EPA Cleanup Proposal Narrative

(*max 10 single-spaced pages; green text represents EPA prompts & will be deleted prior to submission)

(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

Discuss the brownfield challenges and their impact on the city(ies), town(s), or geographic area(s) targeted by this application. Briefly explain how this grant may help address these challenges and impacts.

Identify and describe the target area(s) for the focused grant activities, such as a neighborhood, district, corridor, or census tract. (Depending on the scope and design of your project, one or more target areas may be presented.)

At the height of Cleveland's industrial era, tens of thousands of local workers were employed in manufacturing jobs. Cleveland came to the end of its rapid industrial growth around 1930. Today, Cleveland is left with an industrial legacy and an **estimated 5,000 acres of vacant land**. The Cuyahoga County Land Reutilization Corporation (CCLRC, also known as the Cuyahoga Land Bank) is reclaiming and redeveloping brownfield sites in cooperation with the City of Cleveland, Site Readiness for Good Jobs Fund, and other local partners to prepare land for new industries, improve environmental conditions and recreational opportunities, attract local jobs, and generate growth and economic benefits in neighborhoods long affected by disinvestment and blight. Cleveland is a "minority-majority" city, consistently ranked as one of the poorest large cities in the U.S.

Plant shutdowns in Cleveland aren't just a thing of the past. In April 2015, First Energy **closed its coal-fired Shoreway Plant**, located on the banks of Lake Erie, two miles north of the Priority Site, eliminating 60 jobs. Energy rates in the area subsequently rose, due in part to the closing of this plant.[1]

Creating job ready sites has emerged as a local priority, necessary to attract new businesses and generate 250,000 new jobs in the next decade. Cleveland's urban core consistently loses businesses interested in relocating to Northeast Ohio to suburban locations with available greenfield sites; many failed deals prove businesses can spare neither time nor money to assemble and remediate Cleveland's many brownfield sites. The City of Cleveland has developed a local brownfield redevelopment strategy (discussed further in 1c.) designed around the newly created non-profit Site Readiness for Good Jobs Fund (SRF), a project partner, that relies on public investment to fund assessment and cleanup of Cleveland's brownfield sites. **USEPA Brownfields Cleanup funds are essential** to achieving its goals, including cleanup of this Priority Site.

The **Cedar Road Corridor**,
the Target Area for this grant, runs the length of Census Tract 39035197200 (disadvantaged), less than 2 miles from E 55th St. to E 105th St. and serves as an arterial connector between E. 55th St, a bustling main north-south connector and commercial strip, and University Circle, which showcases world-renowned medical, higher educational, and cultural institutions, such as Cleveland Clinic and University Hospitals, Case Western Reserve University, and Cleveland Museum of Art and Cleveland Orchestra.

The Cedar Road Corridor is filled with large, abandoned former manufacturing buildings and much graffiti and vandalism. These brownfield properties are known or believed to be contaminated due to historical industrial manufacturing activities. In addition to **exacerbating racial and economic disparities and increasing environmental and health exposures for this disadvantaged community**, brownfield sites along this corridor have **lowered property values** in the census tract and surrounding area,

[1] cleveland.com *FirstEnergy Closes 104-year-old Coal Power Plant, Electric Rates to Rise,* 4/15/15

increased health, environmental, and public safety risks, increased crime, blight, and neglect, and reduced local investments and tax revenues.

The Cedar Road Corridor and the Priority Site are both located in Central, one of Cleveland's oldest neighborhoods, and home to the city's largest concentration of Black residents. Heavy manufacturing has been ubiquitous in this neighborhood since the late 1800s, and has included machine tool companies, such as Warner & Swasey and Cleveland Twist Drill, who made lathes, planers, drill presses, and similar parts or devices.[2] The Central neighborhood has a very large concentration of public housing projects that began in 1937 with the imposition of segregated housing. Redlining, institutional housing, and lack of access to credit, combined with the loss of manufacturing jobs, led to Central's current economic disposition. The following data, obtained from U.S. Census Bureau 2023/2024 American Community Survey data, provides comparative data for the disadvantaged census tract in which the Priority Site is located. **Minority:** The census tract in which the Site is located is 90% Minority population; the portion of the Target Area that includes the Central neighborhood/Priority Site is 94% Minority, compared to 43% in Cuyahoga County, and 24% in Ohio. **Median Household Income** in the Target Area census tract is $15,800, well below the Cuyahoga County median income of $45,300 and Ohio median income of $50,700. The 10.4% **Unemployment Rate** of census tract residents (with an additional 60% of residents listed as not in the labor force) exceeds 6.2% in Cuyahoga County and 4.8% in Ohio. **Poverty:** 58% of families living in the Site's census tract are below poverty, more than three times the 16% in Cuyahoga County and 13% in Ohio. **Additionally**, this census tract has had historic underinvestment, with high barriers to accessing home loans.

1b. Description of the Proposed Brownfield Site(s)

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

The property proposed for cleanup is a 4.5-acre vacant former industrial Site referred to as the Former Virden Lighting Co., after one of many industrial manufacturing companies historically located there, comprises 3 parcels currently owned by CCLRC, located at 2162; 2175-2187 Ashland Rd. and 0 Longfellow Ave. in Cleveland, Cuyahoga County, Ohio, USA ("the Site"). The Site, located at the intersection of Ashland Road and Cedar Ave., is on the **eastern edge of downtown Cleveland in a largely vacant, underutilized, and disadvantaged area within Cleveland's Central neighborhood.**

The Site is divided by Ashland Rd. and Longfellow Ave; parcels west of Ashland Rd. are referred to as 2162 Ashland and include one multi-story brick former manufacturing building in poor condition and vacant former residential land. The parcel east of Ashland is referred to as the 2175-2187 portion and consists of two buildings in poor condition with a demolished former building between them. The northern building (Building A) is a four-story primarily brick and concrete building with a basement, former loading dock, and a 42,500 ft^2 footprint. The southern building (Building B) is a five-story primarily brick and concrete building with a 20,000 ft^2 footprint and former loading dock. The Site is bordered to the north by Cedar Ave. with Sussen Self Storage beyond, to the west by a City of Cleveland-owned parking lot and vacant former residential land, to the south by vacant industrial land filled with concrete debris, and to the east by an active elevated Norfolk Southern freight rail line with former vacant industrial land beyond.

The **buildings are in an extremely deteriorated condition** and pose environmental and safety risks to the surrounding community due to subsurface contamination, presence of asbestos-containing materials (ACM), and bricks and concrete building materials crumbling onto adjacent sidewalks. CCLRC has attempted to secure buildings but trespassing is evidenced by vandalism and graffiti. Roofs have

[2] *Industry*, Encyclopedia of Cleveland History

leaked for years, compromising the structural integrity of the buildings. Building B is in the worst condition; the upper floors in Building B are inaccessible due to safety concerns and collapsed stairs.

The Site was originally developed for residential use in the late 1800s but quickly transitioned to industrial activities around 1900 with a long and varied manufacturing history that has included electrical components, lighting, and heavy machinery, as well as ancillary rail operations, plating, and lacquer/paint spray booths. Previous occupants include the Cleveland Railway Company (early 1900s-1960s), Virden Manufacturing Company/Virden Lighting (1913-1981), East Cleveland Railroad Company Power Station (1887-1932), Westinghouse Electric & Manufacturing Company (1929-1932), Thompson Aircraft Products Company (1938-1955), Warner & Swasey Company (mid-1960s-1982), and Thompson Ramo Woodridge Inc./TRW Inc. (1963-1977). Residential dwellings along Longfellow Avenue were razed by 1970. **Records indicate significant operations at the Site ceased around 1982; it became fully vacant around 2000 through present**.

The eastern parcel initially went into state foreclosure in 2012, was purchased by a fraudulent "business" not incorporated or registered in Ohio, who partially demolished the middle building, and again went into foreclosure in 2020. CCLRC took title to all three parcels (the Site) in 2024; back taxes totaled $114,500.

Environmental site assessments have been conducted at the Site; no remedial activities have been conducted to date. Previous Phase I Environmental Site Assessments (ESA) conducted for the Site indicated the following Recognized Environmental Conditions (RECs) at the Site: likely releases of hazardous substances and/or petroleum products at the Site due to the long history of industrial uses including rail spur, transformers, and aboveground storage tanks (ASTs) and associated piping; and likelihood of similar hazardous substances and/or petroleum releases from neighboring properties due to their equally long industrial uses and historical Resource Conservation and Recovery Act (RCRA) Large Quantity Generator (LQG) status. Potential contaminants of concern (COCs) include VOCs, PCBs, poly-cyclic aromatic hydrocarbons (PAHs), petroleum compounds, and heavy metals.

The building roofing materials at 2162 Ashland is presumed to contain asbestos-containing material (ACM) due to its age; the material cannot be sampled due to safety/access issues. ACMs, including roofing material, and other regulated materials, including batteries, pesticides, and mercury-containing equipment that must be abated/removed prior to demolition, were identified in the northern building (Building A) and middle partially demolished building/basement at 2175 Ashland. A complete pre-demolition asbestos and regulated materials survey cannot be conducted on the upper floors of Building B due to safety concerns.

SRF, a project partner, conducted a structural building assessment of Building A (the northern building located at 2175 Ashland Rd.) to evaluate rehabilitation potential. It found that the steel trussing roof supports have been vandalized, rendering the roof unstable; due to the 1900-era age/composition of the steel, truss repairs are cost prohibitive and potentially impossible.

Phase II ESA findings indicate former industrial manufacturing operations that occurred at the Site and neighboring properties have negatively impacted groundwater and soil gas across the Site. Multiple VOCs, including trichloroethene (TCE), were found in groundwater and soil gas above applicable Ohio Voluntary Action Program (VAP) standards. The vapor intrusion pathway is currently considered complete for future residents and/or commercial/industrial workers across the Site.

The proposed Cleanup will includes asbestos and regulated materials abatement and disposal in all buildings except Building B; demolition of Building B (the southern building on the eastern parcel) and disposal as asbestos-containing material; an in-situ Carbon Trap and Treat application that will serve as a combination of source area treatment and permeable reactive barrier (PRB) along the northern and

western property boundaries to restrict off-site VOC migration; and institutional controls to restrict future soil and groundwater use on the Site and future land use to commercial/industrial.

This Priority Site was selected for cleanup due to its high visibility location and safety concerns associate with its deteriorating condition, to reduce the disproportionate impact of brownfields in this disadvantaged neighborhood, help safeguard and improve the disadvantaged adjacent neighborhood, alleviate environmental contamination migration, and protect human health and environment in the immediate Site vicinity.

The Site has sat vacant for over two decades. The substantial cost associated with returning the Site to productive use, due to the large size of the buildings and identified contamination, necessitates USEPA cleanup funding. CCLRC's ability to address the Site's environmental challenges is financially infeasible without this requested Cleanup grant from USEPA, which will help unlock the redevelopment potential of the Site and improve the surrounding community.

Revitalization of the Target Area

1c. Reuse Strategy and Alignment with Revitalization Plans

Describe the reuse strategy, or projected reuse, for the proposed site(s). Discuss how the reuse strategy/projected reuse aligns with and advances the local government's land use and revitalization plans or related community priorities; and if applicable, how it considers the site's location in a federally designated flood plain. Describe how the public and project partners were meaningfully involved in developing the reuse strategy/projected reuse.

Preliminary site planning and market analysis conducted by the project partners have identified light manufacturing and food production/packaging end uses for the Site, offering workforce opportunities to local residents through lower-barrier jobs requiring minimal training or education, and returning the site to productive use. Planned commercial/industrial end use is consistent with the Site's existing light industry zoning and the proposed cleanup plan.

The current plan proposes new construction of an approximately 77,000 sq. ft. one-story building on the eastern parcel, with an estimated construction cost of $14.6 million, and an employee parking lot on the western Site portion. Final reuse decisions will ultimately rely on community/partner input, as outlined in 3b. The Site is not located in a flood plain.

Community conversations will be focused around transforming the Site into ideas presented in various plan, including: ***Connecting Cleveland 2020 City-wide Plan***, which sets forth a vision for the Cedar Ave. Corridor, identifying it as a corridor for improvements, including streetscape enhancements, gateway creation, and mixed retail and commercial space tied to the surrounding Central neighborhood, and the ***Central Neighborhood Plan***, commissioned by Burten Bell Carr Development, Inc., a project partner and the non-profit community development corporation that services the Central area, in conjunction with the City of Cleveland Planning Commission. Burten Bell Carrl Development, Inc. has solicited extensive community feedback to establish comprehensive neighborhood vision and goals, including addressing vacant industrial land and illegal dumping, as well as maximizing redevelopment opportunities in the Cedar Ave. Corridor/Site to attract companies and increase pedestrian safety and greenspace.

The Site is located immediately across Cedar Ave. from Cleveland's MidTown district. Plans for the Site are intended to spread the resulting impacts from several recent notable MidTown projects into the Central neighborhood. The Cleveland Foundation, a project partner, the world's first and one of the largest community foundations, recently constructed its new headquarters and adjacent Midtown Collaboration Center. The $64 million Warner & Swasey renovation project will begin converting a historic industrial building into 112 affordable housing units in 2026; located 1 block north of the Site, this project will provide new, affordable housing for residents and offer workforce housing for the Site's proposed redevelopment, beginning in early 2028.

1d. Outcomes and Benefits of Reuse Strategy

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

Describe how the proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.

If applicable, describe how the reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures. (For more information on energy efficiency measures, please refer to the FY26 FAQs and Renewable Energy or Energy-Efficient Approaches in Brownfields Redevelopment Fact Sheet.)

Pre-demolition abatement of asbestos and regulated materials is necessary to eliminate potential for future releases of these materials to the environment during increased rainfall and extreme weather events. The three on-site buildings currently have leaking roofs and missing/broken windows that have exposed the buildings to the elements for years. Conducting abatement activities soon will prevent accidental environmental release.

Planned soil and groundwater management (through institutional controls) will reduce exposure to subsurface soil and groundwater contamination by limiting land and/or resource use and guiding human behavior. Engineering controls, including a PRB to prohibit groundwater migration, improve resiliency by reducing off-site contamination migration and buffering seasonal changes in rainfall patterns predicted by climate change. Passive vapor barriers will likely be required beneath future building(s), which further improves Site resiliency due to their continued ability to function during extreme weather events, including increased precipitation.

To make the proposed Cleanup project greener and more sustainable, several techniques are planned. The most recent Best Management Practices (BMPs) issued under ASTM Standard E-2893: Standard Guide for Greener Cleanups will be used as a reference in this effort. CCLRC will require contractors to follow an idle-reduction policy and use heavy equipment with advanced emissions controls operated on ultra-low sulfur diesel. The number of mobilizations to the Site will be minimized, and erosion control measures will be used to minimize runoff into environmentally sensitive areas. In addition, CCLRC plans to ask cleanup contractors to propose additional green remediation techniques in their response to the Request for Proposals (RFP).

The planned reuse will potentially incorporate rooftop solar energy generation to cover a portion of the facility's energy needs and energy efficiency measures in the form of LED lighting, additional insulation, and energy-efficient windows and equipment. Future on-site renewable energy technologies, such as solar, geothermal systems, and/or other energy efficiency improvements, could be funded by incentive programs such as the State of Ohio's Advanced Energy Fund, which grants up to $2.5 million for energy efficiency and advanced energy projects.

An economic impact study that evaluated the proposed light manufacturing end use and new 77,000 sq. ft. building construction estimated at least 93 new, permanent full-time jobs and 106 construction jobs would be created on the Site, valued at $49 million in wages and a total annual income tax increase of $5 million.

Very few residents remain within the two residential blocks located immediately west of the Site. Nearly 100 homes historically located here have been demolished, leaving only curb cuts to show where a strong community once lived, worked, and thrived. Currently, there is limited existing green or recreational space nearby except for Longfellow Park, owned by the City of Cleveland. Located within a block west of the Site, this greenspace is empty and underutilized. Cleanup and redevelopment of the

Site will create new jobs; the Warner & Swasey 112-unit affordable housing project 2 blocks north of the Site will attract new residents – together these projects will attract new residents and workers to enjoy the swings at Longfellow Playground.

Strategy for Leveraging Resources

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

CCLRC will leverage this grant with a variety of additional funding sources procured by CCLRC and project partners to conduct planning, assessment, and cleanup activities and increase the Target Area impacts resulting from redevelopment of the Site.

1e. Resources Needed for Site Characterization

Identify additional assessment funding resources that will be sought if further characterization for the proposed site(s) is needed for the remediation to continue.

The Ohio EPA Targeted Brownfield Assessment (TBA) program, which is seeded by a USEPA Brownfields grant, provided consultant services to conduct Phase I and II assessments at the Site. The TBA program funded a "limited" Phase II assessment that did not confirm the extent of contamination in soil gas and groundwater. Therefore, additional Phase II assessment activities necessary to evaluate these media will be funded by SRF and completed for this project by June 15, 2026.

1f. Resources Needed for Site Remediation

Identify funding resources that have been secured, sought, or will be sought, to contribute to the completion of the remediation. Attach documentation that substantiates secured commitments of leveraged funding for remediation of the proposed site(s). (Do not duplicate sources discussed in 3.b-3.e. under Description of Tasks/Activities and Outputs.)

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

CCLRC has obtained a $2.5 million Brownfield Remediation Program (BRP) grant from the State of Ohio Dept. of Development that will fund demolition of the northern building (Building A) and middle partially demolished building/basement at 2175 Ashland. See Attachment A for a copy of the BRP grant agreement between ODOD and CCLRC. The initial grant period is set to expire in June 2026 but will be extended to allow for procurement of necessary Cleanup funds.

Requested USEPA Cleanup funding will augment the BRP grant that has been received for the Site. These sources are anticipated to be sufficient to cover necessary abatement, demolition, and remediation activities. In the unlikely event that additional funding should be required to complete these tasks due to unforeseen circumstances, CCLRC would look to secure additional remediation funding from the Ohio BRP.

1g. Resources Needed for Site Reuse

Identify funding resources that have been secured, sought, or will be sought, to contribute to the completion of the reuse (e.g., demolition activities, redevelopment activities, etc.) for the proposed site(s).

Securing requested USEPA Brownfields Cleanup funding is essential to guarantee a financially viable and successful redevelopment project that meets the community's goals and needs for reuse. CCLRC and partners are currently working with the community to refine development objectives for the Site. A summary of leveraged funding is provided in the following table.

Attach documentation that substantiates secured commitments of leveraged funding for the reuse of the proposed site(s). (Do not duplicate sources discussed in 3.b-3.e. under Description of Tasks/Activities and Outputs.)

Name of Resource	Resource for (1.e.) Assessment, (1.f.) Remediation, or (1.g.) Reuse Activities	Secured or Unsecured	Additional Details or Information About the Resource
Ohio EPA TBA	1.e.	Secured	$40,169 - Ph I and limited Ph II assessments
FY25 ODOD BRP Grant	1.f.	Secured	$2.5 million - Demo of N building on E parcel
USDOT Innovative Finance & Asset Concession Grant	1.g.	Secured	$985,000 - Planning, design, and community engagement for Site and surrounding area
Norfolk Southern (NS) Thriving Communities Grant	1.g.	Secured	$100,000 – Design pedestrian improvements adjacent to NS property
Enbridge	1.g.	Secured	$50,000 - End use planning/layout on Site & surrounding sites
CCLRC/SRF Contribution	1.e.	Secured	$150,000 – Additional Phase II assessment to confirm extent of contamination
CCLRC/SRF Contribution	1.g.	Unsecured	$260,000 – Demo cost, 2162 Ashland building
FY27 ODOD BRP Grant		Unsecured	Available, if necessary, for additional remediation; max request changes annually
NOACA USEPA RLF	1.f., 1.g.	Unsecured	Available, if necessary, for additional remediation; no upper funding limit
Ohio Abandoned Gas Station Cleanup Grant	1.e., 1.g.	Unsecured	$100,000 – assessment; $500,000 – cleanup; If necessary, should underground storage tanks be found during cleanup; schedule unknown.

1h. Use of Existing Infrastructure

Describe how this grant will facilitate the use of existing infrastructure (e.g., utilities, roads, buildings, etc.) at the proposed site(s) and/or within the target area(s).

Due to its urban location, the entire Cedar Ave. Corridor Target Area and Former Virden Lighting Co. Site have infrastructure readily available and suitable for the proposed development, including **roads, sidewalks, affordable city water and sewer, electric, gas, broadband/fiber, and highway and rail access**. This grant will enhance this infrastructure use by supporting remediation and reuse of the Site. Planning activities have not identified additional infrastructure needs or necessary upgrades for the targeted end use.

Both the Cedar Ave. Corridor Target Area and Priority Site benefit from recent transportation improvement projects, located equidistant between the $257 million Opportunity Corridor (OC) to the south and the HealthTech Corridor (HTC) to the north. OC is a 35-mph boulevard and multi-use path encompassing nearly 1,000 acres, designed to spur new economic development in adjacent, struggling neighborhoods and connect residents with healthcare and employment opportunities at University Circle at its terminus. HCT is a 1,600-acre economic development hub focused on building density of healthcare, biotechnology, and tech companies between downtown Cleveland and University Circle. Both the OC and the $200 million HealthLine bus rapid transit system, located along Euclid Ave. to improve access and spur development in the HCT, offer **public transportation options for future Site workers**, as does existing public bus service that runs along Cedar Ave., immediately north of the Site.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Applicants are encouraged to use geospatial mapping tools to better understand the communities that may be adversely and disproportionately affected by environmental or human health harms and risks. Applicants can include data in the Narrative to help characterize and describe the target area(s) and its

community(ies). Data from other sources (e.g., studies, census, and third-party reports) can also be included to give a more complete picture of the impacted communities and populations.

2a. The Community's Need for Funding

Describe how this grant will meet the needs of the community(ies) (i.e., the city(ies), town(s), or geographic area(s) targeted in this application) that has an inability to draw on other sources of funding to carry out environmental remediation and subsequent reuse in the target area(s) because of the small population and/or low-income of the community.

The proposed Target Area for this grant, Census Tract (CT) 39035197200 (referred to as 1972), has a total population of 2,346, and **represents some of the most impoverished and disadvantaged residents in the country** as shown by the data presented below. The Target Area, located across Cleveland's once-vibrant Central and Fairfax neighborhoods, has faced ***enduring poverty*** for the past five decades.[3] In the Target Area, nearly 58% of population is currently below the federal poverty level, indicating it is an area of ***extreme poverty*** (an area with poverty rates greater than 40%). Eight out of 10 residents are two times below the federal poverty level and considered to be low-income households. Median income in the Target Area CT is $15,800, 69% less than that of the State of Ohio.

Poverty is also reflected in the area's employment data from the US Census Bureau. Only 31.4% of working-aged men 35 to 44 (in the Central portion of the CT where the Site is located) are employed, compared to Ohio's rate of 83.3%. Redevelopment opportunities, like that proposed by use of the requested USEPA Cleanup funds, are needed to create jobs in this impoverished area.

Poverty, Income, and Employment Measures for the Target Area

Geographic Area Name	Poverty Rate	Poverty Type	Low-Income Population	Median Income	Unemploy-ment Rate	Labor Force Participation	Employed Men (Aged 35-44)
Ohio	13.3%	NA	29.4%	$50,700	4.8%	73.3%	82.3%
Cuyahoga Co.	16.3%	NA	32.4%	$45,300	6.2%	63.8%	80.5%
Central Portion of CT	**66.3%**	**Extreme**	**81.4%**	**$17,700**	**20.6%**	**56.2%**	**31.4%**
Target Area (CT 1972)	**57.9%**	**Extreme**	**80.1%**	**$15,800**	**10.4%**	**40.6%**	N/A

Source: U.S. Census Bureau, 2024

Steep manufacturing decline has driven historical job and population loss in Cleveland and the Target Area's neighborhoods. **Cleveland's population has sustained a decline of more than 60%** from its peak of 914,808 in 1950 to 365,379 in 2025. The neighborhoods of Fairfax and Central have experienced even more devastating population decline. Central's population has fallen from roughly 70,000 in 1950 to just under 12,000 in 2020, an 83% drop. Fairfax has seen its population decline from almost 40,000 in 1950 to roughly 5,200 in 2020, an astonishing 87% decline, whereas the population of Ohio has increased almost 150% since 1950.

Crushing poverty, coupled with additional social, health, and welfare burdens faced by residents and the lack of available land for new neighborhood amenities make remediation and reuse of brownfields critical to Target Area revitalization.

In 2025, Cuyahoga County had a record $76 million in delinquent property taxes, with roughly 41,000 delinquent property owners. The County's effective tax rate (2.08%) is nearly 60% higher than that of the State, constraining ability to raise taxes to meet critically needed remediation efforts. Likewise, the County sales tax rate is the highest possible in the State. Pressures on property owners also are seen with mortgage delinquencies, which place the Cleveland Metro area 12th highest among large cities.

The community is also considered to be an **Opportunity Zone (OZ)**. OZs are economically distressed communities, defined by census tract, nominated by governors, and certified by the U.S. Secretary of

[3] USDA, Economic Research Service using U.S. Department of Commerce, Bureau of the Census, 1960, 1970, 1980, 1990, and 2000 Decennial Census U.S. county data; U.S. Department of Commerce, Bureau of the Census, 2007–11, 2017–21, 2018-22, and 2019-23 American Community Survey (ACS) 5-year period estimates; and U.S. Department of Commerce, Bureau of the Census, 1970, 1980, 1990, and 2000 Decennial Census data for census tracts normalized to 2020 census tract geography using Geolytics' Neighborhood Change Database (NCDB).

the Treasury. New investments in OZs may be eligible for preferential tax treatment. OZs, like the Target Area, typically have experienced a lack of investment for decades.

Revitalizing the Target Area through job-ready sites is a critical step toward attracting new businesses, creating much needed job opportunities for residents, and driving community redevelopment. USEPA Brownfields Cleanup funds are essential to enabling redevelopment, as the cost and complexity of remediating brownfield sites are a barrier to development and have led businesses to favor available greenfield land in suburban areas.

2b. Health or Welfare of Sensitive Populations

Identify sensitive populations20 in the target area(s) and describe their health or welfare issues
Discuss how this grant and reuse strategy/projected site reuse(s) will address these issues and/or help identify and reduce related threats.

In addition to poverty and a declining population, the residents of the Target Area bear substantial environmental, health, and welfare burdens. This grant will reduce these threats to the welfare of many sensitive populations by implementing the remediation and facilitating the projected site reuses, which will generate positive outcomes and benefits. This challenging dynamic underscores the need for USEPA Brownfield Cleanup funding.

Sensitive Populations

The Target Area's residents trend in the highest national percentiles for low income and percent below poverty level, Minority population, unemployment rate, and over 64 years of age. In addition, the Target Area's Black pregnant women and Black infants are also at risk. The Ohio Department of Health 2020 Infant Mortality Annual Report listed Black infants as having the highest rate (34%) of infant deaths in the state, compared to white (26%); the leading cause of death for Black infants, at three times the rates of white babies, was **prematurity**, versus congenital causes for white babies. The CDC reports that Black women had the highest preterm birth rate of any ethnicity in 2021; risk factors for preterm birth include chronic health conditions such as diabetes, poor nutrition, substance abuse, tobacco use, and less than 18 months between pregnancies.

Health Conditions, 2025

Condition	Cleveland	Ohio
High cholesterol	44.5%	37.4%
Diabetes	15.8%	13.2%
Heavy alcohol use	23.1%	15.8%
Mental Health (14 or more days in the past 30 days)	13.6%	9.5%

Source: Case Western Reserve University and Cleveland Department of Public Health, 2025

Black infants in the Target Area have a much higher risk of death in their first year compared to white infants in the Target Area and all infants elsewhere in the country. The Cleveland Department of Public Health's *Infant Mortality and Birth Outcomes in Cleveland 2021* report summarized, "Racial inequities and structural racism have resulted in higher rates of infant mortality and preterm birth in non-Hispanic Black infants…."

This grant will spur remediation of neighborhood brownfield properties, thereby reducing the potential health risks these sites pose to Target Area residents, most especially the sensitive populations of those living in poverty, residents over 64 years of age, and Black pregnant women and their infants.

In the Central neighborhood, **40% of the population is under the age of 18**, the highest percentage in Cleveland. Two-thirds of the households receive food stamps, and schools in the area fall under the Community Eligibility Provision meal service option for schools in high poverty communities, meaning all students receive free breakfast and lunch. The teen pregnancy rate in the ZIP code is more than twice the county and national average.

Health disparities exist across maternal and child health indicators between Cleveland and the State as a whole. The 2025 Cleveland Health Survey Overall Prevalence Report, a comprehensive assessment of the health and well-being of Cleveland residents issued by the City of Cleveland, identified several health indicators where the City exceeds the State. Overall, the Report identified the general health status (rated health as good or better) of Cleveland as 11.6% worse than the State as a whole. Table # highlights additional areas where Cleveland shows demonstrably worse health conditions than the State. Residents in the Target Area struggle with a number of health concerns including:

- 61.2% of adults with high blood pressure (national average: 37.6%)
- 54.7% of adults with obesity (national average: 36.2%)
- 43.3% of those adults screened in the past 5 years having high cholesterol (national average: 38.0%)
- 41.0% of adults with arthritis (national average: 29.3%)
- 31.2% of adults with diabetes (national average: 13.1%)
- 13.7% of adults with coronary heart disease (national average: 7.5%)
- 10.9% prevalence of stroke in adults (national average: 4.0%)[4]

Welfare

General welfare in the Target Area is affected by the significant crime rate. Crime in the Target Area's ZIP code (44103) is in 1st percentile (99% of ZIP codes have lower crime rates), with 101.8 crimes per 1,000 residents. This level of crime not only has detrimental effects on its victims, it discourages adjacent property owners from maintaining or improving their properties and causing out migration. In terms of tangible costs (damages, policing, lost wages), crime in the ZIP code was estimated to cost residents $13.4 million in 2025, roughly $2,100 per household.

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

Describe how this grant and reuse strategy/projected site reuse(s) will address, or help identify and reduce, threats to populations in the target area(s) with a greater-than-normal22 incidence of diseases or conditions (including cancer, asthma, or birth defects) that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum.

As a high burden of environmental pollution is often borne by sensitive populations and underserved communities, the identified issues and types of contaminants typically found through prior environmental investigations of brownfields located within the Target Area have exerted a disproportionate impact upon the sensitive populations (and underserved communities) residing there. Data sourced from the National Environmental Public Health Tracking Network and PLACES shows that populations in the Target Area have greater-than-normal incidences and/or mortality rates for diseases or conditions (in particular asthma and chronic obstructive pulmonary disease) that may be associated with exposure to hazardous substances, pollutants, and/or contaminants.

Health Indicators and Environmental Burdens

	Chronic Health Conditions		Environmental Burdens			
Geographic Area Name	Asthma Rate[1]	Chronic Obstructive Pulmonary Disease (COPD)[1]	Diesel Particulate Matter[2]	EPA Toxic Release Inventory (TRI) Site Proximity[2]	EPA Treatment, Storage, and Disposal Facility (TSDF) Proximity[2]	RMP Facility Proximity[2]
Ohio	0.67	0.09	0.57	0.54	0.38	0.35
Cuyahoga County	0.79	0.08	0.72	0.61	0.54	0.34
Tract 1972	1.00	0.19	0.88	0.85	0.85	0.88

[4] PLACES https://experience.arcgis.com/experience/22c7182a162d45788dd52a2362f8ed65

Sources: [1]CDC Places, 2023; [2]U.S. EPA, 2023
Note: All data are percentiles.

As mentioned previously, the implementation of the remediation of contaminants will reduce the potential hazards and health impacts to the identified sensitive populations and impoverished communities located in the Target Area. Additional health burdens in the Target Area are presented in Section 2b.

2d. Economically Impoverished/Disproportionately Impacted Populations

Describe how this grant and reuse strategy/projected site reuse(s) will address, or help identify and reduce, related threats to populations in the target area(s) that are economically impoverished and/or disproportionately share the negative environmental consequences resulting from industrial, governmental, and/or commercial operations or policies.

The grant and reuse strategy will directly address the economic challenges and environmental burdens faced by the Central and Fairfax neighborhoods, which are among the most economically impoverished areas in Cleveland. The median income in Central is $15,800, and in Fairfax, it is $17,700, both significantly below the State and County median incomes of $50,700 and $45,300, respectively. By leveraging grant funds, the project can foster job creation, housing, and community services.

The project also has the potential to address environmental and social inequities resulting from historical industrial and governmental policies. The ZIP code 44103, encompassing parts of Central and Fairfax, experiences a high crime burden of $13.4 million ($2,108 per household) and a teen birthrate of 35.46, significantly higher than the county (13.6) and national (16.6) averages. These indicators reflect systemic challenges that could be alleviated through targeted investments in community infrastructure, education, and health services. Furthermore, the reuse strategy can prioritize sustainable development practices to reduce environmental hazards and improve the quality of life for residents.

In summary, the grant and reuse strategy will help identify and reduce threats to economically disadvantaged populations in Central, Fairfax, and Cleveland as a whole by addressing income disparities and fostering sustainable community development. These efforts will not only improve economic conditions but also reduce the disproportionate environmental and social consequences faced by these neighborhoods.

Community Engagement

Community Engagement will be conducted throughout the entire cleanup effort. The Project will incorporate the inclusion of feedback from numerous points of view – general community, labor and workforce, local government, and educational institutions. CCLRC will develop a customized approach for each constituency to encourage meaningful participation and feedback to help shape important community and labor-based outcomes. Community Engagement efforts will be designed to ensure CCLRC:

1) Conducts engagement ***early and often***
2) Operates with ***flexibility*** to ensure all stakeholders are included, heard, and considered
3) ***Keeps the promises*** made
4) Ensures important information about the Project is ***publicly available***
5) Tailors efforts to ***support the vision*** of the community and its workforce

The applicant has already begun engaging with local economic development partners and other stakeholders. The table below presents the range of engagement anticipated. Methods of engagement will depend on the preference of the parties being engaged and the intended outcome of the engagement.

Effective Community and Labor Engagement Strategies

Engagement	Method	Audience Focus
One-way	Outreach (i.e., articles, press releases)	General Public
	Website	General Public
Two-way	Public Meetings and Open Houses	Community
	Community Events/Sponsorships	Community
	Labor Engagement Meetings	Workforce and Labor
	Secondary and Post-Secondary Schools, Workforce Training Centers, STEM Education Programmatic Alignment	Youth, Pre-Apprentice, Apprentice, and STEM Students
	Job Fairs and Hiring Events	Workforce

CCLRC's strategy is to maximize input with appropriate and customized methods specific to the audience. Engaging with local community organizations will expand opportunities for meaningful involvement of community members. CCLRC intends to offer meetings at times that are sensitive to work and family schedules and in locations that are comfortable for and accessible to community members, including virtual online meeting options.

2e. Project Involvement, 2f. Project Roles

2e Identify the local organizations/entities/groups that will assist with this project.
Project involvement may be provided by a broad variety of entities including, but not limited to, community-based organizations (e.g., neighborhood groups, citizen groups, business organizations, etc.), community liaisons representing residents directly affected by the project work, property owners, lenders, developers, and the general public.

2f Project Roles Discuss your plan to communicate project progress to the local community, including residents directly affected by the project work, and the involved organizations/entities/ groups. Include the frequency and method(s) you will use (including an alternative to in-person engagement) and how you will meaningfully solicit, consider, and respond to community input.

Project partners have been chosen because either: 1) their own constituencies/clients include one or more of the Target Area's identified underserved communities, sensitive populations, and/or disadvantaged communities; 2) their own missions are well aligned with the economic or non-economic benefits; 3) their own missions are well aligned with the goals of the USEPA Brownfields Program; and/or 4) their service area overlaps with the Target Area and/or the proposed sites. The following local organizations will serve as community partners and have meaningful involvement in this project, including in making decisions with respect to both the cleanup and the future reuse of the proposed sites:

Name of Organization/Entity/Group & Point of Contact (Name, Title, Email, Phone)	Entity's Mission Specific Involvement in the Project or Assistance Provided
Site Readiness Fund, Richard Barga, Director of Site Development, rbarga@sitereadycle.org, 216.698.5801 *Non-profit agency redeveloping brownfields to create good-paying jobs.*	***Assist with QEP/contractor evaluation/selection, site reuse & area planning, remedial options/funding, public meeting coordination, and workforce development needs.***
City of Cleveland, Joevrose Bourdeau Small, Director, Dept. of Economic Development, jbsmall@clevelandohio.gov, 216.664.2204 - *Local government within Target Area. Currently managing an FY23 USEPA CW Assessment grant.*	***Assist with site reuse including evaluation of site redevelopment options and area planning, cleanup permitting & City service coordination, additional resource identification, and distribution/coordination of community information.***
City of Cleveland Council, Ward 5 Councilman Richard Starr, rstarr@clevelandcitycouncil.gov, 216.664.2309 *City councilman for Target Area*	
Burten Bell Carr Development Corp. (BBC), Michael McBride, Director of Real Estate Development, mmcbride@bbcdevelopment.org, 216.342.2847 x314 - *Non-*	***Community liaisons - Assist with community engagement, planning activities, and workforce identification for site end***

Name of Organization/Entity/Group & Point of Contact (Name, Title, Email, Phone)	Entity's Mission Specific Involvement in the Project or Assistance Provided
profit community development corp. revitalizing blighted and underserved communities in Central & Kinsman.	***use(s). Help identify needs/interests of Target Area residents; provide input during cleanup and reuse planning.***
MidTown Cleveland, Inc., Ashley Shaw, Executive Director, ashaw@midtowncleveland.org, 216.391.5080 x108 *Non-profit community development corp. providing services in MidTown to create a connected & complete community.*	
Cleveland Foundation, Joyce Pan Huang, Chief Impact Officer, EMAIL, PHONE – *Community foundation investing in community revitalization by funding equitable site readiness and development projects.*	***Community liaison - Assist with community outreach, planning activities, redevelopment funding, & workforce identification for site end use(s). Help evaluate equity impact of proposed future re-use for Target Area residents.***
Port of Cleveland, Rhonda Winslow, Vice President of Development Finance, rhonda.winslow@portofcleveland.com 216.377.1335 – *Local port authority providing funding and infrastructure to support regional economic growth*	***Provide input regarding cleanup construction resources and contractor RFP evaluation; May provide financing/tax benefits for potential future building construction.***
NOACA, Jason Knauer, Planner, jknauer@mpo.noaca.org, 216.241.2414 x355 - *MPO conducting transportation and environmental planning; currently managing USEPA RLF.*	***Assist with site reuse planning related to infrastructure & remedial options/funding.***

2g. Incorporating Community Input

Discuss your plan to communicate project progress to the local community, residents/groups directly affected by the project work, and the local organizations/entities/groups that will be involved in the project. Include the frequency and method(s) you will use (including methods that offer an alternative to in-person community engagement) and how input will be solicited, considered, and responded to.

CCLRC considers community and partner input critical to the success of this grant and have integrated this involvement throughout the grant tasks and schedule. CCLRC has managed public funding for property redevelopment since 2010 and intends to utilize community outreach mechanisms from previous grants and partners' existing relationships to enhance community involvement for this grant.

CCLRC and its selected QEP will develop a Community Involvement Plan and brownfield community outreach materials. These materials may include educational handouts; a brownfield website; a brownfield newsletter; a meeting toolkit that would enable residents to host impromptu meetings to discuss this grant and collect local input; social media engagement via various platforms; relevant video(s) pertaining to this grant, its purposes, and its outcomes; and survey materials. CCLRC may also issue grant-related press releases and request local news stories. Grant outreach may also include other materials or mechanisms, as determined most relevant by CCLRC and its project partners.

Community meetings specific to the proposed grant tasks include: three public meetings to inform and update residents about brownfields, this grant, and the proposed cleanup project. Meetings and communications will be developed in English, as approximately 2% of the Target Area identifies as Hispanic/Latino. which is spoken by 95% of residents living in the Target Area; a translator or American Sign Language interpreter will be made available if project partners indicate local need. Materials will be distributed at libraries and community centers to overcome the digital divide. Meeting locations will be accessible to public transit routes and ADA-compliant. CCLRC will respond to all public feedback regarding this grant within two weeks.

Existing community outreach mechanisms and public meetings currently scheduled by the public and non-profit project partners will also be utilized to notify residents about this grant and solicit their input on identifying properties and preferred end uses. Cleveland has an extensive network of nationally-recognized non-profit community development corporations that represent each of its 30 neighborhoods. Burten Bell Carr Development, Inc, which represents the Central residents has been

included as project partners for this grant and will assist with informing local residents about community meetings, as well as contribute their existing frameworks for resident outreach and input such as door knocking, newsletters, block club meetings, mailing lists, safety walks, community events, and annual meetings.

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

Local government applicants may use up to 10% of the total grant award for health monitoring activities. The health monitoring activities must be associated with brownfield sites at which at least a Phase II environmental site assessment is conducted and that are contaminated with hazardous substances. Coordination with the local health agency is required. Please review the Health Monitoring Fact Sheet for more information.

In determining costs to include on the "Construction" budget line, EPA recommends that applicants apply the "principal purpose of the contract" test, instead of characterizing discrete tasks that the same contractor will perform. If the principal purpose (i.e., 50% or more of the estimated costs) of the contract is for construction services as defined below, then the cost for the contract should be placed on the "Construction" budget line. Note, a contract that is principally purposed for construction may include tasks performed by the contractor or its subcontractor that are more characteristic of site assessment (e.g., confirmatory sampling, research into the history of the site), incidental engineering work (e.g., inspections to verify that the remedy is complete), or similar ancillary tasks.

Remediation activities that are classified as "Construction" costs include:

- excavation and removal or treatment of contaminated soil,
- installation of concrete caps and other barriers to migration of contamination,
- abatement of asbestos or lead-based paint contamination in buildings,
- construction or assembly of structures housing equipment to pump and treat contamination,
- permanent installation of equipment purchased by the contractor or the recipient, and
- site restoration activities, such as grading, that prepare a site for reuse and similar activities that improve real property.

Cooperative agreements with successful applicants under this funding opportunity will be subject to the administrative cost limitation described at CERCLA § 104(k)(5)(E). Successful applicants may only use up to 5% of the total amount of EPA funds for their own administrative costs (direct costs for grant administration and indirect costs). For example, if EPA awards $500,000 to an applicant, the 5% cap for administrative costs equals $25,000. Costs must be classified as direct or indirect consistently and applicants may not classify the same cost in both categories. The limitation on administrative costs does not apply to otherwise allowable programmatic costs (including indirect costs) charged by procurement contractors. Note that EPA considers costs for performance and financial reporting to be allowable programmatic costs that are not subject to the 5% limitation.

For applications that include indirect costs in the budget and are selected for funding, an EPA Grants Specialist or Grants Management Officer may request a copy of the indirect cost rate agreement that was negotiated with the cognizant agency before the cooperative agreement is awarded.

Do not include activities that are ineligible uses of EPA Cleanup Grant funds (e.g., land acquisition; building demolition that is not necessary to remediate contamination at the site; or building construction for future redevelopment).

Please refer to the FY26 FAQs for additional examples of eligible and ineligible uses of funds (including administrative costs) and information on classifying construction costs. For questions not covered by the FY26 FAQs, contact your Regional Brownfields Contact listed in Section 1.E.

3a. Proposed Cleanup Plan

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

The Cleanup plan includes pre-demolition asbestos and regulated materials abatement, demolition of all existing structures, and institutional and engineering controls necessary to create land ready for redevelopment within the City of Cleveland.

The proposed Cleanup will includes asbestos and regulated materials abatement and disposal in all buildings except Building B; demolition of Building B (the southern building on the eastern parcel) and disposal as asbestos-containing material; an in-situ Carbon Trap and Treat application that will serve as a combination of source area treatment and permeable reactive barrier (PRB) along the northern and western property boundaries to restrict off-site VOC migration; and institutional controls to restrict future soil and groundwater use on the Site and future land use to commercial/industrial.

As discussed in the attached draft Analysis of Brownfield Cleanup Alternatives (ABCA), the cleanup plan for the Site aims to protect human health and the environment by remediating the Site and concurrently demolishing the existing buildings to create 4.5 acres of commercial/industrial redevelopment-ready land within the City of Cleveland.

ACMs in poor condition, including roofing materials, and other regulated materials including batteries, pesticides, and mercury-containing equipment that must be abated/removed prior to demolition were identified in the northern building (Building A) and the middle partially demolished building at 2175 Ashland. A pre-demolition asbestos and regulated materials survey cannot be conducted on the upper floors of Building B. Therefore, Building B is assumed to contain asbestos-containing materials (ACM) due to its age; this building will need to be demolished and disposed of as ACM. The building roofing material at 2162 Ashland is presumed to contain asbestos-containing material (ACM) due to its age; the material cannot be sampled due to access issues. Per Ohio regulations, contractors will be notified of the presence of lead-based paint inside the buildings so appropriate worker precautions can be taken during abatement and demolition activities.

Former industrial manufacturing operations that occurred at the Site and neighboring properties have negatively impacted groundwater and soil gas across the Site. Multiple VOCs, including TCE, were found in groundwater and soil gas above applicable VAP standards. The vapor intrusion pathway is currently considered complete for future residents and/or commercial/industrial workers across the Site. Engineering controls will include a vapor barrier requirement beneath future buildings and an in-situ Carbon Trap and Treat application that will serve as a combination of source area treatment grids and PRB along the northern and western property boundaries to restrict off-site VOC migration. This remedial option is also considered a climate-friendly improvement since it requires no long-term mechanical system maintenance.

Additionally, institutional controls will be employed as an Activity and Use Limitation (AUL) filed as an Environmental Covenant (EC) attached to the deed that restricts future land use to commercial/industrial. A Building Occupancy Limitation (BOL) requiring evaluation of the vapor intrusion pathway for any new buildings constructed on the Site, or installation of a vapor barrier/vapor mitigation system beneath the footprint will also be considered.

Description of Tasks/Activities and Outputs

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

3b. Project Implementation, 3c. Anticipated Project Schedule, 3d. Task/Activity Lead, 3e. Outputs

Task/Activity 1: Cooperative Agreement Oversight
a. Project Implementation: *EPA-funded tasks/activities*: Program development and organization; partner meetings; develop and issue an RFP and implement a competitive bid process consistent with federal requirements; select a Qualified Environmental Professional (QEP); attend the National Brownfields Training Conference; complete quarterly reports and Disadvantaged Business Enterprises (DBE) reporting; maintain/update ACRES. *Non-EPA grant resources*: None.
b. Anticipated Project Schedule: Quarterly partner update meetings; QEP selected within 1-2 months of signed Cooperative Agreement; Quarterly reports, DBE & ACRES reporting updated quarterly throughout the grant period.
c. Task/Activity Lead: CCLRC will oversee this task with assistance from partners on QEP selection. QEP will complete quarterly reports & ACRES updates.
d. Outputs: Preparation of an RFP & selection of QEP; quarterly partner meetings (up to 16 based on project duration); quarterly DBE/Davis-Bacon & ACRES reporting.
Task/Activity 2: Community Outreach & Engagement
a. Project Implementation: *EPA-funded tasks/activities*: Preparation of EPA-approved Community Involvement Plan (CIP) outlining outreach and communication strategies, especially concerning Target Area residents, partners, and community stakeholders; development of information repository; preparation of marketing materials including fact sheets, etc.; community outreach & project status updates; public meeting notifications; at least 3 public meetings held to solicit input, educate, and update the community; receipt/response to public comments. Conduct 30-day public comment period to solicit input on the revised ABCA; finalization of ABCA after public comments are addressed. *Non-EPA grant resources*: Partners will assist with sharing project updates & outreach materials with the community.
b. Anticipated Project Schedule: Outreach will be performed throughout the grant period. Activities are anticipated to commence with generation of the CIP in early 2027, and occur until cleanup field work is complete, estimated late 2029. Outreach will occur around the following milestones: 1. First Quarter 2027: Post CIP & revised ABCA online for comment; hold first public meeting. 2. Third Quarter 2027: Solicit community feedback regarding draft specifications and proposed redevelopment and cleanup plans before remediation activities commence; hold second public meeting. 3. Third Quarter 2028: Provide remediation & reuse planning updates. 4. Third Quarter 2029: Issue post-cleanup updates & next steps. The third public meeting will occur in late 2028 or 2029, dependent on project activities and schedule developments.
c. Task/Activity Lead: CCLRC will lead community outreach activities, including material and meeting preparation, and receipt/response to public comments. The QEP will assist CCLRC with generation of the CIP and ABCA, providing technical expertise and support at meetings. CCLRC will review deliverables to ensure compliance with state/federal programmatic requirements.
d. Outputs: CIP, outreach & educational materials; public meeting notices, handouts, and presentations; social media posts; final ABCA. Three community meetings.
Task/Activity 3: Cleanup Activities & Oversight
a. Project Implementation: *EPA-funded tasks/activities*: QEP will prepare cleanup plans and specifications for review and approval by USEPA, including a site-specific Quality Assurance Project Plan (SSQAPP). CCLRC will publish the RFP; CCLRC and QEP will conduct pre-bid site visit and select remedial contractor(s) to perform asbestos and regulated materials abatement, demolition, and installation of VOC source treatment/vapor mitigation measures. The contractor, with QEP oversight,

will obtain the necessary permits, and coordinate with the local health agency regarding monitoring activities, as necessary. Contractor will perform cleanup activities, including asbestos and regulated materials abatement, asbestos-related demolition, and installation of VOC source/treatment mitigation measures. QEP will monitor and oversee Site cleanup activities including abatement, demolition, and subsurface remedial components. CCLRC and the QEP will be in communication with USEPA and Ohio EPA during this project phase. *Non-EPA grant resources*: None.
b. Anticipated Project Schedule: The QEP will prepare project documents, including SSQAPP and cleanup design/plans/specifications within 3-6 months of selection (4Q 2026 – 1Q 2027). The RFP will be issued and contractor(s) selected by mid-2027.
c. Task/Activity Lead: The QEP will oversee this task, with assistance from CCLRC.
d. Outputs: Cleanup plans and specifications; bidding documents; SSQAPP, permits; site cleanup.
Task/Activity 4: Voluntary Program & Closeout Reporting
a. Project Implementation: *EPA-funded tasks/activities*: QEP will perform project reporting; review and approve pay apps and prevailing wage/Davis-Bacon documentation, as necessary; perform final Site walk-through; and collect confirmation samples, as needed. Health monitoring and air monitoring will be conducted, as needed. QEP will prepare the VAP No Further Action (NFA) Letter and Covenant Not to Sue request, including institutional controls (Environmental Covenant); and grant closeout documentation. CCLRC will be in communication with QEP and regulators throughout this phase. *Non-EPA grant resources*: None.
b. Anticipated Project Schedule: Cleanup activities are scheduled to commence in Summer/Fall 2027 and will be completed within the grant period with closeout reporting and State of Ohio VAP documentation anticipated by 1Q 2029.
c. Task/Activity Lead: The QEP will oversee this task, with assistance from CCLRC.
d. Outputs: Confirmation soil sampling; prepare VAP NFA and request (CNS) Covenant Not to Sue from Ohio EPA including preparation of AUL/EC; grant closeout documentation.

b. Project Implementation

- Discuss the EPA-funded tasks/activities that will take place to address the proposed site(s).
  - If you plan to issue a subaward(s), indicate what tasks/activities or services will be provided.
  - Examples include procuring a Qualified Environmental Professional, submitting and obtaining approval of a Quality Assurance Project Plan, enrollment of the site in the State's Voluntary Cleanup Program, certifying cleanup is complete, coordination with the local health agency on health monitoring activities, etc.
- If applicable, identify tasks/activities needed to support or complement the grant that will be contributed by sources other than the EPA grant, such as leveraged resources or funding contributed by your organization. (For example, the applicant does not charge the EPA grant for salary dollars and therefore contributes its own resources to carry out programmatic oversight activities or grant administration.) (Do not duplicate sources listed in 1.e.-1.g. under Strategy for Leveraging Resources.)

c. Anticipated Project Schedule

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

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

that any proposed pre-award costs are incurred. For more information on pre-award costs, please see the FY26 FAQs.

d. Task/Activity Lead

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

e. Outputs

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

Outputs may include, but are not limited to, cleanup plans, community involvement plans, final Analysis of Brownfield Cleanup Alternatives (ABCA) documents, administrative records, and cleanup completion report or letter. (Refer to Section 3.A.(4) for an explanation of outputs.)

3f. Cost Estimates

Describe how cost estimates for each task were developed per budget category, including direct and indirect administrative costs (if applicable). Present costs per unit where appropriate. (Note, the total amount of direct and indirect administrative costs cannot exceed 5% of the total EPA-requested funds.) Cost estimates may come from a Phase II report. For information on best practices for preparing budgets for EPA grant applications, refer to the Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance.

You may use the sample table format below to present how you plan to allocate grant funds for tasks/activities described in Section 4.C.(3) by budget category. Replace the task number heading in the sample table with the actual title of the task.

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

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

CCLRC is requesting $4,000,000 to complete the tasks above. The cost estimate presents anticipated costs for this grant, based on experience, estimates from consultants and contractors, local market conditions, and standard hourly rates; no administrative, indirect, equipment, or supply cost are requested. The estimated effort for CCLRC personnel to complete programmatic activities may exceed the estimated hours/cost; excess time will be contributed as in-kind resources. **CCLRC will spend 85% on Construction.**

		Project Tasks					
Budget Categories		**Task 1 - Cooperative Agreement Oversight**	**Task 2 - Community Outreach**	**Task 3 – Cleanup Activities & Oversight**	**Task 4 – Voluntary Program & Closeout Reporting**	**Admin Costs**	**Totals**
Direct Costs	Personnel*	$15,000	$15,000	$10,000	$15,000	-	**$55,000**
	Fringe Benefits	$2,850	$2,850	$1,900	$2,850	-	**$10,450**
	Travel	$5,000				-	**$5,000**
	Contractual	$15,000	$18,000	$176,836	$299,430	-	**$509,266**
	Construction			$3,419,484		-	**$3,419,484**
	Other (conf reg fees)	$800				-	**$800**
	Total	$38,650	$35,850	$3,608,220	$317,280	-	**$4,000,000**

Total Direct Costs	$38,650	$35,850	$3,608,220	$317,280	**$0**	**$4,000,000**
Indirect Costs	-	-	-	-	**-**	**$0**
Total Budget	**$38,650**	**$35,850**	**$3,608,220**	**$317,280**	**-**	**$4,000,000**

*CCLRC effort to complete programmatic activities beyond estimated amount will be provided as in-kind services.

Task 1 – Total: $38,650 – Personnel: General programmatic management and Cooperative Agreement oversight; 250 hours @ $60/hour = **$15,000**, @ 19% Fringe = **$2,850**. Travel: CCLRC staff to attend 2 National Brownfields Conferences (2 airfares @ $600 x 2 = $2400; 4 hotel nights x 2 at $200/night x 2 =$1600; 4 days food @100/day x 2 = $800, ground transportation $100 x 2 $200 **= $5,000**). Contractual: Quarterly reporting & ACRES database updates; meetings with CCLRC, partners, and regulators (approx. 100 hours [2 hours/mo x 45 months] @ $167/hr average = ~**$15,000**). Other: 2 conference registration fees at $400 each = **$800**. **Task 2 – Total: $35,850 –** Personnel: Community outreach coordination including ; 250 hours @ $60/hour = **$15,000**, @ 19% Fringe = **$2,850**. CCLRC will lead community outreach activities, including three public meetings and associated material preparation, and review deliverables. Contractual: Attend 3 public meetings and support meeting preparation (QEP ~$3,000/mtg x 3 public meetings + $3,000 for CIP + $6,000 final ABCA, which will include resiliency assessment to evaluate extent to which current and forecasted climate conditions pose a rise to the proposed effectiveness of each remedial option = **~$18,000**). **Task 3 - Total: $3,608,220 -** Personnel: Prepare contractor RFP with QEP support; regulator communications; 166 hours @ $60/hour = **$10,000**, @ 19% Fringe = **$1,900**. Contractual: QEP = 1000hrs @ ~$175/hr average = $175,000 for: HASP, SSQAPP, remediation design/plans/specifications, including public bidding assistance, and contractor administration services/oversight of demolition (20% on-site) and abatement/remediation (100% on-site) + pre-PRB survey @ $1,836 = **$176,836**. Construction: Remediation Contractor **$3,419,484** (remediation contractor costs: $243,000 for ACM abatement and confirmation sampling; $27,000 for regulated materials abatement; $1,339,200 for Building B ACM demolition; $1,810,284 for Carbon Trap & Treat application to address VOC source areas and prevent off-site COC/vapor migration, including permits, and insurance and confirmation sampling. NOTE: All contractual and construction subtotals have a ~20% contingency built in to account for inflation and escalation in costs as work not anticipated to occur until ~2027/2028. **Task 4 – Total: $317,280** - Personnel: Oversee grant closeout reporting and VAP NFA submittal; meetings with QEP and regulators. 250 hours @ $60/hour = **$15,000**, @ 19% fringe = **$2,850**. Contractual = QEP = $299,430 = $255,150 (1,500 hrs @ $170/hr average) for confirmation sampling coordination/execution, preparation of AUL/EC, VAP NFA submittal, and CNS request; closeout reporting for compliance, including confirmation sampling @ $16,200 + post-PRB and final Site survey required for NFA @ $6,480 + well abandonment @21,600 = $299,430.

- Travel to brownfields-related training conferences is an acceptable use of these grant funds.
- EPA defines equipment as items that cost $10,000 or more with a useful life of more than one year unless the applicant has a lower threshold for equipment costs. Items costing less than $10,000 (e.g., laptop computers) are considered supplies. Generally, equipment is not required for Brownfield Grants.
- Costs must be placed on the Construction budget line when at least 50% of the estimated amount of the contract(s) will be for the remediation of contamination at the brownfield site. Construction costs do not typically apply to assessment activities. See the FY26 FAQs for more information.
- Administrative costs (direct and/or indirect) for the Cleanup Grant applicant itself cannot exceed 5% of the total EPA-requested funds.

Include costs per unit. You may use the table format below.

Examples of costs per unit may include:

Task 1, Project Oversight

– *Personnel Costs*: 222 hours of city staff to provide project oversight, $30/hr salary = $6,660

Task 2, Tank Removal

– *Personnel Costs*: 20 hours at average rate of $50/hr = $1,000

– *Contractual Costs*: 5 tank pulls at cost of $13,000 per tank pull = $65,000

3g. Plan to Measure and Evaluate Environmental Progress and Results

Discuss your plan and system to track, measure, and evaluate progress in achieving expected project outputs, overall results, and eventual outcomes. (Definitions of outputs and outcomes are provided in Section 3.A.(4).)

Outputs

The term "outputs" refers to an environmental activity, effort, and/or associated work products related to an environmental goal or objective that will be produced or provided over a period of time or by a specified date. Outputs may be quantitative or qualitative but must be measurable during the project period. The expected outputs for the grants awarded under these guidelines are cleaned up brownfield sites. Other outputs may include the number of community meetings held, the number of Analyses of Brownfield Cleanup Alternatives (ABCA) completed, the number of community involvement and cleanup plans completed, and/or the number of underground storage tanks pulled.

Outcomes

The term "outcomes" refers to the result, effect, or consequence that will occur from carrying out the activities under the grant. Outcomes may be environmental, behavioral, health-related, or programmatic; must be qualitative or quantitative, and may not necessarily be achievable during the project period. Expected outcomes of Brownfield Grants include the number of jobs created and funding leveraged through the economic reuse of sites; the number of acres made ready for reuse; acres of greenspace created for communities; and the minimized exposure to hazardous substances and petroleum contamination.

CCLRC will utilize its internal Sage accounting and grant tracking software to track, measure, and evaluate project outputs and outcomes throughout all phases of the project. Project achievements will be evaluated and detailed in quarterly reports that outline the project progress in achieving outputs, results, and outcomes; through frequent updating of the ACRES database, and through quarterly meetings with the QEP to review schedules, monitor progress, and identify corrective actions, as needed.

Additionally, CCLRC will meet virtually with the USEPA Project Manager at least quarterly to share progress, discuss challenges, and adjust strategies if necessary. All project outputs will be tracked and reported through the U.S. EPA ACRES system, including tasks complete, money spent, progress made, acres remediated/redeveloped, additional leveraged cleanup or redevelopment funding, and the number of jobs created or retained. Property profiles in ACRES will be updated following the completion of final reports including CIP, SSQAPP, ABCA, etc., remediation, and redevelopment activities.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

To conserve space, you may present information for 4.a. and 4b. in the same response.

4a. Organizational Structure; 4b. Description of Key Staff

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

b Briefly describe the key staff who will successfully administer the grant, including their roles, expertise, qualifications, and experience.

CCLRC has the organizational capacity to effectively manage all facets of the grant including the programmatic, administrative, and financial aspects. Brownfield redevelopment is a core tenant of CCLRC's mission, which pertains to catalyzing economic development by revitalizing individual

neighborhoods throughout Cuyahoga County. CCLRC has received and successfully managed five USEPA Brownfields grants, including two open Cleanup grants.

CCLRC has extensive experience managing USEPA Brownfields grants with full compliance. Carly Beck, Environmental Project & Data Analyst, will lead the project, bringing over 10 years of environmental experience and current oversight of CCLRC's other USEPA grants. She will manage all administration, scheduling, and procurement. Supporting her are Kim Steigerwald, Director of Acquisition and Disposition, who brings more than 33 years of community development experience, including management of prior USEPA grants, along with Mel Sanders, CPA, Chief Financial Officer, with over 10 years of nonprofit grant accounting experience, and Matt Yourkvitch, Esq., Corporate Counsel, with more than 15 years of legal experience. CCLRC utilizes internal software integrated with Sage accounting software for grants management.

4c. Acquiring Additional Resources

Describe your system(s) and/or procedure(s) to appropriately acquire additional expertise and resources (e.g., contractors or subrecipients) required to complete the project. (Refer to Section IV of EPA NOFO Clauses regarding the difference between contractors and subrecipients.).

CCLRC will engage QEPs and as needed, and other real estate experts to provide environmental support, reuse planning, and market studies in compliance with the cooperative agreement and competitive procurement procedures of 2 CFR Part 200 and/or 2 CFR Part 1500, as applicable. In the event of leadership changes due to staff turnover, CCLRC will fill positions with staff who possess strong project management skills.

CCLRC has significant experience hiring contractors and consultants, and working with various local partners and entities. For this grant, CCLRC will be supported by an outside QEP, and will hire an outside contractor(s) to perform the cleanup activities. The RFP issued for QEP services will require the successful consultant to have the necessary qualifications to perform cleanups that meet the grant terms and conditions. CCLRC will follow the Six Good Faith Efforts to ensure that DBEs have the opportunity to compete for procurement.

Past Performance and Accomplishments

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

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

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

4d. Currently Has or Previously Received an EPA Brownfields Grant

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

(1) Accomplishments

Describe the accomplishments (including specific outputs and outcomes) achieved under the current/most recent grant(s) (no more than three), including at a minimum, the number of sites assessed and/or cleaned up. Discuss whether these outputs and outcomes were accurately reflected in the

Assessment, Cleanup and Redevelopment Exchange System (ACRES) at the time of this application submission; if not, explain why.

U.S. EPA Grant	Project Outputs*	Project Outcomes*
FY 2024-USEPA Brownfield Cleanup Grant Award. BF 00E03875. Total $500,000. Term 10/1/24-9/30/28. **Open**.	Issued RFQ; Selected environmental consultant to oversee remediation; entered into Ohio EPA VAP MOA track; assessment and cleanup planning documents currently under Ohio EPA review	
FY 2023-USEPA Brownfield Cleanup Grant Award. BF 00E03571. Total $500,000. Term 10/1/23-9/30/27. **Open**.	Hired environmental consultant to oversee remediation; completed investigations to define extent of subsurface contamination; created ABCA and RAP; implemented selected cleanup remedy	One 1.3-acre property cleaned up facilitating business expansion; NFA letter and Request for CNS currently underway
FY2020-USEPA Brownfield Assessment Grant Award. BF 00E02732. Total $300,000. Term 10/1/2019- 9/30/2022. **Closed.**	Completed 15 Phase 1 ESAs, 9 Phase II ESAs, 5 Asbestos Surveys, 1 LBP Survey, 2 Neighborhood Brownfield Inventories, 1 Landfill Management Plan.	44 properties assessed; leveraged $2 million in local, state redevelopment activities

* All outputs and outcomes have been accurately reported into ACRES at the time of this application submission.

(2) Compliance with Grant Requirements

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

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

For all closed EPA Brownfields Grants, indicate if there were funds remaining, the amount of remaining funds, and a brief explanation for why any remaining funds were not expended within the Period of Performance. Note that EPA will not penalize the applicant for closure of a Revolving Loan Fund cooperative agreement per the FY23 RLF Policy Memo.

U.S. EPA Grant	Compliance with Grant Requirements
FY 2024-USEPA Brownfield Cleanup Grant Award. BF 00E03875. Total $500,000. Term 10/1/24-9/30/28. **Open**.	As of this application submission, $24,479 of $500,000 awarded funds has been spent. The property has been accepted into Ohio EPA's VAP MOA track, and assessment and cleanup planning documents are currently under review. All funds are projected to be spent by the end of the period of performance.
FY 2023-USEPA Brownfield Cleanup Grant Award. BF 00E03571. Total $500,000. Term 10/1/23-9/30/27. **Open**.	As of this application submission, $420,805.69 of $500,000 awarded funds has been spent. The cleanup remedy has been implemented, and post-remedy monitoring, preparation of NFA letter and Request for CNS will continue through 2026. All funds projected to be spent by end of performance period.
FY2020-USEPA Brownfield Assessment Grant Award. BF 00E02732. Total $300,000. Term 10/1/2019- 9/30/2022. **Closed.**	All project activities completed in compliance with workplan, schedule, and terms and conditions of the cooperative agreement. Reporting was consistently reported in ACRES. All awarded funds spent except for $14,894. Property allocated this spend was successfully assessed without remaining funds.