Narrative Information Sheet
Application for EPA Brownfields Revolving Loan Fund
St. Louis Development Corporation

December 1, 2021

St. Louis Development Corporation (SLDC) provides staffing and resources to the City of St. Louis economic development authorities, who frequently are involved in the identification, assessment, acquisition, cleanup, sale and redevelopment of Brownfield properties throughout the City. Accordingly, I am pleased to submit the enclosed materials in support of SLDC’s application for the Brownfield Assessment Grant Opportunity from the United States Environmental Protection Agency.

1. Applicant Identification:  St. Louis Development Corporation, 1520 Market Street, Suite 2000, St. Louis, MO 63103.

2. Funding Requested:
   a. Grant Type: Individual RLF
   b. Federal Funds Requested:
      i. $1,000,000
      ii. No cost share waiver is being requested

3. RLF Boundaries: City of St. Louis, Missouri

4. Target Area and Priority Site Information:
   While the RLF would potentially serve the entire City as it revolves, the main target areas are in the northern neighborhoods or central commercial corridors of the City. Most of the neighborhoods are part of a federally designated Promise Zone, as well as being identified as Neighborhood Revitalization Strategy Areas. The identified target sites are below;

   • 4731 Delmar – Fountain Park Neighborhood - Census Tract 1123
   • 4223 W Dr. Martin Luther King Dr. – The Ville Neighborhood – Census Tract 1113
   • 500 Prospect – Midtown Neighborhood – Census Tract 1186
   • Clarence and North Broadway – Near North Riverfront – Census Tract 1096
5. Contacts:
   a. Project Director: Peter Phillips, Major Project Manager; St. Louis Development Corporation, 1520 Market Street, Suite 2000, St. Louis, MO 63103; (314)-657-3736 (ph), (314)-613-7011 (fax), phillipsp@stlouis-mo.gov
   b. Chief Executive: Neal Richardson, Executive Director, St. Louis Development Corporation, 1520 Market Street, Suite 2000, St. Louis, MO 63103; (314)-657-3703 (ph), (314)-613-7011 (fax), richardsonn@stlouis-mo.gov


7. Other Factors Checklist: None of the factors from the Other Factors Checklist are applicable to the Priority Areas for this grant. It should be noted though, that the City of St. Louis itself is bordered by the Mississippi River and contains other smaller bodies of water, as well as being in a federally designated floodplain. While this does not apply to the current Priority Areas of the Revolving Loan Fund Grant Application, given that the funds are eligible for the entire City of St. Louis, there is a small chance that if altered, the adjacency to water and floodplain designation factors may become applicable.

8. Letter from the State or Tribal Environmental Authority: Attached as Attachment B.

9. Releasing Copies of Applications: N/A
Attachment B:
Letter from State Environmental Authority
November 23, 2021

Peter Phillips  
St. Louis Development Corporation  
1520 Market Street, Suite 2000  
St. Louis, MO 63103

RE: Small Business Liability Relief and Brownfields Revitalization Act  
Environmental Protection Agency (EPA) Grants

Dear Peter Phillips:

Please allow this letter to confirm acknowledgment by the Missouri Department of Natural Resources of the intention to apply to EPA for funding by the St Louis Development Corporation (SLDC) as authorized under the above-referenced Act. I understand and acknowledge that, if successful in its grant application, SLDC or any of its constituent agencies or agents intends to utilize such funds for eligible purposes pursuant to the above-referenced Act.

SLDC, is applying for a $1,000,000 Brownfields Revolving Loan Fund (RLF) grant and intends to conduct Brownfields RLF activities in the city of St. Louis. SLDC plans to partner with the land bank and vacancy/green infrastructure initiative to provide remediation loans/grants to remediate and revitalize old buildings that have long been vacant or underutilized. SLDC will focus funds on the north city area where a vacancy issue has been identified. The funding will be used to remediate the vacant properties prior to demolition and redevelopment. Much of the redevelopments will be mixed use, commercial, or office space.

We expect SLDC, to enroll the sites in the Brownfields/Voluntary Cleanup Program (BVCP), and receive the benefits of the program. Of course, we require that each site enroll separately in the BVCP. Nothing in this letter should be construed as automatic acceptance of the sites; standard enrollment procedures still apply.

Sincerely,

ENVIRONMENTAL REMEDIATION PROGRAM

Scott Huckstep, Chief  
Brownfields/Voluntary Cleanup Section

SH:jrs
NARRATIVE

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields
i. Background and Description of Target Area
Founded in 1764, the City of St. Louis is a 62-square mile rust belt city rich in history and architecture. Despite this history, few people realize St. Louis lost more residents in the Post-War period than Detroit. The City lost 63% of its population since 1950. Between 2010 and 2020, the city lost over another 5.1% of its population. This exodus has left behind nearly 22,000 vacant lots and at least 6,700 vacant buildings. Of these, the majority are located in residential, small business corridors, and industrial parts of the northern areas of the City. These vacant lots and buildings come with both real and perceived negative effects (decreased property values, increased crime, and health hazards) to the residents and the City as a whole. The Land Reutilization Authority (LRA), the City’s land bank and owner of last resort in the tax foreclosure process, currently holds title to over 11,000 abandoned and often contaminated parcels.

Real environmental impacts include harm to organisms and water sources. Most abandoned hazardous substance sites in urban environments have elevated levels of arsenic, lead, and various polynuclear aromatic hydrocarbons in surface soils, the result of airborne deposition of soot from decades of coal and other fossil fuel usage. The City of St. Louis has the 4th highest percentage of housing units constructed prior to 1940 in the nation, with 55.7%. These properties typically have asbestos containing materials in roofing, window, and insulation, have higher maintenance costs, and a history of disinvestment. Storage and use of petroleum and chlorinated solvents is common, and this leaves behind unsafe levels of these materials in soil and groundwater. Health impacts from hazardous substances and petroleum contamination can be extensive. Abandoned petroleum sites have underground storage tanks (USTs), used to store thousands of gallons of gasoline, kerosene, or heating oil. Until regulations were tightened in 1985, most USTs were made of steel and included no leak detection systems, allowing them to corrode and leak over time, polluting both soil and groundwater. Contaminants left behind by petroleum include benzene, toluene, and naphthalene, among others. Benzene is a known carcinogen, and the others are possible carcinogens. This polluted groundwater can make its way into the Mississippi River, polluting the river that is the heart of the Midwest.

While SLDC serves the entire City, and there are vacant lots and brownfields throughout, there is a large concentration in the northern neighborhoods. The four identified projects, which make up the entirety of the budget included in this grant, are located in the Fountain Park Neighborhood, The Ville, Near North Riverfront, and Midtown areas. Fountain Park, a small, but centrally located northern city neighborhood is bordered by three major City thoroughfares, and for its small size (154 acres) has approximately a 70%/30% split of land area for residential and commercial respectively. It is also currently at a 24% vacancy rate. The neighborhood continues to be under-served and racially segregated. It is located in Census Tract 1123 with a population that is 90% African American, with 39% of the population below the poverty line.¹ This area, along with many of the northern City neighborhoods, have seen years of disinvestment and decline.

The Ville is another neighborhood in the northern part of the City situated just northwest of downtown and covers a roughly nine-by-five-block area. The Ville’s rise to the status of St. Louis’ premier African-American neighborhood was due partly to the great institutions and business that were locating in the Ville area, but also largely to the shaping forces of racial restrictive covenants in parts of St. Louis. The Ville shares similar demographics to Fountain Park with high levels of vacancy and historically segregated.

¹ US Census Bureau, American Community Survey
The Near North Riverfront is a historically industrial area that has seen dramatic decline in activity as industry closes and/or moves to newer facilities elsewhere with almost 20% of its total 1,600 acres sitting vacant. This area is just north of Downtown, where the St. Louis Arch and Federal Park sit along the Mississippi River. The previous industrial use makes these parcels impractical for residential redevelopment, but prime real estate for future industrial, commercial, or recreational spaces.

Midtown is a centrally located neighborhood comprised of mostly commercial uses along the central commercial corridor, and residential on its periphery. Midtown still suffers from historic uses and the associated environmental concerns though, leading to expensive redevelopment costs and redevelopers seeking funding options. Common previous uses along the commercial corridor include gas stations, petroleum storage and blending facilities, dry cleaners, and industrial factories.

ii. Description of the Priority Brownfield Sites
Included in the budget for this application is three separate projects. Information on those sites is below:

4731 Delmar – Located in the Fountain Park neighborhood identified above, this 30,000 square foot historic building was built in 1925 and has been re-purposed over the years to host a variety of companies. Previous uses include a cleaning and dyeing operation from 1930 to 1970 and general storage facility. It has been vacant for almost 20 years. The currently known environmental remediation necessary is asbestos-containing material (ACM) in the building, which included friable Thermal System Insulation (TSI) and non-friable boiler room components and boiler room debris and in roofing material. Lead-based paint (LBP) was found in the building on various structural and non-structural components, including: concrete columns, a man-door, brick columns, and select brick walls. Paint varied from intact to peeling conditions. Ballasts and fluorescent bulbs were found throughout the building. While no subsurface Phase II is complete to date, a Sanborn map revealed four 1,000-gallon gasoline USTs in the rear of the building. The closure status of these USTs is unknown.

4223 W Dr. Martin Luther King Dr. - This property in the Ville neighborhood consists of a 30,000 sq ft building and is currently vacant, and believed to be predominantly used as office space in the past. The plan is to create a business center, focusing on the surrounding area businesses to support growth and technical support. This project aligns with the strategy of supporting the growth of small businesses in historically disenfranchised and segregated areas. There is suspected asbestos and lead in the building, which we are currently assessing using EPA Assessment Grant funds.

Armory Phase 2 (500 Prospect) – The 500 Prospect site was developed in 1947 as the Pittsburgh Plate Glass Company, later known as PPG Industries. The site was sold, but continued to operate during the 1970s and 1980s as the Beck & Corbett Company and Lapham-Hickey Steel Corporation until it was purchased and used for its current use as commercial and light industrial manufacturing and warehousing. Known environmental contamination includes asbestos-containing materials and lead-based paint have been identified throughout the building. Universal wastes, heavy metal-containing light bulbs, PCB-containing light ballasts, mercury-containing switches, exit signs, water fountains, smoke detectors, etc. are located throughout the building. An unregistered fuel oil UST was discovered on the northeastern section of the building interior near the basement boiler room. Limited site investigation activities confirmed the presence of heavy metals, petroleum products, and PAHs in site soil and groundwater.

Clarence Broadway Development - The Clarence Broadway site consists of 34 parcels totaling 12.2 acres with a long history of industrial use. Various factories, storage facilities, electronic recycling, and other uses are spread throughout the parcels. The majority of the site is City owned and the developer has begun purchasing the others. Prior environmental reports identified contaminants of concern (COCs) in
soil and groundwater in the area, including petroleum products, metals, polynuclear aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs). Analytical data indicated contaminant levels above Missouri Department of Natural Resources (MDNR) Missouri Risk-Based Corrective Action (MRBCA) Default Target Levels (DTLs) and certain contaminants above Tier I Residential and Non-Residential Risk-Based Target Levels (RBTLs).

These sites represent underutilized areas that are ripe for job creation adjacent to the neighborhoods that have seen relatively high unemployment and poverty.

b. Revitalization of the Target Area
   i. Reuse Strategy and Alignment with Revitalization Plans

The reuse strategy of the RLF Program is to increase economic activity and provide job opportunities for areas that are negatively impacted by vacancy and/or actual environmental contamination. This strategy and cleanup will help to reduce the health hazard concerns for City residents, increase their welfare and standard of living through potential job opportunities, and increased property values.

The Equitable Economic Development Strategy (EEDS) is an effort to raise awareness about the City’s economic opportunities and ultimately promote development in a more equitable way through economic growth and job opportunities for the historically marginalized target neighborhoods. The EEDS identified the North Riverfront as a priority target area. Additionally, the City’s Strategic Land Use Plan (SLUP), last updated 2019, informs strategic use of all parcels. Where available, neighborhood plans in which include information on reuse of lots, community assets, and stakeholders are also incorporated. EPA Cleanup funds complement perfectly the goals for these plans and initiatives by providing that first funding source in to a redevelopment, so practical decisions for reuse can be made and executed.

ii. Outcomes and Benefits of Reuse Strategy

4731 Delmar - Anticipated to be one of the largest co-working space in North St. Louis, Elevation will offer 62 office spaces, 25 workstations or cubicles, 2 conference rooms, 8 flex spaces, and a large event space that can seat 900 people. Through creative and flexible design and architecture, the workspace will provide fully functioning and modern office amenities, event space and a commercial kitchen in addition to live events such as business-focused panels, workshops and networking events. There are expected to be over 44 construction jobs created as a result of the $5.6M redevelopment of the building as well as 10 permanent jobs created to run the facility, bringing much needed activity and jobs to this disadvantaged community. This project is also utilizing Property Assessed Clean Energy (PACE) funding, to increase the overall efficiency and lower carbon footprint of the development.

4223 W. Dr. Martin Luther King Dr. – This collaborative project to bring a business center to provide financial, technical, and legal services to small business owners/entrepreneurs will help to fill a void of services and activity in the historically neglected neighborhood. The Ville is specifically known for being racially divided by restrictive covenants and redlining. This $1.3 million (estimated) project will partner with and house notable nonprofits in the area to bring these services. The outcome will hopefully be increased jobs through the growth of small businesses in this disadvantaged community.

Armory Phase 2 (500 Prospect) – The developer intends to demolish the current building and build a multi-family apartment building of approximately 250 units with an attached parking structure. Exact plans are still being developed, but include connecting the site to the Grand Avenue viaduct as well as to the planned Chouteau Greenway that will provide a dedicated bike/ped pathway between Forest Park and the Arch in downtown St. Louis. Plans also call for the development of a public open space across from the new Armory building (a previous loan recipient) entrance on Prospect, as well as improved pedestrian
connections to the nearby Metrolink station. In addition to the removal of contaminants, the project will also benefit the community by providing new rental housing that is close to both a light rail and major bus line, making it possible for residents to reduce their car dependency. New development in this area will also help fill in a long-time “hole” in the center of the otherwise-developing Midtown area.

**Clarence Broadway Development** – The developer intends to demolish the current buildings on the site and replace them with a new 70,000 SF facility and related improvements that will house a trucking sales and repair company that is expanding in the St. Louis area. The new development will extend the transformation of this blighted area into a contemporary campus of new buildings and enhance a key interstate interchange that provides gateway access into the City’s Near North Riverfront Business Corridor. In addition to the removal of contaminants, the project will also benefit the community by providing expanded employment opportunities for the surrounding neighborhoods. The company will retain 62 employees and hire 10-12 new employees. Many of the positions at the company are entry-level and the company provides training for new employees to teach them on the job creating potential employment opportunities for local residents.

Additionally, each of the project sites is fully within a federally designated Opportunity Zone. The disbursement of RLF funds for these projects leading to redevelopment would directly help to increase economic growth in an Opportunity Zone.

c. **Strategy for Leveraging Resources**
   i. **Resources Needed for Site Reuse**
      We cannot always shift the cost burden of cleanup, especially on sites where there is no interested developer, which is why we are familiar with leveraging other dollars. Resources leveraged to accomplish assessment include: the St. Louis Brownfields Assessment Program (utilizing EPA Assessment funds; HUD Community Development Block Grants, MDNR and EPA Targeted Brownfield Assessment Programs, and on rare occasion, SLDC Corporate Funds. Sources for cleanup include the Missouri Petroleum Storage Tank Insurance Fund (PSTIF) which can be used to clean up contamination left behind by underground storage tanks. The main source of remediation funds has historically been the Missouri Department of Economic Development (DED) Brownfield Redevelopment Program that provides tax credits for up to 100% of the cost of remediation, and also offers Low Income Housing Tax Credits for developers of affordable housing and Historic Preservation Tax Credits. All of these incentives are routinely used with redevelopment of sites within the City. Since 2010, projects in the City of St. Louis were approved for nearly $72 million in Brownfield Remediation Tax credits, creating an estimated 2000 new jobs. All of these sources have been used to varying degree over the years as they are available or applicable, though they are seemingly becoming less and less available.

   ii. **Use of Existing Infrastructure**
      Reuse of existing infrastructure (roads and utilities) occurs at all of our sites given that St. Louis is a fully built urban area. Given that priority areas are plagued with severe vacancy, those portions of the City’s existing infrastructure are underused and under maintained. If funding from this grant can facilitate new uses on vacant lots, this will promote further the use of existing infrastructure.

2. **COMMUNITY NEED AND COMMUNITY ENGAGEMENT**
   a. **Community Need**
      i. **The Community’s Need for Funding**
         With a poverty rate of 27.4% and an unemployment rate 1.5 times that of the state, many city residents do not have the ability to provide necessary upkeep for these aging homes. On top of that, abandoned gas stations clutter
the corners of these neighborhoods, further depressing home values. Nearly a quarter of census block groups in the City have a median sales price of less than $22,000. Because it’s so difficult to sell properties in these markets, a lot of people just walk away, and then they end up in the hands of LRA. Because of the below average property values and low populations, private dollars and redevelopment are not occurring in these areas without substantial incentives from local, state, and federal sources. The target areas, all of which have an average household income rate lower than the average of the City itself ($36,000), have no real means to organize and secure funding for this type of work themselves. Additionally, there are few neighborhood associations that have capacity to apply for or manage grant programs. Historically, SLDC has filled this role for neighborhoods through its Brownfield Program and is many times the sole source of assistance for these neighborhoods for environmental issues.

ii. Threats to Sensitive Populations
(1) Health and Welfare of Sensitive Populations
The City’s long history of manufacturing has left a legacy of soil and groundwater contamination throughout its commercial and industrial corridors. Our target areas were either directly adjacent to or previously one of these industrial areas. By cleaning up and redeveloping these sites, we reduce these negative impacts on the sensitive populations in our target areas. While the City’s average poverty rate is 21.4%, our target areas have poverty rates of up to 50%. The poverty rates for children and the elderly in the City of St. Louis are much higher than for the same populations in St. Louis County, Missouri, and the US. Impoverished residents are less likely to have health insurance, and are therefore more impacted by environmental problems if they do not have the ability to seek health care for treatment. The health and welfare of the African-American population in the City of St. Louis are drastically worse than that of the Caucasian population. **African-Americans in St. Louis have a mortality rate 34% higher than that of Caucasians.** The rate of ER visits due to respiratory problems is over four times higher for African-Americans than Caucasians. Eliminating environmental concerns through cleanup is a big step in being able generate additional interest in these long abandoned areas, which if redeveloped, will increase the welfare of the residents through job opportunities and reduced exposure to contaminants that cause health conditions.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions
**Though falling, St. Louis is ranked in the top 40% of 115 Missouri counties Missouri for its cancer death rate.** Multiple zip codes within our target area have a population that is 99% African-American; zip codes with the highest concentration of African-Americans also have the highest levels of heart disease mortality. The City of St. Louis received a grade of “F” from the American Lung Association for high levels of ozone and St. Louis has the highest number of at-risk groups for lung diseases in all of the State of Missouri. African-American children visit the ER for asthma at over nine times the rate of Caucasian children. Children in the City of St. Louis are also impacted by lead poisoning. St. Louis City is ranked number four among all counties in Missouri in the percent of children tested who had elevated blood lead levels. While lead-based paint was banned in 1978, over 80% of the housing stock in St. Louis was built prior to the ban. The removal and remediation of sources that expose the population to contaminants that cause these health conditions, will reduce likelihood of those health conditions.

(3) Promoting Environmental Justice
Racial segregation in the city is among the worst in the US, and in the City, segregation has led to extremely high poverty and severe inequality of economics and opportunity. While the City’s average

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3 All data in this paragraph from Missouri Department of Health and Human Services, health.mo.gov
5 For the Sake of All http://forthesakeofall.files.wordpress.com/2013/11/policy-brief-4.pdf
poverty rate is 21.4%, our target area have rates up to 54%; some of these same neighborhoods have populations that are 99% African-American.\textsuperscript{7} These communities, which are the most distressed in the region, have the largest number of brownfield sites. Black children are 2.4 times more likely to test positive for lead in their blood than white children in St. Louis City.\textsuperscript{8} Development is slow or nonexistent, which in turn makes finding resources for brownfield remediation even more difficult. A report, titled “Environmental Racism in St. Louis,” details the large discrepancy of health and welfare between the residents of the target area and the rest of St. Louis, makes the connection between vacancy and these disparities, and calls for strategies that reduce the number of vacant properties.\textsuperscript{9} Our project aims to contribute to that plan through remediation and reuse of vacant and abandoned buildings to spur redevelopment in areas that have long been marginalized.

b. Community Engagement

i. and ii. Program Involvement and their Roles
SLDC will have multiple departments involved in this project, along with working closely with the priority neighborhood local community development corporations/neighborhood associations, and local developers. The SLDC Real Estate Department employs the Program Manager that interfaces directly as a member on the Vacancy Collaborative, and will help to communicate with the local residents, business leaders, and political actors tied to that initiative and convey their priorities on site selection and reuse. The Real Estate Department is also the effective land owner, as the department manages the LRA owned lots that will be the focus of the project so access will not be a problem. The SLDC Major Projects Department staffs the Project Manager who will manage the Brownfield Cleanup Program and will participate or lead all activities related to site selection, management of program activities, community involvement plans, and Grant management. Also in the Major Projects Department, the Project Connect Project Manager interfaces with the neighborhood associations and businesses in the target area through attending all meetings and leads an economic development and engagement campaign of the Project Connect Initiative. This position will also be responsible for providing information to residents on updates of projects in surrounding neighborhoods.

When redevelopment activity happens in a particular ward of the City, SLDC engages the elected Alderman of that ward in the process as well. Developers are engaged when sites’ reuse has been decided, or if a developer brings a potential reuse directly to SLDC. Since SLDC manages the City’s Incentive programs, we have an ongoing dialog with local developers and available sites for economic reuse.

iii. Incorporating Community Input
There has been a significant amount of community input involved in the VC initiative, Project Connect Action Plan, and EEDS. There were dozens of community meetings held throughout neighborhoods in the City that solicited survey responses, and comments on redevelopment and reuse plans, that are aligned with our Brownfields strategy. Additionally, for each site, we work through the alderman, community organizations (if in place), local businesses (if they exist), and neighborhood Facebook and NextDoor pages. We keep our website updated with information on community meetings, post brownfield sites on the public portal of the City’s GIS maps, and communicate success by highlighting transformative projects on our website. Email addresses are collected attend community meetings, to update on responses to comments and questions. Community organizations share contact lists, let us speak at their neighborhood organization meetings, and help us learn the community’s priorities so we can inform cleanup planning. For specific site activity in an area where an established organization or is not in place, letters are sent to

\textsuperscript{7} For the Sake of All \url{http://forthesakeofall.files.wordpress.com/2013/11/policy-brief-4.pdf}
\textsuperscript{8} 2018 St. Louis City Health Department Childhood Lead Poisoning Report \url{https://source.wustl.edu/2019/09/environmental-racism-in-st-louis/}
households within a quarter mile radius of the site. Comments on the website pages are sent directly to the Project Manager to respond to and incorporate into cleanup plans and the administrative record.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Program Description and Marketing Strategy

i. Program Management

SLDC was a recipient of an EPA RLF grant back in 2004, established the St. Louis Brownfield Cleanup Fund to administer the RLF Program, and successfully awarded multiple supplemental grants to the Program. SLDC has the staff capacity and experience to effectively manage a RLF Program through its current structure and staff, who are still managing the revolving funds of the previous grant award. In addition to the fully staffed organizational legal and finance departments, a full-time Project Manager is assigned to the Brownfield Program that will manage the day-to-day activities of the RLF.

Since SLDC already has a RLF Program established, we have an application document and review/approval process in place. SLDC interfaces with developers looking for funding opportunities on a regular basis, and many times projects and applicants who know of the available funding programs come to us and ask and/or apply directly. There is also a website dedicated to the St. Louis Brownfield Cleanup Fund where the applications and other Program information on eligibility and success stories are available for those who are searching for the funding opportunity but may not be familiar with SLDC. Though currently the application for loans is not available online due to the lack of available funds. SLDC helps to facilitate loans and other incentive programs for redevelopments in the City as a course of its regular operations, so the capacity and expertise to administer loans, schedule and collect payments, and facilitate underwriting is in place already within SLDC’s Finance Department. Loan underwriting for the Program going forward will be completed in house for smaller loans, or by a partner organization of SLDC’s that facilitates the underwriting of the City’s Small Business Loans and other loan programs for larger projects.

ii. Revolution of the RLF Program

SLDC keeps the terms of the loan options flexible, to meet the needs of developers seeking the funds. Low interest rates, and flexible repayment terms makes the Program attractive. Once repaid, we anticipate the need and interest in the RLF to continue. Additionally, the long standing Finance Department maintains all records of transactions and agreements, and their database generates automatic schedules and reminders for incoming and outgoing payments. A separate account for transaction related to loans, repayments, interest, etc. will be established to monitor activity for this RLF grant Fund, for ease of record keeping for reporting on the grant during the grant period and after. These reports are provided to the Brownfield Program Project Manager for incorporation into the quarterly and annual reports to EPA as required, even after the grant period is expired.

iii. Marketing Strategy

The interest in the funds is highlighted by the lack of available funds from our previous EPA RLF grant, as the majority of the funds are disbursed and awaiting repayment. The four identified projects in this application have submitted information for this grant application as an indication of their interest in utilizing the funds for a loan, and other developers have expressed interest as well. The general target applicant is a local redeveloper seeking reuse of Brownfields in the northern parts of the City that will generate job opportunities or remediation of long vacant properties with environmental hazards. Generally, word of mouth, website updates, and SLDC newsletter blasts will spread the word when funds are available, but if all identified projects move forward, there will not be funds available for new projects until either repayments are made or supplemental funds are awarded.
Generally, the developer will be seeking the Missouri Department of Economic Development (DED) Brownfield Tax Credits as well, but that program is paid as a reimbursement after the site receives state regulatory closure. SLDC’s Cleanup Fund can provide a bridge loan of sorts for those developers seeking funds for cleanup, with little risk to SLDC not receiving repayment (as DED tax credits are a dollar for dollar reimbursement of eligible expenditures) as well as quicker repayment schedules (loan terms can be structured to accelerate repayment after DED tax credit reimbursement is received by applicant). Additionally, for those redevelopments that may not be approved for the tax credit program, this may be the only option for affordable loans for environmental cleanup. With Missouri DED approving less and less projects in the last two years, developers have been seeking additional sources of funding for brownfield cleanup, as historically the DED tax credit program was the main source of assistance.

SLDC Brownfields Cleanup Program intends to utilize these funds for loans to eligible sites, though there may be cases of community identified brownfields with no interested developer. SLDC may consider making a subgrant, or a mixture of a loan and subgrant, to an eligible entity willing to take on cleanup. For example, subgrants could be made available for community groups seeking to reuse brownfields in the target area for noneconomic uses such as community gardens, playgrounds, etc.

b. Description of Tasks/Activities and Outputs

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<th>Task/Activity: Task 1 – Site Cleanup(s)</th>
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<td>i. Project Implementation</td>
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<td>▪ Discussion of EPA-funded activities for the priority site(s): Activities of the SLDC Project Manager include review/evaluation of applications for SLDC Brownfield Program Cleanup Funding, review cost estimates and bids for work to ensure competitive pricing, collection of all required documents on eligibility and compliance for program approval and submittal to EPA for review, corresponding with MDNR, negotiating loan agreements and securing SLDC Board approval for loan agreements, creating/attending and/or facilitating community meetings for each project as most appropriate, helping applicants facilitate community involvement plans and solicitation/responding to comments of community involvement, enrolling in the state voluntary cleanup program, completing project oversight and site visits of projects including Davis Bacon Wage Interviews of contractors, certified payroll review, review of loan draw requests for activity eligibility, creation and management of administrative record for each project site, and reviewing regular progress reports of cleanup projects and confirming via site visits. Any unused funds after anticipated tasks are completed will go toward additional Personnel costs for these activities if additional loans/subgrants are made.</td>
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<td>The cost of underwriting the loans is completed by an affiliate organization of SLDC that handles such activities for other loan programs. The loan applicant procures their own experienced Environmental Professional and Remediation Contractor to develop the Cleanup Plan, Community Involvement Plan, site remediation/cleanup, environmental oversight, and completion of and submission of documentation for state program regulatory closure. The costs incurred by the loan applicants’ Environmental Professional and Remediation Contractors for these activities are eligible and reflected in the Other: Loans category of the Program Tasks.</td>
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| ▪ Discussion of EPA-funded activities for non-priority site(s), if applicable: There may be sites that come to SLDC for funding assistance outside the priority areas, but still inside the City limits (eligible as within SLDC’s jurisdiction). Those sites will be subject to the SLDC
Brownfield Program Cleanup Fund application and review process, be evaluated based on need and project adherence to grant goals, and availability of funds in RLF.

- Non-EPA grant resources needed to carry out task/activity, if applicable: As SLDC Brownfield Program Cleanup Fund only intends to provide up to 80% of the eligible costs of site cleanup, the remaining 20% of site cleanup costs will be provided by the loan applicant, or another obtained non-federal source. SLDC will also be providing this 20% non-federal cost share for the personnel time with the associated tasks, as only 80% of estimated time necessary is being requested in the budget.

ii. Anticipated Project Schedule: Loan agreements and SLDC Board approval for all four projects before end of 2023, with site cleanups completed before end of 2024, and regulatory closure and repayments beginning by end of 2026.

iii. Task/Activity Lead(s): SLDC Project Manager for Program oversight, Applicant Environmental Professional lead for Cleanup oversight, both SLDC Project Manager and Applicant Environmental Consultant for Community Involvement plan and facilitation, Applicant Remediation contractor for site cleanup.

iv. Output(s): Loan agreements, state regulatory closure letters for successful site cleanups, Analysis of Brownfield Cleanup Alternatives, Administrative record of each project site.

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**Task/Activity: Task 2 – Program Management and Reporting**

v. Project Implementation

- Discussion of EPA-funded activities for the priority site(s): SLDC Project Manager Tasks will include completion of quarterly, annual, and ACRES reporting to EPA as required, website updates on site progress and success stories, and internal database management.
- Discussion of EPA-funded activities for non-priority site(s), if applicable: Not applicable
- Non-EPA grant resources needed to carry out task/activity, if applicable: SLDC will be providing the 20% non-federal cost share for the personnel time with the associated tasks, as only 80% of estimated time necessary is being requested in the budget.

vi. Anticipated Project Schedule: Ongoing through Grant period, on a monthly basis.

vii. Task/Activity Lead(s): SLDC Project Manager

viii. Output(s): Quarterly and annual reports to EPA, ACRES data entry on ongoing basis.

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c. **Cost Estimates**

95% of the proposed budget activities are related to providing loans for the cleanup of eligible brownfield sites and associated programmatic cost.
## St. Louis Development Corporation Application for Revolving Loan Funds

### Task 1: Site Cleanup(s):
- **Personnel Costs**: approximately 62.5 hours Project Manager per project/loan agreement (8 hrs application review/compliance, 5 hrs community involvement, 16 hrs review of loan draw requests and site visit confirmation, 8 hours Davis Bacon Interviews/payroll review, and 25.5 hrs administrative record and correspondence with applicant, applicant’s environmental team, and MDNR) at a rate of $40/hr = $2,500 ($2,500/project x 4 projects = $10,000, with a $4,000 SLDC Cost Share)
- **Fringe Benefits**: 40% of the personnel cost of $10,000 = $4,000 ($800 SLDC Cost Share)

### Task 2: Program Management and Reporting:
- **Personnel Costs**: 12.5 hours (Project Manager) a month for 60 months at a rate of $40/hr = $30,000. ($6,000 SLDC Cost Share)
- **Fringe Benefits**: 40% of the personnel cost of $30,000 = $12,000. ($2,400 SLDC Cost Share)

### Table: RLF Budget

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1: Site Cleanup(s)</th>
<th>Task 2: Program Management, Oversight, and Reporting</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel</td>
<td>$ 10,000.00</td>
<td>$ 30,000.00</td>
<td>$ 40,000.00</td>
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<tr>
<td>Fringe Benefits</td>
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<td>$ 12,000.00</td>
<td>$ 16,000.00</td>
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<tr>
<td>Travel</td>
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<tr>
<td>Equipment</td>
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<td>$</td>
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<tr>
<td>Supplies</td>
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</tr>
<tr>
<td>Contractual</td>
<td>$</td>
<td>$</td>
<td>$</td>
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<tr>
<td>Other - Loans</td>
<td>$ 944,000.00</td>
<td>$</td>
<td>$ 944,000.00</td>
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<tr>
<td>Other - Subgrants</td>
<td>$</td>
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<tr>
<td>Total Direct Costs</td>
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<td>$ 42,000.00</td>
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<tr>
<td>Indirect Costs</td>
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<tr>
<td>Total Federal Funding</td>
<td>$ 958,000.00</td>
<td>$ 42,000.00</td>
<td>$ 1,000,000.00</td>
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<tr>
<td>Cost Share (20% of requested federal funds)</td>
<td>$ 191,600.00</td>
<td>$ 8,400.00</td>
<td>$ 200,000.00</td>
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<tr>
<td>Total Budget (Total Direct Costs + Indirect Costs + Cost Share)</td>
<td>$1,149,600.00</td>
<td>$ 50,400.00</td>
<td>$ 1,200,000.00</td>
</tr>
</tbody>
</table>
d. Measuring Environmental Results
In addition to all projects being recorded in ACRES, SLDC has its own internal database where all projects are cataloged. Metrics recorded for environmental projects include location, type of project (assessment/remediation), amount of project, funding source, and status (planning/assessed/remediated). Relevant documents are attached including reports and/or state closure letters. For evaluation of long term outcomes like population growth, crime, health, and poverty of target area, SLDC is almost complete in developing a full scale Geographic Information System (GIS) that provides both an internal and public portal of maps that include City demographics, health stats, property values, and City development and building permit info. These maps are updated on a regular basis and will be used to evaluate all SLDC project effectiveness on an ongoing basis.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE
a. Programmatic Capability
i. Organizational Structure
St. Louis Development Corporation (SLDC) is a Missouri non-profit corporation, with the mission to promote economic development in the City of St. Louis since 1988. SLDC employs professional staff composed of Finance, Legal, Human Resources, Communications, Real Estate, Neighborhood Business Development, and Project Management departments. These departments coordinate and work together on a daily basis to efficiently manage programs and projects including multiple federal and state grant programs. SLDC conducts the equivalent of a Circular A-133 Audit annually, using an outside accounting firm with no adverse audit findings to date.

ii. Description of Key Staff
SLDC’s Brownfield Program consists of a full-time Project Manager, Peter Phillips, who manages the day-to-day activities of brownfield assessment, remediation, and grant management. This will include, in addition to grant oversight and reporting, the procurement of Qualified Environmental Professionals, and program requirements under the Tasks of this application. Additionally, Mr. Phillips will serve as the point of contact for interfacing with EPA and MDNR project managers for grant and project related issues. Mr. Phillips has been managing the SLDC Brownfields Program for almost three years, and during that time has overseen over 30 Phase I and Phase II assessments, of which the majority were funded through EPA Assessment Grants or partnerships with the Missouri Department of Natural Resources and/or EPA Targeted Brownfield Assessment Programs. Mr. Phillips also recently made a $730,000 loan to close out a previous EPA RLF grant and was on the project team that completed the largest site preparation project in the history of the City, including the assessment and remediation of 551 parcels.

Other SLDC departments will have roles in outreach, site selection, and approval of contract and payment of invoices. The Neighborhood Business Development Department’s Commercial District Managers attend regular neighborhood and business association meetings for both soliciting and providing information from/to neighborhood residents and businesses. The SLDC Finance Department will manage the financial transactions of loan disbursements payment to recipients and requests for funding against the EPA Grant. The finance department has been managing the finances of various federal and state grants for decades. In addition to the Project Manager, the legal department will be reviewing all contracts and agreements for compliance with local, state, and federal laws as well as the EPA grant requirements.

iii. Acquiring Additional Resources
When SLDC does procure assistance of professionals, SLDC utilizes the City’s competitive public procurement process to obtain professional services, where solicitations are placed in daily and weekly publications, on the SLDC and City of St. Louis websites, and shared with minority business associations that assist minority-owned businesses with obtaining contracts.
b. Past Performance and Accomplishments
   i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments
SLDC has a proven track record of successful EPA grant management. To date, we have completed Phase I and II Environmental Site Assessments on more than 200 acres of Brownfields land and received clean closure of over 35 abandoned sites. Of seventeen total EPA Grant awards, accomplishments for the three most recent are below:

-Assessment BF97782601: Grant Period 10/01/2020 – 9/30/2023 (open) This $300,000 Assessment Grant is currently 10% expended, but already 3 Phase I Assessments and 1 Phase II Assessment have been completed, including the Target Priority sites of 4223 W. Dr. Martin Luther King Dr. Another 5 Phase I and 1 Phase II Assessments have been contracted, but yet to be invoiced. With many of these sites expected to require Phase II Assessments, the grant schedule should be on track to fully expend by the end of the grant period. Quarterly reports and sites are submitted through ACRES and up to date.

-Assessment BF97750501: Grant Period 10/1/2015 – 9/30/2020 (closed) This $400,000 Assessment Grant has provided for 9 Phase I Assessments (7 haz, 2 petro), 12 Phase II Assessments (5 haz, 7 petro), cleanup planning at 5 sites (2 haz, 3 petro), and development of an updated Community-wide Quality Assurance Project Plan. The ACRES information has been added for these sites and quarterly reports submitted on time.

-Revolving Loan Fund BF98746101: Grant Period 10/1/2004 – 9/30/2019 (closed) After multiple rounds of supplemental funding, this RLF provided funds to complete 3 loans and 7 sub grants. This met the expected work plan of the RLF. The RLF expended 99% of the awarded federal funds, achieved the required 20% match, and leveraged over $80,000,000 in private funds for the total redevelopment costs. The ACRES information has been added for these sites and quarterly reports submitted on time.

(2) Compliance with Grant Requirements
-Assessment BF97782601: Grant Period 10/01/2020 – 9/30/2023 (open) This $300,000 Assessment Grant is currently 10% expended, but already 3 Phase I Assessments and 1 Phase II Assessment have been completed, including one of the Target Priority sites of 4223 W. Dr. Martin Luther King Dr. Another 5 Phase I and 1 Phase II Assessments have been contracted, but yet to be invoiced. With many of these sites expected to require Phase II Assessments, the grant schedule should be on track to fully expend by the end of the grant period. Quarterly reports and sites are submitted through ACRES and up to date.

-Assessment BF97750501: 10/1/2015 – 9/30/2020 (closed) This Assessment Grant has completed 100% of the original work plan goals. In the hazardous work plan, the Phase IIs will be under represented in number, as the few completed were large areas and cost more than expected. In 2016-2017, staff turnover resulted in little progress. Grant period extensions were requested to accommodate this turnover, and activities increased since 2018. Though quarterly and annual reporting was completed on a timely basis, ACRES reporting was slower to be completed, due to staff turnover, but was updated before closure.

-Revolving Loan Fund BF98746101: 10/1/2004 – 9/30/2019 (closed) When initially awarded, the goal was to establish an RLF program, and complete multiple loans and sub grants. Early success was had in that a website, application and approval process. The economic downturn in 2009 made redevelopment (and loans) less attractive however, and from 2009-2017 only sub grants were made. A $730,000 loan was made in 2018 to expend 99% of federal funds awarded. After closeout $2,058.64 remained, which was too small of an amount for additional work contracts and was forfeited. Quarterly and ACRES reporting were completed on a timely basis and we report annually on the revolving portion of the funds.
Attachment A:
Threshold Criteria Response
Threshold Criteria for Revolving Loan Fund Grant

1. Applicant Eligibility:
St. Louis Development Corporation (SLDC) is a Missouri non-profit corporation, the purpose of which is to promote economic development in the City of St. Louis. SLDC provides administrative and staffing services to various governmental agencies including the Land Reutilization Authority (LRA), the Land Clearance for Redevelopment Authority (LCRA), the Planned Industrial Expansion Authority (PIEA), and the Tax Increment Financing Commission. These agencies are sometimes referred to collectively in this application as “related agencies.” SLDC is an umbrella agency carrying out each related agency’s functions. SLDC’s Executive Director and its Chairman are both appointed by the Mayor of the City of St. Louis. The Chairman of each related agency and the Chairmen of two (2) aldermanic committees comprise the remainder of SLDC’s Board. SLDC is eligible as a “nonprofit organization” and quasi-governmental entity”. See Attachment C for documentation.

2. Demonstration of Previous RLF Grant Status:
SLDC has previously been awarded a Brownfields RLF, which has since been closed. BF98746101 Grant period 10/1/2004-9/30/2019. Received confirmation of grant closeout by email 10/23/2020.

3. Expenditure of Existing Multipurpose Grant Funds:
SLDC does not have an open EPA Brownfields Multipurpose Grant.

4. Description of RLF Boundaries:
St. Louis Development Corporation’s service jurisdiction is the city limits of the City of St. Louis, Missouri.

5. Oversight Structure and Legal Authority to Manage a Revolving Loan Fund
a. All loan and/or subgrant recipients will be required to enroll into Missouri’s Brownfield Voluntary Cleanup oversight program. All federal, state, and local laws will be complied with by review of cleanup and sampling methods including quality control and assurance by local counsel, state oversight program, and any applicable EPA oversight.

b. Legal opinion for authority to manage a revolving loan fund is attached as Attachment D.

6. Statutory Cost Share:
   a. The 20% cost share will be met through the process of only loaning out up to 80% of total cleanup costs to loan recipients. Though there are no planned subgrants in the current budget, if there are subgrant recipients, they will also be required to provide the non-federal cost share, meaning that SLDC will plan on providing up to 80% of the total cost.
cleanup cost. In rare instances, this may be waived by SLDC for sub recipients, but only if SLDC has found another source to cover the 20% cost share for the grant.

b. Not applicable, SLDC is not requesting a hardship Waiver of the cost share.

7. **Named Contractors and Subrecipients:**
Contractors and/or subrecipients have not yet been procured/named.