RE: NARRATIVE INFORMATION SHEET: FY2022 USEPA BROWNFIELDS CLEANUP GRANT
ST. PHILIP’S SCHOOL & COMMUNITY CENTER, DALLAS, TEXAS

St. Philip’s is pleased to submit this proposal for United States Environmental Protection Agency (USEPA) Fiscal Year (FY) 2022 Brownfields Cleanup Grant funding. Requested information is provided below.

1. Applicant ID:
   St. Philip’s School and Community Center
   1600 Pennsylvania Avenue
   Dallas, TX 75215-3239

2. Funding Requested
   a. Grant Type: Multiple Site Cleanup
   b. Funding Requested:
      (i.) Requested Amount: $500,000
      (ii.) Cost Share Waiver: Not Requested
      (iii.) $500,000 Limit Waiver: Not Requested

3. Location: City of Dallas, County of Dallas, State of Texas

4. Property Information: 1624, 1628, 1632 Martin Luther King Jr. Boulevard and 3016 and 3021 Colonial Avenue, Dallas, Texas 75215

5. Project Contacts:
   Project Directors:  
   Julie Saqueton  
   Co-Director of Community Development  
   St. Philip’s School & Community Center  
   1600 Pennsylvania Avenue  
   Dallas, Texas 75215  
   214-421-5221, ext. 123  
   JSaqueton@StPhilips.com

   Becky Madole  
   Co-Director of Community Development  
   St. Philip’s School & Community Center  
   1600 Pennsylvania Avenue  
   Dallas, Texas 75215  
   214-421-5221, ext. 198  
   BMadole@StPhilips.com

   Chief Executive Officer:  
   Dr. Terry Flowers  
   Headmaster & Executive Director  
   St. Philip’s School & Community Center  
   1600 Pennsylvania Avenue  
   Dallas, Texas 75215  
   214-421-5221, ext. 113  
   TFlowers@StPhilips.com

6. Population: 2,635,516 (City of Dallas; American Community Survey 5-year estimates, 7/1/2019)
### 7. Other Factors Checklist

<table>
<thead>
<tr>
<th>Factor</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>Pages 1 &amp; 4</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>N/A</td>
</tr>
<tr>
<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
<td>N/A</td>
</tr>
<tr>
<td>Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.</td>
<td>Narrative Section 1.b.ii / 1.c (page 5)</td>
</tr>
<tr>
<td>The proposed site(s) is adjacent to a body of water (i.e., the border of the 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).</td>
<td>N/A</td>
</tr>
<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>N/A</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>N/A</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td>Narrative Section 1.b.ii (page 5)</td>
</tr>
<tr>
<td>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.</td>
<td>N/A</td>
</tr>
</tbody>
</table>

N/A = not applicable

8. **Letter from the State Environmental Authority:** A letter of acknowledgement from the Texas Commission on Environmental Quality is attached.

9. **Releasing Copies of Applications:** Not applicable.
NARRATIVE INFORMATION SHEET –
TCEQ ACKNOWLEDGEMENT LETTER
November 23, 2021

Ms. Julie Saqueton, Director of Community Development
St. Philip’s School and Community Center
1600 Pennsylvania Avenue
Dallas, Texas 75215

Re: St. Philip’s School and Community Center’s Application for a U.S. Environmental Protection Agency FY22 Brownfields Cleanup Grant for the 1624, 1628, and 1632 MLK Jr. Blvd. and the 3016 and 3021 Colonial Ave. parcels located in Dallas, Texas.

Dear Ms. Saqueton:

The Texas Commission on Environmental Quality (TCEQ) is pleased to offer this letter of support for the St. Philip’s School and Community Center (St. Philip’s) application to the U.S. Environmental Protection Agency (EPA) for a FY22 Brownfields Cleanup Grant. The TCEQ believes that receiving the cleanup grant will significantly benefit the redevelopment of the parcels along the MLK/Colonial corridors which will enhance the local economy, increase the tax base, and improve the environment.

The TCEQ has completed a Phase I environmental site assessment (ESA), Phase II ESA, and an Analysis of Brownfields Cleanup Alternatives document (ABCA) for the property. TCEQ is pleased to continue the work of assessing and remediating contaminated properties in Dallas and looks forward to the redevelopment of the parcels along the MLK/Colonial corridors.

The TCEQ looks forward to working with St. Philip's on its Brownfields initiative and supports the grant application. You may contact me at 512-239-2023 or Phylicia.allen@tceq.texas.gov with any questions or if you need any additional information.

Sincerely,

Phylicia Allen
Phylicia Allen, Brownfields Program Coordinator
Remediation Division

PA/dl
NARRATIVE PROPOSAL
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION:

1.a. Target Area and Brownfields:

1.a.i Background and Description of Target Area: The area along the east bank of the Trinity River where the City of Dallas (City) sits today was settled in 1841 as a trading post. Following the Civil War, the City experienced punctuated growth as freed slaves flocked to Dallas and settled in “freedmen’s towns” on the periphery. With the arrival of the railroads in the 1870s, the City flourished as a transportation hub for regional products, including cotton, cattle, and later oil. African Americans settled in the freedmen’s town that is the South Dallas/Fair Park area and provided the labor for the growing economy. The South Dallas/Fair Park neighborhood earned its name from hosting the Texas State Fair beginning in 1886. The fair was a representation of racial inequity through history as eminent domain was used to raze homes to expand the fair and fences were raised to block the view of the living conditions of the poor. Until 1961, African Americans living in the South Dallas/Fair Park neighborhood were only allowed to access the fair on October 15th, “Negro Achievement Day.” A recent index of the country’s 274 largest cities published by The Urban Institute ranked Dallas last for economic and racial inclusion, and this is demonstrated by the history of South Dallas/Fair Park. The St. Philip’s School and Community Center (St. Philip’s), an educational and community service nonprofit organization, is applying for an EPA Brownfield Cleanup Grant to further revitalization efforts along Martin Luther King Jr. Blvd. (MLK) in South Dallas/Fair Park’s “Forest District”, the brownfield “Target Area”. The Target Area is a 265-acre area centered along MLK and bound by Botham Jean Blvd and industrial properties to the west, Al Lipscomb Way to the north, the S.M. Wright Freeway (Hwy 175) to the east, and the intersection of Botham Jean Blvd and I-45 to the south. It is only 1.5 miles south of downtown Dallas but suffers from some of Dallas’ highest poverty rates and from an array of environmental justice (EJ) and socio-economic inequities. As the City’s economic growth continued, the 1940s-1950s saw the rise of middle class African American families concentrated in the Target Area. Over the next several decades, however, discriminatory practices, legislation, disruptive transportation planning, and disinvestment triggered blight that stripped away progress resulting in enduring, severe poverty and a high concentration of brownfields. This has lowered property values and more than half of the tax lots are now vacant. 20% of remaining structures are vacant, and nearly 60% of homes are in need of repairs. Critical assets like parks, quality housing, and living wage jobs are almost entirely lacking. These conditions have caused upwardly mobile residents to leave seeking better conditions. Today, 86.6% of residents are minorities, and nearly 1/3 did not graduate high school. While Dallas has grown by over 75% since 1970, the Target Area has decreased in population by 50%. Today, the City is home to over 1,330,612 residents, with under 1,300 remaining in the Target Area.

1.a.ii. Description of the Proposed Brownfield Site: St. Philip’s is applying for EPA Brownfield Cleanup Grant funding for five individual properties [1624, 1628 & 1632 Martin Luther King Jr. Blvd. (MLK) and 3016 & 3021 Colonial Ave. (Colonial)], collectively referred to as the “Site”. The Site is located in the heart of the Target Area at the corner of MLK and Colonial, one block from the St. Philip’s campus and adjoining the athletic fields. Each of the five properties include a building, totaling nearly 30,000 square feet (SF) on 1.44 acres. From west to east along MLK, 1624 MLK is in use as a hardware store; 1628 MLK has two units, currently occupied by a barber shop and a gym; and 1632 MLK is a five-unit retail strip that is gutted and vacant awaiting renovations. Along Colonial, 3016 Colonial recently opened as the WeCreation Community Innovation & Design Center for St. Philip’s students and the community to collaborate; and 3021 Colonial is the Doherty Family Fieldhouse, an athletic facility used by more than 700 youth. The Site is in a mixed (residential/commercial) area where development dates to the late 1800s. Retail uses have included the sale of clothing, home goods, outdoor recreation, furniture, beauty supply, restaurants and bars/nightclubs. Additionally, 1632 MLK was previously developed with a second building and both the existing building and the former building housed dry cleaners (from at least 1921-1956 and 1961-1992, respectively). 3021 Colonial also housed a dry cleaner from at least 1941-1966.

Phase I Environmental Site Assessments (ESAs) were completed for all five properties prior to St. Philip’s acquisition (circa between 2014 – 2017). The dry cleaners were identified as recognized environmental conditions (RECs). A Phase II ESA was conducted for 1632 MLK in 2018, which identified tetrachloroethylene

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1 The Real Estate Council Community Driven Growth Road Map for Equitable Development Plan, 2018.
(a/k/a PCE – a dry cleaning solvent) concentrations greater than the Texas Risk Reduction Program (TRRP) Tier 1 Residential Soil to Groundwater Ingestion Protective Concentration Levels (PCLs) in all soil borings. Both PCE and its breakdown product trichloroethylene (TCE) were identified in a temporary groundwater well. Supplemental Phase II ESAs were conducted in 2019 and 2021 that further delineated the extent of PCE and related compounds in soil and groundwater above TRRP Tier 1 Residential Soil to Groundwater and Groundwater Ingestion PCLs. The findings demonstrate a potential source area from a pocket of soil contamination beneath 1632 MLK and a preferential migration pathway along the sanitary sewer at the rear of the 1632 MLK building. An area where PCE in groundwater is estimated to be 1,000x the PCL on the 1632 MLK parcel extends off-site to the neighboring right-of-ways (ROWs); concentrations 100x the PCE PCL extend to 1628 MLK and the ROWs; and concentrations 1x the PCE PCL may extend to 1624 MLK and possibly a portion of the 3016 and 3021 Colonial parcels. A 2020 Vapor Intrusion Evaluation was conducted at the 1632 MLK building that found PCE and TCE in sub-slab soil vapor above the default EPA Vapor Intrusion Screening Levels. At 3021 and 3016 Colonial, a preliminary Vapor Intrusion Evaluation was completed in 2020 that concluded PCE concentrations may exceed the Residential PCL for Air Inhalation at both parcels. A supplemental Phase II ESA is anticipated in 2022 to further delineate the degree and extent of soil and groundwater contamination by PCE, TCE, and related breakdown compounds at the Colonial parcels.

1.b.i. Reuse Strategy & Alignment w/ Revitalization Plans: The Site is not only physically central to several redevelopment priorities, it has also been identified as a catalyst for neighborhood change. Beginning in 2010, a reuse vision for South Dallas was created via a workshop series where urban planners and community members engaged to revitalize the MLK corridor as a connector for two of Dallas’ biggest assets – the Trinity River and Fair Park. The outcome was the MLK Corridor Plan, which identified priorities like walkability, creation of a cultural/historical walk, and enhancing streetscaping and business frontages. The MLK Corridor Plan was expanded on in through the Dallas Catalyst Project (DCP) in 2017 and the Forest District Esplanade Project in 2020. St. Philip’s, Cornerstone Baptist Church, Forest Forward and The Real Estate Council (TREC) formalized a collaboration under the DCP to address the physical disrepair along MLK starting with 1632 MLK, the Forest Theater, and other facades, to catalyze further development. The Forest District Esplanade Project, in collaboration with the Urban Land Institute, is a component of the broader effort to connect the Trinity River to Fair Park. Utilizing the canopy of the I-45 bridge, the vision is to create safe, positive, and creative outdoor environments in spaces now dividing the community. This includes creating green spaces under the I-45 overpasses with the goal of providing residents with access to high-quality parks/green space within a 10-minute walk, creating safe connections between neighborhoods, and catalyzing change. The Site will pilot redevelopment on a highly visible corner, with its reuse contributing to the priorities of safety, connection, and access to green space, and with a portion sharing a block with the future I-45 esplanade greenspace.

In Partnership with TREC, a nonprofit organization centered around creating local leaders and catalyzing investment, the Target Area community created an Equitable Development Plan in 2018. Residents, property owners, community leaders, subject matter experts, local government staff, and other interested stakeholders were engaged. 20+ meetings were held reaching more than 550 residents and stakeholders. Neighbors went door-to-door to bring the community together with experienced planning professionals for shared learning, culminating in an action plan that reflects the residents’ desire for the neighborhood’s future.

Running in parallel was a process to refresh the District’s Neighborhood Master Plan. The community provided important feedback on housing, green space, and the importance of investing in major corridors. Design for MLK as the “Main Street” was developed, including adaptive reuse of existing buildings and new construction for infill operators such as small (subsidized) grocers, restaurants, neighborhood services and retail, and placement of new parking, bike lanes, and streetscaping. The Site is in the “Southern Village” area of the Neighborhood Master Plan. Revitalization revolves around St. Philip’s and the creation of a new commons open space as a focal point. All Site buildings are identified as revitalized structures with infilled new commercial structures to the west along MLK. To the rear, new green space, parking, and expanded athletic fields have been designed. 3016 Colonial is also reimagined with existing structures and additional commercial spaces. This block also features a service road realigned to gain developable land through abandonment of excess I-45 right-of-way. Site remediation and redevelopment will be one of the first revitalization projects implemented to achieve the community vision in the Neighborhood Master Plan.

1.b.ii. Outcomes and Benefits of Reuse Strategy: The EPA grant will support a $3M redevelopment. The reuse strategy includes preservation of historic buildings at 1632 MLK and retrofitting them for modern commercial
use for small, local businesses; and expanding public green spaces to seamlessly tie the St. Philip’s athletic fields to the commercial frontage along MLK. The City has identified the Target Area as one of the most vulnerable to rapid transition and growth. One of the benefits of the reuse strategy is how it’s uniquely positioned to ensure community ownership and opportunity for residents to participate directly in the neighborhood’s future.

The redevelopment project will benefit a disadvantaged community and it will be a critical demonstration of a positive, community-led outcome for the neighborhood. Based on an analysis of economic factors, demographic statistics, and multipliers to model economic impacts, this project will generate an estimated 18 direct construction jobs, 14 indirect jobs (at local suppliers) and 18 “induced” jobs (from additional spending at local businesses). Upon completion, 1632 MLK is anticipated to generate five new local businesses; create at least 15 full time living wage jobs over five years; and bring in over $1.1M in property tax revenue and $6M in sales tax revenue over 25 years. TREC has also committed funds to improve 1624 and 1628 MLK, which will increase property tax revenue, sustain three locally owned small businesses that are poised for growth, retain seven jobs and add four more. The Colonial parcels (with the Fieldhouse athletic center and Innovation Center) will remain in their current active use, and their lots will be improved to incorporate development associated with St. Philip’s community park and athletic complex expansion. At present four football teams (85 youth), three cheer teams (40 youth), 42 cheer and football coaches, and upwards of 400 parents use the Fieldhouse regularly and expansion will allow more space for team practice areas and public use. The Innovation Center will increase parking allowing more access. All improvements will be implemented with energy efficiency measures and green business practices. This will create a cohesive live/work/play area where residents will benefit and contribute to economic vitality, increased walkability, safer cycling, and access to green space.

1.c.i. Resources Needed for Site Reuse: St. Philip’s has already secured funds for supplemental Phase II ESAs and planned reuse of the Site. $50K from Dallas’ 2020 EPA Brownfields Grant has been allocated for supplemental assessment in 2022. A small grant from Simmons Bank is under consideration for a portion of the cleanup. The projected redevelopment cost for 1632 MLK is $3M. A three-year, $1M TREC Foundation investment toward the MLK corridor, with $475K to be spent at 1632 MLK, as well as professional services from TREC’s members, has been secured alongside TREC’s commitment to fund improvements at 1624 MLK ($90K) and 1628 MLK ($60K). An additional $1M Eco. Dev. Grant from the City was secured for redevelopment of 1632 MLK. This totals nearly $1.5M toward redevelopment. Two restaurants have signed letters of intent to lease at 1632 MLK and committed to improvements. Private donations and pro-bono services make up the remainder of funding.

St. Philip’s began redevelopment in 2017-2018 with funds from TREC, the Doherty Family Foundation, and Keller Webster & Associates for 3021 Colonial to become the Doherty Family Fieldhouse. An additional S2M was received in 2019 from the Dallas Stars, a National Hockey League (NHL) team, with an additional $75K from the NHL organization, in part to help build upon their multi-sport athletic complex at the Site. These funds will be used for the expansion of green space and related amenities. The Innovation Center at 3016 Colonial was funded by the Sapphire Foundation, TREC’s Developing Young Professionals group and St. Philip’s. Additional improvements will be fundraised by St. Philip’s and TREC’s investment in the Target Area catalytic real estate projects. The Site is in a census tract (CT) that qualifies for New Market Tax Credit (NMTC) investments under the Community Renewal Tax Relief Act of 2000. The Innovation Center is included in a larger St. Philip’s project that is eligible to receive the benefits from the NMTC Program as well.

1.c.ii. Use of Existing Infrastructure: The project is in an established neighborhood and on a street served by existing infrastructure, including sanitary sewer, water, gas, electric, and internet and paved streets with curbs, sidewalks, and streetlights. The Site is accessible from downtown Dallas at a distance of just 1.5 miles, and two north-south freeways crossing through Dallas (US I-45 and SR 175) split in the Target Area. The SM Wright Freeway Project funded by TXDOT will also direct more visitors to the area by transforming Highway 175 to the S.M. Wright Parkway, an urban boulevard that crosses MLK, reducing lanes on 175, and improving interchanges between the two arterial routes. Furthermore, TREC is working with the City and the North Central Texas Council of Gov’ts (NCTCOG) to turn MLK into a Complete Streets project. NCTCOG has completed a study on the truck traffic and is working on strategies and funding to remove it from MLK. The Site is also serviced by the Dallas Area Rapid Transit (DART) bus routes 2, 35, and 426 at the corner of MLK/Colonial, with the 426 stop directly in front of 1632 MLK. The availability of multiple public transportation routes is aligned well with the needs of the community that will be served by the planned development. Funding already received from TREC for streetscaping along MLK will include features such as the construction of pedestrian crosswalks, separate bike lanes, accessible sidewalks, and stormwater-friendly landscaping.
2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT:

2.a.i. The Community’s Need for Funding: The grant will meet the needs of a nonprofit organization supporting a disadvantaged community that otherwise lacks the funding to advance cleanup at the Site. Over 1,200 of Dallas’ most economically distressed households live in substandard conditions in the Target Area, suffering extreme rates of poverty and households receiving assistance (2-4x state/federal averages), and low incomes (<50% state/federal averages). As a result, the Target Area’s business tax and spending base is low. There is also low property tax revenue due to home values being less than half the city and US median values (Table 1).

| Table 1. Economic Distress Data [American Community Survey (ACS) 2019 5-Year Estimates] |
|---------------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| Data Type                      | Target Area     | City of Dallas  | Dallas County   | Texas           | United States   |
| Total Population               | 1,761           | 1,330,612       | 2,606,868       | 28,260,856      | 324,697,795     |
| 5-Year Unemployment Rate       | 6.3%            | 3.2%            | 3.3%            | 3.3%            | 3.4%            |
| Poverty Rate                   | 27.6%           | 18.9%           | 15.4%           | 14.7%           | 13.4%           |
| Per Capita Income              | $15,062         | $34,479         | $32,653         | $31,277         | $34,103         |
| % Households with Food Stamps/SNAP Benefits | 47.0% | 12.9% | 11.6% | 11.8% | 11.7% |
| % Households with Social Security Income | 24.2% | 4.2% | 4.1% | 4.7% | 5.3% |
| Home Ownership Rate            | 13.2%           | 40.9%           | 50.0%           | 62.0%           | 64.0%           |
| Median Home Value              | $91,345         | $188,100        | $174,900        | $172,500        | $217,500        |
| Land Area (square miles)       | 0.4             | 340.52          | 871.3           | 261,232         | 3,531,005       |

2: Census Tract (CT) 34. Bold/shading indicates results that > and/or < Texas and/or the U.S., res. SNAP = Supplemental Nutrition Assistance Program.

The grant will have a profound impact by transforming contaminated properties in disrepair into sources of jobs and revenue, and by serving as a critical catalyst for economic growth and revitalization along the MLK Corridor.

2.a.ii Threats to Sensitive Populations / (1) Health or Welfare: The Target Area includes some of the highest concentrations of low income and minority populations in the US. EPA’s EJ Screening (EJSCREEN) Tool reports that the Target Area is above the 85th percentile for each of the sensitive population categories of overall demographic index, minority, low income, and less than high school education compared to the US (Table 2). Additionally, as demonstrated in Table 2, there is a greater relative percentage of children ≤5 years old and women of child-bearing age. 86% of residents are minorities, including the 74% that make the Target Area a Black cultural hub with a population that is 3x higher than the City or county, and nearly 6x higher than the state of Texas or US. The discriminatory policies levied against the Target Area created generational poverty and high rates of crime that are prevalent today. According to the Federal Bureau of Investigation’s uniform crime reports for 2019, South Dallas, of which the Forest District is a part, has a violent crime rate that is 363% the US average.

| Table 2. Sensitive Populations (EJ Screen and ACS 2019 5-Year Estimates) |
|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| Data Type       | Target Area (EJ Data; Percentile in US) | Target Area (EJ Screen and ACS 2019 5-Year Estimates) | City of Dallas | Dallas County | State of Texas |
| Minority residents (% of total pop.)* | 90 | 86.6% | 71% | 70.9% | 58.0% |
| Black or African American (% of total pop.) | N.A. | 74.0% | 24.3% | 22.6% | 12.1% |
| Children ≤5 years (% of total pop.) | N.A. | 7.1% | 6.8% | 7.3% | 6.8% |
| Women 15-44 years (% of female pop.) | N.A. | 42.4% | 46.3% | 44% | 41.5% |
| Adults without a high school degree | 85 | 17.9% | 22.5% | 20.7% | 16.3% |
| Low income/Per Capita Income | 93 | $15,062 | $34,479 | $32,653 | $31,277 |
| Demographic Index | 95 | N.A. | N.A. | N.A. | N.A. |

*CT 34: Calc. by subtracting % of “white persons not Hispanic” from 100%. Bold/shading indicates results that > or < Texas and/or U.S., respectively.

Disinvestment in the Target Area has resulted in profound welfare concerns. Over time healthy businesses were replaced with 48 liquor-related businesses within four blocks of the St. Philip’s campus. Drug trafficking and prostitution became common. The high concentration of vacant properties results in considerable public health concerns related to illegal activities and creates costs associated with code enforcement and condemnation orders, contributes to the lack of quality housing, and creates a diversion of emergency response resources.

St. Philip’s reuse strategy is focused on land-based approaches to development as an agent for change. Under St. Philip’s leadership, only five of the liquor businesses remain; 27 drug properties were shut down; and a disreputable motel was shuttered. In their place, St. Philip’s created >70 residential units and a variety of community services and spaces. St. Philip’s has demonstrated land-based approaches work to create a healthier, vibrant, and diverse community, and they have the experience and track record to tackle brownfield cleanup. The cleanup and reuse will reduce health threats and will increase economic opportunity and quality of life measures through revitalization into productive commercial services and much needed green space.
2.a.ii (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Life expectancies in South Dallas range from 65.5 to 65.9 years, compared to 78.5 years nationally. Table 3 summarizes prevalence rates for 10 disease and adverse health conditions for residents in the Target Area, based on estimates developed by the Centers for Disease Prevention & Control (CDCP). Included are the average prevalence rates for all 2,760 Census Tracts (CTs) evaluated in Texas and 27,210 CTs in 500 US cities included in the study (including >103M people).

Table 3. Health Measure Estimates for the Target Area

<table>
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<tr>
<th>Health Measure</th>
<th>Prevalence in Target Area</th>
<th>Average Prevalence in Texas</th>
<th>Percentile among CTs in 500 US Cities</th>
<th>Health Measure</th>
<th>Prevalence in Target Area</th>
<th>Average Prevalence in Texas</th>
<th>Percentile among CTs in 500 US Cities</th>
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</thead>
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<tr>
<td>Lack of Health Insurance</td>
<td>27.6%</td>
<td>26.4%</td>
<td>88.4%</td>
<td>Kidney Disease</td>
<td>4.2%</td>
<td>2.9%</td>
<td>89.4%</td>
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<tr>
<td>High Blood Pressure</td>
<td>46.5%</td>
<td>26.5%</td>
<td>94.0%</td>
<td>No Leisure/Physical Activity</td>
<td>36.1%</td>
<td>28.3%</td>
<td>84.4%</td>
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<tr>
<td>Asthma</td>
<td>11.2%</td>
<td>8.8%</td>
<td>80.4%</td>
<td>Poor Mental Health</td>
<td>15.0%</td>
<td>12.7%</td>
<td>71.9%</td>
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<tr>
<td>Diagnosed Diabetes</td>
<td>18.5%</td>
<td>11.4%</td>
<td>93.5%</td>
<td>Obesity</td>
<td>44.2%</td>
<td>33.5%</td>
<td>93.0%</td>
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<tr>
<td>High Cholesterol</td>
<td>41.2%</td>
<td>35.8%</td>
<td>92.4%</td>
<td>Poor Physical Health</td>
<td>16.4%</td>
<td>12.6%</td>
<td>80.4%</td>
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The Target Area scores significantly worse (i.e. - has higher prevalence rates) for all 10 measures compared to the average rates for Texas. Prevalence rates for nine of the 10 measures rank above the 80th percentile when compared to all 27,210 CTs included in the study. For four of the measures (high blood pressure, diagnosed diabetes, high cholesterol, and obesity), prevalence rates are among the highest 10% of all 27,210 CTs. The Site reuse strategy includes an expansion of an interconnected athletic complex and public green space, as well as safe areas for walking and cycling, which can promote activity and exercise that can reduce the prevalence of eight of the 10 health measures. Ongoing efforts to eliminate truck traffic on MLK as part of the corridor revitalization associated with the reuse strategy could assist in the reduction of asthma. The creation of living wage jobs will help allow more community members to purchase health insurance.

2.a.ii (3) Promoting Environmental Justice: Sensitive populations in the Target Area are at a higher risk of exposure to multiple sources of pollution. EPA’s EJSCREEN Tool reports that the Target Area ranks between the 75th and 94th percentiles compared to the entire US for all 11 EJ indices. This demonstrates a disproportionate burden and vulnerability of sensitive populations in the Target Area to multiple sources of pollution.

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<tr>
<td>Particulate Matter (PM2.5)</td>
<td>77</td>
<td>Ozone</td>
<td>76</td>
<td>NATA Diesel PM</td>
<td>93</td>
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<tr>
<td>NATA Respiratory Hazard Index</td>
<td>76</td>
<td>Traffic Proximity and Volume</td>
<td>93</td>
<td>Lead Paint Indicator</td>
<td>87</td>
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<tr>
<td>NATA Respiratory Hazard Index</td>
<td>76</td>
<td>NATA Diesel Proximity</td>
<td>93</td>
<td>Superfund Proximity</td>
<td>82</td>
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<tr>
<td>NATA Air Toxics Cancer Risk</td>
<td>76</td>
<td>NATA Air Toxics Cancer Risk</td>
<td>76</td>
<td>Wastewater Discharge Indicator</td>
<td>92</td>
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</tbody>
</table>

Air Quality: Residents are exposed to air quality issues from multiple sources, in particular vehicle emissions from the triangle of freeways that bisect, divide, and isolate the area. The reuse strategy for the Site is a part of a larger plan for the Target Area that includes eliminating truck traffic on MLK and reducing Hwy 175 to an urban boulevard. This will significantly reduce exposure to vehicle emissions. Additionally, residents are exposed to industrial emissions from a 30-acre chemical plant west of the Target Area and a metals processing facility northeast of the Target Area. Based on Toxic Release Inventory (TRI) data, 11,066 pounds of PCE, a known carcinogen and the primary contaminant of concern at the Site, was released to the air from industrial facilities in Dallas in 2020 alone. Additionally, the potential exposure (from vapors) associated with historic drycleaner releases impacting indoor air quality in the five buildings at the Site was a major factor in selecting the preferred cleanup alternative identified in the Analysis of Brownfield Cleanup Alternatives (ABCA). Installation of sub-slab depressurization systems beneath the buildings will protect occupants from inhalation of harmful vapors. Finally, paving activities completed during redevelopment will create a cap and reduce potential exposure in outdoor areas.

Notes:
2 Notes for Table 3. A) Data accessed from the CDCP website on 5/21/2021. B) The target area CT is 34. C) Average of values for all 2,760 Texas CTs. D) Ranking of the value for the target area CTs versus all 27,210 urban CTs in 500 US cities included in the study. A percentile value of 99.0% means that the average prevalence in the target area is higher (worse) than that in 99.0% of all US CTs evaluated. E) Model-based estimate for crude prevalence among adults aged ≥ 18 yrs, 2016. F) Crude prevalence of mental or physical health not good for ≥14 days among adults aged ≥18 yrs, 2016.
3 Notes for Table 4. A) Data accessed from the EPA Environmental Justice Screening (EJSEREN) Tool website on 10/10/2021. B) NATA = 2014 National Air Toxics Assessment C) RMP = Risk Management Plan
Water Quality: Establishing a Municipal Setting Designation (MSD) for the Site and surrounding area is a critical institutional control that is a part of the selected cleanup alternative. The MSD will protect residents from ingesting groundwater that is up to 1000x the Groundwater Ingestion Protective Concentration Levels (PCLs).

2.b. Community Engagement:

2.b.i. Project Involvement/Roles: St. Philip’s was founded in the late 1940s and presently offers primary education and community programs to over 3,000 moderate- and low-income South Dallas residents. Their programs include affordable housing, a food pantry, community garden, medical clinic, legal aid clinic, senior citizen transportation, and youth sports. St. Philip’s key staff members Julie Saqueton and Becky Madole Post are actively involved in the community and will manage all aspects of grant implementation activities. Additionally, St. Philip’s has received commitments from the following project partners who bring specific resources and expertise to their roles on the project and will help with outreach and engagement activities.

- **Texas Commission on Environmental Quality (TCEQ):** Phyllicia Allen; phyllicia.allen@tceq.texas.gov; 512-239-2023
- **City of Dallas; Eco. Dev. and Brownfields:** Sue Housel; sue.housel@dallascityhall.com; 214-939-2848
- **St. Philip’s Neighborhood Association:** Lasheryl Walker; 214-457-6849
- **The Real Estate Council (TREC) Foundation:** Linda McMahon; lmcmahon@recrecouncil.com; 214-692-1681
- **Forest Forward:** Elizabeth Watley; ewatley@forestforward.org; 972-639-4939
- **Cornerstone Baptist Church (CBC):** Pastor Chris Simmons; cssimmons@cornerstonedallas.org; 214-426-5468
- **Hunt Family Foundation:** Ashlee Hunt Kleinert; akleinert@palettespi.com; 972-342-5457
- **Dallas Stars Foundation:** Chelsea Livingston; starsfoundation@dallastars.com; 214-387-5527

2.b.ii. Incorporating Community Input: St. Philip’s will communicate progress and solicit input on the project in accordance with a Public Engagement Plan (PEP) to be completed upon notification of award. Additionally, outreach for cleanup activities will be integrated with the public process being implemented for the overall redevelopment project. The commitment of project partners such as the St. Philip’s Neighborhood Association, TREC, Forest Forward, CBC and others to assist with community outreach and engagement activities will be critical in ensuring that the project and the proposed cleanup plan have the support of the neighborhood. As detailed in the threshold criteria, public input on the grant application and draft Analysis of Brownfields Cleanup Alternatives (ABCA) was solicited in November 2021 through a presentation at a public meeting held at St. Philip’s on November 18, 2021. St. Philip’s is located within one block of the Site and can comfortably host meetings and outreach events for up to 500 people in their chapel and conference rooms. The meeting was advertised on social media and St. Philip’s website and was hosted utilizing a hybrid approach (both in person and online via Zoom teleconference). The meeting was attended by 11 individuals. St. Philip’s completed a presentation about the grant application and ABCA and answered questions. Following the meeting, St. Philip’s received formal comments from one attendee. Materials related to the event are provided as Attachment B4 of the Threshold Criteria.

Anticipated methods used for communicating progress and soliciting input will make use of existing stakeholder networks and channels of communication, including: public meetings; creating a project-specific
webpage on the St. Philip’s website (https://www.stphilips1600.org/); updates in St. Philip’s’ e-newsletter (sent quarterly to over 700 subscribers); and social media posts, including the community message board website, Next Door. Both St. Philip’s and TREC have professional communications teams that support community development projects. Input will be collected via email, mail, meeting minutes and discussed at regularly scheduled monthly meetings. St. Philip’s staff respond to all comments and inquires with acknowledgement that feedback has been received and considered. Meetings will continue to utilize a hybrid approach (in person and virtual) to both address continuing health concerns related to the COVID-19 pandemic while also providing opportunities for direct engagement. Engagement will continue until cleanup/reuse activities are completed.

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

3.a. Proposed Cleanup Plan: As noted in Section 1.a.ii, the contaminants of concern are related to historic releases of drycleaning solvents at the Site, including tetrachloroethylene (a/k/a PCE), and its related daughter products [including trichloroethene (TCE), cis-1,2-dichoroethene (DCE) and vinyl chloride (VC)]. Concentrations of these contaminants are greater than the Texas Risk Reduction Program (TRRP) Tier 1 Residential Soil to Groundwater Ingestion Protective Concentration Levels (PCLs) and Groundwater Ingestion PCLs in soil and/or groundwater in multiple locations. PCE and TCE also exceed the default EPA Vapor Intrusion Screening Level criteria at 1632 MLK and preliminary data suggests PCE may exceed the Residential PCL for Air Inhalation at 1624 and 1628 MLK and 3016 and 3021 Colonial. Following supplemental assessment activities, the anticipated cleanup will utilize a combination of approaches described as Alternative 3 in the draft Analysis of Brownfield Cleanup Alternatives (ABCA). The selected alternative considered the Phase II ESA results, redevelopment plans and current/future use of the Site. Cleanup activities will include the installation of sub-slab depressurization (SSD) systems under existing buildings at the Site and establishing a Municipal Setting Designation (MSD) as an institutional control to mitigate the groundwater ingestion pathway. Cleanup activities will continue to be integrated with redevelopment plans as the ABCA is finalized, and the Cleanup Action Plan (CAP) is prepared.

The SSD systems will create a pressure differential under the building slabs and force soil vapors to exit into/from exterior piping above the roof line. This active system will connect sub-slab piping to a blower that will draw the soil vapor from beneath the slab before it can reach the interior of the building. Activities that will be funded (in part) by the EPA Brownfield Cleanup Grant will include design; acquisition of equipment and materials; and installation of the SSD systems. Installation is anticipated to include: cutting six-inch wide trenches within the interior of the building to install conveyance piping; setting the piping, conduit, and equipment supports; constructing the blower shelter; provide electrical service connections; and performing leak testing for the system. The EPA Grant will also fund the first two years of operation & maintenance (O&M) and system repairs. Lastly, the EPA Grant will fund consultant labor and TCEQ fees associated with the MSD.

3.b. Description of Tasks/Activities & Outputs (i. Implementation; ii. Schedule; iii. Leads; & iv. Outputs): St. Philip’s is requesting $500,000 of EPA hazardous substance cleanup funding. Implementation will be led by St. Philip’s with support from its partners, a consultant and contractor to be retained in accordance with 2 CFR 200.317-326. TCEQ/EPA staff will also play a significant role with technical oversight. The scope of work has been organized into four main tasks as detailed below. Details on the required 20% cost share are provided in Section 3.b.

<table>
<thead>
<tr>
<th>Task 1: Grant Management &amp; Community Engagement</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Task/Activity Description: Grant management will include: 1) quarterly progress reporting, 2) annual disadvantaged business enterprise (DBE) and federal financial reporting (FFR), 3) creating profiles and updates in the Assessment, Cleanup and Redevelopment Exchange System (ACRES), and 4) preparing final close-out documents. Community Engagement will include: 1) public meetings, 2) updates on the St. Philip’s website and social media, and 3) preparing fact sheets and mailers.</td>
</tr>
<tr>
<td>ii. Anticipated Schedule: Progress reports will be submitted periodically as required over the grant implementation period. Initial information will be entered into ACRES following execution of the Cooperative Agreement (CA), and updated upon completion of milestones, TCEQ approvals, and site redevelopment. Community outreach will be ongoing.</td>
</tr>
<tr>
<td>iii. Task/Activity Lead(s): St. Philip’s will lead management and engagement, with support from the consultant and partners.</td>
</tr>
<tr>
<td>iv. Outputs: 1) Outreach meetings, notices and meeting materials; 2) Fact sheets, website updates, posts and articles; 3) Quarterly progress reports, annual DBE/FFR reports, ACRES updates, and final close-out documents.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 2 – Cleanup Planning and Contractor Procurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Task/Activity Description: St. Philip’s will retain a consultant/Qualified Environmental Professional (QEP) through a qualifications-based procurement process compliant with 2 CFR 200.317-326 to prepare the final Analysis of Brownfield Cleanup Alternatives (ABCA), Cleanup Action Plan (CAP), Quality Assurance Project Plan (QAPP) and to assist with bid</td>
</tr>
</tbody>
</table>
specifications environmental contractor selection and community engagement activities. The QEP will also assist with Threatened and Endangered Species Act (ESA §7(a)(2)) and National Historic Preservation Act (NHPA §106) review activities.

ii. Anticipated Schedule: Procurement will be completed early so that grant funded activities can begin immediately upon execution of the CA. The ABCA, CAP, QAPP, bid specs and contractor selection will be completed during the first six months.

iii. Task/Activity Lead(s): St. Philip's will manage Task 2. Outputs will be completed by the QEP.

iv. Outputs: 1) Procurement documents; 2) ABCA; 3) CAP; 4) QAPP; 5) ESA/NHPA documents. 6) Bid Specifications.

### Task 3 – Site Cleanup

i. Task/Activity Description: 1) The QEP oversee the contractor during installation of the sub-slab depressurization (SSD) systems; complete env./indoor air quality sampling; operations and maintenance (O&M) of the SSD systems; and documentation and reporting in accordance with the QAPP, CAP, and TCEQ/EPA requirements; 2) The contractor will complete permitting and pre-work submittals; acquire equipment and materials; complete installation of the SSD systems in accordance with plans and specifications; and perform leak testing to verify the integrity of the systems.

ii. Anticipated Schedule: Contracting will occur during January–June 2023; Cleanup will occur during April 2023 to April 2024.

iii. Task/Activity Lead(s): The QEP will oversee cleanup activities to be completed by the selected cleanup contractor.


### Municipal Setting Designation (MSD)

i. Task/Activity Description: 1) Meetings with the City/TCEQ; 2) QEP to complete the MSD Application, including: a) required maps; b) legal description and GIS files of area; c) documentation of hydrogeology; d) data tables demonstrating extent of contamination; e) ordinance/restrictive covenant and resolutions; f) location/contacts for all private water wells within 5 miles of MSD boundary; g) attempt to notify all well owners a minimum of 3X with documentation; and h) evidence of support from the City and utilities; and 3) Complete a CORE Data Form and Correspondence ID Form for submittal to TCEQ.

ii. Anticipated Schedule: It is anticipated that the MSD will be completed during October 2022–June 2023.

iii. Task/Activity Lead(s): The QEP will complete required technical components, with oversight from the City and TCEQ.

iv. Outputs: 1) MSD application documents. 2) Three rounds of certified mailers for well owners within 5-miles of the proposed MSD. 3) Municipality comment and approval letters. 4) Completed CORE Data and Correspondence ID forms.

### 3.c. Cost Estimates:

As summarized in the table, St. Philip’s is requesting $500,000 of hazardous substance funding. Please note that no travel, equipment or supplies are being requested and these rows were deliberately left out of the table.

<table>
<thead>
<tr>
<th>Line #</th>
<th>Budget Categories</th>
<th>Task 1 Grant Management &amp; Engagement</th>
<th>Task 2 Cleanup Planning</th>
<th>Task 3 Site Cleanup</th>
<th>Task 4 MSD</th>
<th>Totals</th>
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<td>$0</td>
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<td>Total Budget</td>
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<td>$60,000</td>
<td>$425,000</td>
<td>$73,000</td>
<td>$600,000</td>
</tr>
</tbody>
</table>

The table below provides details regarding the estimated costs for project activities and outputs by task and budget category.

**Task 1 – Grant Management & Community Engagement:** Total Budget = $42,000 ($24,000 EPA Grant; $18,000 Cost Share)

Contractual costs of $24,000 (160 hrs @ $150/hr) is budgeted for the consultant to assist with reporting (QPRs, annual DBE/FFRs, ACRES updates, and Final Close-out Reports) and community outreach and engagement activities.

Cost share of $18,000 (300 hrs @ $60/hr) includes St. Philip’s in-kind labor for grant management and engagement.

**Task 2 – Cleanup Planning:** Total Budget = $60,000 ($40,000 EPA Grant; $20,000 Cost Share)

Contractual costs of $40,000 is budgeted for the QEP to update the ABCA ($6,000); prepare the QAPP ($6,000); prepare the CAP ($10,000); and prepare the cleanup plans, specifications and contractor bid package ($18,000).

Cost share of $20,000 includes monetary contributions towards consultant fees for the CAP plans and specifications.

**Task 3 – Cleanup:** Total Budget = $425,000 ($375,000 EPA Grant; $50,000 Cost Share)

Contractual costs of $375,000 is budgeted, including: 1) $311,000 for the contractor for equipment, materials and construction of the SSD systems (includes prevailing wages under Davis-Bacon Act); 2) $34,000 for the QEP for contractor oversight, documentation and reporting; and 3) $30,000 for the QEP for O&M of the SSD systems over a two-year period.
Task 4 – Municipal Setting Designation (MSD): Total Budget = $73,000 ($61,000 EPA Grant; $12,000 Cost Share)

Contractual costs of $60,000 includes $48,000 (320 hours @ $150/hr) to prepare the MSD documents and $12,000 for expenses including three rounds of mailers to be sent to private well owners within 5 miles of the proposed MSD. Other costs of $1,000 for a flat fee that will be charged by TCEQ for staff oversight and review for the MSD documents.

Cost Share: As noted above, St. Philip’s will meet the 20% cost share in part through in-kind labor (estimated at $24,000) performed by St. Philip’s staff for grant management, community engagement, and consultant/contractor oversight. The remaining $76,000 will be paid by St. Philip’s through monetary contributions towards consultant and contractor fees.

3.d. Measuring Environmental Results: St. Philip’s will closely track and monitor cleanup progress of the Site throughout the three-year project period. This is a requirement not only for the EPA Grant but for the City’s Economic Development Grant and the Innovation Center New Market Tax Credits (NMTC) which has significant financial conditions linked to project milestones. One of the mechanisms St. Philip’s will utilize is to assign the overall Construction Project Manager (see Section 4.a.iii) to be responsible for maintaining the project schedule and tracking and reporting all relevant cleanup milestones. Upon notification of award by EPA, the tasks, subtasks, milestones and reporting requirements specific to the EPA Grant will be integrated into the overall master redevelopment project schedule which will be maintained in Microsoft Project and updated on a continual basis. The redevelopment project is expected to be completed on a relatively expedited schedule, with the building completed in 2024 (i.e., within the EPA Grant project period). This will enable all near-term outputs and results to be fully achieved and documented within the quarterly progress reports. These near-term outputs and results will include the 1) estimated volume of diverted soil vapor; 2) the indoor area made safe by vapor mitigation measures; and 3) the land area made safe for commercial use through the MSD. St. Philip’s will also track long-term reuse outcomes. The metrics that will be measured and documented will include: 1) the number of businesses and jobs created; 2) dollars of public and private funding leveraged; and 3) the number of youth athletes, teams, community programs, and members of the public impacted by the expansion of the athletic complex and green space. All outputs and outcomes completed during and after the EPA Grant period will be reported and updated in ACRES.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE:

4.a.ii. Organizational Capacity/Structure: As part of its mission to advance revitalization in the Target Area, St. Philip’s has been an active Coalition member of the City of Dallas’ FY2020 EPA Brownfield Assessment Coalition Grant. Over the past year St. Philip’s has nominated a total of 31 properties for assessment activities, including the sites in this grant application. Additionally, St. Philip’s has worked with TCEQ to conduct Phase I/II ESAs and complete the draft Analysis of Brownfield Cleanup Alternatives (ABCA) for this Site. Through this experience St. Philip’s has developed relationships with staff from the City, TCEQ and EPA, and acquired the technical expertise necessary to successfully manage an EPA Cleanup Grant. Julie Saqueton and Becky Madole Post are Co-Directors of Community Development for St. Philip’s, and will leverage their complimentary skillsets as Brownfields Grant Manager and Assistant Grant Manager, respectively. Julie and Becky will have the support of St. Philip’s staff with expertise in accounting, engagement, and development activities. Additionally, St. Philip’s will have the support of a dedicated and experienced Construction Project Manager.

4.a.iii. Description of Key Staff: Key project staff have a wealth of experience managing projects in the Target Area:

Brownfields Grant Manager – Julie Saqueton, Co-Director of Community Development will manage the administrative and programmatic requirements of the grant. Having previously served at St. Philip’s as CFO, Julie has worked closely with Dr. Terry Flowers, Executive Director/Headmaster, for over a decade. In 2017, Julie was asked to serve as Executive Director of St. Philip’s Community Development arm. She is an experienced leader within the organization and externally. She studied Economics at UC Santa Barbara, and went on to get her CPA while working at Price Waterhouse. She later earned an MBA degree from UC Davis while working at Hewlett Packard as Corporate Director of Finance/Strategic Planning. She began work at St. Philip’s in 2008. She was the financial lead for the development of the Life Center and Aunt Bette’s Food Pantry. Since taking on her role in Community Development, she has led the planning, acquisition and development efforts including 20+ residential lots, 3 multi-family complexes, and six multi-unit commercial retail buildings. She loves the opportunity to employ her skills in a community where she is deeply invested.

Assistant Grant Manager – Becky Madole Post, Co-Director of Community Development will assist Julie with grant management and administration activities. Becky is an experienced leader in cross-sector collaborative endeavors. Her professional background has immersed her in research-based best practices that she employs in her community work. She brings a wealth of experience leading strategic community partnerships that has proved extremely valuable in her
current role, alongside the practical skills of stewarding multi-million-dollar budgets and successful administration of grants. A graduate of Tulane University, Becky was deeply engaged in a community-led development initiative in Post-Katrina New Orleans which became a model for disaster recovery. She is an alumna of the Dallas Mayor’s Star Council, a group of young leaders who share a passion and are committed to improving the City through civic engagement.

**Construction Project Manager – Mandi Adams, Project Manager at The Beck Group** will work with St. Philip’s to coordinate cleanup alongside overall redevelopment activities. Ms. Adams has over ten years’ experience managing a diverse portfolio of complex construction projects in Dallas. She has a BS in Civil Engineering from Missouri University of Science & Technology, an MBA degree from the University of Texas at Arlington, and is a certified LEED Green Associate.

**4.a.iv. Acquiring Additional Resources:** St. Philip’s has a fully-staffed human resources department with the resources, experience and expertise to recruit qualified replacements for any key project staff that depart during the project. St. Philip’s routinely contracts out for engineering and consulting services, and have all management and procurement procedures in place to secure services through competitive processes compliant with 2 CFR 200.317-326 requirements, as well as the experience and expertise needed to manage contractors as they complete assignments on their behalf. As mentioned in Section 1.c.i, St. Philip’s has leveraged additional resources from the Dallas CWA grant to complete supplemental assessment and possibly pre-design work at the Site in anticipation of funding being awarded.

**4.b.ii Past Performance & Accomplishments (Has Not Received an EPA Brownfields Grant but has Received Other Assistance Agreements): 4.b.ii.(1) Purpose & Accomplishments:**

- **Rees-Jones Foundation Education Grant ($600,000; 2019):** The Rees-Jones Foundation awarded a $600,000 grant which was split into $100,000 for tuition-assistance for the 2019-2020 school year, allowing St. Philip’s to provide financial aid to 57% of the student body; and $500,000 allocated to the construction of the Rees-Jones Welcome Center, which consists of the school entry area; Admissions, Finance, and Community Advancement offices and conference rooms, and an expanded concessions area for the adjoining community center and athletics program facility. St. Philip’s received funding in September 2019, began construction in February 2021, and had the ribbon-cutting ceremony for the building November 2021. Measures of success include all portions of the project being fully completed, with completion on-time and on budget despite unprecedented supply chain issues and contractor labor demands due to the pandemic. The project was part of the $50M We Believe Campaign, focused on strengthening the endowment for the long-term financial stability of St. Philip’s.

- **City of Dallas, Texas Notice of Available Funding for Housing Development Grant ($670,000 Grant, 2021):** The City of Dallas Department of Housing and Neighborhood Revitalization awarded $670,000 in grant funds to St. Philip’s, in partnership with local developer, Matthews Southwest. The grant was submitted for a hybrid grant ($370,000) and construction loan ($300,000) but was awarded entirely as a grant due to the City’s overwhelming support for the project. These funds support the St. Philip’s Catalyst Project: An affordable housing development for those earning 60 - 100% of the area median income. The development is scheduled to be underway in 2022 and made up of single-family proof of concept housing (six units) on four lots owned by St. Philip’s consisting of 3 - 4-bedroom housing units in halfplex and traditional single-family design, with accessory dwelling units (ADU) where possible to provide future homeowners with an opportunity to generate additional income through rental revenue and meet the City’s demand for affordable housing. The project, when complete, will be under consideration for Affordable Housing Finance’s Annual Reader’s Choice Awards for the nation’s top developments and recognition by City leaders as a proof of concept solution to affordable housing needs in South Dallas.

- **Muse Family Foundation Minor Home Repair Grant ($50,000 Grant, 2021):** The Minor Home Repair Grant Program from the City of Dallas was discontinued and the Muse Family Foundation was able to provide funds for repairs typically covered under the City grant – repairs to 10 homes impacted by Winter Storm Uri in February 2021. The funds were used to leverage an additional $47K from the Federal Home Loan Bank SNAP Program. St. Philip’s used the Foundation and leveraged funds towards nearly $100K of repairs, 21 low income (<80% AMI) and vulnerable (senior citizen, disabled) Forest District residents were able to remain in their homes during the COVID-19 pandemic in safe and warm conditions.

**4.b.i.(2) Compliance with Grant Requirements:** St. Philip’s has complied with all work plan, schedule, terms and conditions, and other requirements under its current and previous assistance agreements. The expected results were achieved or exceeded and completed on schedule without the need for corrective measures. All reporting was completed on schedule and in accordance with grant requirements. St. Philip’s is committed to supporting all planned grant activities described in this FY2022 EPA Grant proposal, and will effectively utilize all grant funds within the allotted timeframe. We look forward to partnering with EPA and contributing another critical brownfield success story to our target area community.
THRESHOLD CRITERIA RESPONSES
THRESHOLD CRITERIA FOR BROWNFIELD CLEANUP GRANTS

1. **Applicant Eligibility**

   St. Philip’s School & Community Center (St. Philip’s) is a State of Texas non-profit corporation exempt from federal income tax under Section 501(c)3 if the Internal Revenue Code. As such, St. Philip’s is eligible to receive a United States Environmental Protection Agency (USEPA) Brownfields Cleanup Grant. See Attachment A1 for supporting documentation of St. Philip’s non-profit status.

2. **Previously Awarded Cleanup Grants**

   The Site has not received funding from a previously awarded USEPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds**

   St. Philip’s does not have an open USEPA Brownfields Multipurpose Grant.

4. **Site Ownership**

   St. Philip’s is the sole owner of 3016 and 3021 Colonial Avenue. Their subsidiary, SP 1600 Penn Foundation owns 1624 and 1628 Martin Luther King Jr. Blvd., and their subsidiary 1632 MLK LLC owns 1632 Martin Luther King Jr. Blvd. See Attachment A2 for organizational structure and USEPA concurrence of eligibility.

5. **Basic Site Information**

   This is an application for a Multiple Site Cleanup Grant for five individual properties as defined below, and collectively referred to as the “Site”.

   Site Addresses: 1624-1632 Martin Luther King Jr. Blvd., 3016 and 3021 Colonial Ave., Dallas, TX

   Current Owner(s): St. Philip’s, SP 1600 Penn Foundation, 1632 MLK LLC

   **Site Details**

<table>
<thead>
<tr>
<th>Parcel Description</th>
<th>Parcel Address(es)</th>
<th>Former Owner</th>
<th>Assessor’s Parcel No.</th>
<th>Buildings</th>
<th>Tract Area</th>
</tr>
</thead>
<tbody>
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<td>Adjoining 1624 MLK Jr. Blvd.</td>
<td>Samuel Washington</td>
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<td>6,700 SF strip retail, 1-story</td>
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<td>Samuel Washington</td>
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<td>Victor Ballas</td>
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<td>12,000 SF strip retail, 1-story</td>
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<td>Former Dry Cleaner 3021 Colonial Ave.</td>
<td>Stuart Margol/Margol Family Trust</td>
<td>142096000000</td>
<td>3,770 SF retail, 2-story</td>
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<td>2,680 SF retail, 1-story</td>
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<tr>
<td><strong>TOTAL:</strong> 1624-1628 MLK Jr. 3016, 3021 Colonial</td>
<td>3 former owners</td>
<td>5 tax parcels</td>
<td>5 buildings, nearly 30k SF</td>
<td>1.44 acres</td>
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6. **Status and History of Contamination at the Site**

   a) The properties are impacted with hazardous substances, as further detailed in Section 6.d. below.
b) The properties are located in a mixed residential/commercial area in which initial development dates back to the late 1800s. The properties were first developed with their present buildings between 1913 – 1935 as follows:

- 1624 MLK Jr. Blvd. [MLK] was first developed with a house by 1922, and the present retail building in 1935. The property building has been a hardware store since at least 1986.
- 1628 MLK was first developed with a house by 1905, and a retail building in 1929 with a sign painting warehouse at the rear of the lot by 1950. Over time the property was split into two units (1628 and 1630 MLK) and has been occupied by a clothing store (1971 – 1981), pharmacy (1991), carpet store (2005). Presently the property building is occupied by a barbershop (2017 – present) and gym (1996 – present).
- 1632 MLK was first developed with a store and warehouse by 1899 and house by 1905. In 1913 the northeast half of the present-day property building was constructed with three retail units. The entire property structure was constructed prior to 1950 and housed two additional retail units. The southeast corner of the property was developed with an additional retail building by 1922 that was demolished in the 1970s. Over time the parcel has been occupied by a bar (1966 – 1971), a night club (1986 – 2005), a clothing store (1986 – 2014), outdoor recreation retail stores (1966 – 1996), furniture outlet (2010), beauty supply store (2005), convenience store (2010 – 2014), and two dry cleaners (1921 – 1956 and 1961 – 1992). Presently the property is vacant.
- 3016 Colonial Ave. [Colonial] was first developed by 1899 with a house and outbuildings. By 1925 it was in use as a hat shop. The present-day property building was constructed in 1930 with a shoe store until 1951. Over time the property has also been occupied by a restaurant (1961 – 1971) and a bar/night club (1981 – 2010). 3016 Colonial suffered fire damage and was partially rebuilt in 1980. The property is now occupied by a newly renovated WeCreation Community Innovation and Design Center for St. Philip’s students, local businesses, and community members. The Center ribbon cutting was November 18, 2021.
- 3021 Colonial was first developed in 1899 with a house. By 1923 the property was redeveloped with the present-day commercial building. It has been partially occupied by a beauty salon (1941) and restaurant and pool hall/night club (1946 – 2010), and dry cleaners (1941 – 1966). Along with 3016 Colonial, 3021 suffered fire damage and was partially rebuilt in 1980. Presently the parcel is occupied by the Doherty Family Fieldhouse, an athletic facility used by St. Philip’s students and the community.

c) Environmental concerns at the Site include volatile organic compounds (VOCs, tetrachloroethylene [PCE] and its breakdown products trichloroethylene [TCE], cis-1,2-dichloroethylene, vinyl chloride) in soil, groundwater, and soil vapor.

d) The Site became contaminated from at least one of the on-Site historical dry cleaners at 1632 MLK and possibly 3021 Colonial. There are no specific spill or leaking underground storage tank records that indicate a specific release source. The extent of contamination is delineated at 1632 MLK but extends to portions of the surrounding properties. Supplemental assessment funded by the FY2020 City of Dallas Brownfields CWA Grant is expected to provide detailed delineation in early 2022.
The properties are real property, for which reuse is significantly complicated by the presence of hazardous constituents associated with previous uses and activities. Per Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) §§ 101(39)(B)(ii), (iii), and (vii) and “Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k),” 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 Grant Applications

Phase I Environmental Site Assessments (ESAs) were completed for all five properties between 2014 – 2017, prior to their acquisition by St. Philip’s. The Site dry cleaners were identified as recognized environmental conditions (RECs) at the 1632 MLK and 3021 Colonial properties. A Phase II ESA was conducted for 1632 MLK in 2018 (report dated August 23, 2018), which identified PCE concentrations greater than the Texas Risk Reduction Program (TRRP) Tier 1 Residential Soil to Groundwater Ingestion Protective Concentration Levels (PCLs) in all soil borings and both PCE and its breakdown product TCE in a temporary groundwater well. Supplemental Phase II ESAs were conducted in 2019 and 2021 (reports dated August 31, 2019 and July 28, 2021, respectively) at 1632 MLK that further delineated the extent of PCE in soil and PCE, TCE, and their daughter products of cis-1,2-dichloroethylene and vinyl chloride in groundwater above TRRP Tier 1 Residential Soil to Groundwater and Groundwater Ingestion PCLs. The findings demonstrate a possible source area from a pocket of soil contamination beneath 1632 MLK and migration pathway along the sanitary sewer at the rear of the 1632 MLK building. An area where PCE in groundwater is estimated to be 1,000x the PCL at 1632 MLK extends off-Site into the neighboring right-of-ways (ROWs); concentrations 100x the PCE PCL extend to 1628 MLK and the ROWs; and concentrations 1x the PCE PCL may extend to 1624 MLK and possibly a portion of 3016 and 3021 Colonial. A 2020 Vapor Intrusion Evaluation (report dated September 10, 2020) was conducted at the 1632 MLK building that found PCE and TCE in sub-slab soil vapor above the default EPA Vapor Intrusion Screening Levels. At 3021 and 3016 Colonial, a preliminary Vapor Intrusion Evaluation was completed in 2020 (report dated September 8, 2020) that concluded PCE concentrations may exceed the Residential PCL for Air Inhalation at both parcels. A supplemental Phase II ESA is anticipated in 2022 to further delineate the degree and extent of soil and groundwater contamination by PCE, TCE, and related breakdown compounds at the Colonial properties.

9. Enforcement or Other Actions

There are no ongoing or anticipated USEPA or Texas Commission on Environmental Quality (TCEQ) enforcement actions at the Site.

10. Sites Requiring a Property-Specific Determination

St. Philip’s affirms that the Site does not need a property-specific determination.

11. Threshold Criteria Related to CERCLA/Petroleum Liability

The Site is contaminated with hazardous substances. Therefore, per the USEPA guidelines, responses are provided for items under 11.a.

a) Property Ownership Eligibility – Hazardous Substance Sites
i. Exemptions to CERCLA Liability: Not applicable

ii. Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability: Not applicable

iii (1). Landowner Protections from CERCLA Liability

Bona Fide Prospective Purchaser Liability Protection

The applicant affirms, as described below, that they have complied with all of the bona fide prospective purchaser protection (BFPP).

i. The owner must have acquired title to a property after January 11, 2002.

The title to each of the properties was acquired after January 11, 2002.

ii. The owner must have conducted all appropriate inquiries (AAI) prior to acquiring the property. AAI, typically met by conducting a Phase I Environmental Site Assessment using the ASTM E1527-13 (or ASTM E2247-16) standard practice, must be conducted or updated within one year prior to the date the property is acquired (i.e., the date on which the entity takes title to the property). In addition, certain aspects of the AAI or Phase I Environmental Site Assessment must be updated, prior to property acquisition, if the activities were conducted more than six months prior to the date of acquisition.

AAI was conducted within six months prior to acquisition of each property. See the Ownership table in Section A below.

iii. The owner must not be liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination. (Affiliations include familial, contractual, financial, or corporate relationships that are the result of a reorganization of a business entity with potential liability.)

The applicant/property owner affirms that they are not liable in any way for contamination at the Site or affiliated with any other person potentially liable for the contamination.

iv. All disposal of hazardous substances at the site occurred before the person acquired the site.

Disposal of hazardous substances at the Site occurred prior to the applicant/owner acquisition of the Site.

v. The owner must exercise appropriate care by taking reasonable steps to address releases, including stopping continuing releases and preventing threatened future releases and exposures to hazardous substances on the site.

The applicant/owner affirms that it has not allowed dry cleaning activities to continue, and that occupancy of the 1632 MLK property has not been allowed to occur to minimize potential exposure to hazardous substances.
vi. The owner must comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls associated with response actions at the site.

There currently no land use restrictions associate with the Site. The applicant and owner affirm to comply with any future land use restrictions and not impede the effectiveness or integrity of any institutional controls associated with response actions at the Site.

vii. The owner must provide full cooperation, assistance, and access to authorized persons.

The applicant and owner affirm to provide full cooperation, assistance, and access to authorized persons.

viii. The owner must comply with any CERCLA information requests and administrative subpoenas, and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.

The applicant and owner affirm to comply with any CERCLA information requests and administrative subpoenas and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the Site.

ix. The owner must not impede performance of a response action or natural resource restoration.

The applicant and owner affirm to not impede performance of a response action or natural resource restoration at the Site.

(a) Information on the Property Acquisition.

The Method of Acquisition, Acquisition Date, Nature of Ownership, Past Owner Name and Identity are summarized in the table below. The applicant and Site owner affirms they have no familial or other Relationships with Prior Owners, Operators, and Responsible Parties (or other potentially responsible parties) of the property (including the person/entity from which they acquired the property).

<table>
<thead>
<tr>
<th>Parcel Address(es)</th>
<th>Assessor's Parcel No.</th>
<th>Former Owner</th>
<th>Relationship to Former Owner</th>
<th>Method of Acquisition</th>
<th>Date of Due Diligence</th>
<th>Acquisition Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1624 MLK Jr. Blvd.</td>
<td>142075000000</td>
<td>Samuel Washington</td>
<td>No Relationship - Purchaser</td>
<td>Regular Real Estate Purchase Contract</td>
<td>06/15/2018</td>
<td>8/23/2018</td>
</tr>
<tr>
<td>1628 MLK Jr. Blvd.</td>
<td>142072000000</td>
<td>Samuel Washington</td>
<td>No Relationship - Purchaser</td>
<td>Regular Real Estate Purchase Contract</td>
<td>06/15/2018</td>
<td>8/23/2018</td>
</tr>
</tbody>
</table>
Application for FY2022 EPA Brownfield Cleanup Grant, St. Philip’s School & Community Center – 1624-1632 MLK Jr. Blvd. and 3016 and 3021 Colonial Ave., Dallas, Texas

<table>
<thead>
<tr>
<th>Parcel</th>
<th>Address</th>
<th>Purchaser</th>
<th>Relationship</th>
<th>No Relationship - Purchaser</th>
<th>Regular Real Estate Purchase Contract</th>
<th>Purchase Date 1</th>
<th>Purchase Date 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>1632 MLK Jr. Blvd.</td>
<td>142087000000</td>
<td>Victor Ballas</td>
<td>No Relationship - Purchaser</td>
<td>Regular Real Estate Purchase Contract</td>
<td>10/31/2017</td>
<td>12/19/2017</td>
<td></td>
</tr>
<tr>
<td>3016 Colonial</td>
<td>142120000000</td>
<td>Stuart Margol/Margol Family Trust</td>
<td>No Relationship - Purchaser</td>
<td>Regular Real Estate Purchase Contract</td>
<td>08/22/2014</td>
<td>11/21/2014</td>
<td></td>
</tr>
<tr>
<td>3021 Colonial</td>
<td>142096000000</td>
<td>Stuart Margol/Margol Family Trust</td>
<td>No Relationship - Purchaser</td>
<td>Regular Real Estate Purchase Contract</td>
<td>08/22/2014</td>
<td>11/21/2014</td>
<td></td>
</tr>
</tbody>
</table>

(b) Pre-Purchase Inquiry

The Phase I ESA for the 3016 and 3021 Colonial Avenue parcels was completed by Cirrus Associates in accordance with ASTM E1527-13 August 22, 2014 on behalf of Angela Easton at Hunt Oil Company. The Phase I ESAs was completed by Richard Record and Roger Duval who affirmed that they met the definition of environmental professional as defined in Title 40 CFR Part 312.0 and finalized on December 2, 2014. The site visit was conducted by Cirrus on August 19, 2014. The environmental database report was prepared on July 25, 2014. The parcels were purchased by St. Philip’s on November 21, 2014 which was within the 180 day time period following the earliest component of the Phase I ESA inquiry process (i.e., the environmental database report prepared on July 25, 2014).

A Phase I ESA for the 1632 Martin Luther King Jr. Boulevard parcel was completed by Aptim Environmental & Infrastructure, Inc. (APTIM) in accordance with ASTM E1527-13 on October 31, 2017 on behalf of St. Philip’s. The Phase I ESA was completed by Steven Miller and Leigh Grover who affirmed that they met the definition of an environmental professional as defined in Title 40 CFR Part 312.0. The site visit was conducted by APTIM on October 11 and 13, 2017. The environmental database report was prepared on October 9, 2017. The parcels were purchased by 1632 MLK LLC on December 19, 2017 which was well within the 180 day time period following the earliest component of the Phase I ESA inquiry process (i.e., the environmental database report prepared on October 9, 2017).

A Phase I ESA for 1624 and 1628 Martin Luther King Jr. Boulevard parcels was completed by Aptim Environmental & Infrastructure, Inc. (APTIM) in accordance with ASTM E1527-13 on June 15, 2018 on behalf of St. Philip’s. The Phase I ESA was completed by Steven Miller and Leigh Grover who affirmed that they met the definition of an environmental professional as defined in Title 40 CFR Part 312.0. The site visit was conducted by APTIM on June 8, 2018. The environmental database report was prepared on May 23, 2018. The parcels were purchased by SP 1600 Penn Foundation on August 23, 2018 which was well within the 180 day time period following the earliest component of the Phase I ESA inquiry process (i.e., the environmental database report prepared on May 23, 2018).

(c) Timing and/or Contribution Toward Hazardous Substances Disposal:

Disposal of hazardous substances at the Site occurred prior to St Philip’s and or its subsidiaries acquisition of the Site and St. Philip’s affirms that they have not contributed to any release of...
hazardous substances at the Site and that they have not arranged at any time for the disposal of hazardous substances nor transported them to the site.

(d) Post-Acquisition Uses

Post-uses included either preparing to modernize to the historic structures or maintaining the existing tenant leases as follows. From west to east along MLK, 1624 MLK is approximately 0.18 acres with a single-story 6,700 SF retail building in use as a hardware store; 1628 MLK is approximately 0.18 acres with a single-story 4,200 SF retail strip divided into two units, currently occupied by a barber shop and a gym; and 1632 MLK is approximately 0.56 acres with a single-story 12,000 SF retail strip divided into five units that are entirely gutted and vacant. Along Colonial Ave., 3016 Colonial is approximately 0.19 acres with a 2,680 SF single-story building that recently opened as the WeCreation Community Innovation and Design Center for St. Philip’s students, local businesses, and community members to collaborate, and 3021 Colonial is approximately 0.34 acres with a 3,770 SF building in use as the Doherty Family Fieldhouse, an athletic facility used by more than 700 youth.

(e) Continuing Obligations

Upon completion of the Phase I ESAs prior to acquisition of the Property parcels, St. Philip’s completed Phase II Environmental Site Assessments at the 1624 – 1632 MLK parcels. Based on those results, the 3016 and 3021 Colonial buildings were assessed for potential vapor intrusion issues and those assessments confirmed the need for additional assessment. St. Philip’s has received a commitment from the City of Dallas for a nominal amount of funding to complete Phase II ESAs at these sites. No continuing releases or threats of continuing releases were identified during due diligence activities completed as a part of Phase II ESA and supplemental Phase II ESAs at the Site. Therefore, no “reasonable steps” were required.

St. Philip’s affirms their commitment to: comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls; assist and cooperate with those performing the cleanup and provide access to the property; comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and provide all legally required notices.

12. Cleanup Authority and Oversight Structure

a) Cleanup Oversight:

Cleanup of the Site will be conducted by St. Philip’s under the Texas Commission on Environmental Quality Voluntary Cleanup Program. TCEQ will review, approve, and provide oversight of remedial planning, cleanup, and remedial documentation/site closure activities. St. Philip’s relies on outside consultants procured in accordance with procurement provisions of 2 CFR §§ 200.317 through 200.326 to provide necessary oversight and technical expertise necessary for cleanup.

b) Access to Neighboring Properties (if required):

Not applicable. The cleanup activities will be focused on mitigating contaminants on the Site.

13. Community Notification

a) Draft Analysis of Brownfield Cleanup Alternatives
Printed copies of the draft application, including a draft ABCA were made available to the public at a virtual public meeting held from 7-8:30 pm on November 18, 2021, hosted by St. Philip’s. In addition, a copy of the draft ABCA was posted on St. Philip’s website on October 17, 2021. A copy of the draft ABCA is provided as Attachment B1.

b) Community Notification Ad

On November 17, 2021, a community notification ad was placed on the website “Next Door” and disseminated to 13 surrounding neighborhoods. In addition, a community notification ad was placed on St. Philip’s website on November 17, 2021. A copy of the community notification documentation is provided as Attachment B2.

c) Public Meeting

A virtual public meeting was held from 7-8:30 pm on November 18, 2021, by St. Philip’s. Documentation for this meeting is attached, including a summary of the meeting and presentation made to the public (Attachment B3), a summary of public comments received on the draft proposal and ABCA, and the responses provided by the City (Attachment B4), and the meeting sign-in sheet (Attachment B5).

d) Submission of Community Notification Documents

The following required community notification documents are provided as attachments:

<table>
<thead>
<tr>
<th>Attachment</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>B1</td>
<td>A copy of the draft ABCA.</td>
</tr>
<tr>
<td>B2</td>
<td>Documentation of community notification to the public and solicitation for comments on the proposal, including a printout/screenshot of the notification posted on the St. Philip’s website and ‘Next Door’ website beginning on November 17, 2021.</td>
</tr>
<tr>
<td>B3</td>
<td>A meeting summary and presentation materials.</td>
</tr>
<tr>
<td>B4</td>
<td>A summary of public comments received at the meeting or through subsequent emails, and a summary of the responses provided by St. Philip’s.</td>
</tr>
<tr>
<td>B5</td>
<td>Copies of the sign-in sheets for the meeting.</td>
</tr>
</tbody>
</table>

14. Statutory Cost Share

St. Philip’s anticipates that it will be able to fully meet the 20 percent cost share of $100,000 through a combination of staff time spent performing outreach, project management, cleanup oversight and coordination in conjunction with implementation of Tasks 1 through 4 ($24,000) and monetary contribution ($76,000). Estimates for staff time required for each task were based on time expended on multiple past projects funded in part through EPA Cleanup Grants.

15. Waiver of the $500,000 Limit

St. Philip’s is not requesting a waiver of the $500,000 limit.

16. Named Contractors and Subrecipients

Procurement Procedures for Contractors: Not Applicable.
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Procurement Procedures for Subrecipients: Not Applicable.