributed to the contamination and/or will not re-contaminate the property once remediation is complete; 5) Borrower/Subgrantee has secured any additional financing required to complete the project; and 6) Each project is required to complete a Site Eligibility Form that the coalition will develop. The form that must also be accepted by the appropriate State EPD unit for petroleum cleanup projects or for the hazardous cleanup projects prior to approval of an RLF application.

MANAGEMENT AND OPERATIONAL TEAM

The City's Brownfields' staff has the experience and capacity to integrate the U.S. EPA RLF funds into the City's existing Brownfield program. The City's Staff is lead by Mr. Ms. A. and is comprised of an experienced Brownfields staff including an administrative assistant, three Brownfield specialists and one Brownfield coordinator. Each Brownfield specialist performs specific duties to the RLF including the organization of site visits, and the pre-audit and review of all disbursement requests to prepare them for payment. One specialist will provide up to 70% of working hours to the RLF program. Tasks include marketing, program management, clerical functions, and program implementation. All staff has educational experience in business, planning and environmental sciences. All specialists have several years of environmental cleanup and procedure work experience. All staff is 40-hour hazardous materials incident response operations certified. The City's budget officer along with other City fiscal staff manages a several million dollar federal account and is familiar with the federal processes required for administering the RLF grant. The budget officer will provide monthly reports tracking the activity of the account. The City's legal council supports all grant agreements, will provide the expertise to manage the creation and implementation of loan and subgrant agreements. The City contractually requires all borrowers to retain records for 3 years following the completion of their project. The City will retain all documentation in house for 5 years following completion of the project. The City will contract with a qualified environmental

consulting firm in compliance with federal procurement requirements to assist with administering the activities required for the U.S. EPA-funded RLF program. (environmental professional) The City will work in cooperation with the environmental authority and on-site project management to ensure that the cleanup activities are completed according to the applicable regulation and in a safe environment.

The City has over 5 years of experience and manages over \$22 million in grants and loans with no adverse audit findings. The City's mission is to provide leadership in establishing common positive goals and strategies to develop the human, social and economic assets of the City by enhancing the quality of life for area resident's workers and businesses. The City shapes public policy at federal, state, and local levels. It identifies, obtains and responsibly manages financial resources to successfully implement this vision.

The City, through the grant and loan administrator for the City, manages over \$22 million in Federal, State and Local grants annually. The City has provided services to other local entities since 1976. The City is in compliance with OMB Circular A-133 and has no adverse Audit findings, and has never been required to comply with special "high risk" terms and conditions under agency regulations implementing OMB Circular A-102.

The City for 5 years was a grant recipient of a Small Business Revolving Loan Fund from the SBA. Ms. A was the manager for this program. The City was totally responsible for loaning over \$450,000 to small businesses that were start-ups or high risk. All loan preparations completed through the City. The City secured collateral and matching fund requirements. Loan payments were made to the City. When necessary the City would carry forward with collection practices for late payments and defaulted loans that required action.

Lead Personnel

Ms. A will be the Brownfield project coordinator. Ms. A has over 19 years of grant and loan management experience. Ms. A has a degree in marketing and graduate work in business administration. Ms. A has been project coordinator for the City's Brownfield project since its first grant in 1997. She coordinates grant implementation activities for the City. She also coordinates monthly stakeholder meetings, tracks budgets and ensures all reporting requirements are completed. Ms. A will also oversee the Brownfields staff in the administration of the loan. Ms. A's responsibilities will continue with the RLF grant.

Ms. B, Financial Controller for the City, will be the Fiscal Manager for the RLF. Ms. B will assist with fund management responsibilities. She has over 8 years assisting with the City's accounting responsibilities. Ms. B has a degree in Business with an accounting emphasis with graduate courses in Business Administration.

Mr. C will provide legal council to prepare development agreements, loan agreements, and other loan related documents. Mr. C has over 20 years experience with real estate, finance, and commercial lending. Mr. C's experience also includes: 1) foreclosures, 2) property access agreements, and 3) ensuring compliance with prudent lending practices. He is also an expert in environmental law having drafted significant portions of pertinent state law. Further, Mr. C has

provided legal services to other Brownfields' programs since 1995. Mr. C received his law degree for the University of X Law School.

Criteria D: Sustainable Reuse of Brownfields

To what extent will this grant support the goals listed below:

1. Prevent pollution and reduce resource consumption through, e.g., Brownfields prevention, infrastructure reuse, native landscaping, innovative stormwater management/reuse, construction debris/fill reuse, local government commitment to achieving green building and/or energy efficiency building standards, and/or others.
2. Promote economic benefits, e.g., an expanded tax base, increased investment, job creation, enhanced property values through adjacent Greenspace creation, and/or others.
3. Promote a vibrant, equitable, and healthy community, through, e.g., smart growth, linked recreational and park areas, affordable housing, and/or others.

Sustainable Reuse of Brownfields Example 1

Sustainable reuse of Brownfields requires strategic partnerships that leverage resources to promote revitalization supportive of the redevelopment vision. A key goal of this project is to provide seed funding to partner organizations to catalyze redevelopment in disenfranchised and blighted areas. This project also plans to leverage funding obtained from two existing EPA Brownfields Assessment Grants received by the City in 2005. The City and their private partners have worked together closely to nominate sites for assessment under this program. It is expected that the RLF may utilize site assessment information obtained through this program, thereby leveraging assessment grant dollars and other public and private funding to select sites most appropriate for remediation.

Prevention of future Brownfield sites is another significant goal of the RLF that will be reached through incorporation of sustainable development practices, the specifics of which are addressed in the following sections.

PREVENT POLLUTION AND REDUCE RESOURCE CONSUMPTION

The remediation of currently idle and underutilized property within the existing urban core will improve land quality and land use patterns, increase energy efficiency, improve air quality and improve water quality by preventing pollution and reducing resource consumption.

The RLF will prioritize sites targeted for remediation and provide a mechanism to remediate identified Brownfield sites that pose a threat to human health and the environment. Remedial actions performed during site redevelopment, which will reduce the amount of impacted source material and possible contaminant migration, will improve land quality. These efforts will thereby reduce the exposure to human receptors and ecological systems and be protective of human health and the environment.

This project also provides an opportunity to encourage redevelopment of properties using environmentally friendly design/build/operate principles, integrating green building and D.S. Green building Council Leadership In Environmental and Energy design (LEEDTM)

certification. To responsibly build the City's growth and promote sustainable development, the Mayor and the City are committed to leading by example. In 2003, the City passed an ordinance requiring all new city financed construction projects to be LEED Silver-certified or better. Projects will be selected that will continue this example.

The City metropolitan region has struggled for decades with meeting appropriate air quality standards established under Clean Air Act of 1990. It has made improvements in recent years, but is still considered a non-attainment zone for ozone. In order to meet Clean Air Act requirements and plan for future growth, the City must continue its evolution into a Smart Growth city characterized by 1) Concentrated development patterns that cluster homes and shops around transit hubs and job centers; 2) More convenient mass transit for residents and commuters; 3) Additional Greenspace and parks; 4) Protection of the region's woodlands – by preventing clear-cutting for Greenfield development – and waterways by preventing soil disturbance; 5) Redevelopment supportive of alternative transportation, pedestrian access, biking and transit.

The BeltLine project is designed to satisfy all of these goals, while also seeking to utilize existing urban infrastructure, including 22 miles of largely underutilized railroad lines and transportation corridors. The remediation of currently idle and underutilized property within the existing urban core will attract infill redevelopment, reducing the effects of suburban sprawl. With appropriate guidance from the City, this activity will result in communities that are livable and supportive of alternative transportation due to increased street connectivity land use mix and pedestrian scale, thereby reducing the dependence on the automobile and improving the region's air quality.

The addition of 1,300 acres of interconnected Greenspace will aid in improving water quality by reducing the amount of storm water runoff and non-point source pollution. Infiltration of storm water within Greenspace, as opposed to sheet flow across impervious surfaces, will allow water to be retained by the land rather than flowing unimpeded into storm drains and into tributaries and streams. The reduction in water volumes discharged to waterways will prevent eroded stream banks, loss of habitat and aquatic life and decrease potential flooding and property damage, improving the region's overall water quality.

Finally, the City gives priority to sites that take advantage of existing and adequate public infrastructure services such as water and sewer service, rail, roads, gas and electric utilities, and technology fiber in its assessment grant ranking criteria. Through planning and City codes, it is a priority to reuse City infrastructure.

PROMOTE ECONOMIC BENEFITS

Among the economic benefits this project will promote is an expanded tax base for properties that are eventually remediated, redeveloped and returned to productive use. Several area businesses are considering expansion and are in the process of securing new business locations. This grant will be used to assist the businesses and encourage them to reuse Brownfield sites. This will result in the retention of existing successful businesses and encourage their growth resulting in retention of existing jobs and the creation of new jobs. These productive properties

will stimulate economic growth in areas of the City that have been neglected for years, and create jobs and economic opportunities within local communities. Economic benefits will be enhanced with the funding support from the BeltLine TAD that is projected to generate approximately \$1.7 billion over the 25 year period. The TAD will provide a substantial funding source for purchase of right-of-ways and adjoining green space tracts, development of multi-use paths, parks and transit, and providing incentives for development and affordable housing. During the first 5 years, \$8 million from TAD funding has been allocated for assessment and remediation of Brownfields sites to facilitate private development, which will be leveraged through the RLF. While this local funding appears to be a substantial commitment, it is insufficient given the significant Brownfield challenges. The remediation of only the parkland acquired as part of the five year plan is estimated to cost approximately \$11 million. BeltLine transit will link over 45 sites expanding the regional transit system, helping the metropolitan area meet air quality requirements by providing an alternative to the automobile and reducing congestion. This investment will reduce the need for highway and parking construction, increase mobility for seniors and young adults and improve access to key employment locations including downtown.

PROMOTE A VIBRANT COMMUNITY

Site selection criteria will include priority for sites that have the potential for contributing to smart growth concepts and for sites owned by someone willing to make a commitment to redevelop their property according to these concepts. Developers and nonprofits that apply for participation in the RLF program will be required to submit plans for reuse of their properties that include a Greenspace component. Reuse plans that include new public Greenspace on remediated Brownfields along with commercial or industrial development will receive a higher ranking for participation in the RLF Program. When Greenspace is created that could be an asset to both the public and the employees of newly developed commercial or industrial properties, TLF will encourage the developer to open the area to all responsible users and to maintain it.

A component of the BeltLine project is to create an easily accessible network of parks and Greenspace that is expected to encourage walking, jogging, biking and other forms of exercise. This exercise in conjunction with the reduction of exposure of pollutants will help improve public health. In addition, the BeltLine vision includes the addition of over 5,600 affordable workforce housing units in the urban core, which will play an important role in revitalizing communities and preventing displacement of the existing community. These developments allow the community to live, shop and work all within walking distance.

Criteria E: Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purposes

Describe the extent to which the grant would facilitate the creation of, preservation of, or addition to a park, greenway, undeveloped property, recreational property, or other property used for nonprofit purposes. If this grant would result in such creation or addition (e.g., a new or expanded community park), what specific regulations, policies, or programs, are (or will be) in place to provide for long-term management and care? If this grant would result in such preservation (e.g. preserving outlying Greenfields by focusing development on Brownfields) what specific regulations, policies, or programs, are (or will be) in place to assure long-term management, care and preservation?

Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purposes Example 1

The City is an advocate and educator for Brownfield redevelopment, especially when Brownfield projects have a direct correlation with preserving/conserving the area's remaining open and Greenspace. In 2005, Department of Development Brownfield Redevelopment Division was brought on board to assist the Rocky Mountain Institute, Entrepreneurs for Sustainability, and the City Planning Commission with the BeltLine Initiative (BE). This initiative aims to revive the last miles of the X River Valley both ecologically and economically through a series of projects, including renewable energy, storm water management, Brownfield redevelopment, and a series of parks and Greenspace. More information is available at www.x.x.

A high priority of the City is the preservation of undeveloped land. With the large inventory of know Brownfields, the City will encourage development on former commercial and industrial sites rather than on undeveloped land. Part of its strategy entails fostering relationships with developers who consistently choose to remediate and redevelop Brownfields rather than choosing Greenfields to develop. Those sites that do not include or are not adjacent to natural amenities will be required to provide open space per City regulations in order to receive funding.

When Greenspace is preserved or created on a project site, the program will require the applicant to set in place a plan for long-term care, maintenance and/or preservation. Part of the project cost is expected to be set aside to maintain Greenspace. In addition, the City maintains a fund that will provide supplemental funding for this purpose. The City's Parks Department maintains and protects over 2,500 acres of open spaces, parks and natural corridors. The department recently completed a community-wide master parks plan that strengthens and guides the development of the City's open space network. If additional land is cleanup up for land conservation and preservation purposes that falls within the plan, the Parks Department has the capacity and the authorization to protect and manage the additional land for the long term.

A strong partnership has been forged with our non-profit development organizations. Proposals are solicited from non-profits for worthwhile developments that fit into the character of the neighborhood. Historical preservation sites are given a priority within the selection process.

Criteria F: Pre-Award Community Notification

Note: Responses to this section are required as part of your proposal and will be ranked accordingly. Actual notification need not take place prior to selection, but applicants should be prepared to implement their plan as soon as selections are announced. EPA will require the execution of Community Notification plans prior to grant award and no later than September 14, 2007.

If selected, as part of their work plan, applicants will be required to summarize the major comments received and their responses to those comments.

Please note that the notification is to citizens or members of the public, not exclusively to government officials.

1. Describe how the targeted community(ies) was or will be notified of your proposed plans should your proposal be selected for funding. If conducted by another entity on behalf of you, the applicant, please demonstrate how you were or will be involved in the community notification (i.e., you attended or will attend the public meeting, you responded or will respond to comments, etc). Describe the means by which you notified or will notify the community of your plans and by what means they provided or may provide comment.
2. Explain why the notification method proposed above was/is the most appropriate way to reach your target community. Provide any details that justify your notification plans (languages used, type of media used, medium used, etc.).
3. How long of a comment period did/do you propose (if less than two business weeks please explain why)? What forms of outreach did/will you employ to encourage community comment over this period?
4. What were/are your plans for addressing comments received?

Pre-Award Community Notification Example 1

DESCRIBE HOW THE TARGETED COMMUNITY(IES) WAS OR WILL BE NOTIFIED OF YOUR PROPOSED PLANS SHOULD YOUR PROPOSAL BE SELECTED FOR FUNDING

The City considers the involvement of the community a very important aspect of a City Brownfield RLF Program. On (date before submittal), Ms. A, City Brownfield Staff Member, held a public meeting that provide a PowerPoint presentation and a period for audience participation. An advertisement of the public meeting was placed in newspapers covering the city. Local television and radio stations also have made public service comments regarding the proposal. The City web site displayed the news release, the PowerPoint presentation, and other pertinent information about the proposal. A comment period was provided for the general public prior to submission of this to EPA. A mailing announcing the public meeting and soliciting responses to the proposal was sent to

EXPLAIN WHY THE NOTIFICATION METHOD PROPOSED ABOVE WAS/IS THE MOST APPROPRIATE WAY TO REACH YOUR TARGET COMMUNITY

The news agencies to be notified by the press release will include the regional newspaper and local newspapers distributed in the local communities which are widely read by the general public in the City. Local radio and television stations are also widely listened to and viewed. The City office, where the public meeting will be held, is centrally located, fully accessible and the site of numerous community meetings. It is usually booked four nights a week throughout the year. The City's office is also located in the building and is easy for citizens to visit and review the grant proposal. The City's web site is updated on a regular basis and contains much information to assist the general public. Public libraries offer free web access and are located throughout the city. This web site will display the news release, the grant proposal, and other pertinent information. Letters sent to specific organizations and key stakeholders will include contact information to enable them to easily participate.

HOW LONG OF A COMMENT PERIOD DID/WILL YOU PROPOSE? WHAT FORMS OF OUTREACH DID/WILL YOU EMPLOY?

The City enjoys a good reputation for community awareness and involvement. The City provides for a 30 day period for accepting comments. Comments may be in the form of written comments via the postal mail or email to the web site. All partners (See Ongoing Community Involvement Section) will be solicited for comment. Public Notice in the City newspaper, local newspapers, television and radio stations, and fliers at appropriate places will be distributed. The City brochure process outlined in Ongoing Community Involvement that follows will be followed in getting the word out for comments.

WHAT WERE/ARE YOUR PLANS FOR ADDRESSING COMMENTS RECEIVED?

The City receives very positive feedback from the community whenever grant requests are discussed. Community residents recognize the more funds are needed to cleanup our many Brownfields. The City will continue to discuss plans to establish the RLF with the community in various forms and will consider the public's feedback when finalizing our business plans and scoring criteria. The City's web site provides the public with the ability to submit comments by email and provides contact information if a person would prefer to submit a comment by phone or letter. Comments via phone will be summarized, documented, and kept for review of any interested person. All original letters with comments will be kept. The City will review and consider all comments. If a comment provides an idea that would improve the City's grant proposal, EPA would be contacted to determine if the idea could be incorporated into the new cooperative agreement.

Criteria G: Ongoing Community Involvement

EPA requires early community notification and encourages continuing community involvement.

1. Discuss your plan for involving affected communities (e.g., neighborhood organizations, citizens' groups, borrowers, nonprofits, developers, and other stakeholders) in cleanup decisions or reuse planning. Describe what community involvement activities, if any, have already occurred.
2. Describe your efforts and/or plans to develop partnerships at the local, state, and/or tribal level with other stakeholders to ensure appropriate and sustainable cleanup and redevelopment of Brownfields in your targeted community.
3. Describe your specific plans for communicating the progress of your project(s) to citizens, including plans for communicating in languages indigenous to the community or other efforts to reach the targeted community as well as the broader community.
4. Provide a list of the community-based organizations involved in this project and a contact person, phone number, and a brief description of the organization's activities and representation (these organizations may include, but are not limited to, local citizen groups, environmental organizations, civic organizations, local business groups and institutions, educational institutions, and local labor organizations). Community-based organizations do not include the local planning department, the local fire department, or the mayor's office.

Note: EPA may conduct reference checks to ensure that organizations identified are supportive and involved with the Brownfields project.

Ongoing Community Involvement Example 1

DISCUSS PLANS FOR INVOLVING COMMUNITIES

The City has a long and successful history of involving its residents and community groups in a wide variety of planning projects, redevelopment efforts and grants. The City citizen participation and community involvement was a critical component of the City's 2001 Comprehensive Plan that addressed the need for Brownfield redevelopment in the City as well as the CDBG 5 Year Action Plan. The City's citizens and community groups were notified by mail of the EPA's award to the City of \$200,000 in Cleanup and \$400,000 in Assessment Funds, and this began a series of Community Involvement and Education activities that have provided outreach to city, community, educational, financial, non-profit, faith-based, business and environmental groups. A mailing list has been created of these groups with contact information. In addition, the contact person for each group is personally contacted concerning Brownfields plans and issues. This database is continually reviewed to remain current. The City enjoys a good reputation for community awareness and involvement. Activities such as informative mailings, attending group meetings and continuous updates through web and print media keep all parties informed. A group called the City Brownfield Coalition has been in existence since 2002 and has been successful in establishing partnerships concerning Brownfield sites in the City. Public meetings are held in conjunction with these efforts.

Brownfield redevelopment is an important component of neighborhood revitalization and urban renewal. For such redevelopment to be successful, a foundation of community support and involvement in the planning, design, development and completion of the Brownfield project is essential. The City has a brochure (attachment C) that outlines a process that they follow on all projects for effective community participation. It involves the following steps: 1) Identifying all stakeholders in a project and ensuring that they are present at public meetings and discussion forums. 2) It is important that the community know that its leadership and decision makers support the project. (this avoids wariness of “outsiders” taking control of the development. 3) Prepare a Community Involvement Plan (CIP) to provide the community with dependable and easily accessible information on the project, the process and opportunities for comments. 4) Factor in the community for important decisions. (This step includes setting up citizen advisory committees and bringing the developer with alternatives to “local” meetings and presenting charrettes, etc.) 5) Get people involved from the outset. 6) Get people to show up by contacting all community organizations such as churches and schools. Have fliers at local coffee shops, community centers, grocery stores or other places that people frequent. 7) Make meetings convenient in time and location for the source group not the people putting on the meeting. Provide information on how project will affect the community. 8) Provide an atmosphere that is conducive to conversation. Silence is not always a form of approval. 9) Evaluate meetings to make them more successful. 10) Remember that community participation never really ends.

DESCRIPTION OF PARTNERSHIP AT STATE AND LOCAL STAKEHOLDERS

The City has created sustainable relationships between local and state government and with project stakeholders. These working relationships will ensure that all involved parties have a resource for answering questions, listening to ideas/concerns, and completing a chain of responsibilities. The City will continue to build on these successful partnerships and relationships.

The City has an excellent partnership with the State EPA (SEPA). Past examples of this relationship have included the X Brownfield Redevelopment Project that resulted in a 20XX Phoenix Award. The Main Street Redevelopment Project that required a tri-party agreement with the City, the former owner, and SEPA in order to acquire the site as a donation. All sites are entered into the SEPA voluntary cleanup program.

The City also has involved the City Name Eastern Band of the XX Indian Tribe concerning their land that is included in this area. This partnership was successful in completion of a casino on Indian land that incorporated City and Tribal cooperation in the site cleanup and incorporating various laws and requirements.

The City also involves the State and Local Health Departments. Overall site health assessments are completed and findings are incorporated into the plans for these sites. The State and Local Health Department make personnel available on an as needed basis to assist in handling health issues as they occur.

In addition acquisition, remediation and redevelopment continues to occur because of strong partnerships with the State Department of Commerce, The State Department of Revenue, The U.S. Office of Housing and Urban Development, the County, the State and City Economic Development Council.

SPECIFIC PLANS FOR COMMUNICATING PROGRESS

The City will communicate projects, plans, and information of interest through local media (City Name Newspaper Name), Beacon (free weekly publication), XXX (Hispanic Language Publication), Local television stations and on the City’s web site. The web site is linked to many of their partner web sites and all relevant documents and presentations are available for download from this web site. Flyers are also distributed in languages indigenous to the City at points of congregation frequented by the various groups. Mailings are also sent City inhabitants and to the various partnership groups. Where applicable these are done in the appropriate language. The City staff will communicate through speaking engagements at local organizations, clubs, lending institutions, and governmental meetings. In addition, ongoing dialogue with stakeholders will be maintained throughout the Brownfield and project phases. Communication and feedback are considered a priority and monitored for effectiveness. It is a constantly evolving process to maintain the maximum benefit to all involved. If other disability or communication issues are ascertained, they will be addressed.

COMMUNITY ORGANIZATION INVOLVEMENT

The City will work with a myriad of local, business, special interest, faith based, resident and community based groups to compete the activities outlined in this RLF proposal. Letters of support from 19 organizations are in Attachment D. The following is a list of organizations involved in the program.

Village of Madison Heights	Contact Name	Phone Number	Homeowners Group
Township of Royal Oak	Contact Name	Phone Number	Local Township
County Econom. Dev. Corp.	Contact Name	Phone Number	Development Council
City River Basin Part.	Contact Name	Phone Number	River Partnership
City Redevelopment Auth.	Contact Name	Phone Number	Redevelop Authority
Business Improvement Dist.	Contact Name	Phone Number	Improvement District
XXX County Health Partners	Contact Name	Phone Number	Not for Profit Health Organization
Community Action SW	Contact Name	Phone Number	Special Interest Group
AFL/CIO	Contact Name	Phone Number	Union
City Realtor Association	Contact Name	Phone Number	Real Estate Org.
XXX College	Contact Name	Phone Number	Educational Inst.
University of State	Contact Name	Phone Number	Education Inst.
State Cooperative Extension	Contact Name	Phone Number	Urban Forestry
Sustainable (City Name)	Contact Name	Phone Number	Economic, social equity and environmental quality group

City Trail Council	Contact Name	Phone Number	Non-profit volunteer group which builds and maintains trails
XXX Indian Council	Contact Name	Phone Number	Indian Tribe
Friends of Big Birch Creek	Contact Name	Phone Number	Watershed group
State Citizen Group	Contact Name	Phone Number	Brownfields group
County Board of Health	Contact Name	Phone Number	Health Department
BeltLine Partnership	Contact Name	Phone Number	Advocacy Group
Trust for Public Land	Contact Name	Phone Number	Nat'l non-profit land conservation group
PATH Foundation	Contact Name	Phone Number	Local Ethnic Group
Financial Association	Contact Name	Phone Number	Lending Association
City Council of Churches	Contact Name	Phone Number	Faith based advocacy
Friends of BeltLine	Contact Name	Phone Number	Non Profit advocacy
Audubon Society	Contact Name	Phone Number	Advocacy Group
Sierra Club	Contact Name	Phone Number	Advocacy Group
Mt. Zion Baptist Church	Contact Name	Phone Number	Faith based advocacy
Acme Manufacturing	Contact Name	Phone Number	Large employer in area

Criteria H: Reduction of Threats to Human Health and the Environment

1. How and to what extent will funds be used to identify and/or reduce threats to human health and the environment within the target area that may be associated with exposure to Brownfield site contaminants? If known, describe the proposed end use of the Brownfields site and how this proposed end use will factor into cleanup activities, monitoring and maintenance of engineering controls or institutional controls as part of redevelopment.
2. Describe how you are working with your local, state or tribal health agency to ensure protection of public health and the environment during the cleanup and redevelopment process. Include a brief discussion of relevant state/tribal response program (or “Voluntary Cleanup Program”) processes, where applicable. Note: Local governments seeking funds to support health monitoring must provide additional detail on proposed monitoring activities as part of this question.

Reduction of Threats to Human Health and the Environment Example 1

HOW AND TO WHAT EXTENT WILL FUNDS BE USED TO IDENTIFY AND/OR REDUCE THREATS TO HUMAN HEALTH AND THE ENVIRONMENT WITHIN THE TARGET AREA THAT MAY BE ASSOCIATED WITH EXPOSURE TO BROWNFIELD SITE CONTAMINANTS?

Based on the City’s Sustainable Brownfield Program, funded under an EPA Community-wide Assessment Grant, there are over 200 Brownfield sites in the BeltLine area, totaling 2000 acres. The sites consist of idle, underutilized or abandoned properties with know or perceived environmental impacts. The City Health Department has identified the following contaminants: arsenic, polycyclic aromatic hydrocarbons (PAH’s), i.e., pyrene, heavy metals and TPH’s. These contaminants are either known carcinogen causing agents, especially harmful to infants and children and/or result in birth defects and malformations. The RLF will not only cleanup Brownfield sites of such contaminants, but will most likely eliminate a source of contamination for the surrounding area. Cleanup projects will also eliminate exposure pathways of contamination that pose a serious public health risk as found by the State Environmental Health Agency.

An example of cleanup for the ultimate end use is the cleanup of an abandoned land fill. Some of the associated issues include documented leachate outbreaks from contaminants at the landfill. After cleanup is completed, an engineering control of a geotextile barrier will be incorporated for this site to ensure a “clean” soil barrier. This in addition to the institutional control regarding excavation and drilling at this site in the future, along with the asphalt cap over the old landfill, will ensure that there is a barrier between the proposed shopping center and the contaminants. Along with storm water runoff requirements, this site should become productive again.

Efforts under this program will focus on an aggressive education and outreach campaign designed to stimulate community input regarding the identification of sites that have been previously assessed that pose a risk to human health and the environment

All loan recipients will be required to enroll in the State Voluntary Cleanup Program (VCP). This will ensure that processes are verified and that cleanup will attain applicable levels in order to obtain a No Further Action letter and Covenant Not to Sue (if desired) pursuant to the State Revised Code. For those projects that involve asbestos, lead based paint, demolition, etc. that fall outside of the VCP, the County will ensure that the properties are cleaned up to applicable levels as required by federal, state and local laws/regulations.

All cleanup activities will be conducted using the safe work practices and protocols established under the applicable regulatory standards.

At the conclusion of the project, appropriate engineering and institutional controls will be undertaken. Institutional controls have to be implemented into deed restrictions. The City has passed zoning laws and regulations that reinforce these deed restrictions. Engineering controls are evaluated on a site by site basis. All covenants will be in line with the habitation intent of the redevelopment. Since much of the redevelopment includes homes, the cleanup requirements and controls will be stringent. For those sites that will be used for commercial purposes, the controls will be appropriate for those sites.

All sites will continue to be monitored by the local health department to ensure reduction in health issues for this area. This is available from a state grant to measure effectiveness of the environmental programs within the state.

This coordinated approach to remediation will ensure that the potential threats to human health and the environment are adequately addressed. One of the primary goals for the Economic Development Priority Areas and BeltLine Redevelopment Area is to mitigate and eliminate hazards and contaminant releases associated with the Brownfield property, including polluted storm water runoff, direct contact, groundwater contamination, and other waste that pose a threat to human health and the environment.

DESCRIBE HOW YOU ARE WORKING WITH YOUR LOCAL, STATE OR TRIBAL HEALTH AGENCY TO ENSURE PROTECTION OF HUMAN HEALTH AND ENVIRONMENT DURING THE CLEANUP AND REDEVELOPMENT PROCESS? INCLUDE A BRIEF DISCUSSION OF RELEVANT STATE/TRIBAL RESPONSE PROGRAM (OR VCP) PROCESSES, WHERE APPLICABLE.

The City has a long standing and positive relationship working with local, state, tribal and federal environmental agencies throughout its Brownfield Program. The City communicates with the County and City Health Departments and through them the State Department of Public Health to provide assistance as needed. In addition, the Agency for Toxic Substances and Diseases Registry (ATSDR) is consulted as appropriate. ATSDR is a Federal Public Health Agency charged with assessing health hazards at hazardous waste sites, helping to prevent/reduce exposure, and increase knowledge of the health effects that may result from exposures.

The XXX Indian Tribe Health Department is consulted for areas under Tribal regulation. Their assistance in identifying threats has helped make it a more efficient process. The City was able to successfully work with the Tribal personnel during the Casino construction and a further satisfactory relationship is anticipated on future tribal cleanups.

The City will facilitate the reduction of health risks for city residents by including the participation of health-oriented and environmental organizations in the development of site selection criteria and the development of a Brownfield RLF Program. With their assistance, sites will be identified that are threats to human health and the environment. The health department has already collected information regarding rates of asthma and lead poisoning in the city and can assist the identification process by targeting sites near areas that show higher risk for these health problems. Statistics from the State Department of Public Health show that the city has a higher incidence of cancer than the state incidence rate. The State Department has been beneficial in identifying pollutants and sites that contribute to these higher rates.

This RLF program will require all applicants to enroll in the appropriate environmental program. For example, all appropriate cleanups are enrolled in the State Voluntary Cleanup Program and projects requiring underground storage tanks will be handled according to the UST Removal Program. A complete outline of these programs is attached in Exhibit E. In addition, Asbestos, Lead Based Paint and PCB issues will be handled appropriately, since they fall outside of the VCP. The State's VCP levels track with the U.S. EPA requirements. For projects enrolled in the VCP, the standards require that sites meet cleanup levels, which are protective of human health, safety and the environment. The VCP rules contain generic number standards along with determination procedures. If generic standards or procedures are not available for all chemicals of concern on the site, a site-specific risk assessment, approved by the State EPA will be performed after the approval of the sites VCP Phase II report. In (State), risk assessments follow U.S. EPA exposure assessment and exposure factor guidance. The State works with the Brownfield program to insure all work is completed in accordance with environmental standards. The Qualified Environmental Professional in conjunction with the EPA and the State VCP will assure that the cleanups are conducted to EPA standards. This coordinated approach to remediation and health issues will ensure that the potential threats to human health and the environment are adequately addressed.

Criteria I: Leveraging of Additional Resources

1. Identify the funds (e.g., general revenues, Tax Increment Financing (TIF), staff time/in-kind) that your agency/organization has committed or will commit to meet cleanup/redevelopment needs not met through this grant, e.g., additional stages of cleanup, infrastructure upgrades, etc. If you are applying as a coalition, describe the resources (i.e., funding, services, and expertise) that the coalition members are contributing as part of the coalition.
2. Demonstrate your ability to leverage funds. Describe all other funding sources (e.g., federal, state, nonprofit, or private) that will be committed or that you are pursuing to fill in any remaining funding gaps to ensure the success of cleanup projects under your RLF program.

Leveraging of Additional Resources Example 1

IDENTIFY THE FUNDS THAT HAVE BEEN COMMITTED OR WILL BE COMMITTED TO MEET CLEANUP/REDEVELOPMENT NEEDS NOT MET THROUGH THIS GRANT

The City will leverage the use of local, state, and federal incentives as well as private funds to meet the City's Brownfield remediation needs that exceed this grant for sites within the Economic Development Priority Areas. The City will utilize the State Assistance and Revitalization Fund program to support cleanup needs not met through the RLF expenditures. They have already committed \$6,750,000 for two of the three loans in the pipeline with a fourth under consideration. Locally, the City committed money from the City's operating fund to cover gaps in financing. Additionally, they are committed to the use of \$15 million in tax increment funding (TIF) as a funding mechanism. The City also uses tax abatements for new or expanding businesses that utilize Brownfield funds. To supplement the city tax credit, there is a Single Business Tax Credit available from the state under their Brownfield Plan that allows the developer to become eligible for a tax credit equal to 10% of their investment costs, up to \$30 million. The city also has at their disposal, a CDBG grant from HUD. City has also obtained volunteer commitments from local banking, legal and environmental consultants for in-kind services. City financial institutions also pledged financial support where adequate funding is not available. Finally, a local philanthropist has pledged \$5 million dollars towards shortfalls in projects.

DEMONSTRATE YOUR ABILITY TO LEVERAGE FUNDS

The City has leveraged funds in the past to ensure successful cleanup and will use these funds for additional leverage. Much of the institutional and private funding support outlined in the previous subject is the result of successful leveraging in the past and is present to leverage these funds. Currently, the City has a portfolio of 31 projects that for every \$1 they have spent, they have leveraged \$12.40 in funding to accomplish completion of these projects. Included in the project is the acquisition of park land, Ironwood housing development which started as part of a \$200,000 assessment grant, Wakefield business park, and Bessemer industrial reclamation both of which started with \$200,000 cleanup grants. A private donation of \$4 million has been pledged based on a matching figure of public funds being raised of which the RLF will count.

To date, The City has leveraged over \$250 million in TIF funds, \$65 million in private investment, \$10 million in state cleanup funds, and currently manages \$52.5 million of various Federal Grants. In addition, the staff has over 15 years of experience mixing and matching federal grants with other sources to accomplish successful projects. Finally, For the Bedford I landfill project, the City was awarded \$150,000 in CDBG funds, \$3 million in TIF Financing and \$200,000 for U.S. EPA Brownfields Cleanup that will result in private mixed use development of over \$45 million.

Criteria J: Programmatic Capability

1. Demonstrate your ability to manage this grant and successfully perform all phases of work under this grant, and, if applicable, describe the system(s) you have in place to acquire the requisite expertise and resources necessary to successfully perform the grant. If you plan to acquire any fund management or environmental expertise, describe the relationship between the potential cooperative agreement recipient and the institution or individual and the type of agreement (e.g., contract³ or subgrant⁴) that is planned. If you are, or have been, a recipient of an EPA Brownfields cooperative agreement(s), highlight significant accomplishments generated AND monies leveraged through the use of the funds.
2. Describe your history of managing federal funds. If applicable, you must identify and provide information regarding the status of any adverse audit findings from an OMB Circular A-133 audit, an audit conducted by a federal, state, tribal, or local government inspector general or similar organization, or audits conducted by the U.S. Government Accountability Office. If applicable, you also must note whether you are, or have previously been, required to comply with special “high risk” terms and conditions under agency regulations implementing OMB Circular A-102. Note: If you have not previously managed federal funds, respond with NA and you will receive a neutral score. Blank responses will receive a zero score for this factor.
3. If you are, or have been, a recipient of an EPA Brownfields cooperative agreement(s) or other EPA or Federal assistance agreements, provide information regarding your compliance with quarterly progress reports, Brownfields reporting measures, annual financial status reporting, and any other reporting requirements under those agreements. In addition, provide information on your past performance in reporting on whether you were achieving the results under these agreements. Describe how this information demonstrates that you are making satisfactory progress. Note: If you have not previously received any EPA or Federal assistance agreements, respond with NA and you will receive a neutral score for this factor. Blank responses will receive a zero score for this factor.
4. Describe your plans for tracking and measuring progress towards achieving the expected outputs and outcomes, including those identified in Section I.

Programmatic Capability Example 1

DEMONSTRATION OF ABILITY TO MANAGE THIS GRANT

The City Department of Planning and Development Staff with assistance of the City’s Deputy Finance Director have successfully managed a wide variety of grants and redevelopment projects. Personnel for this effort have been outlined previously in this application. Included in

³ Note, cooperative agreement recipients must comply with 40 CFR 31.36 when entering into procurement contracts with RLF grant funds and 40 CFR 31.37 when issuing subgrants with RLF grant funds. Nonprofit organizations receiving RLF loans/subgrants and cleanup grants must comply with 40 CFR Part 30 when entering into procurement contracts with RLF grant funds.

⁴ Note, cooperative agreement recipients cannot award subgrants to for-profit organizations.

these grants are several Site Assessment and Cleanup Grants through the US EPA. In addition, numerous contracts with environmental consultants have been executed and fulfilled in order to assess, remediate, and monitor sites in compliance with State and Federal laws. The Director and Deputy Director of Planning and Development will be managing the EPA RLF program, with assistance from the City's Deputy Finance Director. All personnel have many years experience in handling various State and Federal grants. The resumes for the Planning staff are provided as an attachment.

HISTORY OF MANAGING FEDERAL FUNDS

The City has been the recipient of numerous federal and state grants, including HUD's CDBG annual entitlement funds for housing rehabilitation and economic development, HUD's Lead Hazard Abatement Program funding for housing, HUD's Economic Development Initiative special grant funds for environmental remediation, state Department of Natural Resources funds for numerous waterfront projects, (Non-profit) Coastal Management Program funds for environmental remediation and waterfront projects, state Department of Commerce funding for environmental remediation and public facilities, and a variety of local grants. All of which have not received any adverse findings (financial or management). The City of has had no adverse findings from audits conducted under OMB Circular A-133 and has had no "high risk" terms and conditions added to federal grants under agency regulations implementing OMB Circular A-102.

COMPLIANCE WITH U.S. EPA COOPERATIVE AGREEMENTS

The City received a U.S. EPA Brownfields Assessment grant for Hazardous Substances in 2005 and for Petroleum Contamination in 2004. The cooperative agreement with U.S. EPA for hazardous substances was signed in the fall of 2005 so work is just getting underway. Our work under the petroleum assessment grant is going very well and we have met our obligations for quarterly progress reports, brownfields reporting measures, and annual financial status reporting.

DETAILS OF PAST U.S. EPA COOPERATIVE AGREEMENTS

The City of received a \$200,000 U.S. EPA Brownfields Grant for hazardous substances in 2005 and just recently signed the cooperative agreement. No monies have been drawn on this grant.

The City received a \$200,000 U.S. EPA Brownfield Grant for petroleum contamination and have spent \$17,367 with \$182,633 remaining.

ACCOMPLISHMENTS UNDER OUR U.S. EPA COOPERATIVE AGREEMENTS

The first brownfield project completed with City assistance was undertaken in 1994 using the first ever \$200,000 U.S. EPA Pilot Demonstration Grant, which was combined with \$1.7 million in private funding and \$250,000 from local foundations. The money was used to cleanup a site for a local company to expand its operations. As a result, 180 new jobs and over \$645,000 in annual property taxes have been generated at the site.

The City supported the redevelopment of the former Bedford Site with the County's original BCRLF loan. The City purchased the Property in 2002 and subsequently initiated the approximately \$40 million redevelopment project of a Youth Intervention Center. The center will provide state of the art housing, programs, and educational opportunities for youth within the County Juvenile Justice System. The redevelopment will bring 300 to 400 well-paying institutional jobs to a community where 58% of the residents are living in poverty and 99% are minorities.