NARRATIVE INFORMATION SHEET US EPA FY2023 Brownfield Cleanup Grant Application Cuyahoga County Land Reutilization Corporation Euclid-Woodlawn Redevelopment, East Cleveland, Ohio

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

a. i. Overview of Brownfield Challenges and Description of Target Area

The Project Site is located in census tract 39035151700 in the City of East Cleveland, Ohio, one of the poorest cities in Ohio and the country. The city is a first-ring suburb of Cleveland, incorporated in 1911, and was once a thriving bedroom community of 40,000 with a strong manufacturing job base that, in turn, supported a vibrant civic, social, and cultural life. East Cleveland has seen steady decline over the last thirty years, the result of regional economic changes and demographic shifts. Its population has halved since 1970, causing its tax base to plummet, making it challenging for the city to provide even basic services to its remaining residents. This majority African American city was devastated by the foreclosure crisis, resulting in 1600+ vacant lots (23% of parcels) and 1200 vacant structures (17% of parcels). The median household income is \$22,426 and over 50% of the population is unemployed. The poverty rate is 36.5% for the city and 30.4% for the Project Site census tract. There has been very little private sector investment in the past 3 decades. The census tract in which the project site is located developed around automotive uses, including an auto factory, a dealership, several auto repair facilities and gas stations, as well as commercial uses including drycleaning establishments. According to the Cuyahoga County Environmental Justice (EJ) Index Cumulative Burden of Environmental Exposures and Population Vulnerability done using 2018 data, East Cleveland has 9 census block groups with environmental justice burden scores of 9/10, the average cumulative burden score for the county is 5.8. The project target area has EJ burden scores of 8-9. The residents in this census tract face significant health disparities and are in the 95-100 percentile nationally for low life expectancy, heart disease and asthma. They are in the 90-95 percentile nationally for lead paint, hazardous waste proximity and USTs, and in the 95-100 percentile for diesel particulates, and air toxics cancer risk. The County Board of Health reported that in 2018, of children under 6 yrs. old in East Cleveland, 15.7% had an EBLL of >=5 ug/dl. which causes health problems in children, including brain damage and slowed growth.

As Cleveland and the surrounding region revitalizes, East Cleveland boasts significant assets that put it in the path of opportunity and development. An excellent location, close to transportation and communication corridors, adjacency to Cleveland's University Circle neighborhood which is a major employment center (e.g. Cleveland Clinic, Case University, Cleveland Museum of Art), and abundant space for development are among its locational advantages. The Project Site is at the gateway to a 30-acre \$122 million redevelopment project ("the Redevelopment") led by CCLRC and the City of East Cleveland, aimed at laying the groundwork for rebuilding the city's tax base. The planned reuse of the Project Site is the construction of an approx. 60-unit apartment building. Other elements of the Redevelopment include rebuilding the street infrastructure, constructing 200 new homes and redevelopment of an additional 15 commercial parcels. The Project Site is located along one of the region's main commercial corridors, Euclid Avenue. Were it not for the contamination at the Project Site, this would be viable commercial redevelopment property. The Project Site is critical to Phase 1 of the Redevelopment, scheduled to begin in 2023. This cleanup project will not only remove direct environmental threats to residents but will also help reverse the environmental conditions disproportionately affecting the majority African American population of East Cleveland.

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

The 0.82-acre site is located at the intersection of Euclid Avenue and Woodlawn Avenue in East Cleveland, Ohio, at the gateway to a low-income census tract and the city's targeted area for redevelopment. Through

environmental assessments conducted with the assistance of EPA grants past uses were identified to include commercial printing operations in the 1930s and 1970s, dry cleaning from at least 1935, an auto repair garage, a gasoline station from 1967 to 1973, and auto sales from 1974 to 2021. The assessments revealed the presence of trichloroethylene (TCE) in soil, groundwater, and soil gas vapor at concentrations exceeding state cleanup standards with a potential for off-site migration. Previous assessments of the Site have delineated the area requiring remediation. CCLRC has prepared the Site for these next steps through demolition of the former structures and removal of one underground storage tank.

b. Revitalization of the Target Area

b. i. Reuse Strategy and Alignment with Revitalization Plans

The Project Site is located in a target area identified by the city and its residents through a series of extensive studies done in 2015 and 2020 in partnership with local universities and with significant community involvement. In 2016, the city's Council passed a resolution authorizing the CCLRC to assemble parcels within the target area and commence development planning. The CCLRC has just completed an Implementation Plan for the target area and finalized the funding for Phase 1 of the Redevelopment. The target area was considered best suited to jumpstarting the economic revitalization of the city because it is directly adjacent to Cleveland's University Circle, one of the largest employment hubs in Ohio, and an economic engine for Northeast Ohio. It is home to 40,000 jobs, 10,000 residents and 13,000 students. As a result of those studies, the city partnered with the CCLRC to strategically assemble 180+ residential lots, demolish any blighted structures and acquire 18 commercial parcels in the target area. The target area is comprised of 5 residential streets that run north and south off Euclid Avenue, a main commercial artery that runs from downtown Cleveland through East Cleveland. The Redevelopment includes the reconstruction of the streets (waterlines, sewers and roadwork), building of new single-family homes, townhomes and apartments, and development of new commercial buildings to attract jobs to the area. All funding for the waterlines is in place, as well as the sewer and roadwork for Phase 1, and this infrastructure work will take place in 2023. Construction of the Phase 1 residential units will start in 2024. The Project Site is at the gateway to Phase 1 and is slated for the construction of a new 60unit apartment building. We have significant developer interest in the site and will be issuing an RFP to select the developer in first quarter 2023. The city in partnership with CCLRC has had a series of community meetings throughout 2022 to keep the community apprised of the redevelopment plans and to gather input into the site planning and desired housing types to be included in the Redevelopment. In addition to resident input, we have held focus groups with realtors, developers, lenders, community development non-profits and political stakeholders. The project has received funding commitments so far from the City of East Cleveland (\$4 million), JobsOhio (\$1.5 million), the Water Department (\$1.681 million), the NEORSD (\$2.723 million), Cuyahoga County (\$1 million), the Port Authority (\$100,000), and Bank of America (\$25,000) - Attachment 4.

b. ii Outcomes and Benefits of Reuse Strategy

The proposed 60-unit apartment building to be constructed on this site after cleanup is estimated to create \$20 million of new property value and generate \$114,000 of new annual income tax revenue for the city. This will represent the first new residential project built in the city since 2010. The remediation of the project Site will mitigate health risks to the community. Along with the \$3 million renovation of the adjacent commercial building by CCLRC in 2023, these two projects will be critical to attracting both the private developers needed to build out the single family and townhome components of the project, as well as the potential homebuyers for those units. By attracting new residents to this disadvantaged community, the reuse strategy aims to reverse population loss. Sustainability is one of the core elements of the Redevelopment. We will be incorporating a cooperatively owned solar array on top of the adjacent renovated building, and all residential buildings in the project will be required to include rooftop solar or be at least solar ready. We are working with the city and the County Planning Commission to update the city's zoning code to facilitate solar installations, and with Power a Clean Future Ohio (PCFO) to provide solar technical assistance to all developers and builders involved

in the project. All buildings will have to meet or exceed Enterprise Green Community standards. The project will not displace any residents, and we have deliberately included resident retention strategies into the plan, including \$10,000 home repair grants to all owner occupant existing residents, as well as partnerships with social service agencies who can assist residents with challenges that threaten their housing stability. The Redevelopment is also aimed at attracting businesses to redevelop commercial properties along Euclid Avenue, creating desperately needed job opportunities, while improving the commercial tax base.

c. Strategy for Leveraging Resources

c. i. Resources Needed for Site Characterization, Remediation, and Reuse

Name of Resource	Is the Resource for (1.c.i.) Assessment, (1.c.ii.) Remediation, (1.c.iii.) Reuse Activities?	Is the Resource Secured or Unsecured?	Additional Details or Information About the Resources	
US EPA Brownfields Assessment Grant	Assessment	Secured	Phase 1 and 2 ESAs were already completed for all 3 parcels. No further assessment is likely to be needed based on the prior work and investigations done on the sites, but if further assessment is necessary, we would apply for funds through the EPA Targeted Brownfields Assessments Program and/or the State of Ohio TBA program.	
US EPA Brownfields Clean Up Grant	Remediation	Unsecured	Because of the extensive prior assessment work and the fact that we have completed several aspects of the remediation already, the EPA funding being sought through this application is expected to be enough to complete the remaining remediation.	
Private Developer Funds	Reuse	Unsecured Contingent upon site remediation		
Infrastructure Funding	Reuse	Secured	\$6.054 of waterline, sewer, and ARPA funding	
CCLRC funding	Reuse	Secured	\$3 million (grants & loans) for renovation of the adjacent building	

c. ii. Resources Needed for Site Remediation

Because of the extensive prior assessment work and the fact that we have already removed one UST on the Site, the EPA funding being sought through this application is expected to be enough to complete the remaining remediation.

c. iii. Resources Needed for Site Reuse

For redevelopment of the site to be feasible, substantial rebuilding of the surrounding public infrastructure is critical first. Rebuilding the crumbling under and above ground street infrastructure (waterlines, sewer and sanitary lines, roads, streetlights and sidewalks) is key to both attracting private investment and residents for the planned residential reuse. Waterline funding for the entire target area has been secured (\$1.681 million), sewer and sanitary funding for Phase 1 on the streets bordering the site is in place (\$2.723 million) and sidewalk and streetlight funding is in place for Phase 1 (\$2.1 million). Equally important to the Project Site's redevelopment is the renovation of the long vacant commercial building adjacent to the project site, which is currently a neighborhood blight. The CCLRC has raised \$3 million for the renovation of this 23,000 sq. ft. building, bids have been received and we expect to be under contract before the end of 2022. The funding for the construction of the planned apartment building on the Project Site is expected to be secured by the successful developer selected through an RFP process in early 2023.

c. iv. Use of Existing Infrastructure

The infrastructure in the target area is in extremely poor condition because of decades of deferred maintenance as a result of the City's precarious financial situation. As part of this redevelopment project, the city has secured funding to replace all the waterlines in the target area, separate the sewer and sanitary lines in the area where the cleanup site is located and has allocated \$2.1 million of ARPA funds for new sidewalks and streetlights. The water and sewer infrastructure upgrades are expected to reduce the overflows and leaks associated with CSOs, and the resulting contaminants in the drinking water supplies and beaches that have led to rising waterborne disease outbreaks. The Redevelopment, of which the Project Site is a critical element, by attracting 200+ new taxpaying households to the city, will also help spread the cost of infrastructure over a greater number of people, lowering the cost burden particularly on the existing low-income households.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

a. i. The Community's Need for Funding

The City of East Cleveland is one of the poorest cities in Ohio and has been in fiscal emergency since 2012. The Project Site census tract is in the 96th percentile for low income. The city does not have the resources (staffing or funding) to assess and cleanup brownfield sites. The CCLRC has been assisting the city for over a decade by securing grants and managing 1,356 demolition projects, including removal of asbestos, containerized waste and USTs on their behalf. The city's median household income is \$22,426 (in the 60-70 percentile nationally), and in the census tract where the project is located, the median household income is \$19,142. Only 42.9% of the population is employed. The city's poverty rate is 36.5%. This redevelopment project is aimed at rebuilding the tax base of the city, and the cleanup and reuse of this site will help towards this goal.

a. ii. Threats to Sensitive Populations

a. ii. (1) Health or Welfare of Sensitive Populations

The low-income census tract in which the brownfield site is located is in the 95-100 percentile nationally of people of color, it is in the 80-90 percentile of people over age 64, it has a median household income of \$22,426 and a city poverty rate of 36.5%. This census tract was ravaged by the foreclosure crisis resulting in over 1600 vacant lots and 1200 vacant structures. The residents in this census tract face significant health disparities. They are in the 90-95th percentile nationally for lead paint, hazardous waste proximity and USTs, and in the 95-100th percentile for diesel particulates, and air toxics cancer risk. They are in the 99th percentile for diabetes, the 97th percentile for heart disease, the 96th percentile for low life expectancy and the 98th percentile for lead paint. The County Board of Health reported that in 2018, of children under 6 yrs. old in East Cleveland, 15.7% had an EBLL of >=5 ug/dl. which causes health problems in children, including brain damage and slowed growth. The CCLRC is taking several steps to address these health disparities:

 Assessments: Since 2016, the CCLRC has done assessments on 21 sites in East Cleveland a number of which were found to be contaminated.

- Remediation: The CCLRC removed one UST on the Project Site in summer 2022 as part of our demolition of the structures on the Site. The State's Bureau of Underground Storage Tank Regulations issued a no further action letter.
- Lead & Greenhouse Emissions: Nationwide, homes are responsible for about a fifth of the country's greenhouse emissions, because of fossil fuels burned to power home heating, cooling and cooking. Energy bills are a greater burden in the poorest neighborhoods, in part because many homes lack energy-saving insulation or modern, efficient appliances. Renovating those homes can solve many problems at once: removing lead and fixing other health hazards while cutting fossil fuel use. We are working with existing residents to repair their homes with \$10,000 grants, and helping them access additional grants for lead remediation, and energy conserving measures.
- Air Quality: This census tract has only a 18% existing tree canopy. We are planting new trees on each
 redeveloped parcel in the target area and creating pocket parks/greenspace in the neighborhood. Greater
 exposure to trees in daily life is associated with better health outcomes. Trees and vegetation in parks can
 help reduce air pollution both by directly removing pollutants and by reducing air temperatures.
- Water: Existing standards require horizontal and vertical separations between potable water, reclaimed water, storm water and sanitary sewage. Pipeline separation is a necessity for protection of public health and safety, property and the quality of the pipeline contents. Pipeline failure or leaks can result in pipeline contamination that increases risks public health and safety. Given the age of the East Cleveland infrastructure, these separations are not currently in place for the streets in the target area. As part of the project, this old infrastructure is being replaced, and properly separated.

a. ii. (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

The predominant contaminant at the site (TCE) has been found to be responsible for a variety of health impacts to include cancer, damage to the nervous system, kidneys, and liver. Vapor intrusion of TCE has been shown to be a reproductive hazard for women of childbearing age and short-term and long-term exposures can potentially affect the developing fetus. The 2019 Cuyahoga County Health Assessment Report identified infant mortality as a top priority heath issue. Infant and neonatal mortality rates (8.1 and 6.0, respectively) for Cuyahoga County overall are higher than the rates for the state of Ohio (7.2 and 5.0, respectively), and do not meet the Center for Disease Control's Healthy People 2020 Goals (6.0 and 4.1, respectively). As a result of poor air quality, 15.7% (15,043) of children in Cuyahoga County have an asthma diagnosis, with higher rates (19.3%) among those who live in and adjacent to the City of Cleveland. Eliminating the contaminants from the site and mitigating the migration of contaminants will lower exposure to hazardous substances for the people who live and work in the neighborhood including to infants and women of childbearing age.

a. ii. (3) Promoting Environmental Justice

The City of East Cleveland has suffered from decades of environmental, social and economic neglect as evidenced by every index, census and survey. According to the Cuyahoga County Environmental Justice (EJ) Index Cumulative Burden of Environmental Exposures and Population Vulnerability done using 2018 data, East Cleveland has 9 census block groups with environmental justice burden scores of 9/10, while the average cumulative burden score for the county is 5.8. The project target area has EJ burden scores of 8-9. The impact of housing policies like the redlining maps drawn up by banks in the 1930s to exclude people of color from gaining access to home loans led to not only limited wealth, but environmental justice concerns like high exposure to pollution and lower home values in East Cleveland neighborhoods close to toxic industrial sites such as our target area. Several studies have demonstrated a connection between living in a neighborhood such as our target area that was subject to redlining in the past and an increased likelihood of suffering from asthma today. The legacy of redlining and disinvestment policies led to devaluation of properties, and vacancies. Currently in East Cleveland 17% of the parcels have vacant structures on them, and 23% of parcels are vacant lots where structures have been demolished. The Redevelopment is aimed at addressing several of these environmental justice issues by taking an equitable development approach to ensure that this low-income

minority community has access to jobs, greenspace, improved housing and infrastructure, and access to quality amenities. The redevelopment of the Project Site and the adjacent properties in the target area will lead to increased property values for the existing residents, enabling them to build wealth. The home repair grants we are providing to adjacent residents will enable them to live safely in their homes, free from lead, and with lower costs for heating and cooling their homes. The restoration of the tree canopy in this neighborhood as part of the project will lead to better air quality and lower incidence of asthma.

b. Community Engagement

b. i. Project Involvement

Several organizations, stakeholders and residents have been involved in the Redevelopment to date. The planning for the redevelopment of this target area began in 2015 with a <u>study</u> done by the city, Case Western Reserve University, Cleveland Neighborhood Progress (a regional community development organization) and NOAH, a local community group. This was followed up by a <u>visioning project</u> in 2020 by the city, Cleveland State University, NOAH and PolicyBridge, a nonpartisan, African American led public policy "think and action tank", based in Cleveland, Ohio. The public was engaged through meetings, surveys and stakeholder interviews. These community studies identified community priorities and goals for the area in which the Project Site is located, and proposed land uses. Throughout 2022, the CCLRC has held focus groups with realtors, developers, businesses, and property owners to solicit specific input and feedback on the reuse plans, and discussions with residents about site planning. The city has held regular community updates and Council meetings to keep residents updated on the project's progress.

b. ii. Project Roles

Name of organization/entity/group	Point of contact (name, email & phone)	Specific involvement in the project or assistance provided
CCLRC	Kim Kimlin, kkimlin@cuyahogalandbank.org, 216-698-2319	Community meetings; reuse planning and implementation; grant administration; environmental consultant selection; clean up oversight
City of East Cleveland	Michael Smedley, smedley@cityofeastcleveland.org , 216-450-4871	City-wide meetings to solicit community feedback and provide updates on the project; ensures that proposed reuse project is consistent with city goals and objectives; chairs zoning committee which approves redevelopment projects.
Trust for Public Land	Sean Terry, <u>Sean.Terry@tpl.org</u> , 773-727-5296	Redevelopment planning for target area green spaces
Western Reserve Land Conservancy	Isaac Robb, irobb@wrlandconservancy.org, 503-385-6988	Tree planting and maintenance planning

b. iii. Incorporating Community Input

In the City of East Cleveland, because of its small size, there are very few formal community groups/organizations. However, there is strong direct community engagement. The City administration holds regular community meetings and tele-townhall meetings with up to 500 participants. It is not uncommon for council meetings to be standing room only. All of these meetings are hybrid to address social distancing. Consequently, the main way in which residents have been kept involved and updated on the target area redevelopment plans has been through the city's regular meetings and communication channels. The CCLRC has supplemented these efforts by going door to door in the target area since April 2022, introducing ourselves and the project, answering resident questions, gathering their input and addressing any concerns. A community

kickoff celebration was held on October 8, 2022, showcasing the planned redevelopment of the brownfield site, and gathering community input. It was attended by 150+ residents. The CCLRC has also established a project website to keep residents updated and has engaged consultants to work with us and neighborhood residents in 2023 on planning the public spaces directly around the brownfield site, including the planned greenspaces/parks. We have also hired a marketing firm to assist us in developing a more robust website and a direct email campaign. We plan on having quarterly community events, with project updates, in the building adjacent to the project site throughout 2023.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The Project Site has been underutilized for over a decade in part due to the historical use and the presence of hazardous substances in soil, groundwater, and soil vapor in an area measuring approximately 14,000 square feet. The cleanup plan includes limited soil removal in areas of planned building foundations, in-situ treatment of groundwater and soil in the saturated zone, and installation of a sub-slab depressurization system during construction of the future multi-family residential building, with VAP No Further Action submitted along with a request for a Covenant Not to Sue (CNS) from the Ohio EPA once applicable VAP standards are achieved ensuring that the cleanup meets standards for residential reuse and off-property migration of contaminants are mitigated. This plan is the most effective and economic method to achieve remediation goals for residential reuse. This remedy is appropriate because it will reduce human exposure to onsite contamination. The selected alternative will reduce human exposure to the hazardous substances by removing the source and eliminating the exposure pathways. The cleanup project associated with this selected alternative is estimated to cost \$500,000. The site will enter into the Voluntary Action Program with the Ohio EPA and will have an approved Soil Management Plan (SMP) and a Health and Safety Plan to ensure that all remediation activities are performed with strict adherence to the health and safety of the public and the environment.

b. Description of Tasks/Activities and Outputs

The tasks that will be accomplished as part of this grant are as follows:

Task/Activity 1: Soil Excavation and Disposal

- i. Project Implementation: A properly procured Remediation Contractor will perform removal and disposal of impacted soils in the area of planned building foundation; conduct waste characterization; and backfill of clean fill
- ii. Anticipated Project Schedule: Year 1 of the grant (quarter 3 & 4 of grant)
- iii. Task/Activity Lead(s): Remediation Contractor, under the oversight of CCLRC and the Qualified Environmental Professional.
- iv. Output(s): estimated 200 tons of soil removed and disposed; clean fill emplaced; Removal of health risk for construction excavation workers and safe redevelopment of the site.

Task/Activity 2: Groundwater Treatment

- i. Project Implementation: A properly procured Remediation Contractor will perform in-situ chemical oxidation treatment of groundwater and soil in the saturated zone and conduct confirmation sampling
- ii. Anticipated Project Schedule: Year 1 of the grant (quarter 4 & 5 of the grant)
- iii. Task/Activity Lead(s): Remediation Contractor, under the oversight of CCLRC and the Qualified Environmental Professional.
- iv. Output(s): groundwater treatment for an area measuring approx. 14,000 square feet to depths of 16 feet for mitigation of health risk associated with vapor intrusion to indoor air to residential receptors and mitigation of off-property migration of TCE.

Task/Activity 3: Sub-Slab Depressurization Installation

- i. Project Implementation: A properly procured Remediation Contractor will install a sub-slab depressurization system during construction of the planned building and conduct confirmation testing of the negative pressure field.
- ii. Anticipated Project Schedule: Year 2 of the grant (quarter 5 & 6 of the grant)
- iii. Task/Activity Lead(s): Remediation Contractor, under the oversight of CCLRC and the Qualified Environmental Professional.
- iv. Output(s): Mitigation of vapor to indoor air for residential land use.

Task/Activity 4: VAP NFA Submittal and Request for CNS

- i. Project Implementation: CCLRC will procure a Certified Professional to conduct VAP reporting requirement, HASP, QAPP and Remedial Action Report; and prepare submittal of an NFA with a request for a CNS from the State of Ohio.
- ii. Anticipated Project Schedule: Years 2 and 3 of the grant (quarter 6 through 10 of the grant)
- iii. Task/Activity Lead(s): Qualified Environmental Professional / Certified Professional, under the oversight of the CCLRC.
- iv. Output(s): final ABCA; QAPP, Completion Reports, NFA Submittal, Request for CNS

To ensure all grant monies are directed towards the remediation efforts at the site, CCLRC will conduct grant management, project oversight, community engagement and notification, EPA Cooperative Agreement Compliance Reporting, ACRES Reporting and Closeout Documentation as part of in-house costs.

c. Cost Estimates

The table below shows the budget for the project and is followed by a description of how costs for each task were developed per budget category. CCLRC will cover any indirect and administrative costs. Cost estimates were developed based on the initial bids from contractors. All costs are for hazardous substance cleanup.

Budget Categories		Task 1 Soil Excavation	Task 2 Groundwater	Task 3 Sub-Slab Depressurization	Task 4 VAP NFA	Total
		and	Treatment	System	and CNS	
		Disposal				
	Personnel					
	Fringe					
Direct	benefits					
Costs	Travel					
	Equipment					
	Supplies					
	Contractual	\$60,000	\$200,000	\$110,000	\$130,000	\$500,000
	Other					
Total Direct Costs		\$60,000	\$200,000	\$110,000	\$130,000	\$500,000
Total Indirect Cost						
Total Federal		\$60,000	\$200,000	\$110,000	\$130,000	\$500,000
Funding						
Cost Share						
Total Budget		\$60,000	\$200,000	\$110,000	\$130,000	\$ 500,000

- Task 1- Soil Excavation and Disposal: Contractual cost for the excavation and disposal of approximately 200 tons of potentially impacted soils in the areas of the planned residential building.
- Task 2 Groundwater Treatment: Contractual cost for treatment of saturated soils and groundwater utilizing in-situ chemical oxidation.
- Task 3 Sub-Slab Depressurization System Installation: Contractual cost for installation of a sub-slab depressurization system during construction of the planned building.

 Task 4 – VAP NFA Submittal and Request for CNS: Contractual cost for consultant to complete oversight, confirmation sampling, and reporting necessary to prepare an NFA submittal and request a CNS from the Ohio EPA.

d. Measuring Environmental Results

CCLRC will maintain close coordination with all work to be funded under this project and will pay careful attention to tracking important EPA output metrics, and jobs created. CCLRC will track, measure, and evaluate progress toward achieving the project outputs listed in section 3.b above primarily by utilizing EPA's ACRES system. In addition, CCLRC will monitor project progress through documentation provided by all contractors and consultants and will provide this information to the EPA through quarterly reports, annual reports, and as otherwise required by the cooperative agreement.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

a. i. Organizational Structure & a. ii. Description of Key Staff

CCLRC's 9-member Board of Directors consists of the County Executive, County Treasurer, a County Council member (the statutory directors), a City of Cleveland representative, and four members selected by the statutory directors. CCLRC's staff of 33 is highly skilled in all aspects of demolition, rehabilitation and redevelopment, including grants management. In 14 years of operation, CCLRC has never had an audit finding. We have already successfully managed three USEPA Brownfields Grants. Primary responsibility for management of the FY2023 BFs Grant will reside with the CCLRC's Department of Community Stabilization.

CCLRC Key Staff Grant Management Experience				
Ricardo Leon, Chief Operating Officer	10 years of community & economic development experience; 5 years of direct CDBG supervision. Raided & managed \$12 million in government/philanthropic funds.			
Kim Kimlin, Director of Community Stabilization	25 years in community & economic development. Raised and/or managed \$36MM from govt. or philanthropic sources. Past OH BF Conference panelist.			
Ron Pavlovich, Finance Director	27 years CPA experience, including 15 years as CFO of non-profit organizations; years managing CCLRC federal funds.			
Jim Maher, Commercial Demolition Officer	13 years demolition experience; 20 years prior experience in construction management/community development.			

a. iii. Acquiring Additional Resources

CCLRC has contractor/consultant procurement procedures in place. We will issue an RFP to environmental services firms to develop the cleanup bid specifications in compliance with all applicable EPA requirements.

b. Past Performance and Accomplishments

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

b. i. (1) Accomplishments

The CCLRC has previously received FY 2010, FY 2015 and FY2020 Brownfields Assessment grants. With these grants, we have carried out 13 asbestos surveys, 2 lead based paint surveys (Hazardous), 35 Phase I ESA (Hazardous), 9 VAP Phase I ESA (Hazardous), 18 Phase I ESA (Petroleum), 9 VAP Phase I ESA (Petroleum), 12 Phase II ESA (Hazardous), 21 Phase II ESA (Petroleum), 2 Risk Assessments, 1 Risk Mitigation Plan, and 2 Hazardous Planning Activities. Among accomplishments from these grants were 3 cleaned up gas station sites, 6 future public green spaces, 4 new or expanded businesses, reuse of a warehouse, 1 senior and 1 homeless housing project, renovated mixed use office/retail space, a townhome project, a storm water retention site and parking for a community theater.

b. i. (2) Compliance with Grant Requirements

CCLRC received a \$300,000 grant for the period 10/1/2019 through 9/30/2022 of which \$285,106 (95%) was deployed. We used the funds to undertake 57 assessments, exceeding the 28 assessments that we had projected to complete in our workplan, on 41 sites. Outputs included 5 asbestos surveys, 42 Phase I ESAs, 9 Phase II ESAs, 1 lead-based paint survey. We also undertook 3 planning activities including 1 re-use plan and 2 inventories. Included in this activity are two Phase I assessments and one Phase II assessment that were undertaken on two of the three parcels on the Project Site. We complied with our workplan and all of the outputs have been entered into ACRES. All grant deliverables and quarterly reports have been timely submitted. All close-out reports will be submitted before 12/31/22. CCLRC received an FY2010 Grant of \$400K which was fully disbursed and a FY2015 grant of which \$399,988.13 was disbursed.

THRESHOLD CRITERIA FOR CLEANUP GRANTS

1. Applicant Eligibility

I affirm that my organization is a Land Clearance Authority, and; therefore, eligible to apply for this assessment grant. Documentation of my organization's status is attached (Attachment 2 a, b and c).

2. Previously Awarded Cleanup Grants

I affirm that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

I affirm that my organization does not have an active EPA Brownfields Multipurpose Grant.

4. Site Ownership

I affirm that as of November 22, 2022, CCLRC owns the parcels comprising the Euclid-Woodlawn Redevelopment at 1810 Woodlawn Avenue, 12500 Euclid Avenue, and 12524 Euclid Avenue, East Cleveland, OH 44112.

5. Basic Site Information

Site Name: Euclid-Woodlawn Redevelopment

Address: 1810 Woodlawn Avenue, 12500 and 12524 Euclid Avenue, East Cleveland, OH 44112

Owner: Cuyahoga County Land Reutilization Corporation

Date of Ownership: 03/02/2021, 11/17/2022, 9/30/2019 respectively

6. Status and History of Contamination at the Site

- a) This site is contaminated with hazardous substances.
- b) Operations at the site included commercial printing operations in the 1930s and 1970s, dry cleaning from at least 1935, an auto repair garage, a gasoline station from 1967 to 1973, and auto sales from 1974 to 2021.
- c) Environmental concerns at the site include the presence of TCE in soil, groundwater, and soil gas vapor.
- d) The site likely became contaminated through mishandling of drycleaning chemicals. This resulted in impacted soil, groundwater, soil gas vapor in an area measuring approximately 14,000 square feet to a depth of 16 feet.

CCLRC did not cause or contribute to the generation or disposal of any hazardous materials at the Site. CCLRC has met its continuing obligations and is working to get the Site cleaned up.

7. Brownfields Site Definition

I affirm the site is a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Applications

The site has undergone the following environmental assessment:

- Phase I Environmental Assessments (dated May 2019, January 2021, October 2021 and November 2022)
- Phase II Environmental Site Assessments (dated August 2019, November 2019, January 2022, and February 2022).
- UST Closure (July 2022).

The Phase I ESAs were conducted in accordance with ASTM International (ASTM) E1527-13 Standard Practice (ASTM Standard; ASTM, 2013). The Phase II ESA was conducted in general accordance with ASTM International (ASTM) E1903-11 Standard Practice (ASTM Standard; ASTM, 2011). Assessments completed in 2021 and 2022 were completed on behalf of CCLRC and were conducted in accordance with Sampling and Analysis Plans approved by the EPA Brownfields Program.

9. Site Characterization

There is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site.

10. Enforcement or Other Actions

I affirm there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

- 11. Sites Requiring a Property-Specific Determination N/A
- 12. Threshold Criteria Related to CERCLA/Petroleum Liability N/A
- 12. Threshold Criteria Related to CERCLA/Petroleum Liability N/A
- 12.a Property Eligibility Hazardous Substance Sites
- 12.a.i Exemptions to CERCLA Liability

12.a.i.3 Property Acquired Under Certain Circumstances by Units of State and Local Government

12524 Euclid was acquired by CCLRC on 09/30/2019 by State of Ohio forfeiture sale due to tax delinquency and tax foreclosure. All disposal of hazardous substances at the site occurred before CCLRC acquired the property. CCLRC has not caused or contributed to any release of hazardous substances at the site, and has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site. A Phase 2 ESA was conducted in January 2022.

12.a. iii. Landowner Protections from CERCLA Liability

- 12. a. iii. (1) Bona Fide Prospective Purchaser Liability Protection
- 12. a. iii. (1) a. Information on the Property Acquisition

12500 Euclid Avenue: CCLRC acquired fee simple title by voluntary transfer from CCLRC East Cleveland II LLC on 11/17/2022. CCLRC East Cleveland II LLC is an Ohio limited liability company and wholly owned subsidiary of CCLRC that did not the own or operate the property at the time of any release of hazardous substances.

1810 Woodlawn: CCLRC acquired fee simple title by negotiated purchase from Lincoln Property Mgmt. LLC on 03/02/2021. Lincoln Property Mgmt. LLC is an Ohio limited liability company with private ownership and no relationship to CCLRC.

12. a. iii. (1) b Pre-Purchase Inquiry

ASTM E1527-13 Phase I done for by Partners Environmental on behalf of CCLRC for 12500 Euclid Avenue on 11/16/22 and 1810 Woodlawn on 01/22/2021. Work was conducted by environmental professionals at Partners Environmental Consultants Inc. under the direction of an Ohio Certified Professional.

12. a. iii.1.c Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the site occurred before CCLRC acquired the property. CCLRC has not caused or contributed to any release of hazardous substances at the site, and has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

12.a.iii.1.d Post-Acquisition Uses

The 3 parcels have not been used for any purposes since we acquired them. They have remained as either vacant structures or as vacant lots.

12.a.iii.1.e Continuing Obligations

The CCLRC has taken all appropriate steps to stop any continuing releases, to prevent any threatened future releases, and to prevent or limit exposure to any previously-released hazardous substances. The CCLRC is committed to:

- 1. comply with any land-use restrictions and not impede the effectiveness or integrity of any institutional controls;
- 2. assist and cooperate with those performing the cleanup and provide access to the property;
- 3. comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- 4. provide all legally required notices.

13. Cleanup Authority and Oversight Structure

- a. The cleanup project will be managed by CCLRC, whose staff is familiar with environmental investigations and remediation, and a consulting firm with an Ohio EPA Certified Professional. The site will be enrolled in the Ohio EPA Voluntary Action Program (VAP) and all work will comply with applicable federal and state laws and ensure protection of human health and the environment. Specifically, Ohio Administrative Code (OAC) 3745-300 which contains requirements for VAP sites. CCLRC will work with their consultant, contractor, and personnel from the Ohio EPA to ensure that notifications, inspections, specific work practices, and proper disposal are followed.
- b. No access to neighboring properties will be required for this cleanup project.

14. Community Notification

14.a Draft Analysis of Brownfields Cleanup Alternatives

I affirm that a draft ABCA (Attachment 1a) has been completed for this cleanup grant application.

14.b Community Notification Ad

Euclid-Woodlawn Redevelopment: A public meeting has been scheduled and a community notification ad has been published at least two weeks prior to submitting this cleanup grant application (Attachment 6).

14.c Public Meeting

A public meeting was held on November 17, 2022 via zoom to facilitate social distancing and at CCLRC offices at 812 Huron Road E. Suite 800, Cleveland, OH 44115. No public comments were received. There were no public participants (Attachment 8).

14.d Submission of Community Notification Documents

The following items are attached:

A copy of the draft ABCA (Attachment 1a); a copy of the newspaper ad that demonstrates solicitation for comments on the application and that notification to the public occurred at least 14 calendar days before the application was submitted to EPA (Attachment 6); the comments or a summary of the comments received (not applicable as none received); the applicant's response to those public comments (not applicable since none received); meeting notes or summary from the public meeting(s) (Attachment 7); and meeting sign-in sheet/participant list (Attachment 8).

15. Name Contractors and Subrecipients: N/A