



# Municipality of Norristown

**Municipal Council**

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November 10, 2023

1. Applicant Identification: Municipality of Norristown, 235 E Airy Street, Norristown, PA 19401

2. Funding Requested

a. Assessment Grant Type – Community-Wide

b. Federal Funds Requested - \$500,000

3. Location a) Norristown, b) Montgomery County, and c) Pennsylvania

4. Target Area and Priority Site Information:

- Target Area: Norristown
- Census tracts: 42091203700, 42091203902, and 42091203801
- Priority Sites: Norristown State Hospital, 1101 Stanbridge Street, Norristown, PA 19401  
 Schuylkill Riverfront District Census Tract 23091203902 (multiple addresses)  
 Machined Metals, 301 W Oak Street, Norristown, PA 19401

5. Contacts

a. Project Director \_\_\_\_\_ :

Jayne Musonye, Director of Planning & Municipal Development  
 Municipality of Norristown  
 235 East Airy Street  
 Norristown, PA 19401  
 610-270-0450; [jmusonye@norristown.org](mailto:jmusonye@norristown.org)

b. Chief Executive/Highest Ranking Elected Official:

Thomas Lepera, Municipal Council President  
 Municipality of Norristown  
 235 East Airy Street  
 Norristown, PA 19401  
 484-683-1180; [tlepera@norristown.org](mailto:tlepera@norristown.org)

6. Population

a. Municipality of Norristown, 35,795

7. Other Factors

Factor	Page #
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Community population is 10,000 or less	NA
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water.	#1,2, & 5
The priority site(s) is in a federally designated flood plain.	#1
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	#2
The reuse of the priority site(s) will incorporate energy efficiency measures.	NA
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	#1
At least 30% of the overall project budget will be spent on eligible reuse/areawide planning activities, as described in Section I.B., for priority site(s) within the target area.	#5
The target area(s) is located within a community in which a coal-fired power plant had recently closed (2012 or later) or is closing.	NA

8. Letter from the State or Tribal Environmental Authority  
a. Attached

9. Releasing Copies of Applications – Not Applicable

Municipality of Norristown



Jayne Musonye, Director  
Planning & Municipal Development



October 4, 2023

Ms. Jayne Musonye, Director  
Department of Planning and Municipal Development  
Municipality of Norristown  
235 East Airy Street  
Norristown, PA 19401

RE: U.S. EPA Brownfields Grant Proposal | State Letter of Acknowledgement  
Municipality of Norristown  
Montgomery County, Pennsylvania

Dear Ms. Musonye:

The Pennsylvania Department of Environmental Protection is pleased to support your efforts to redevelop brownfield properties in your regional area. Returning environmentally challenged and underutilized land and buildings to productive use improves our environment, safeguards our residents, and helps boost Pennsylvania's economy.

The DEP supports the Municipality of Norristown's application for a US EPA Brownfields Community-Wide Assessment Grant in the amount of \$500,000 to community-wide assessment activities and develop remediation plans for several brownfield sites throughout the municipality.

The municipality's efforts to examine the redevelopment potential of aggregated, underutilized sites to create renewed neighborhoods and business districts in Pennsylvania is a worthwhile endeavor.

Both Central Office and Regional Office Staff in the Land Recycling Program look forward to supporting Norristown and U.S. EPA Region 3 on this project.

If you have any questions, please contact John Gross by email at [johngross@pa.gov](mailto:johngross@pa.gov) or by telephone at 717-783-7502.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Maddigan", is written over a light blue horizontal line.

Michael Maddigan  
Land Recycling Program Manager  
Bureau Environmental Cleanup and Brownfields

**1.a.i Overview of Brownfield Challenges and Description of Target Area:** The Municipality of Norristown (Norristown) is the largest of a series of riverside communities that once formed the industrial base for the southeast region of Pennsylvania. It is located along the Schuylkill River in central Montgomery County and encompasses 3.6 square miles. Norristown was incorporated in 1812 and by 1880 had progressed to become a center for industry, retail business, banking and insurance, and the county government. The primary industry which enabled this riverfront community to flourish was textiles and the associated mills, which utilized the Schuylkill River for power and transportation of goods. These mills once lined the riverfront and provided the community with a variety of skilled and semi-skilled jobs. Over 100 years of industrial, manufacturing and associated support businesses centered around the historical textile industry have created numerous brownfield sites throughout Norristown. While the entirety of the Municipality is included in this grant application, the following census tracts are the priority focus 42091203700, 42091203902, and 42091203801, which have all been identified as “Disadvantaged” by the Climate and Environmental Justice Screening Tool (CEJST). These areas have also been identified by the Norristown Economic Revitalization Strategy (2018), Norristown State Hospital Land Planner Feasibility Study (2019), and Schuylkill Riverfront Redevelopment Planning and Feasibility Study (2019) as the areas most suited for redevelopment. These areas are woven into the residential fabric of Norristown and as historically important industrial and manufacturing operations have waned, the legacy of environmental impacts has disproportionately impacted these neighborhoods, depressed property values, and negatively impacted human health throughout the Municipality. Funding made available by the EPA will facilitate assessment activities to quantify environmental liabilities and alleviate uncertainties, and make these areas more attractive to responsible revitalization while supporting sustainable and equitable social opportunities.

**1.a.ii Description of the Priority Brownfield Sites:** The priority brownfield sites identified for assessment are the Norristown State Hospital, Schuylkill Riverfront Redevelopment Area (several former heavy industrial manufacturing facilities including former textile mills), the former Machined Metals (vacant and condemned) which are now a blight on the community and represent significant health risks.

The Norristown State Hospital, ownership recently transferred to the Municipality from the Commonwealth of Pennsylvania, located in census tract 42091203700 a CEJST identified “disadvantaged” community, built in 1879 consists of 198-acres campus, with 133-acres in Norristown. The facility includes over 30-buildings in various stages of disrepair and a majority of the facility has closed, costings hundreds of local jobs. A *Redevelopment Feasibility Study* completed in 2019 identified the highest and best reuse of the site to include affordable/senior housing and open recreational space. The *Redevelopment Feasibility Study* also included limited environmental assessment activities which identified thousands of linear feet of asbestos wrapped piping and environmental impacts associated with gasoline and heating fuel oil tanks. Norristown has issued a Request for Proposals for developers however; any potential redevelopment of this land will require complete environmental characterization and cleanup.

The Schuylkill Riverfront District (SRD) area is a CEJST identified “Disadvantaged Community”, a PADEP-designated EJ area, and located in the FEMA 100-year Floodplain. The SRD encompasses approximately 15 acres of prime riverfront land and includes 8 industrial and former industrial sites. The Schuylkill Riverfront Redevelopment Planning and Feasibility Study (2019) identified the highest and best reuse of the site to include commercial mixed-use and open recreational space. Phase I ESA’s have been completed for several of the sites within the SRD area using previous EPA Brownfields Assessment Grant funding and identified recognized environmental conditions ranging from a former manufactured gas plant to historical heavy industrial operations. These areas have been identified as critically important to the revitalization of the community due to proximity to the Schuylkill River, commercial corridors and major transportation routes, a major public transportation hub, and existing municipal infrastructure.

The former Machined Metals is currently vacant and condemned and located within a primarily residential area of Norristown. This site consists of a multi-story building on approximately 2-acres and is adjacent to a SEPTA rail stop. The site was identified as part of Norristown’s previous US EPA grant and is located in the Washington/Markley Corridor Redevelopment Areas. This site has been identified as critically important to the revitalization of the community due to proximity to residential areas, commercial corridors and major transportation routes, a major public transportation hub, and existing municipal infrastructure.

The priority sites and the SRD have been identified by published planning studies which incorporated community input and municipal goals. These priority sites are ready to initiate assessment activities immediately due in part to private developer interest and best-use options, including climate resiliency, identified in recent various planning studies.

**1.a.iii. Identifying Additional Sites:** Norristown has developed tools and strategies to identify brownfields sites specifically in alignment with Justice40 and Environmental Justice initiatives. Norristown understands many brownfields are disproportionately located in and impacting disenfranchised and disadvantaged communities. Utilizing the Justice40 model, Norristown has demonstrated a track record of utilizing over 40% of their previous EPA Brownfields Assessment grants in disadvantaged communities that are marginalized, underserved, and overburdened by pollution. Norristown utilizes the EPA Climate and Environmental Justice Screening Tool (CEJST) to factor into a weighted scoring system for identifying brownfields sites for assessment. CEJST identified “Disadvantaged Communities” are targeted first for assessment activities. Additionally, the census tracts identified by the CEJST will be targeted for community outreach to gain input from local expertise for insight from the impacted community. This insight will not only be for site identification, but also for the redevelopment planning process. The identification of sites via this approach will be paired with public community meetings targeting the identified disadvantaged communities to solicit an open dialogue to gather community input for redevelopment needs.

**1.b.i Reuse Strategy and Alignment with Revitalization Plans:** Expanding Norristown’s ability to assess brownfields and restore their potential as both economic and community resources will allow Norristown to support the goals and objectives outlined in the *Redevelopment Area Plan* (2018), the *Norristown Riverfront Redevelopment Planning and Feasibility Study* (2019), the *Norristown State Hospital Land Planning Study* (2019), *Norristown Comprehensive Plan* (2020), and *Norristown Redevelopment Area Transportation Study* (Public Meeting August 2023). Priority recommendations of those plans are to target the removal or rehabilitation of distressed properties to encourage reinvestment in these communities, develop affordable housing, and create jobs with livable wages. These plans were developed by both Montgomery County and the Municipality of Norristown using extensive and targeted input from the residents and community organizations that are directly impacted by the blight and environmental legacy of brownfields. The most recent Riverfront Study (2019) specifically identifies the preferential development of brownfields sites to positively impact and promote growth and economic development throughout the Municipality. Overall, the goals of these plans are to promote responsible development and reuse of existing brownfields sites, protect the Schuylkill River and riverfront from climate-change impacts, and encourage sensible growth throughout Norristown by utilizing existing public utility infrastructure, and providing access to greenspace to disadvantaged and sensitive populations by utilizing US EPA Smart Growth principles. These long-term, capital improvement, community revitalization, and feasibility plans have all identified brownfield sites in Norristown as priority targets to meet their goals. However, Norristown needs additional funding resources to assess these brownfields sites to meet their strategic goals.

**1.b.ii. Outcomes and Benefits of Reuse Strategy:** Norristown has leveraged resources to develop planning and feasibility studies for the two priority sites identified; the Norristown State Hospital and the Schuylkill Riverfront, as well as previous US EPA Brownfields Assessment grants to identify the third priority site, former Machined Metals. A major outcome and benefit identified by these planning studies is to develop the Municipality as a stronger regional core as Norristown functions as the County Seat. By revitalizing blighted, abandoned, and contaminated brownfields throughout the Municipality, Norristown’s revitalization approach promotes economic stability and equitable growth while prioritizing environmental justice initiatives and strengthening the social fabric of the Municipality. Assessment, cleanup, and redevelopment of these priority sites will also mitigate existing hazardous conditions and environmental health conditions while creating jobs and green space for disadvantaged neighborhoods in which these brownfields are located. Redeveloping these sites as sustainable, mixed-use greenspace/commercial areas will utilize the existing infrastructure and replace a public health hazard with a source of jobs and community pride, consistent with the *Redevelopment Area Plan* goal to prioritize the preservation of existing neighborhoods.

By identifying, assessing, and prioritizing development of existing brownfields sites, Norristown’s redevelopment strategy will support their *Comprehensive Plan* (2020) goal to promote the revitalization of existing urban places which will also “create good jobs” for the community. Brownfields revitalization within these disadvantaged and EJ areas will also help to meet the *Redevelopment Plan* goals by responsibly redeveloping those sites along the riverfront, such as the identified priority sites. Supporting the goals identified in the *Redevelopment Plan*, the *Consolidated Plan*, the *Norristown State Hospital Plan*, and the *Riverfront Study*; Norristown is also engaging more underserved neighborhoods identified in the Redevelopment Area, where individual brownfield sites have a disproportionate impact on these disadvantaged populations. Additionally, the size of the former Norristown State Hospital, over 100-acres of open space makes Norristown a potential location for renewable energy projects such as wind and solar which supports a

*MONTCO 2040 – The Comprehensive Plan for Montgomery County (2021)* goal to support development of locally generated renewable energy.

The Norristown State Hospital, Schuylkill Riverfront District (SRD) properties, and former Machined Metals have been identified by previous EPA Brownfields Assessments grant and published planning studies which incorporated community input and municipal goals. Once these sites have assessments completed, they would be eligible for additional funding as well as commercial lending options. These priority sites are ready to initiate assessment activities immediately due in part to private developer interest and best-use options, including climate resiliency, identified in recent various planning studies.

**1.c.i Resources Needed for Site Reuse:** Norristown has a demonstrated record of leveraging public/private funding to support community revitalization projects. Norristown leveraged their eligibility to access significant public funding from numerous sources to extend the influence of their brownfields program beyond assessment to include remediation, planning, and redevelopment. Norristown utilized their most recent EPA Brownfields grant to complete 12 Phase I Environmental Site Assessments and one (12 sites adjacent sites investigated as one, thus reducing costs) Phase II ESA (including approved Sampling and Analysis Plan), of which facilitated the sale and redevelopment of a former commercial/industrial site. The completion of the environmental assessments led to approximately \$39 million in private funding has been raised to transform the site into a mixed-use commercial/residential high rise, which will provide new jobs and much needed housing options.

The following is a list of redevelopment resources leveraged to support previous priority brownfields site and will leverage for future projects.

- Federal Highway Commission and Montgomery County – Lafayette Street Extension Project. This project was developed to improve access and development opportunities through upgrades to existing infrastructure. (Value \$90 million)
- Pennsylvania Department of Community and Economic Development (DCED) – The Industrial Sites Reuse Program (ISRP) provides grants and financing for environmental assessment and remediation activities. (Value: up to \$1.2 million)
- DCED Local Share Account (LSA) – Riverfront Planning Study (\$125,000)
- Redevelopment Assistance Capital Program (RACP) – provides funding for the acquisition and construction of regional economic, cultural, civic, recreational and historical improvement projects. (Value: up to \$5 million)
- Delaware Valley Region Planning Commission (DVRPC) – Transportation and Community Development Initiative grant – Planning Study focusing on linking land use and transportation ( \$80,000)

**1.c.ii Use of Existing Infrastructure:** Norristown is committed to prioritizing sites which utilize existing infrastructure by using US EPA Smart Growth concepts and data-driven tools such as Geographic Information Systems (GIS) to guide planning and implementation of the brownfields assessment program. By utilizing existing infrastructure, the redevelopment of priority sites identified by Norristown reduces the need for additional capital investment, preserves greenspaces, and minimizes greenhouse gas contributions from redevelopment activities. The 2021 Montgomery County Comprehensive Plan emphasizes the need to focus future development around existing transportation and public utility corridors to support “resilient, green and energy-efficient infrastructure networks”. To this end, Norristown has prioritized brownfields sites in the vicinity of the Southeastern Pennsylvania Transportation Authority (SEPTA) commuter rail stations and the Norristown Transportation Center, including disadvantaged census tracts and the Schuylkill Riverfront area. This public transportation hub provides public bus, highspeed commuter and rail service throughout the region. According to the SEPTA 2020 Statistics, the Norristown Transportation Center services, on average serves 17,301 passengers a day. By redeveloping brownfields in close proximity to this regional public transportation hub, Norristown has also incorporated EPA Smart Growth policies to support climate-change mitigation practices by reducing the need for private vehicle use and thereby reducing emissions associated with transportation. The Federal Highway Commission and Montgomery County have invested \$90 million in infrastructure improvements in Norristown making the priority sites primed for reuse and redevelopment.

**2.a.i The Community’s Need for Funding:** The declining economic situation in Norristown has been exacerbated by the inequities of economic growth and prosperity in the surrounding communities. Following the population trends, major commercial and office development projects have flourished along the primary traffic arteries and at highway interchanges. However, these capital and infrastructure projects have historically bypassed Norristown, thus pushing business opportunities and jobs outside of the Municipality. With access restricted and new traffic arteries developing further from Norristown, many residents followed



which further depressed the housing values, reduced the tax base, and decreased the skilled labor force of Norristown. Norristown’s perpetually eroding tax base combined with job losses have limited the funding and resources available for capital reinvestment projects, economic revitalization initiatives, and infrastructure improvements. According to the US Census 2021, seven of the nine census tracts which make up Norristown are identified as disadvantaged due to low-income populations. The median family income for Norristown in 2021 was \$55,354, approximately half of that of Montgomery County, \$99,361 (the County), and the poverty rate is 17.1%, more than double the rest of the County, (7.0%, US Census 2021). Montgomery Hospital, one of the largest single employers in Norristown, closed in September 2012 which resulted in the loss of over 1,300 jobs in Norristown. Additionally, the Norristown State Hospital (civil section) closed in 2019 which resulted in further losses of over 380 jobs. Nearly 40 to 50% of the County’s Housing Choice Vouchers (Section 8) are used in Norristown. As Norristown is the County Seat, approximately 25% of the total assessed value in the Municipality is exempt from real estate taxes. The disproportionately larger number of Norristown residents living below the poverty line, combined with high unemployment and tax-exempted properties significantly impacts the Municipality’s tax base leading to chronically underfunded programs, including the community-wide brownfields program.

**2.a.ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations:** Exposure to contaminants through various pathways from brownfields in Norristown is having a wide range of adverse effects on the health of Norristown residents. Norristown has a higher disability rate among working-aged individuals than county, state and national averages which further exacerbates the unfavorable economic conditions in the Municipality. Exposure to contaminants from brownfield sites is likely a contributing factor to the observed health effects. A high percentage of those living near brownfield sites are low-income, sensitive, and minority populations; therefore, these populations are disproportionately represented in reported adverse health effects statistics and less likely to seek costly medical care. The Climate and Economic Justice screening tool identified eight of the nine census tracts in Norristown as being disadvantaged due to: low-income, legacy pollution, and a disproportionately higher incidence of contact with waste water discharge. Moreover, residents of four of those census tracts have greater than average respiratory issues with incidents of asthma above the 90<sup>th</sup> percentile. The 2022 *Community Health Needs Assessment* identified that 70.9% of the housing in Norristown is “with potential lead risk”. According to the National Institute of Health “...Lead exposure may be increasing asthma risk and contributing to racial disparities<sup>1</sup>.” These pose a direct threat to the sensitive populations of the Municipality, which may be contributing to the > 90<sup>th</sup> percentile rates for asthma. The following table summarizes the concentration of sensitive populations in Norristown compared to county, state and national averages.

<b>Sensitive Populations</b>	<b>Norristown</b>	<b>Montgomery County</b>	<b>Pennsylvania</b>	<b>National</b>
Percentage persons below poverty level <sup>1</sup>	17.1%	7.0%	11.8%	11.5%
Percentage minority population <sup>1</sup>	60.3%	21.8%	19.2%	24.5%
Percentage children under 5 <sup>1</sup>	8.8%	5.2%	5.2%	5.6%
Percentage of under 65 years old with a disability <sup>1</sup>	11.8%	6.2%	9.9%	8.7%

<sup>1</sup>US Census Bureau, 2022 American Community Service data available at: <https://www.census.gov/quickfacts/table/DIS010215/00,4254656,42091,42>

In summary, a disproportionate number of peoples in poverty, minorities, children under five, and disabled people are unjustly affected by the hazardous and petroleum substances associated with the brownfields in Norristown compared to the surrounding communities. Potential reuse options, including public green spaces and diverse commercial enterprises would assist in mitigating impacts to these sensitive populations. Norristown, through zoning and planning, encourage reuse options including greenspace and other, safe and walkable areas such as urban gardens and parks; affordable housing, and equitable amenities such as health clinics and grocery stores.

**2.a.ii. (2) Greater Than Normal Incidences of Disease and Adverse Health Conditions:** Exposure risks associated with these sites are related to Norristown’s long industrial history. The industrial operations have not all ceased and toxic air releases are still felt today. The priority census tracts specifically, are in the: 89-95 percentile for Toxic Releases to Air and 89-95 percentile for asthma (EPA EJ Screen and CEJST). Specifically,

<sup>1</sup> Environ Health Perspective, “Blood Lead Level and Risk of Asthma”, published 2005 March 3 (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1257653/>)

the priority Schuylkill Riverfront, with a legacy of textile mills, dry cleaners, and metal plating operations are ubiquitous and widespread throughout the Municipality. The prominence of brownfields in proximity to low-income peoples have depressed property values and led to an increase in “Housing with potential lead risk” according to the Southeastern Pennsylvania Community Health Needs Assessment (2022), this report also states “vulnerable populations...[and] low-income individuals/families” are more susceptible to economic barriers to health care. Accordingly, compared to the surrounding communities, Norristown has a greater occurrence of chronic diseases, as summarized below.

<b>Summary Health Measure</b>	<b>Norristown</b>	<b>Montgomery County</b>
Premature cardiovascular deaths (per 100,000)	76.7	46.9
Asthma hospitalization rate <18 years (per 100,000)	17.3	2.9
Diabetes hospitalizations (per 100,000)	266.1	155.1
Hypertension hospitalizations (per 100,000)	518.7	323.6
Life expectancy: Female (in years)	76.7	81.7
Life expectancy: Male (in years)	67.0	77.0
<i>All data from Southeastern Pennsylvania Community Needs Health Assessment 2022</i>		

Textile mills along the Schuylkill River were a common occurrence in the 1800’s and early 1900’s. According to the “American Dyestuff Report-1994,” the six most common dyes associated with the textile industry at that time contained chromium, arsenic, cadmium, mercury, and lead; all of which are either known carcinogens or human toxins according to the US EPA. These sites represent a source of pollution and contribute to the cumulative environmental quality and associated human-health issues both within the Municipality and in downstream communities.

**2.a.(3).(a.) Identification of Environmental Justice Issues:** Norristown recognizes the legacy of racism and environmental discrimination have caused a disproportionate number of low income residential areas in close proximity to industrial and often contaminated sites. Norristown has actively identified environmental justice sites to target for re-investment in such communities. Utilizing tools such as the EPA EJScreen, PADEP EJ Screen and EPA CEJST, Norristown has selected their three highest priority sites, Norristown State Hospital, Schuylkill Riverfront District and former Machined Metals, for assessment which are located in CEJST identified disadvantaged census tracts to help correct this historic injustice. Based on data collected from the CEJST, Norristown State Hospital (Census Tract 42091203700), Schuylkill Riverfront District (Census Tract 42091203902) and former Machined Metals (Census Tract 42091203801) the disproportionate negative and discriminatory impacts are startling and obvious. All data below from CEJST and is in relation to the United States as a whole when referring to percentile ranking and displays a clear picture of environmental injustice.

Norristown State Hospital – CEJST Disadvantaged Census Tract, Population 1,864, People of Color 60%, Low Income 93<sup>rd</sup> percentile, Poverty 89<sup>th</sup> percentile, Unemployment 90<sup>th</sup> percentile. This disadvantaged community is further burdened by the following environmental conditions; Proximity to Risk Management Plan Facilities 84<sup>th</sup> percentile, Proximity to Superfund 95<sup>th</sup> percentile and Diesel Particulate Matter Exposure 63<sup>rd</sup> percentile.

Schuylkill Riverfront Area – CEJST Disadvantaged Census Tract, Population 3,569, People of Color 69%, Low Income 83<sup>rd</sup> percentile, and Poverty 90<sup>th</sup> percentile. This disadvantaged community is further burdened by the following environmental conditions; Proximity to hazardous waste facilities 80<sup>th</sup> percentile, Proximity to Superfund 99<sup>th</sup> percentile, Diesel Particulate Matter Exposure 71<sup>st</sup> percentile and Wastewater Discharges 99<sup>th</sup> percentile.

Former Machined Metals - CEJST Disadvantaged Census Tract, Population 3,859, People of Color 63%, Low Income 71<sup>st</sup> percentile, Unemployment 92<sup>nd</sup> percentile, and Poverty 64<sup>th</sup> percentile. This disadvantaged community is further burdened by the following environmental conditions; Proximity to Risk Management Plan facilities 90<sup>th</sup> percentile, Proximity to Superfund 98<sup>th</sup> percentile, Diesel Particulate Matter Exposure 67<sup>th</sup> and Underground Storage Tanks and Releases 87<sup>th</sup> percentile.

**2.a.(3).(b.) Advancing Environmental Justice:** Norristown is committed to supporting EJ initiatives like Justice40 to remove the blight, environmental hazards, and human impacts in the disadvantaged communities of the Municipality. Accordingly, Norristown has set a goal to allocate a minimum of 40% of the grant budget to direct assessment tasks and activities to sites within disadvantaged communities. To further incorporate EJ principles into their brownfields program, Norristown’s site-ranking criteria will be weighted to prioritize those



sites within CEJST identified “disadvantaged” communities. Additionally, Norristown intends to implement the EJ goals identified in the *MONTCO 2040* Plan to promote healthy food retailers in the current “food deserts”; and inclusionary zoning practices as brownfields sites are redeveloped.

The goal for the ultimate redevelopment of the three highest priority sites, Norristown State Hospital, Schuylkill Riverfront District and former Machined Metals, include recreational open space, affordable housing, healthy food retailers, mixed-use commercial and office space. The redevelopment of these sites will advance EJ issues by: cleaning up contaminated sites, create jobs that pay well, combat the existing identified “food deserts” and create new green open space and parks. The CEJST ratings for the sites above shows higher rates of unemployment, poverty, lack of affordable housing, lack of green space, and are identified as food deserts. The cleanup and redevelopment of these two sites will address each of these issues as well increase investment in these communities. Norristown is preparing to combat potential displacement of existing community members by the potential for property increases due to the planned redevelopment of the high priority sites via ongoing community engagement and working with the Zoning and Planning Department for modifications to ensure the inclusion of low-income housing in the communities targeted for assessment and redevelopment. The most recent public meeting regarding Norristown planned redevelopment was held in August 2023. Without this Assessment Grant, Norristown will not be able to continue to support the assessment of the priority brownfields sites and other environmental challenges throughout the Municipality.

**2.b.i Community Engagement - Project Involvement & ii. Project Roles**

<b>Name of Organization</b>	<b>Point of Contact</b>	<b>Specific Involvement</b>
Norristown Brownfields Steering Committee	Jayne Musonye: 610-270-0450 <a href="mailto:jmusonye@norristown.org">jmusonye@norristown.org</a>	Liaison between community and municipal government
Community Action Development Commission	Sandy Sharma: 610-277-6363 <a href="mailto:ssharma@cadcom.org">ssharma@cadcom.org</a>	Local community engagement and outreach.
ACLAMO (Community Non-Profit providing health and wellness to Latinos and others)	Nelly Jimenez: 610-277-2570 <a href="mailto:nellja@aclamo.org">nellja@aclamo.org</a>	Latino community outreach and engagement
Keep Norristown Beautiful	Lisa Bobyock 610-272-8080 <a href="mailto:lbobyock@norristown.org">lbobyock@norristown.org</a>	Provide community input on potential sites
Montgomery County Intermediate Unit	Bukola Bedu; 610-755-9400 <a href="mailto:bbedu@mciu.org">bbedu@mciu.org</a>	Meeting space for community engagement and outreach

Norristown has partnered with the above listed community partners to utilize their grassroots expertise to identify local needs to be addressed by the assessment, cleanup and redevelopment of brownfields. Based on community planning meetings, local consensus has found a need for equitable access to amenities such as health clinics, grocery stores, and walkable areas such as urban gardens and parks. These identified community needs have been incorporated into published redevelopment plans.

**2.b.iii Incorporating Community Input:** The Brownfields Steering Committee includes members who live and work in Norristown. They have played an active role in assisting the Municipality in identifying potential brownfields sites and reporting violations to the PADEP. Norristown partnered with the entire community during development of the Consolidated Action Plan (2020) and public hearings are held regularly with live streaming available on the Norristown website, to update the community members on the progress of the assessment activities. This approach has been highly successful in previous Assessment Grants which identified over 80 sites for potential assessment and redevelopment. Accordingly, this approach will be continued in the new Assessment Grant and new community groups will be actively recruited to participate in the brownfields program.

While Norristown will continue their open dialogue with the communities identified for brownfields redevelopment, our partners will also assist in providing active communication networks and space for community outreach meetings. Specifically, the Community Action Development Commission astutely assist the development of “micro-businesses” and food resources. The ACLAMO provides Spanish speaking outreach and the County Intermediate Unit provides facilities for in-person and virtual meetings. The natural confluence of our partners will assist in not only identifying potential sites but also in assisting in end-use development that will empower our underserved community members and promote EJ principals. This developed network will assist in open dialogue with the community most impacted by brownfields and set the stage to incorporate their feedback for grassroots redevelopment options that best serve the needs of the

community. The community outreach component will communicate site activities and performance for all aspects of the brownfields program and will promote an inclusive, open, and ongoing dialogue with site personnel and the community. All communications and mailings will be provided in English and Spanish to serve the entire community.

**3.a. i-iv. Description of Tasks/Activities and Outputs:** Based on Norristown’s previous successful implementation of an U.S. EPA Brownfields Assessment grant, we have found the funding is key to preparing sites for private funding investments. Once the potential environmental liability is quantified the “fear of the unknown” is significantly diminished and private investment occurs. Additionally, commercial lending institutions will not provide funding for site redevelopment without an ASTM compliant Phase I ESA. Our budget breakdown and task are based on our previous successful U.S. EPA Brownfields Assessment grant which directly led to a private investment of \$36 million in site redevelopment.

<b>Task 1: Programmatic</b>
i. <u>Project Implementation:</u>
<ul style="list-style-type: none"> <li>▪ Overall programmatic and administrative oversight along with cooperative agreement (CA) compliance</li> <li>▪ Solicitation, selection, and contracting an experienced, qualified environmental professional (QEP)</li> <li>▪ Prepare and submit Quality Management Plan (QMP)</li> <li>▪ Annual and quarterly progress reporting (US ACRES), ASAP accounting updates, and grant closeout</li> <li>▪ Travel for applicant attendance at conferences to present program success stories</li> </ul>
ii. <u>Identifying Additional Sites:</u> Potential sites will be evaluated using the U.S. EPA Community Reuse Property Prioritization Tool to include: distance to population centers, existing infrastructure, site access, developer/community interest and site access.
iii. <u>Anticipated Project Schedule:</u> The solicitation and selection of the QEP will be completed within 3 months following execution of the CA. All other administrative tasks will be completed, as required in the CA, over the grant-performance period. Conference attendance, annual, as available.
iv. <u>Task/Activity Lead:</u> Norristown (Applicant)
v. <u>Outputs:</u> CA execution, QEP solicitation and contracting, QMP, 16 quarterly progress reports (US ACRES), monthly ASAP accounting updates, annual FFR and MBE/WBE reporting, 1 kickoff meeting with US EPA, travel for staff for up to 3 conferences, and requisite grant closeout reporting.
<b>Task 2: Community Outreach</b>
i. <u>Project Implementation:</u>
<ul style="list-style-type: none"> <li>▪ Public announcements of grant progress, updates, and meetings via print, electronic, social and TV media</li> <li>▪ Solicitation of community input through Norristown social media accounts and email newsletters</li> <li>▪ Secondary information distribution via Norristown community engagement partners</li> <li>▪ Host a kick-off meeting (and livestream) to inform the community and solicit input</li> <li>▪ Outreach to community engagement partners, local governments, and private stakeholders</li> </ul>
ii. <u>Identifying Additional Sites:</u> The public will be encouraged to submit potential sites during public outreach meetings as well as via online submissions on the Norristown website.
iii. <u>Anticipated Project Schedule:</u> Initial public meeting will be scheduled during the first quarter following grant award. Program updates, announcements, and solicitations for input will be posted regularly via Norristown social media accounts, websites. Additionally, public update meetings will be held annually, or as needed, based on community input, site selection, and program progress.
iv. <u>Task/Activity Lead:</u> Norristown (Applicant)
v. <u>Outputs:</u> Host up to 3 public meetings, regular social media and website updates, creation of marketing materials, press releases/conferences, and regular outreach to community partners.
<b>Task 3: Site Inventory and Selection</b>
i. <u>Project Implementation:</u>
<ul style="list-style-type: none"> <li>▪ Maintain, update, rank, and prioritize brownfields inventory sites</li> <li>▪ Coordinate with community engagement partners and coordinate with the selected QEP to expand the list of brownfields sites and revise ranking criteria to incorporate EJ criteria</li> <li>▪ Site owner outreach, site access coordination, and completion of site access agreements</li> <li>▪ Preparation of Property Approval Questionnaires (PAQs) and coordination of requisite eligibility determination for petroleum sites with the Pa Dept. of Environmental Protection</li> </ul>
ii. <u>Identifying Additional Sites:</u> QEP canvassing of Norristown via vehicular reconnaissance, priority will be given to sites located in disadvantaged census tracts.

<p>iii. <u>Anticipated Project Schedule</u>: The existing site inventory will be actively expanded during the first 6-9 months following grant award and updated for the duration of the performance period. Site selection will be completed and access agreements, PAQs, and petroleum eligibility determination coordination, as necessary, will be completed continuously during the 4-year grant-performance period.</p>
<p>iv. <u>Task/Activity Lead</u>: Norristown (Applicant)</p>
<p>v. <u>Outputs</u>: Update and expand site inventory list, rank and identify priority sites, complete up to 16 PAQs and 16 site access agreements, including eligibility determination coordination for petroleum products sites, and complete up to 5 site inventory evaluation visits.</p>
<p><b>Task 4: Site Assessments</b></p>
<p>i. <u>Project Implementation</u>:</p> <ul style="list-style-type: none"> <li>▪ Prepare and submit a Quality Assurance Program Plan (QAPrP) to be used for the duration of the performance period for all sites</li> <li>▪ Coordinate site access at eligible sites to complete Phase I/II activities</li> <li>▪ Complete up to 20 Phase I ESAs (and accompanying US EPA All Appropriate Inquiry Checklists) in accordance with ASTM E1527-13 and All Appropriate Inquiry requirements</li> <li>▪ Complete up to 9 Phase II ESAs, which include the completion of site-specific health and safety plans (HASP) and requisite submission of Field Sampling Plans (FSPs) to evaluate environmental conditions at selected sites, consistent with PA Land Recycling Program requirements</li> </ul>
<p>ii. <u>Identifying Additional Sites</u>: During site assessment activities QEP will evaluate the area surrounding the area of the assessment site for additional potential sites.</p>
<p>iii. <u>Anticipated Project Schedule</u>: Phase I ESAs will be initiated within 6 months of the start of the program and will be ongoing throughout the duration of the performance period. A FSP, HASP, and a Phase II ESA report will be completed for each site, as appropriate, based on the findings of the Phase I ESA on a rolling basis. The QAPrP will be completed and submitted to the US EPA within the first 6 months of the program and prior to initiation of any Phase II ESA activities.</p>
<p>iv. <u>Task/Activity Lead</u>: The selected Qualified Environmental Professional. At the direction of the Norristown (Applicant), the QEP will be the Task 4 lead because of the specialized expertise and familiarity with programmatic requirements of the US EPA Brownfields Assessment Grant program and Pennsylvania Voluntary Cleanup Program (Land Recycling Program) regulations, along with specialized training necessary to complete the activities for Task 4 (e.g., HAZWOPER, 29 CFR Part 1910.120).</p>
<p>v. <u>Outputs</u>: Up to 20 Phase I ESA reports, 1 QAPrP, 9 FSPs, 9 HASPs, 9 Phase II ESA reports, and US ACRES updates.</p>
<p><b>Task 5: Remedial Planning and Design</b></p>
<p>i. <u>Project Implementation</u>:</p> <ul style="list-style-type: none"> <li>▪ Complete up to a total of 4 Remedial Action Plans (RAPs) based on the results of the Phase I and Phase II ESAs and reuse needs/requirements</li> <li>▪ The RAPs will outline the remediation plans and will be used to leverage additional assessment and cleanup funds and satisfy Pa Land Recycling Program requirements.</li> </ul>
<p>ii. <u>Identifying Additional Sites</u>: Sites slated for redevelopment will be revisited for potential additional sites in the area to build on the success.</p>
<p>iii. <u>Anticipated Project Schedule</u>: RAPs will be developed and submitted to the US EPA within 3 months following the completion of Phase II ESA activities for a given site, as appropriate.</p>
<p>iv. <u>Task/Activity Lead</u>: The selected Qualified Environmental Professional. At the direction of the Norristown (Applicant), the QEP will be the Task 5 lead because of the specialized expertise and familiarity with programmatic requirements of the US EPA Brownfields Assessment Grant program and Pennsylvania Voluntary Cleanup Program (Land Recycling Program) regulations.</p>
<p>v. <u>Outputs</u>: Complete up to 4 RAPs, identify secondary funding programs to leverage with the completed RAPs.</p>

**3.b. Cost Estimates:** table below provides the funding allocation for each proposed task.

Budget Categories		Project Tasks (\$)					Total
		Task 1: Programmatic	Task 2: Community Outreach	Task 3: Site Inventory and Selection	Task 4: Site Assessments	Task 5: Remedial Planning and Design	
Direct Costs	Personnel	\$11,000	\$2,750	\$4,125	\$4,400	\$1,925	\$24,200
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0	\$0
	Travel	\$2,400	\$0	\$2,200	\$0	\$0	\$4,600
	Equipment	\$0	\$0	\$0	\$0	\$0	\$0
	Supplies	\$1,200	\$1,000	\$0	\$0	\$0	\$2,200
	Contractual	\$4,800	\$6,000	\$31,200	\$395,000	\$32,000	\$469,000
	Other	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total Direct Costs</b>		\$19,400	\$9,750	\$37,525	\$399,400	\$33,925	\$500,000
<b>Indirect Costs</b>		\$0	\$0	\$0	\$0	\$0	\$0
<b>Total Budget</b>		\$19,400	\$9,750	\$37,525	\$399,400	\$33,925	\$500,000

**Cost Estimate Development – based on previous U.S. EPA Brownfields Assessment Grant implementation.**

Task 1 Programmatic: *Personnel* – 200 hours over four years at an average rate of \$55/hour = \$11,000; *Travel* - \$800 for Norristown staff attendance at three conferences (travel, conference fee, lodging & food) = \$2,400; *Supplies* - \$1,200 for printing and distribution of program information materials, website maintenance and remote-hosting service (e.g., Zoom) fees. *Contractual* – QEP to complete QMP and assist in Quarterly Reports and Project Closeout - \$4,800.

Task 2 Community Outreach: *Personnel* – 50 hours (ten hours per five public meetings) at an average rate of \$55/hour = \$2,750; *Supplies* – \$1,000 for newspaper fees, website/social media fees, printing information materials; *Contractual* – 5 days for the QEP to attend and support outreach meetings at an average rate of \$1,200/day = \$6,000.

Task 3 Site Inventory and Selection: *Personnel* – 75 hours at an average rate of \$55/hour = \$4,125, coordination with land owners and potential developers; *Travel* – 40 hours at an average rate of \$55/hour = \$2,200 for Norristown staff to visit potential sites; *Contractual* – 26 days for the QEP to assist in contacting site owners, completing Property Approval Questionnaires, canvassing, inventory database updates, and maintenance at an average rate of \$1,200/day = \$31,200.

Task 4 Site Assessments: *Personnel* – 80 hours at an average rate of \$55/hour = \$4,400, coordination with land owners, EPA and QEP; *Contractual* – The QEP will complete up to 20 Phase I ESAs at an average cost of \$6,000 each = \$120,000, a QAPrP at a cost of \$5,000, and up to 9 Phase II ESAs (including Site Access Agreements, FSP, HASP, and Phase II ESA report) at an average cost of \$30,000 each = \$270,000 (Total: \$399,400).

Task 5 Remedial Planning and Design: *Personnel* – 35 hours at an average rate of \$55/hour = \$1,925, coordination with developers, PADEP, and QEP; *Contractual* – The QEP will complete up to 4 RAPs at an average cost of \$8,000 each = \$32,000.

**3.c. Plan to Measure and Evaluate Environmental Progress and Results:** Paramount to sustaining progress toward brownfields assessment project goals is continuous and regular communication between the Norristown, the QEP, and the US EPA Project Officer. Norristown will maintain open lines of communication throughout the performance period and schedule monthly update calls with the QEP and the US EPA Project Officer, as necessary. Norristown will also use free project scheduling software such as Airtable for tracking project specific timelines. Consistent with the summary of tasks and activities above, Norristown intends to assess up to 5-8 sites per year (Phase I ESAs) and will evaluate overall progress toward that goal by performing an annual review of the requisite quarterly progress reports. Additionally, the solicitation for the QEP will require the submission of a project timeline based on the expected outputs identified in Section 3.b to ensure the program schedule is being met and deliverables are being completed in a timely and efficient manner. Norristown will also submit quarterly progress reports and update ACRES as deliverables are completed and progress is made on programmatic goals. Norristown will also update ACRES when additional resources beyond the Assessment Grant are leveraged at a priority site, consistent with the approach of their previous assessment grant.

**4.a.i. - iii. Organizational Capacity, Structure & Description of Key Staff:** The Norristown Department of Planning and Municipal Development's specialized brownfields staff, previous US EPA Brownfields Assessment Grant experience, and community connections provide it with the capacity and structure to carry out the programmatic, administrative, and financial requirements to successfully manage and implement the grant program. Under the guidance of the current Director, Ms. Jayne Musonye, has successfully managed and implemented a Municipal-wide brownfields assessment program. Ms. Musonye has over 30 years of community and economic development experience and will oversee the overall administration and management of the assessment grant. Ms. Musonye has been responsible for completing assessment activities at numerous brownfield sites and has leveraged over \$50 million in additional private and public funding for assessment, remediation, and redevelopment activities at those sites. Norristown will dedicate one staff member, Mr. Sean Turner, from their Planning and Municipal Development team to oversee the day-to-day management of this program; direct the selected QEP throughout the grant performance period and complete ASAP drawdowns. Mr. Turner served in a similar role for their previous US EPA Assessment Grant and has experience simultaneously managing numerous state and federal grant programs for Norristown.

**4.a.iv. Acquiring Additional Resources:** Norristown recognizes that it does not have all the in-house resources necessary to complete certain technical tasks and activities, it does have the experience to acquire the expertise necessary to complete the project, as described. Norristown has a demonstrated record of acquiring the external resources necessary to lead a successful community-wide brownfields program. Upon authorization of the Cooperative Agreement by the US EPA, Norristown will issue a request for proposal to select an experienced, qualified environmental professional (QEP) to assist in completing select technical project tasks and activities as identified in Task 4 and 5 of Section 3a. The QEP will coordinate directly with Mr. Turner on day-to-day activities who will coordinate with Ms. Musonye on overall grant program performance and accounting requirements. Mr. Turner will also coordinate with the QEP throughout the grant performance period to secure additional funding resources, such as those programs described in Section 1.c.i., to extend the impact and reach of the assessment grant program. Additionally, Norristown has worked directly with their affiliate economic and industrial development organizations in Montgomery County and led the team which leveraged federal and state assistance to effectuate job creation and remove environmental hazards similar in scope and purpose to the proposed municipal-wide brownfields assessment grant program.

**4.b.i. Currently Has or Previously Received an EPA Brownfields Grant:** Previously, Norristown was awarded a Community-Wide Brownfields Assessment Grant for \$300,000 in FY2018 (BF 96359001). The funding for the previous grant has been drawn down below 100%, but additional assessment work is needed in Norristown to support brownfields assessments. Accordingly, Norristown is submitting this application for assessment funding from the US EPA in order to further support ongoing brownfields redevelopment and equitable growth opportunities.

(1) **Accomplishments:** Despite the challenges and impediments to progress from the COVID-19 Pandemic, Norristown, has: developed an inventory of over 80 sites; completed an EPA approved QAPP; completed 23 Phase I ESA reports (along with the 23 associated PAQs), conducted Phase II assessments at two sites where two Sampling and Analysis Plans (SAPs) were also developed and approved by the EPA. Site access agreements were also developed and executed for each site prior to initiating any Phase I/II activities and all quarterly updates, along with annual MBE/WBE and FFR updates, have been completed and submitted. ACRES reporting for the work completed under the current EPA Community- Wide Brownfields Assessment Grant is up to date and also reflects associated accomplishments completed at each of the assessed sites as well as additional funding leveraged. Additionally, Norristown leveraged assessment activities to facilitate the sale of 12-adjacent parcels which are being redeveloped by a private party with an investment of \$39 million. Additional assessment work is necessary to sustain the progress that has been made on these and other brownfields sites throughout Norristown and the support made possible by an EPA Community-Wide Brownfields Assessment grant is critical as this success would not be otherwise possible.

(2) **Compliance with Grant Requirements:** Norristown's current assessment grant (October 2018-September 2023), has prioritized compliance with grant requirements to include timely submission of requisite updates (e.g., quarterly reports, annual MBE/WBE and FFR forms), regular ACRES updates, and monthly ASAP accounting updates. Norristown regularly communicated with the US EPA project officer assigned and solicits their input on to ensure tasks and actions are compliant. Due to setbacks from the COVID pandemic Norristown, working with their EPA PO requested two one-year extensions in order to successfully complete planned Phase II ESA's. Norristown successfully utilized all of their previous US EPA Brownfield Assessment grant in FY23 and submitted a detailed closeout report.