### Narrative Information Sheet

1. **Applicant Identification:** City of Port Arthur, Grants Management, P.O. Box 1089, Port Arthur, TX 77641

2. **Funding Requested:**
   - a. **Assessment Grant Type:** Community-Wide
   - b. **Federal Funds Requested:**
     - i. $500,000
     - ii. **Waiver Request:** No

3. **Location:** Port Arthur, Jefferson County, Texas

4. **Target Area and Priority Site Information for Community-wide Assessment Grant**
   - **List the target area:** Downtown Revitalization Area
   - **Census tract numbers:** 51 and 61
   - **Narrative’s Priority Site:** Hotel Sabine – 600 Proctor Street

5. **Contacts:**
   - a. **Project Director:** Mary Essex, Grants Program Administrator
   - Phone: 409-983-8251; FAX: 409-983-3295
   - Email: mary.essex@portarthurtx.gov

   - b. **Highest Ranking Elected Official**
     - Mayor Thurman Bill Bartie
     - Phone: 409-983-8105; FAX: 409-983-3295
     - Email: thurman.bartie@portarthurtx.gov


7. **Other Factor**

   - **None of the Other Factors are applicable.**
   - Community population is 10,000 or less.
   - The applicant is, or will assist, a federally recognized Indian tribe or United States Target brownfield sites are impacted by mine-scarred land.

   - **X** The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).

   - **X** The priority site(s) is in a federally designated flood plain.

   - **X** The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.

   - **X** The reuse of the priority site(s) will incorporate energy efficiency measures.

   - **30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.**

   - The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.

9. Releasing Copies of Applications:
Indicate any portion(s) of the application that are confidential, privileged, or sensitive information, or state 'n/a' or 'not applicable' - not applicable.
November 23, 2021

The Honorable Thurman Bill Bartie
Mayor of Port Arthur
City Hall-Mayor’s Office
P.O. Box 1089
Port Arthur, Texas 77641

Re: City of Port Arthur’s Proposal for a U.S. Environmental Protection Agency FY22 Brownfields Community-Wide Assessment Grant

Dear Mayor Bartie:

The Texas Commission on Environmental Quality (TCEQ) is pleased to offer this letter of support for the City of Port Arthur’s proposal to the U.S. EPA for a FY22 Brownfields Community-Wide Assessment Grant. The TCEQ believes that the grant will significantly benefit the City of Port Arthur by enhancing the local economy, increasing the tax base, and improving the environment. The TCEQ understands the target area for the grant include the City of Port Arthur’s downtown district. The grant will support the City’s Downtown Revitalization Plan which focuses on affordable housing, community farms and gardens, neighborhood parks, and expansion of existing businesses.

The TCEQ looks forward to working with the City of Port Arthur on its Brownfields initiative and supports the grant application. You may contact me at 512-239-2023 or Phyllicia.allen@tceq.texas.gov if you have any questions or if you would like additional information.

Sincerely,

Phyllicia Allen
Phyllicia Allen, Brownfields Program Coordinator
Remediation Division

PA/dl
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION
1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area: Port Arthur is a city of 55,109 residents located along the Gulf coast in southeastern Texas. The City was founded in 1895 and ranks 57th largest city in the state. It’s the 12th largest seaport and the largest refining port in the U.S. Starting in the 1960s, successive waves of economic recession have resulted in many vacant buildings throughout the Downtown Revitalization Target Area. The Target Area being 450 acres of mixed uses properties between Rev Dr Ransom Howard Street and the waterfront of the Sabine Neches Canal. The City’s population has been in decline for the past 40 years, down from a high of 61,251 in 1980, unemployment (23.6% in May 2020) and poverty (27.2%) have sky-rocketed above the national averages (4.8%, 12.3%). The City’s blighted properties with real or perceived impairments have become home to crime and illegal activities. To make things worse, Port Arthur continually has suffered the wrath of Mother Nature. According to the Downtown Revitalization Plan the entire Target Area is located in a federally designated flood plain. Since 1965, the City has suffered damages from seven major hurricanes or tropical storms costing billions in damages and lost tax revenues. The City struggles to fund repairs from the natural disasters including buying out properties that were destroyed. As the businesses close and residents leave, so does the badly needed tax revenue to make the repairs and provide basic services. With less funding available, crime has become widespread. The Total Crime Risk Index for the City is higher than that of the 85.9% of the Nation. With this grant, the City will assess priority properties and implement the Revitalization Plan. Without this grant, conditions will only get worse for the sensitive population.

1.a.ii. Description of the Priority Brownfield Site(s): The Target Area is located in the City of Port Arthur’s downtown district, 450 acres of mixed-use properties bound by Denbro Avenue to west, Lake Charles Avenue to the east, the Sabine Neches Canal to the south and Rev Dr Ransom Howard Street to the north. The City owns 29 of the 275 potential brownfields properties which it acquired at sheriff sales as a result of tax foreclosures following destruction by countless natural disasters. Environmental site assessments (ESAs) were started on 14 of these properties with the 2018 grant and supplemental sampling is required by TCEQ to further evaluate possible impacts.

The former Hotel Sabine is one of the priority properties that is located at 600 Proctor Street. It opened in 1929 and remained such until the mid-1980’s when it closed for the next 40 years. The 10-story building is the tallest in the City. It was designed to withstand the most severe coastal storms which makes it attractive to one of the City’s largest employers who is interested in renovating the building into part of their downtown corporate complex. The project started in 2018 when the developer acquired the adjacent Adams and Federal Buildings but due to the pandemic, the renovation project has been delayed for almost two years. This grant will be used to complete the additional assessment activities on the former Hotel Sabine and adjacent properties at 638-648 Procter Street with planned future use as office space and adjacent parking. These properties were found to be impacted with arsenic, lead, and mercury in soil and groundwater above the TCEQ Background concentrations. This $12 to $15-million dollar abatement and renovation project will generate temporary construction and permanent service related jobs as well as tax revenue.

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2 [2019 Data Profiles | American Community Survey | US Census Bureau](https://www.census.gov/programs-surveys/acs/)
1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans: The 2015 Downtown Revitalization Plan was a comprehensive study that engaged the community to identify new development opportunities. From which came 4 priority types of equitable redevelopments including: (1) affordable housing; (2) community farms and gardens; (3) neighborhood parks; and (4) new or expansion of existing businesses. These are the desired goals for the grant.

The City started addressing these goals by initiating assessment activities on 14 sites with the 2018 EPA assessment grant. Ten of these sites require additional sampling to evaluate elevated metal in the soil or groundwater and three other sites require initial Phase II ESAs. Once cleared of environmental impairments by Texas Commission on Environmental Quality (TCEQ), these sites can be reused to expand existing businesses, locate new ones, and create new affordable housing. The City is working with the Port Authority on acquiring three of the sites pending the Phase II ESA results. Also, the City is working with the Housing and Neighborhood Revitalization Division to provide affordable housing on five sites. Finally, the City is working with Motiva Enterprises, one of the largest employers in the region, to move their corporate headquarters to Target Area. Motiva had acquired and started renovations of the vacant Adams and Federal buildings and were in negotiation to buy the former Hotel Sabine and adjacent sites before the COVID pandemic outbreak. These sites require additional sampling to further evaluate metal concentrations in order to obtain redevelopment clearance by the TCEQ. With this grant, the City will finish assessing these blighted properties and implement the reuse plan. Without this grant, it will be difficult for the City to implement the Plan and socioeconomic conditions will likely continue to decline.

1.b.ii. Outcomes and Benefits of Reuse Strategy: The City’s redevelopment goal for the Downtown Revitalization Target Area is to ensure sustained livability of this community into the future. The Downtown Revitalization Plan was a comprehensive study that engaged the community to identify new development opportunities. With this grant, the City will be able to continue the assessment and redevelopment process critical to implementing the Plan. The City will be able to clear properties with perceived impacts and manage those with actual ones, a continuation of the process started with the 2018 EPA assessment grant. Pending assessment results, the City has been negotiating with local companies to expand or relocate their businesses to the Target Area, creating employment opportunities for the disadvantaged community with high levels of persistent poverty (30.7%) and unemployment (13.1%) as related to the EJ40 initiative and the socioeconomic data in Table 1. In addition, the City has been working with the housing authority to build affordable housing in the Target Area. New construction will include solar and other energy efficiencies such as Energy Star products. Jobs and development bring tax revenue the City lacks to maintain infrastructure and existing parks including: Port Arthur Pavilion, Boardwalk Park, Montgomery Park, Popeye Holmes Park, St Mary’s Park, Lions Park, and Lakeshore Park. As the Target Area starts to prosper, additional support services will locate in the community further improving the lives of the sensitive population.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: Sadly, without this grant, the City does not have a funding source to continue the revitalization process. The progress made with the 2018 assessment grant will come to a stop. The attraction of new businesses, expansion of existing ones, and the

construction of affordable housing in the Target Area will die without the completion of the environmental site assessments that are underway to determine a safe reuse of the priority properties. As the private sector sees the Target Area can be redeveloped safely with sustainable businesses, more stakeholders will be willing to provide funding towards the revitalization effort. To help fill the redevelopment funding gaps, the City may use Housing and Urban Development funding programs such as Community Development Block Grants, Section 108 Loan Guarantees, or Brownfields Economic Development Initiative grants. Additionally, the City can work with developers to obtain incentives through the Texas Enterprise Zone Program to encourage job creation and capital investment. The Port Arthur Economic Development Corporation is a partner with the City of Port Arthur to enhance Port Arthur’s business climate and overall economic development. Additional sources being considered are Public Works or Economic Adjustment programs through the Economic Development Administration. The City may also consider grant assistance through the National Telecommunications and Information Administration for broadband improvements for the entire project area through the various Broadband Infrastructure Programs. Other EPA Brownfields (cleanup, multipurpose, planning, & revolving loan fund) funding will become available for projects once the assessment activities have deemed the property is shovel ready or can be remedied cost affectively. These additional funding sources will be critical to abatement of contaminants such as asbestos and lead containing building materials.

1.e.ii. Use of Existing Infrastructure: This grant will fund environmental site assessments (ESAs), cleanup/reuse plans, and community outreach for equitable redevelopment projects including: (1) affordable housing; (2) community farms and gardens; (3) neighborhood parks; and (4) new or expansion of existing businesses. The Target Area is located along major transportation routes such as Houston and Savannah Avenues, and Procter and Rev Dr Ransom Howard Streets. Redevelopment of the brownfields properties in the Target Area will allow for the reuse of the existing infrastructure (electric, gas, roads, sewers, water) to reduce the costly expansion of utilities into greenfields. Where necessary, upgrades to existing infrastructure (broadband internet) will be included in the site reuse plans. Sustainable reuse of brownfields reduces runoff and waste disposal at landfills through recycling of building materials such as asphalt, brick, concrete, glass, metal, and wood. Pre-pandemic, the City was working with a local company to move their corporate headquarters to the Target Area. They had started renovating two buildings and expressed interest in one of the Target Area’s priority sites, the Hotel Sabine, and adjacent brownfield sites at 638-648 Procter Street which had assessments done with the 2018 EPA assessment grant.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
2.a. Community Need
2.a.i. The Community’s Need for Funding: EPA Region 6 and the Texas Commission on Environmental Quality (TCEQ) have limited resources that don’t trickle down very far before they are depleted. With much of the state’s economy tied to the petroleum industry, the COVID19 pandemic has left much of the workforce not commuting to an office or without a job resulting in a surplus of inventory and wells being shut-off. No production equals no tax revenue. All of which impacts state and local governments abilities to provide services. Without this grant, the City will no longer be able to complete the assessment activities necessary for job creation, generation of tax revenue, and removing the perceived and managing the actual environmental impairments. All of which prevents these vacant brownfields from being put back to its best use and on the tax rolls.
The Target Area consists of low-income, high unemployment, minority neighborhoods. The unemployment and poverty rates are twice the national averages, while median household income is nearly half. To make ends meet, a greater percentage of both parents have to work, requiring the grandparents to care for the children. There is a greater percentage of individuals relying on food stamps/SNAP benefits and half as many residents having health insurance coverage.

Table 1: Socioeconomic Data Comparison

<table>
<thead>
<tr>
<th>Category</th>
<th>Target Area</th>
<th>Port Arthur</th>
<th>Jefferson County</th>
<th>State of Texas</th>
<th>USA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>16,107</td>
<td>55,109</td>
<td>254,340</td>
<td>28,995,881</td>
<td>328,239,523</td>
</tr>
<tr>
<td>Unemployment (Sept, 2021)</td>
<td>13.1%</td>
<td>10.4%</td>
<td>8.4%</td>
<td>4.9%</td>
<td>4.8%</td>
</tr>
<tr>
<td>Poverty Rate - All People</td>
<td>30.7%</td>
<td>27.2%</td>
<td>17.7%</td>
<td>13.6%</td>
<td>12.3%</td>
</tr>
<tr>
<td>Percent Minority</td>
<td>64.7%</td>
<td>50.0%</td>
<td>41.7%</td>
<td>26.6%</td>
<td>25.0%</td>
</tr>
<tr>
<td>Median Household Income</td>
<td>$29,544</td>
<td>$36,557</td>
<td>$51,248</td>
<td>$64,034</td>
<td>$65,712</td>
</tr>
<tr>
<td>Per Capita Income</td>
<td>$18,794</td>
<td>$19,563</td>
<td>$27,094</td>
<td>$32,267</td>
<td>$35,672</td>
</tr>
<tr>
<td>&lt;High School Education</td>
<td>14.0%</td>
<td>12.9%</td>
<td>8.5%</td>
<td>7.7%</td>
<td>6.6%</td>
</tr>
<tr>
<td>Bachelor's degree or higher</td>
<td>79.4%</td>
<td>73.4%</td>
<td>84.1%</td>
<td>84.6%</td>
<td>88.6%</td>
</tr>
<tr>
<td>With a Disability - All People</td>
<td>12.8%</td>
<td>11.7%</td>
<td>20.9%</td>
<td>30.8%</td>
<td>33.1%</td>
</tr>
<tr>
<td>Grandparents Raising Grandchild</td>
<td>20.3%</td>
<td>14.1%</td>
<td>15.9%</td>
<td>11.5%</td>
<td>12.7%</td>
</tr>
<tr>
<td>Food Stamp/SNAP benefits</td>
<td>70.3%</td>
<td>69.1%</td>
<td>66.6%</td>
<td>35.6%</td>
<td>31.1%</td>
</tr>
<tr>
<td>No Health Insurance</td>
<td>24.4%</td>
<td>20.5%</td>
<td>15.4%</td>
<td>10.8%</td>
<td>10.7%</td>
</tr>
<tr>
<td>Vacant housing units</td>
<td>21.9%</td>
<td>20.1%</td>
<td>14.3%</td>
<td>11.4%</td>
<td>12.1%</td>
</tr>
<tr>
<td>Mthly Rent Cost &gt;35% of Pay</td>
<td>47.2%</td>
<td>44.8%</td>
<td>37.2%</td>
<td>38.6%</td>
<td>39.4%</td>
</tr>
<tr>
<td>Median Home Value</td>
<td>$62,300</td>
<td>$65,800</td>
<td>$112,800</td>
<td>$172,500</td>
<td>$240,500</td>
</tr>
<tr>
<td>Pre-1980 Housing</td>
<td>72.7%</td>
<td>61.6%</td>
<td>58.7%</td>
<td>38.9%</td>
<td>52.5%</td>
</tr>
<tr>
<td>No Vehicles</td>
<td>13.0%</td>
<td>10.9%</td>
<td>7.3%</td>
<td>5.3%</td>
<td>8.6%</td>
</tr>
</tbody>
</table>

*Target Area defined as zip code 77640


2.a.ii. Threats to Sensitive Populations:

2.a.ii.1 Health or Welfare of Sensitive Populations: Poverty rates for individuals, children, elderly and families are all higher in Downtown Revitalization Target Area than in the City, County, State, and Nation. In fact, all the poverty indicators are about double the national averages. Other welfare indicators such as unemployment, minorities, being on food stamps, living in old housing, and lack of a vehicle, high school education, or health insurance are all higher for residents of Target Area. Conversely, per capita, median household income and home value are lower. All of these welfare indicators in Table 1 are biased toward the sensitive populations in the Target Area. High levels of persistent poverty (30.7%) and unemployment (13.1%) discourages redevelopment, stifle economic growth, and encourage criminal activities. The Crime Index for Port Arthur in 2019 was 85.9% higher than other U.S. cities.

<table>
<thead>
<tr>
<th>2019 Crime (per 100,000 population)</th>
<th>Port Arthur</th>
<th>USA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Violent Crime Index – assault, murder, rape, robbery</td>
<td>363.1</td>
<td>205.8</td>
</tr>
<tr>
<td>Property Crime Index – burglary, larceny, motor vehicle</td>
<td>2,184</td>
<td>2,110</td>
</tr>
</tbody>
</table>

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Crime and poverty in the Target Area have discouraged services available in middle class neighborhoods from entering. Convenience stores, pawn shops, and abandoned buildings took root instead of banks, grocery stores, and medical facilities. Currently, only 1.3% of the Target Area population uses public transportation which is 392% less than nationally. Funding from this grant will be used to solicit input on the types of public transportation that best meet the community’s needs, improve air quality, and reduce the carbon footprint that will lead to a cleaner and healthier environment (Goal I of EPA’s FY 2018-2022 Strategic Plan). Also, there are no hospitals in the Target Area with the nearest emergency room located more than 7 miles north of the Target Area. Grant funding can be leveraged to incentivize medical providers to relocate to the Target Area providing the essential services so badly needed by the Target Area’s sensitive populations.

2.a.ii.(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Children, elderly, minorities, unemployed, those living in poverty, and the uneducated comprise the sensitive populations in the Target Area. These overly burdened groups are more likely to be exposed to facilities that emit air pollutants or release toxins to the environment than their counterparts below.

<table>
<thead>
<tr>
<th>African American</th>
<th>Low Income</th>
<th>Family Below Poverty</th>
<th>Kids Below Poverty</th>
<th>Non-High School Graduates</th>
<th>Renters</th>
</tr>
</thead>
<tbody>
<tr>
<td>289%</td>
<td>190%</td>
<td>182%</td>
<td>182%</td>
<td>173%</td>
<td>125%</td>
</tr>
</tbody>
</table>

The Target Area’s sensitive population has a greater cancer risk from exposure to air pollutants than whites, non-poverty, high school graduates, or home-owners. The Target Area is located in Jefferson County which scored in the 90 percentiles in the nation for having the worst air quality. Government databases, list of 186 facilities in or adjacent to the Target Area having a history of using hazardous and/or petroleum substances. Many of the contaminants being released at these facilities are known or suspected toxins or carcinogens. The City, County, nor State have the funding to assess the exposure risks associated with the brownfields sites in the Target Area.

The most recent Community Needs Assessment found the Target Area is in a highly industrialized part of the City with severe pockets of urban poverty and high uninsured rates. Jefferson County Texas ranks 205 of 221 Counties in Health Outcomes, 209 in Health Behaviors, and 218 in Physical Environment. Age-Adjusted Mortality Rates are significantly higher for: Ischemic Heart Disease; Stroke; and Congestive Heart Failure. There are also significantly higher rates of diabetes, blood cholesterol and high blood pressure. Jefferson County is designated as an area with a shortage of primary care and specialty physicians. These factors have created a cycle in which chronic diseases go undiagnosed and untreated until the patient is so ill that they must be rushed to the emergency room of the local hospital, the most expensive setting to receive care. The lack of health services has led to a downward spiral for many patients. The aging population is the fastest growing demographic in the County with 13.4% of the citizens being 65 or over. According to the New Institute of Medicine, the percent of local Medicare beneficiaries with Ischemic Heart Disease is 42.2%, Diabetes 30.7%, Obstructive Pulmonary Disease 13.3%, and Heart Failure at 23.5%. All these Target Area health problem percentages are higher than national Medicare averages and can be related to exposure to toxic chemicals such as metals, pesticides, volatile

10 [http://www.ushospitalfinder.com/hospital/Medical-Center-of-Southeast-TX-Port-Arthur-TX](http://www.ushospitalfinder.com/hospital/Medical-Center-of-Southeast-TX-Port-Arthur-TX)
11 [http://www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)
13 [https://enviro.epa.gov/myenvironment](https://enviro.epa.gov/myenvironment)
organic compounds that have been detected in the air, soil, and groundwater associated with historic industrial activities and brownfields in the City and Target Area\textsuperscript{14}. With this grant, the City will assess, manage, and put these sites back to use and alleviate the environmental justice impacting the Target Area's sensitive populations. The City started the process with the 2018 EPA grant, but needs this funding to continue assessments. Without this grant, conditions will worsen for the sensitive populations as these sites provide a haven for criminals.

2.a.ii.(3) Promoting Environmental Justice: According to EPA's EJSCREEN, Envirofacts, and Texas Commission on Environmental Quality's (TCEQ) databases, there are 16,107 residents living adjacent to 186 government regulated facilities managing hazardous and petroleum substances\textsuperscript{15} in or adjacent to the Target Area. These facilities were major contributors to Jefferson County scoring in the 90\textsuperscript{th} percentile for dirtiest/worst air quality in the U.S. based on air emissions. Documented releases of metals and volatile organic compounds, to name just a few, are known carcinogens\textsuperscript{16}. Jefferson County scored in the 90\textsuperscript{th} percentiles for dirtiest/worst counties in U.S. for water releases, production-related waste generation, off-site transfers of wastes, ozone depleting potential, cancer and non-cancer risk, and recognized development or reproductive toxicants. Families are concerned about the consequences of exposure to pollutants by children who live in neighborhoods that are interspersed with these facilities. With this grant, the City will assess blighted properties and implement its Downtown Revitalization Plan (DRP) that will lead to a cleaner and healthier environment (Goal 1 of EPA's 2018-2022 Strategic Plan), generate business opportunities through expansions or relocation, and prevent revitalized lands from becoming re-contaminated (Objective 3 of EPA's Strategic Plan). Without this grant, the City will not be able to implement the Plan, continue the momentum created by the 2018 EPA Assessment Grant and socioeconomic conditions will likely continue to decline.

2.b. Community Engagement
2.b.i. Project Involvement: The City has strong partnerships with community-based organizations (CBOs) and will continue to develop additional partnerships during the course of implementing this grant. The table below provides a list of the CBOs and their role in the grant.

<table>
<thead>
<tr>
<th>Organization and Description</th>
<th>Roles for the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>CIDA\textsuperscript{17}, Inc – Community Advocacy</td>
<td>Serve on Brownfields Steering Committee</td>
</tr>
<tr>
<td>Port Arthur Economic Development Corp – Business and Job Creation</td>
<td>Educate and disseminate project information to public</td>
</tr>
<tr>
<td>Port Arthur Independent School District - Education</td>
<td>Educate and disseminate project information to public</td>
</tr>
<tr>
<td>Port of Port Arthur – Commerce and Maritime Operations</td>
<td>Educate and disseminate project information to public</td>
</tr>
<tr>
<td>Jefferson County Commissioner Office – District 3 Representative</td>
<td>Educate and disseminate project information to public</td>
</tr>
</tbody>
</table>

2.b.ii. Project Roles: The City has developed partnerships with the local CBOs in Section 2.b.i to assist with the EPA Community-wide Assessment grant. These partners will have an active role in

\textsuperscript{14} \url{https://www.christushalth.org/works/files/community-health/Community-Needs-Assessment2012SFTX.pdf}

\textsuperscript{15} \url{https://www.epa.gov/ejscreen, https://www.epa.gov/enviro/index.htm}, \url{http://www.tceq.state.tx.us/cpub/index.cfm}

\textsuperscript{16} \url{https://enviro.epa.gov/mvenvironment}

\textsuperscript{17} CIDA = Community In-Power and Development Association
disseminating project information and soliciting feedback from their members. These partnerships are critical to establishing trust between the Target Area’s sensitive population and City Hall.

2.b.iii. **Incorporating Community Input:** The City plans to revise the 2018 *Community Involvement Plan (CIP)* to include the successful engagement tools and a schedule of planned activities. These tools will include *Online Surveys or a Project Website* to provide a portal for public information. *Data Gather Meetings and Workshops* will be held with stakeholder groups to identify and discuss issues that may impact the revitalization of the Target Area. *Charrettes* may be held to provide participants the ability to collaborate on grant activities. *Updates and Postings* of presentations and outputs will be uploaded to the *Project Website* to keep the community and stakeholders current of grant activities. *Media Coverage* of grant activities and the use of *translators and interpreters* will be used when deemed necessary by the City staff. During the pandemic, the City found that it could still communicate with the public and solicit input through video conferencing.

3. **TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

3.a. **Description of Tasks/Activities and Outputs**

3.a.i. **Project Implementation:** Below are task descriptions providing an explanation of the activities provided by the City and those by the Qualified Environmental Professional (QEP). **Over 80% of the grant ($424,500) will be used on Phase I ($69,500) and II ($355,000) ESAs.** In addition, the City of Port Arthur will donate staff time and benefits, office equipment and supplies.

**Task 1 – Grant Implementation and Reporting:** The City will allocate $7,000 for the Program Manager and QAQC Manager to attend EPA Brownfields national and regional conferences and/or training. The City will allocate $18,000 for the QEP’s reporting assistance.

**Task 2 – Community Involvement:** The City will allocate $10,500 for the QEP to assist with community outreach activities discussed in Section 2.b. and the attached *Threshold Criteria Responses*. This will include updating the existing *CIP* and having annual public presentations.

**Task 3 – Site Assessments and Cleanup Plans:** The City has allocated $464,500 to complete: 10 Phase I Environmental Site Assessments (ESAs) by ASTM standard E1527-13, update the 14 Phase I ESAs completed under the 2018 grant to establish site eligibility for Phase II ESAs and supplemental Phase II ESAs, conduct 11 Phase II ESAs in accordance with ASTM standard E1903-19, and complete supplemental sampling on 10 properties assessed with the 2018 grant that require delineation of soil and groundwater impacts. Activities will also include updating the Quality Assurance Project Plan (QAPP), Sampling and Analysis Plans (SAP), Health and Safety Plans (HASP), updating the site inventory list, and reporting in accordance with EPA and TCEQ guidance and regulations. Five Analysis of Brownfields Cleanup Alternatives (ABCA) and Reuse Plans will be developed that provide remediation and reuse options consistent with public health and environmental objectives and cleanup regulations.

3.a.ii. **Anticipated Project Schedule:** The anticipated schedule and timing for the activities outlined in 3.a.i. *Project Implementation* during the 3-year period of performance is summarized below.

**Year 1:** Select QEP; Update Property Inventory/Prioritization; Update QAPP & CIP; Update 14 Phase I ESAs completed with 2018 grant; SAP/HASP, supplemental sampling on 10 Phase II ESA properties with soil impacts; 1 ABCA/Reuse Plans.
**Year 2:** Eligibility determinations and 5 Phase I ESAs priority sites; Update QAPP; 5 Phase II ESAs on priority sites, 2 ABCA/Reuse Plans; Community Outreach activity.

**Year 3:** Eligibility determinations and 5 Phase I ESAs priority sites; Update QAPP; 5 Phase II ESAs on priority sites, 2 ABCA/Reuse Plans; Community Outreach activity.

3.a.iii. Task/Activity Lead: The City (applicant) is the lead entity for all grant tasks. The City’s Brownfields Program Manager will coordinate grant task activities with the QEP’s project manager, and when necessary, other City staff. The QEP will in turn manage their contractors.

3.a.iv. Outputs: The table below identifies and quantifies the anticipated outputs for each task.

<table>
<thead>
<tr>
<th>Outputs</th>
<th>Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>TASK 1: # of sites assessed, acres cleared for reuse, sites redeveloped</td>
<td># acres redeveloped, # jobs created, # new businesses/expansion of existing ones; # affordable homing units &amp; acres of parks created; tons recycled; amount of tax revenue generated &amp; funds leveraged.</td>
</tr>
<tr>
<td>TASK 2: Update CIP, 3 community meetings and/or outreach activities</td>
<td># of stakeholder commitments, # of participant responses received from outreach events, # of new partnerships formed with community-based organizations, agencies and stakeholders.</td>
</tr>
<tr>
<td>TASK 3: 10 Phase I ESA, 14 Phase I ESA Updates, 11 Phase II ESA, 5 ABCA, 12 SAP/HASP, 1 QAPP, 12 qtrly &amp; 1 final report</td>
<td># of prioritized sites ready for reuse, # of acres assessed and ready for reuse, amount of other funds leveraged; # of assessment, cleanup and redevelopment jobs leveraged, and amounts of contaminant removed.</td>
</tr>
</tbody>
</table>

3.b. Cost Estimates
3.b.i. and ii Development of Cost Estimates and Application: Task budgets and quantities in Sections 3.a and 3.b are based on the 2018 Community-Wide Assessment (CWA) grant. The City’s proposed CWA grant budget for 2022-2025 is provided below. The City will expend 80% of the grant funds on Phase I and II ESAs (outputs) and 5% or less on reporting requirements. No grant funding will be spent on Personnel, Fringe Benefits, Equipment, or indirect costs.

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1</th>
<th>Task 2</th>
<th>Task 3</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Costs</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Travel</td>
<td>$7,000</td>
<td>$0</td>
<td>$0</td>
<td>$7,000</td>
</tr>
<tr>
<td>Contractual</td>
<td>$18,000</td>
<td>$10,500</td>
<td>$464,500</td>
<td>$500,000</td>
</tr>
<tr>
<td>Total</td>
<td>$25,000</td>
<td>$10,500</td>
<td>$464,500</td>
<td>$500,000</td>
</tr>
</tbody>
</table>

**Task 1:** Grant Reporting and Implementation (City & Contractor unit cost pricing)
- City Travel – 4 trips to EPA conferences or training @+$1,750 per trip = $7,000
- Contractual Costs – $500/month (2.5 hr @$200 hr) = 3 yr x 12 months x $500 = $18,000

**Task 2:** Community Involvement (Contractor unit cost pricing)
- Update Community Involvement Plan – $3,000 (16 hr @$125 hr + 5 hr @$200 hr)
- Yearly Outreach Meetings = $2,500 (12 hr @$125 + 5 hr @$200 hr); 3 yr x $2,500 = $7,500

**Task 3:** Assessments and Cleanup (Contractor unit cost pricing) – 14 Phase I ESAs completed with the 2018 grant will be updated so that either a (3 sites) Phase II ESA can be completed or
(10 sites) Supplemental Phase II ESA will be completed to further evaluate metals detected in the soil and groundwater with the 2018 EPA grant. The supplemental sampling will include surface and shallow subsurface soil analyses. An additional 10 Phase I/II ESAs will be completed. Contractor unit costs below based on the 2018 EPA grant.

Property Inventory and Prioritization = $10,000 (64 hr @$125 +10 hr @200 hr)
Phase I Environmental Site assessments (ESAs) – 10 @$3,500 each = $35,000
Phase I ESA Updates (2018 Grant ESAs) – 14 @$1,750 each = $24,500
Annual QAPP Updates – $2,500 each; 3 yr x $2,500 = $7,500
Phase II ESAs – 11 @$22,500 each = $247,500 (1 site from 2018 + 10 sites from 2022 grants)
Supplemental Phase II ESAs (2018 Grant ESAs) – 10 @$10,000 each = $100,000
ABCA Reuse Plans – 4 @$10,000 = $40,000

3.c. Measuring Environmental Results: The City’s Brownfield Program Manager will track, measure, and evaluate the progress and success of the grant implementation by comparing project outputs, results, and outcomes against those in the Cooperative Agreement (CA). Each month the QEP will provide a project status update of what tasks were worked on and budget expenditures during the month which will be incorporated into the EPA quarterly reports and tracked against the CA. Monthly, the Program Manager will meet with EPA’s Project Officer to discuss the grant.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE
4.a. Programmatic Capability
4.a.i. Organizational Capacity: The City of Port Arthur has a long successful history of implementing government grants, including three previous EPA Brownfields grants. The City retains highly qualified staff able to manage all aspects of the grant. Ronald Burton is the City Manager and has been with the City since 2008. Mary Essex is the Grants Administrator and has worked for the City for 30 years managing all the government grants. Ms. Essex will serve as the Brownfields Program Manager, responsible for program development, grant administration, and reporting as she did for the previous 2018 EPA Assessment Grant. She will be responsible for all Cooperative Agreement reporting requirements including quarterly and closeout reports, Federal Financial and MBE/WBE reports, and data inputs to ACRES to track the grant’s outputs/outcomes. She will also manage the QEP. Pamela Langford, Assistant City Manager of Operations and Director of Development Services will serve as the Brownfields Quality Assurance Manager as she did during the 2018 EPA grant. Cheryl Gibbs is the Public Information Officer and will assist Ms. Essex with Community Outreach activities. Larry Badon, Senior Planner, will assist Ms. Essex with redevelopment plans. Staff from other City’s departments will be utilized as needed. If additional expertise is required, Human Resources will ensure that qualified staff are hired.

4.a.ii. Organizational Structure: The City’s Grants Administrator will use the organizational structure assembled for the previous 2018 EPA Brownfields grant implemented during the COVID-19 pandemic. She will work with the QEP to complete all the grant’s requirements. The QEP will provide monthly updates explaining the status of the grant implementation which will be the basis for the quarterly report to EPA. As invoices are received, Ms. Essex will process and forward to the City’s accounting department for prompt payment and draw-down of grant funds. Project outputs will be reviewed and sent to EPA’s Project Officer. Each month, she will meet with the Project Officer to discuss the progress of the grant implementation.
4.a.iii. Description of Key Staff: Mary Essex has worked for the City for 30 years managing all grant funding. Ms. Essex will serve as the Brownfields Program Manager as she did for the 2018 EPA Grant. Ms. Essex will manage the QEP, the Cooperative Agreement, grant budget and all reporting requirements including quarterly and closeout reports, Financial and MBE/WBE reports, and inputs to ACRES. Pamela Langford, Assistant City Manager and Director of Development Services, will assist with reviewing the Cooperative Agreement, Quality Assurance Project Plant (QAPP), Quality Management Plan and Reuse Plans. Larry Badon, Senior Planner, will be utilized on re-use plan review for compliance with zoning and development requirements per the 2015 Downtown Revitalization Plan. Cheryl Gibbs, Public Information Officer, will assist with review and implementation of the Public Involvement Plan (CIP) and Community Outreach activities. Ms. Essex will work with the purchasing department to solicit and secure a QEP once the EPA announces the 2022 grant awards. The QEP will be selected based on their qualifications per 40 CFR 31.36 and Part 34, and City Codes, to ensure DBEs have an opportunity to participate.

4.a.iv. Acquiring Additional Resources: If additional resources are deemed necessary, Ms. Essex will work with the City’s Public Information Officer and Purchasing Department to solicit qualifications and secure a competent contractor to provide the expertise necessary to complete the grant requirements in accordance with 40 CFR 31.36 and Part 34, and City Codes.

4.b. Past Performance and Accomplishments
4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: The City has successfully managed 3 previous EPA grants as summarized below. The 2018 Assessment grant has not been closed as of October 1, 2021 and had a contractual balance of $6,071.72 (see Attachment 2).

<table>
<thead>
<tr>
<th>Award Year</th>
<th>Award Type</th>
<th>Award Amount</th>
<th>Cooperative Agreement</th>
<th>Remaining Funds at Grant Closure</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>Hazardous Sub. Assessment Pilot</td>
<td>$200,000</td>
<td>BP98663401</td>
<td>$0</td>
</tr>
<tr>
<td>2005</td>
<td>Hazardous Substance Assessment</td>
<td>$200,000</td>
<td>BF96601301</td>
<td>$0</td>
</tr>
<tr>
<td>2018</td>
<td>Hazardous Sub &amp; Petrol Assessment</td>
<td>$300,000</td>
<td>BF01F48001</td>
<td>$6,071.72</td>
</tr>
</tbody>
</table>

4.b.i.(1) Accomplishments: The City of Port Arthur has successfully implemented 3 previous EPA Brownfields grants which completed 27 Phase I ESAs and 13 Phase II ESAs on 58 acres. All outcomes and outputs have been entered into ACRES for the 2000, 2005, and 2018 grants. The 2000 and 2005 EPA grants were used to leverage approximately $268,000 in EPA Region 6 TAB funding to complete 6 Phase I/II ESAs on approximately 45 acres18.

4.b.i.(2) Compliance with Grant Requirements: The City of Port Arthur successfully complied with previous grant requirements with no adverse audit findings related to the 2000, 2005, or 2018 Brownfields grants. All reports and documents were submitted to the EPA in a timely manner per the terms and conditions of the Cooperative Agreements. Measurements of program outputs and outcomes have been entered into ACRES and reported on a quarterly basis. No known funding remained when the 2000 and 2005 grants were closed. The recent grant, (BF01F49001, 2018-2021) there was a balance of $6,071.72 as of 10/1/2021 which will be used for the QEP to assist with the grant close-out. During the 2018 Community-Wide Assessment grant, 71% of the $300,000 grant was expended on direct assessment tasks (Phase I & II ESAs).

18 https://nepassisttool.epa.gov/nepassist/nepamap.aspx
III.B. Threshold Criteria for Assessment Grants

1. Applicant Eligibility
The City of Port Arthur, Jefferson County, Texas is a General Purpose Unit of local government as defined under 2 CFR 200.1 and page 12 of the RFP No. EPA-OLEM-OBLR-21-04.

2. Community Involvement
The City of Port Arthur will continue to inform and involve the community and other stakeholders during the planning, implementation, and other brownfield assessment activities through the proven methods and approach used in the 2018 EPA Community-Wide Assessment grant and the 2015 Downtown Revitalization Plan\textsuperscript{1}. The Downtown Revitalization Plan was a comprehensive study that engaged the community to identify new development opportunities over a 18-month period. The Plan incorporated previous planning documents, building on successes and working relationships. It included an assessment of the physical environment, infrastructure, and market in order to support the Downtown viability. The City realizes the community needs to see visible change and continued progress in the transformation of the Downtown Target Area.

During the implementation of the 2018 EPA Brownfields Community-Wide Assessment grant, the City found that engaging the community and soliciting feedback on brownfields activities and redevelopment plans are essential to the overall success of the City’s Brownfields program. Even during the COVID-19 pandemic, the City affectively communicated with the community and stakeholders through virtual meetings of City Council reviews, updates, and public notices posted on the City’s website. To supplement these proven communication tools during this grant implementation, the City will consider utilizing online surveys and a project website to further engage the community in prioritizing assessment, cleanup, and redevelopment activities. When the pandemic is over, the City will resume in-person meetings with the public to solicit input using more traditional community participation activities such as charrettes, data gathering meetings, media events, open houses, and workshops. City Council meetings will be in person and virtually.

One of the first activities to be completed under this grant will be the updating of the existing Community Involvement Plan that was developed for the 2018 assessment grant. The Plan will detail the successful community engagement techniques utilized during the solicitation period for the 2015 Downtown Revitalization Plan and the implementation of the 2018 EPA Brownfields Community-Wide Assessment grant. Incorporating a Brownfields Project Website will enable the community to have 24/7 access to brownfields program and project information. The local library provides internet access for those that do not have a computer. In addition, the City will maintain electronic copies of all project documents on flash drives for public viewing at City Hall.

Despite 64.7% minorities in the Downtown Revitalization Target Area, only 6.8% don’t speak English very well. The City is committed to ensuring that every reasonable effort is made to provide information is accessible in a timely manner to all residents of the community. When deemed necessary, the City will provide competent, trained, and culturally sensitive translators

\textsuperscript{1} https://www.portarthurtx.gov/486/Downtown-Revitalization
and interpreters. Critical information and vital documents will be translated, as necessary. These tools will help engage the community residents with limited English proficiency, who are traditionally underrepresented in civic engagement and city planning processes.

The City and its stakeholders have collaborated on the completion of the Downtown Revitalization Plan and have developed a vision for change to right the decades of socioeconomic blight to the Target Area. Now to make the change a reality, the City needs this EPA funding to jump start the assessment and redevelopment process and show the sensitive populations that there is a brighter tomorrow on the horizon.

4. Expenditure of Existing Grant Funds
The City of Port Arthur, Texas is the recipient of a FY2018 EPA Brownfield Community-Wide Assessment grant, BF 01F48001-0 As of October 1, 2021, the remaining balance is $6,071.72 (See Attachment 2).