

406 Princess Anne Street, Fredericksburg, Virginia 22401

PROPOSAL FOR USEPA'S COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT RFP NO. EPA-OLEM-OBLR-23-12/ CFDA NO. 66.818

Section IV.D. – Narrative Information Sheet November 13, 2023

1. <u>Applicant Identification</u>

George Washington Regional Commission (GWRC) 406 Princess Anne Street Fredericksburg, Virginia 22401

2. <u>Funding Requested</u>

a. <u>Assessment Grant Type</u>: Community-wide

b. <u>Federal Funds Requested</u>: \$500,000

3. <u>Location</u>:

City of Fredericksburg, Virginia Spotsylvania County, Virginia

4. Target Area and Priority Site/Property Information:

• Target Area and City/County/Census Tract of Target Area

Target Areas City or County/Census Tract

U.S. Route 1 Corridor City of Fredericksburg, Census Tract

51630000302

Spotsylvania County, Census Tracts

51177020107, 51177020202, 51177020305,

51177020204, 51177020304

U.S. Route 2 Corridor City of Fredericksburg, Census Tract

51630000400

Spotsylvania County, Census Tract

51177020201

<u>Priority Sites</u> <u>City or County/Census Tract</u>

Narrative Information Sheet Page 1 of 3

U.S. Route 2 Corridor City of Fredericksburg, Census Tract

51630000400, Walker Grant School

U.S. Route 2 Corridor Spotsylvania County, Census Tract

51177020201, Bowman Center

City of Fredericksburg Fredericksburg, Virginia Spotsylvania County Spotsylvania, Virginia

Addresses of Priority Sites

- a. Old Walker Grant School, 500 Gunnery Road, Fredericksburg, VA 22401
- b. Bowman Center Parcel, 11801 Capital Lane, Fredericksburg, VA 22408

5. <u>Contacts</u>

a. Project Director / AOR

Charles P. Boyles, II (Executive Director) George Washington Regional Commission

406 Princess Anne Street Fredericksburg, VA 22401 Phone: 540-642-1580

Email: chip.boyles@gwregion.org

b. Chief Executive/Highest Ranking Elected Official

Charles P. Boyles, II (Executive Director)
George Washington Regional Commission

406 Princess Anne Street Fredericksburg, VA 22401 Phone: 540-642-1580

Email: chip.boyles@gwregion.org

6. Population

George Washington Regional Commission 175,445^{1,2} Fredericksburg, Virginia 28,027² Spotsylvania, Virginia 138,493²

¹GWRC population for this application is Fredericksburg + Spotsylvania

² US Census Bureau, ACS 5-Year Estimates, 2017-2021

7. <u>Other Factors Checklist</u>:

Other Factors	Page #
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United	
States territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority	
site(s) is contiguous or partially contiguous to the body of water, or would be	
contiguous or partially contiguous with a body of water but for a street, road, or	
other public thoroughfare separating them)	2
The priority site(s) is in a federally designated flood plain.	2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar,	
or geothermal energy.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	2
The proposed project will improve local climate adaptation/mitigation capacity	
and resilience to protect residents and community investments.	3
At least 30% of the overall project budget will be spent on eligible reuse/area-	
wide planning activities, as described in <u>Section I.B.</u> , for priority site(s) within the	
target area(s).	8
The target area(s) is located within a community in which a coal-fired power	
plant has recently closed (2012 or later) or is closing.	N/A

- 8. <u>Letter from the State Environmental Authority</u>: Attached
- 9. Releasing Copies of Applications: N/A



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

1111 E. Main Street, Suite 1400, Richmond, Virginia 23219 P.O. Box 1105, Richmond, Virginia 23218 (800) 592-5482 FAX (804) 698-4178 www.deq.virginia.gov

Travis A. Voyles Secretary of Natural and Historic Resources Michael S. Rolband, PE, PWD, PWS Emeritus Director (804) 698-4020

November 1, 2023

Mr. Charles P. Boyles, II George Washington Regional Commission (GWRC) 406 Princess Anne Street Fredericksburg, VA 22401

VIA ELECTRONIC MAIL

Subject: Acknowledgement and Support

FY 2024 USEPA Community-Wide Brownfields Assessment Grant

George Washington Regional Commission (GWRC)

EPA-OLEM-OBLR-23-12

Dear Mr. Boyles:

The Virginia Department of Environmental Quality (DEQ) is in receipt of your request for support of the above referenced EPA Brownfield Grant application. The request will be for an EPA Brownfield Community-Wide Assessment Grant for the George Washington Regional Commission (GWRC), which includes Caroline County, City of Fredericksburg, King George County, Spotsylvania County, and Stafford County. We are thrilled to add our support for the subject EPA grant proposal.

It is our understanding that the target area includes multiple sites located within the above localities, primarily in the U.S. Route 1 and U.S. Route 2/17 corridors within the City of Fredericksburg and Spotsylvania County. The priority sites include the Old Walker Grant School located in the City of Fredericksburg and the FMC Wastewater Treatment Plant located in Spotsylvania County, which will benefit from assessment and planning to bring about meaningful revival of these communities. DEQ understands these grant funds are absolutely critical to moving sites forward and encouraging redevelopment. The DEQ Brownfields Program is pleased to provide our support for this grant proposal and feels that, if successful, the grant funds will play a vital role in the revitalization and redevelopment of the target areas in these communities.

Acknowledgement and Support FY 2024 USEPA Community-Wide Brownfields Assessment Grant EPA-OLEM-OBLR-23-12

It is our sincere hope that your EPA proposal will be successful, and GWRC will be able to continue leveraging funds to stimulate economic development and revitalization within the target area and region. If I can be of further assistance, please don't hesitate to contact me at (804) 385-5956.

Sincerely,

Lucas Hamelman, CPG

VRP & Brownfields Remediation Project Manager

cc: J. Meade R. Anderson, CPG – DEQ-CO

Karen Weber, CPG – DEQ-CO Richard Doucette – DEQ-NRO

Thomas Laughlin – TRC Companies, Inc.

GEORGE WASHINGTON REGIONAL COMMISSION (GWRC) PROPOSAL FOR USEPA'S COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT RFP NO. EPA-OLEM-OBLR-23-12/ CFDA NO. 66.818 Section IV.E – Narrative Proposal / Evaluation Criteria November 13, 2023

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Unless noted, references are latest publicly available and reflect the most current information.

1.a Target Area and Brownfields

<u>1.a.i Overview of Brownfield Challenges and Description of Target Area:</u> The *GWRC* is the 'planning district commission' for Planning District 16 that includes the City of Fredericksburg, and Spotsylvania, Caroline, King George, and Stafford Counties. GWRC provides a broad array of planning and support services for the benefit of the nearly 40,000 residents in the region. For this grant application, *GWRC's* focus is to assist the *City of Fredericksburg (City)* and *Spotsylvania County (County)* (collectively hereinafter referred to as 'Alliance'). The remaining counties are not included in this application.

The primary target areas for the GWRC's proposed Brownfields Program are the U.S. Route 1 and U.S. Route 2 corridors, important Gateway Corridors for GWRC, the County and City. Routes 1 and 2 saw heavy development in the 1970s but now are in varying states of economic decline. Once thriving strip malls, shopping centers, hotels, and restaurants with inefficient access and large parking lots of a bygone era have left the area unattractive and in need of revitalization. Consequently, adjacent residential neighborhoods are also in decline. Envisioning new suburban business districts that complement and connect to the City's downtown and its business corridors, the City hopes to increase tax revenue through multi-modal transportation and a commercial mix that offers a wide variety of goods, services, and jobs along these important City corridors. Along Route 2 at the city's southern boundary, the Mayfield tract includes residential areas, agricultural fairgrounds, recreation complexes, a municipal wastewater treatment plant (WWTP), CSX railroad, abandoned sites, and a variety of commercial and industrial facilities. This area is also littered with older service stations that likely are impacted by various chemicals including petroleum hydrocarbons. The County has identified potential sites along Route 1, including the Massaponax Church Road (Rt. 608) interchange with I-95, dominated by an abundance of automotive-related businesses, trucking companies, an extensive vehicle junkyard, vacant sites, and construction materials yards. Going north, along Route 1 at Rt 208 is an area known as Four Mile Fork (approximately four miles from the City). This is another area dominated by aging commercial developments, particularly automotive sales, and services. Vast parcels in this area are severely blighted, many vacant. This rundown air of neglect spreads into the residential areas branching off Rt 208. The Route 2 (business) corridor includes the Sylvania Heights tract with commercial brownfields reuse and redevelopment potential. Expected contaminants along this corridor include petroleum, solvents, polycyclic aromatic hydrocarbons, heavy metals, and historically, chemicals used in cellophane manufacturing processes include alkali, carbon disulfide, sulfuric acid, and sodium sulfate. These contaminants, in close proximity to residential areas are a concern for the communities in the corridor if not assessed and remediated.

<u>1.a.ii</u> <u>Description of the Priority Brownfield Site(s)</u> The **Alliance** identified over 12 abandoned sites along target areas with potential to change the blighted landscapes and revitalize the stagnant economy. Sites range from an acre or less; to 5- to 10-acre commercial sites; and larger 10+ acre industrial tracts. The priority sites identified herein were expressly selected due to their potential to catalyze additional investment and revitalize these corridors, as well as to extend redevelopment opportunities.

City of Fredericksburg. In the Route 2 (business) corridor, is the Old Walker-Grant School (Mayfield - CT 51630000400). This 2.5-story brick schoolhouse was built in 1935 and was the first publicly supported black high school in Fredericksburg. The foundation of the building stands on the original site of the Fredericksburg Gun Manufacturing Company (its history stretches back to the 1700s). The school was placed on the National Register of Historic Places in October 1998. The property is in a business mixed-use area. Because of long-term commercial uses in the area, there is potential for impact from historical on-site and off-site sources such as gun manufacturing (iron forging), heating oil tanks, gas stations, etc. Given the age of the building, there is potential for hazardous building materials (lead-based paint and asbestos) used during construction. For several years, it remained nearly empty, with the City using it for storage, and churches using it as a pickup point for clothing and food. The site's

proximity to schools and residences makes it a high priority for investigation and redevelopment, including incorporating energy efficiency measures. *This site is located within the FEMA Special Flood Hazard Area Zoned AE (1% chance base flood or 100-year flood zone)*¹.

Spotsylvania County. Along the Route 2 (business) corridor near the FMC Wastewater Treatment Plant, at the junction of the City and Spotsylvania County, is the Bowman Center (Sylvania Heights - CT 51177020201), home to the Sylvania Plant Historic District (National Register of Historic Places - former cellophane manufacturing site). This former industrial facility produced cellophane from around 1930, until it closed in 1978. It is currently under redevelopment as commercial and apartment space, renovating the old brick buildings. At the rear (east side) of the Bowman Center development, is a vacant, county-owned parcel along the riverfront. The irregularly shaped parcel surrounds the FMC WWTP and stretches north across Deep Run Creek, to the County line. An arm of the parcel extends into the central portion of the Bowman Center and includes a portion of abandoned railroad tracks. An additional free-standing portion of the parcel is located along Route 2 (Business 17). Expected contaminants in this area include petroleum, solvents, polycyclic aromatic hydrocarbons, heavy metals, and chemicals used in cellophane production (alkali, carbon disulfide, sulfuric acid, and sodium sulfate) along with suspect building materials (asbestos and lead-based paint). As a result, the GWRC and County intend to use brownfield funding for an environmental assessment and redevelopment planning (comprehensive plan) focusing on capitalizing on the current redevelopments at **Bowman Center** by providing a community-desired use for the parcel (to potentially include commercial or amenity/park to complement the transitioning mixed-use character of the area). A portion of the Bowman Center parcel site adjacent to the Rappahannock River lies within the Floodway. Inland portions (along the River and Deep Run Creek) are within Zone AE and Special Flood Hazard Area Zone A (1% annual chance base flood). Inland from those areas are mapped an area of Zone X (0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile.)2

1.a.iii Identifying Additional Sites: **GWRC** will use the following criteria to identify additional sites within the target areas: first, through community engagement activities, identify what the community see as assets and needs within the identified underserved and disadvantaged areas using collected pertinent demographic (census tract) and environmental data (EJScreen, etc.), as well as preferred development types; second, identify underutilized properties with revitalization potential where clean up and redevelopment can act as a catalyst for redevelopment activities within the City; and third, identify potential reuses of the identified catalyst sites that match the community needs. For this study, a catalyst site is defined as a site that: is known to be contaminated or has the potential for contamination; is vacant or abandoned; and, because of its attributes (e.g., size, location, etc.), its redevelopment may spur other development.

1.b Revitalization of the Target Areas

1.b.i Reuse Strategy and Alignment with Revitalization Plans: The *GWRC* has considered the proposed redevelopment/reuse plans for the priority brownfields sites to ensure they are in alignment with their respective land use and revitalization plans. The City has robust plans for revitalization³, using their *Small Area Plan* to clearly define areas that would benefit citizens in each area. An example being the *Old Walker-Grant School* priority site, where the City anticipates utilizing the building to house Alternative Education Programs, a Boy & Girls Club for the Rappahannock Region, and serve as the Walker Grant Cultural and Educational Center. In its Guiding Principles and Policies⁴ in Spotsylvania's Comprehensive Plan, the County outlines it's goals of presenting an attractive and orderly and business-friendly community, with revitalization of older, underperforming commercial, office, and industrial sites. Further development is planned to be aesthetically pleasing, fit into the historic nature of the communities, and be environmentally friendly all focusing on opportunities for infill development and revitalization of priority sites, such as the *Bowman Center*, which has the potential to include commercial and amenity/park to complement the transitioning mixed-use character of the area.

1.b.ii Outcomes and Benefits of Reuse Strategy: All priority project outcomes align with Alliance's reuse strategies,

¹ FIRM Flood Panel 5100650037D, 04/05/2023

² FIRM Flood Panel 5117C0125D, 05-09-2023

³ City of Fredericksburg Comprehensive Plan, Chapter 10 – Land Use Plan General Guide, pages 136-157.

⁴ Spotsylvania County Comprehensive Plan, Guiding Principles and Policies, page 15.

all are catalyst sites. The need for economic revitalization in the City and County is evident in the number of underutilized and vacant buildings identified in the target areas. By revitalizing their brownfield inventory sites multiple outcomes will be achieved, including the following: 1) removal of legacy pollutants improving health outcomes for sensitive populations 2) reuse of historical structures 3) increased opportunity for community gathering and wellbeing 4) business growth and additional redevelopment within the target areas 5) increased property values 6) local job creation and 7) building upgrades to include modern energy efficiency measures. The benefits of these outcomes will have a major impact on Target Area residents and the surrounding underserved communities, including the following: 1) increased mental and physical health, especially to disadvantaged communities 2) stronger community ties 3) updated buildings through use of energy efficient windows, appliances, lighting, and water fixtures and reduced stress on electrical grids and treatment facilities 4) focus on climate resiliency by incorporating climate friendly best management practices (BMPs) into brownfield site reuse concepts. This includes methods to reduce total energy use and increase the percentage of energy from renewable resources; reduce air pollutants and greenhouse gas emissions; reduce water use and preserve water quality; conserve material resources and reduce waste; and protect land and ecosystems such as Deep Run Creek and the Rappahannock River. The Bowman Center site will particularly benefit from climate focused redevelopment planning as it is adjacent to two waterbodies and within designated flood prone areas. By prioritizing BMPs, Low Impact Development, and Green Infrastructure for stormwater management into site reuse plans, Spotsylvania will build and strengthen community flooding resiliency to the effects of climate change and provide equitable development to its disadvantaged communities. Additional specific economic and non-economic outcomes and benefits are detailed below.

1.c Strategy for Leveraging Resources

1.c.i Resources Needed for Site Reuse: The **GWRC** will work with the City's and County's respective **Economic** Development Authorities (EDAs), which have incentives in place to encourage redevelopment at brownfields sites assessed through this program. As political subdivisions established by the Code of Virginia, EDAs are charged by their governing bodies to attract commercial and industrial enterprises that will best contribute to the economic wellbeing of the community and the preservation of its natural resources. EDAs can issue tax-exempt bonds to finance facilities within their jurisdictions and provide incentives to encourage redevelopment of existing businesses and sites, including small grants for capital investments, local permitting and utility fee waivers, and assistance with expediting local review and permitting processes. The City of Fredericksburg has a program for partial exemption from the real estate tax increase, which is the result of rehabilitation of a qualifying residential building. The building must be in the Historic District and must meet certain other criteria⁵. The County has a "fast track" program that provides benefits and increased review and approval process⁶. The Community Development **Block Grant Program** provides flexible funding to facilitate community revitalization, economic development, and improved community facilities. The GWRC will maximize EPA grant funds by seeking additional resources available for cleanup and reuse of priority brownfield sites for any available resources. These available funding resources include, but are not limited to, the Virginia Department of Environmental Quality (VDEQ) Virginia Brownfields Assistance Fund (VBAF) Program (up to \$500,000 for brownfields site assessments and cleanups).

1.c.ii Use of Existing Infrastructure: Goals among the *GWRC Alliance* include ensuring that the infrastructure is in place to sustain growth. Assessment and reuse of the existing buildings on brownfields sites will directly enable reuse of some of the existing infrastructure. Existing infrastructure is in place for most redevelopment projects envisioned for the *Alliance's* target areas and priority sites, although some improvements may be necessary depending upon the proposed end use for particular sites. An example of how the localities will address infrastructure deficiencies within its target areas, the City plans to add brick sidewalks in the downtown brick sidewalk network, filling in gaps where streetlights are absent, and installing ADA compliant walkways where needed. The County is considering uses for the riverfront parcel at the Bowman Center that will protect the waterway while providing access to the community and connect to an existing riverfront trail. No significant utility or transportation upgrades are anticipated for the priority sites, although the localities stand ready to facilitate upgrades if needed, to assist in development of a specific project.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

⁵ https://www.fredericksburgva.gov/323/Rehab-Tax-Credit

⁶ https://www.spotsylvania.va.us/584/Targeted-Industries

2.a Community Need

2.a.i The Community's Need for Funding: In the Region, pockets of disinvestment and lagging economic vitality exist. The economic and demographic conditions within census tracts where the Route 1 and Route 2 target areas are located clearly demonstrate the need for funding. The population in CT 51630000400 (Mayfield) suffers from more distressing conditions than CT 51177020201 (Sylvania Heights), with poverty rates almost double that of

Demographics of	СТ	СТ		
Targeted Communities	51630000400	51177020201	VA	US
Population	4,096	7,441	8.5 mil	329.7 mil
Poverty Rate	22.4%	5.4%	9.9%	12.6%
Under 18 Poverty Rate	37.5%	7.1%	13.0%	17.0%
Over 65 Poverty Rate	30.5%	0.0%	7.6%	9.6%
Median Household Income (MHI)	\$58,625	\$64,641	\$74,222	\$62,843
Homes built 1940-1949	1.6%	13.5%	4.3%	4.7%

U.S. Census Bureau. "SELECTED SOCIAL CHARACTERISTICS IN THE UNITED STATES." American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP02, DP03, DP04, DP05, 2021. Accessed on October 27, 2023.

Virginia. MHI in Sylvania Heights is considered moderate at 87% of the State's value. Mayfield's MHI scores at 79% of the State's value. Many homes in Sylvania Heights were built during the heyday of the cellophane factory, and thus subject to the construction practices and materials (asbestos, lead-based paint) of that time. Both the City's and County's resources are stretched thin in maintaining basic services because of declines in state and federal income tax revenue, and this grant will be a vital support in addressing current community issues, and funding future developments, so that the City and County can address their economic and community needs. The City and County do not have dedicated funding for such environmental assessments except through these brownfields assessment grants.

2.a.ii Threats to Sensitive Populations:

(1) Health or Welfare of Sensitive Populations: Mayfield and Sylvania Heights present a mixed bag of demographics but have common ground in that both communities are at risk of exposure to environmental contaminants in their neighborhoods. Located along the major arterials for north/southbound traffic on the eastern seaboard, these communities are subjected to poor air quality and traffic proximity. Aging housing exposes them to higher levels of lead-based paint, and the current and former industrial facilities near the neighborhoods places them at elevated risk of contaminants in their homes. Heath Indicators presented in the table (at right) were not available by census tract, so include the whole of Spotsylvania County and the entirety of Fredericksburg. Several of the indicators are often related to impoverished conditions, such as obesity. Both of the priority sites have planned uses that can help with this issue, as they are planned to offer physical activities (Boys & Girls Club and potential riverfront park to connect to an existing riverfront trail). This grant will facilitate the identification of risks to these sensitive populations at

Health Indicators by Locality				
% Prevalence of Disease and Adverse Health Conditions (percentages)	Fredericksburg	Spotsylvania	۸۸	sn
Uninsured Population age 18-64	7.4	7.4	na	10.8
Coronary Heart Disease	4.2	5.4	5.7	3.5
Cancer - adults	5.4	6.9	7.3	6.4
Current Asthma - adults	10.9	10.1	9.8	10.4
Obesity (BMI >= 30) - adults	34.0	36.3	na	33.0
High Blood Pressure - adults	29.1	35.1	34.4	32.1
Diabetes - adults	9.1	10.6	na	11.3
With Any Disability - adults	24.7	25.3	na	28.3
¹ Low Birth Weight (<5 lb 8 oz)	9	8	8	8
² Social Vulnerability	0.7260	0.2699	na	na

Except where footnoted, data from Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Division of Population Health. PLACES Data [online]. 2022 [accessed Oct 18, 2023]. URL: https://www.cdc.gov/PLACES

County Health Rankings & Roadmaps,

https://www.countyhealthrankings.org/explore-health-

rankings/virginia/data-and-resources

² CDC/ATSDR Social Vulnerability Index -

https://www.atsdr.cdc.gov/placeandhealth/svi/interactive_map.html

these sites and other brownfields. The neighborhood plans outline future site uses that will guide the GWRC on how to address or remediate environmental issues found through the assessments.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to the Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Division of Population Health Data, several indicators exceeded state and national levels. Many of these issues are known to result from exposure to environmental contaminants. Another troubling trend is obesity, which has been linked to lower income due to poor food quality. According to research by the CDC, "lower high school graduation rates, higher rates of unemployment, higher levels of food insecurity, greater access to poor quality foods, less access to

convenient places for physical activity, targeted marketing of unhealthy foods, and poor access to health care or referrals to convenient community organizations that aid family-management or self-management resources" are seen in populations with high levels of obesity. Specific statistics for birth defects was not available; however, low birth weight is linked to birth defects, and Fredericksburg exceeds state and national scores.

(3) Environmental Justice:

(a) Identification of Environmental Justice Issues: EJ Indexes along Rt 1 and Rt 2 corridors include multiple sensitive populations, including minorities, populations below poverty levels, children under 18 in poverty, and elderly in poverty, as described in Section 2.a.ii.(1). EJ impacts to these sensitive populations include air pollution, high traffic volumes, and industrial facility impacts. Newer technologies developed to track climactic changes have identified such issues as urban heat islands within cities⁷. A review of mapping for Fredericksburg revealed several areas of concern, including downtown and in the vicinity of UMW. The concentration of buildings and impervious surfaces builds up heat during the day that does not adequately dissipate overnight. The high volumes of traffic in the target corridors have impacted the quality of air.

	GWRC			
Environmental Justice Selected Variables (percent)	Mayfield - CT 51630000400	Sylvania - CT 51177020201	۸۸	sn
Particulate Matter 2.5	7.77	7.73	7.53	8.08
Ozone	57.3	57.5	59.1	61.6
Diesel Particulate Matter	0.419	0.2	0.209	0.261
Air Toxics Cancer Risk	30	30	29	25
Air Toxics Respiratory HI	0.4	0.4	0.33	0.31
Traffic Proximity	240	21	150	210
Lead Paint	0.35	0.16	0.22	0.3
Superfund Proximity	0.15	0.61	0.11	0.13
RMP Facility Proximity	1.1	0.29	0.21	0.43
Hazardous Waste Proximity	0.1	0.067	0.61	1.9
Underground Storage Tanks	3.8	1.4	1.9	3.9
Wastewater Discharge	0.0048	0.0044	7.2	22
https://ejscreen.epa.gov/mapper/				

CEJST⁸ identifies census tract 51630000301 in Fredericksburg as a Justice40 disadvantaged community in one category: Workforce development (low median income = 96% + poverty = 94%). This tract is immediately adjacent to the Mayfield tract.

The *Mayfield* tract is transected by Route 3 on the north, Route 2 with industrial facilities (WWTP, oil terminal) on the east, railroad tracks with commercial properties beyond, on the west, and industrial facilities on the southern end (WWTP, former cellophane manufacturer), beyond which lies the *Sylvania Heights* tract that is impacted by the same industrial facilities. Wastewater treatment plants can be a source of greenhouse gas emission (carbon dioxide, nitrous oxide, and methane) that result from biological processes occurring in wastewater. Oil terminal facilities can contribute to ozone, VOC emissions including air toxics such as benzene, ethylbenzene, and n-hexane. Chemicals used in cellophane manufacturing processes include alkali, carbon disulfide, sulfuric acid, and sodium sulfate. An area at the southeast corner of the FMC WWTP is noted to have included a historical dumping area (unpermitted) for the WWTP. It is unknown what was disposed of in this area, or when dumping ceased. The FMC WWTP is scheduled to be decommissioned at the end of 2025. Many of the homes built in Fredericksburg were intended for workers at the former mills and were built in the late 1800s. As noted above, many homes in Sylvania Heights were built between 1940 and 1949 for workers at the cellophane factory. Lead-based paint and asbestos materials may be found in many of these homes and community buildings.

(b) Advancing Environmental Justice: This grant will greatly help in evaluating and cleaning up brownfields in these target areas for environmental risks and consequently address some of the environmental conditions described above. This critical step will help move sites closer toward redevelopment into commercial and recreational facilities that will also promote physical activity, increase property values, and strengthen community bonds, all of which help rectify environmental injustices. No residents or businesses will be displaced by projects initiated under this grant

2.b Community Engagement

2.b.i / 2.b.ii Project Involvement and Project Roles: Recognizing the importance of community involvement in the

https://www.arcgis.com/apps/webappviewer/index.html?id=1b6cad6dd5854d2aa3d215a39a4d372d

⁷ Urban Heat Island (UHI) Severity for US Cities

⁸ https://screeningtool.geoplatform.gov/en/#12.32/38.30302/-77.47436

brownfields prioritization and redevelopment process, the *GWRC* will engage community members, made up of elected officials, administrative officers, economic developers, and public/private sector representatives from each locality to serve as the *Alliance Brownfields Redevelopment Advisory Group (Alliance BRAG)*. Among the first tasks of the BRAG will be development of a *community involvement plan* to guide broader community support for the overarching goals of the program and engage affected stakeholders to better understand their needs, concerns, and interests related to the brownfields program. The purpose of this plan is to provide a voice for the broader community and a forum for those who may not be directly represented by the BRAG. A *community liaison* will be responsible for interacting with the local community on behalf of the *BRAG*. Based on initial outreach efforts by the *Alliance*, the following *Project Partners* have committed to participation in the program:

Partner Name	Point of Contact/Email/Phone	Specific Role in Project	
GWRC - Economic Development - Executive Director	Charles P. Boyles chip.boyles@gwregion.org (540) 642-1580	Staff support, advise on economic development priorities, based upon reuse, has final authority to move forward on projects; and ensures that all project partners are involved in making decisions with respect to cleanup.	
GWRC - Economic Development	lan Ginger ginger@gwregion.org (540) 642-1571	GO Virginia Program Liaison; staff support, tourism research and marketing support / develop and maintain relationships with key community members.	
GWRC - Housing and Community Health Program	Sam Shoukas shoukas@gwregion.org (540) 642-1578	Housing and Community Health Program Liaison; staff support, participation on task force and committees	
GWRC - Affordable Housing AmeriCorps VISTA	Maddie Harris harris@gwregion.org (540) 642-0577	Affordable Housing AmeriCorps VISTA Liaison; staff support, participation on task force and committees	
City of Fredericksburg	Tim Baroody tjbaroody@fredericksburgva.gov (540) 372-1010	City Liaison and Technical Liaison; assist with evaluations / implementation of redevelopment opportunities / develop and maintain relationships with key community members.	
Spotsylvania County	Ed Petrovich epetrovich@spotsylvania.va.us (540) 507-7010	City Liaison and Technical Liaison; assist with evaluations / implementation of redevelopment opportunities / develop and maintain relationships with key community members.	
Community Liaison	To be decided (will be elected from among the Project Partners)	Community liaison services to the communities to be served by this grant.	

2.b.iii Incorporating Community Input: The GWRC Alliance will use a hybrid approach to communicate project progress and receive and incorporate feedback from the local community. In-person and virtual meeting will be organized with consideration for different work schedules, and meetings will be advertised via the BRAG members, through the GWRC's website, social media, an e-mail list collected from the website and prior meetings, local print, and fliers. In-person meetings will be organized at locations within the target areas. GWRC will solicit comments, recommendations for site selection and prioritization, and redevelopment ideas during in-person and virtual meetings as well as at local events and through online and e-mail surveys. Core stakeholder groups will be formed in each target area to include community organizations, property owners, businesses, and staff as well as relevant BRAG members. These stakeholder groups will act as the interface between the GWRC, BRAG, and the community to provide a means for dialog beyond initial meetings and to incorporate and respond in an intentional way to community input onsite prioritization, site selection and reuse planning. Partner organizations9, by their very structure, can communicate and disseminate information directly to and act as representatives for the targeted communities. Community input will be solicited, considered, and responded to in an intentional way. This method of communication using stakeholder groups will be beneficial for those communities where internet or phone access is limited. All forms of media and meetings can be offered with multilingual options and accessible to people with disabilities, to better reach and serve all communities.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

3.a Description of Tasks/Activities and Outputs

Task 1 – Program Administration / Community Engagement

⁹ The Alliance, schools, free clinics, local organization

- i. Project Implementation: Cooperative Agreement Oversight includes program and financial management to ensure compliance with grant requirements; oversee data input to EPA's ACRES database; attend brownfield-related training and conferences; and submit quarterly, annual, and final performance reports. If specific, eligible, and appropriate activities occur beyond the priority sites are needed, the same process described herein will be followed as needed. Community Engagement includes coordinating and conducting meetings and developing materials. Grant-funded direct costs: Travel expenses (registration, airfare, lodging, and meals), supplies, and contractual costs for assistance with reporting and maintaining interactions with stakeholders. Non-EPA funded activities: In-kind staff oversight for administration, monitoring, reporting, and community engagement activities and attending training conferences.
- ii. Anticipated Project Schedule: Procure Qualified Environmental Professional (QEP) (4.a.iii): Q1; ACRES and quarterly reports: quarterly and as needed; Annual and closeout reports: Q4, Q8, Q12, Q16; BRAG meeting: Q2 and quarterly thereafter; Other activities: Ongoing and as needed.
- iii. Task / Activity Lead: Authorized Organization Representative (AOR) and Management Team with input/assistance from QEP and BRAG. AORs have the authority to sign grant applications and the required certifications and/or assurances that are necessary to fulfill the requirements of the application process and grant implementation.
- iv. Outputs: RFP/QEP Contract (1); Quarterly Reports (16 Total 4/Year); Annual Reports (4); Closeout Report (1); Property Profile Forms/ACRES Site Entries (30); BTF Meetings (16); Community Meetings (8); Conferences (3); Brochures (3); Web Page Content (3); Advertisement, printing, and supplies (5 events).

Task 2 - Site Inventory and Prioritization

- i. Project Implementation: The Alliance will prepare a GIS brownfields site inventory and database for priority and target area sites described in Section 1.a.ii and include sites in underserved communities within the geographic area. These properties will be compiled, mapped, characterized, and prioritized by the BRAG and Alliance based on community vision, redevelopment potential, and community needs. A pool of sites will be selected for assessment from the target areas. If, grant funds remain after addressing the priority sites, the most current EJ Screening Tool will be used to identify additional sites in underserved communities in the geographic area, when sites have been identified they will be selected using the same criteria. No assessments will be conducted prior to confirming eligibility with EPA and DEQ if applicable for petroleum sites using Property Approval Questionnaires (PAQs). Grant-funded activities: Contractual costs to update, maintain inventory/database and prepare PAQs. Non-EPA funded activities: Staff oversight, site prioritization, and property owner access coordination.
- ii. Anticipated Project Schedule: Site inventory and database, prioritization, selection: Q2 Q3, update monthly; Other activities: Ongoing and as needed.
- iii. Task / Activity Lead: QEP will prepare/maintain inventory and PAQs with AOR/Management staff oversight, assistance with access coordination and work product review/approval. BRAG will provide site selection and prioritization input.
- iv. Outputs: Inventory/Database (1); Prioritize Matrix (1); New and/or updated PAQs (30)

Task 3 – Environmental Site Assessments (ESAs)

- i. Project Implementation: Upon receiving eligibility approval and access from property owners, approximately 18 Phase I ESAs will be conducted beginning with priority sites. Phase I ESA time and costs are contingent upon property size, existing improvements, past uses, and extent of known or suspected Recognized Environmental Conditions (RECs). Based on Phase I ESA results, approximately 5 sites will be addressed through Phase II ESAs, which include (a) project work plans, i.e., Quality Management Plan (QMP), generic Quality Assurance Project Plan (QAPP) or Site-Specific Quality Assurance Project Plan, site specific Health and Safety Plans (HASPs), and Sampling and Analysis Plans (SAPs); (b) soil, groundwater and/or air sampling; (c) lab analyses and data validation; and (d) summary reports with recommendations for further action, if warranted. *Grant-funded activities:* Contractual costs for assessments, work plans and reports. *Non-EPA funded activities:* In-kind staff oversight, coordination with property owners, and review of work products prior to EPA submittal.
- ii. Anticipated Project Schedule: Phase I ESAs: Q3 Q15 (after creating inventory database and priority list);

- Phase II ESAs: Q3 Q15 (following Phase I review and priority list)
- iii. Task / Activity Lead: QEP with AOR oversight, assistance with property owner coordination and community input, and work product review/approval.
- iv. Outputs: Phase I ESA Reports (12); Phase II ESA Reports (4); Phase II ESA Planning Documents (9 Total): QMP (1), Generic QAPP (1), HASPs (4) and SAPs (4)

Task 4 – Preliminary Planning for Remediation and/or Redevelopment

- i. Project Implementation: For some sites addressed through Phase II ESAs, preliminary remediation plans (Analyses of Brownfields Cleanup Alternatives or ABCAs) and associated cost estimates will be prepared to review alternatives for further environmental investigation and/or remediation, if warranted. Staff and QEP will also work with stakeholders to conduct preliminary redevelopment planning for selected target areas and/or sites to explore best reuse and economic potential. This may include reuse plans, marketing/feasibility studies, master plans, infrastructure evaluations, and conceptual development plans. Grant-funded activities: QEP costs for remediation and redevelopment plans. Non-EPA funded activities: Staff oversight, coordination with property owners and community partners to prepare plans and review/approve work products.
- ii. Anticipated Schedule: Q3 Q15
- iii. Task / Activity Lead: QEP with AOR oversight, assistance with property owner coordination and community input, and work product review/approval.
- iv. Outputs: Site-Specific ABCAs (2); Site-Specific Redevelopment Plans / Studies for priority sites (4); Area-Wide Revitalization Plans / Studies for target areas (3)

<u>3.b Cost Estimates:</u> The *Project Budget Table* shows cost estimates for each task, the cost development based on reasonable and realistic unit costs, and cost application to task activities. Cost estimates include an allocation of 59% of funds towards site-specific assessments and 31% of funds towards reuse/area-wide planning activities.

Budo	get Categories	Task 1 Grant Mgmt / Community Engagement	Task 2 Site Inventory / Prioritization	Task 3 Environmental Site Assessments	Task 4 Remediation / Redevelopment Planning	TOTAL
	Personnel/Fringe*	\$12,000	\$3,000	\$3,000	\$7,000	\$25,000
Costs	Travel	\$10,000	\$0	\$0	\$0	\$10,000
	Supplies	\$3,000	\$0	\$0	\$0	\$3,000
Direct	Contractual	\$24,000	\$35,000	\$253,000	\$150,000	\$462,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
TOTAL BUDGET		\$49,000	\$38,000	\$256,000	\$157,000	\$500,000
*Average for personnel weighted by involvement: \$100/hr (\$65.00/hr personnel+\$35/hr fringe = \$100/hr)						

Task 1 – Administration / Community Engagement – \$49,000 Direct & Contractual

- (a) GWRC staff oversight for administration, monitoring, reporting, and community engagement activities and attending training conferences. \$100/120hrs \$12,000 Total***
- (b) Travel \$10,000 Total (Direct Expense) Attendance of 2 national conference for 1 person and 3 state conferences for 2 people assuming the following unit costs (national/state): Conference registration: \$255/\$190; Transportation: \$1000/\$205; Hotel: \$200 per night for 3 nights/\$175 per night for 2 nights; Meals: \$70 per day for 4 days/\$70 per day for 3 days
- (c) Supplies \$3,000 Total (Direct Expense) Advertisement, printing, supplies and promotional materials for 6 community-wide and/or site-specific events estimated @ \$500 per event.
- (d) Contractual \$24,000 Total QEP assistance for reporting / grant reporting: \$1,000/quarter (\$4,000/year, \$16,000 Total); and QEP assistance for community engagement activities including development of communication materials: \$500/quarter (\$2,000/year, \$8,000 Total)

Task 2 – Site Inventory and Prioritization – \$38,000 Contractual

- (a) GWRC staff oversight, site prioritization, and property owner access coordination. \$100/30hrs \$3,000 Total***
- (b) Develop and maintain a GIS brownfields site inventory mapping / database and site prioritization matrix estimated: \$15,000 Total
- (c) Site access coordination assistance, preparation, and submittal of PAQs: \$1,250/quarter (\$5,000/year, \$20,000 Total)

Task 3 – Environmental Site Assessments (ESAs)* – \$256,000 Contractual

- (a) GWRC staff oversight, coordination with property owners, and review of work products prior to EPA submittal. \$100/30hrs \$3,000 Total***
- (b) Phase I ESAs Twelve (12) @ \$5,250 average \$63,000 Total
- (c) Phase II ESAs Four (4) @ \$42,000 average \$168,000 Total
- (d) Project Work Plans Nine (9) plans \$22,000 total, as follows:
 - Quality Management Plan 1 @ \$ 2,000, Generic Quality Assurance Project Plan 1 @ \$ 6,000
 - Site-Specific Health & Safety Plans (HASPs)** 4 @ \$1,000 average \$4,000 Total
 - Site-Specific Sampling & Analysis Plans (SAPs)** 4 @ \$3,000 average \$12,000 Total

Task 4 - Remediation / Redevelopment Plans - \$157,000 Total - Contractual

Based on site conditions following assessment, the City anticipates completing approximately nine (9) planning documents estimated as follows:

- (a) GWRC staff oversight, coordination with property owners and community partners to prepare plans and review/approve work products. \$100/70hrs \$7,000 Total***
- (b) Preliminary Site Remediation Plans (ABCAs) 2 @ \$15,000 average \$30,000 Total
- (c) Site-Specific Redevelopment/Reuse Plans/Studies 4 @ \$15,000 average \$60,000 total
- (d) Area-Wide Redevelopment Plans/Studies 3 @ \$ 20,000 average \$60,000 total
- * Unit costs for ESAs are estimates and may change depending on site-specific conditions.
- ** HASPs and SAPs will be combined into single report submittal.
- *** Administrative costs cannot exceed 5% of EPA funds. The GWRC will not charge indirect costs.

3.c Plan to Measure and Evaluate Environmental Progress and Results: To maintain steady progress throughout the grant, the QEP will prepare *quarterly reports to the GWRC and BRAG* in compliance with the approved *EPA Cooperative Agreement Work Plan*, which will summarize activities, e.g., milestones achieved, issues encountered, and budget and schedule updates. Progress will be measured by the outputs defined in Section 3.a.iv and evaluated against the schedule in Section 3.a.ii and costs defined in Section 3.b.i./3.b.ii. Significant deviations will be discussed with the EPA Project Officer to develop corrective actions. Updates will be reported upon implementation and completion of each site-related task in *EPA's ACRES database*, and *GWRC* will provide ongoing (quarterly, at a minimum) and post-grant information describing outcomes and benefits of the funding, including additional funds leveraged, jobs created, acres made ready for redevelopment, and private investment and tax revenue generated by the program.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a Programmatic Capability

<u>4.a.i / 4.a.ii / 4.a.iii</u> <u>Organizational Capacity, Organizational Structure, and Description of Key Staff:</u> This table provides the future brownfields program's organizational structure and describes key staff experience and qualifications. Given their education and professional experience, including their current position with the GWRC, the key staff fulfill roles that provide the technical, administrative, and financial capacity to provide oversight, management, and administration the grant. If additional staff or resources are required, GWRC will seek in-house staff to fulfill the need.

AUTHORIZED ORGANIZATIONAL REPRESENTATIVE (AOR): Charles P. Boyles, II, Executive Director, FOIA Officer. With over 30 years working in local government, Chip is the Executive Director of the George Washington Regional Commission in Fredericksburg, Virginia since November 2021. Previously served as Interim City Manager for the City of Charlottesville and with 7 years as the Executive Director of the Thomas Jefferson Planning District Commission in Charlottesville.

ECONOMIC DEVELOPMENT / PLANNING: Charles P. Boyles, II, Executive Director, FOIA Officer. Same as AOR, presented above.

FINANCIAL: Michele Dooling, Director of Finance and Personnel. With over 42 years in finance, Ms. Dooling has 4.5 years as the Director of Finance and Personnel with the GWRC and is a graduate from the Immaculata University, Pennsylvania.

TECHNICAL: Meredith Keppel, Environmental Planner II. Meredith started at the George Washington Regional Commission in October 2022. In her time as a conservation professional, Meredith has served at the Blue Ridge Land Conservancy, at the Northern Virginia Soil and Water Conservation District, and for the City of Roanoke. In her current role, Meredith is responsible for overseeing the Coastal Zone Management and Watershed Implementation Plan grants for Spotsylvania, Stafford, King George, and Caroline Counties as well as the City of Fredericksburg. Meredith graduated summa cum laude with a Bachelor of Arts degree in Environmental and Sustainability Studies from George Mason University.

The table provides the future brownfield program's organizational structure and a description of the experience and qualifications of the key staff. Given their education and professional experience, including their current position with *GWRC*, the key staff fulfill roles that provide the technical, administrative, and financial capacity to provide oversight, management, and administration the grant. Upon award of the Community Wide Brownfields Assessment Grant, the *GWRC* will convene Alliance representatives to establish *a governance/decision-making structure and prepare a Memorandum of Agreement (MOA)*, through which members will agree upon mechanisms and processes for implementation, e.g., stakeholder representation, outreach activities, redevelopment priorities, site selection criteria, and number of sites to be assessed per locality, to ensure equitable distribution of funds.

4.a.iv Acquiring Additional Resources: The *GWRC* will rely on a *Qualified Environmental Professional (QEP)* contractor with appropriate expertise and resources to carry out the technical aspects of its Brownfields Redevelopment Program. For contractor selection and procurement, *GWRC* will follow its competitive negotiation policies and procedures to obtain high quality professional services at reasonable cost, which will be conducted in a fair and impartial manner in compliance with Federal Code 40 CFR 31.36 and the Virginia Public Procurement Act (*COV*, Chapter 43, Title 2.2). Beginning with advertisement of a request for qualifications and proposals for professional services, followed by interviews with top candidates if needed, staff will score applicants and make recommendations to GWRC BRAG for approval to negotiate a contract with a qualified candidate. Applicable EPA solicitation clauses will be incorporated into the *GWRC's* solicitation and final contract executed with the selected QEP.

4.b Past Performance and Accomplishments

4.b.ii The *GWRC* Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance Agreements

(1) Purpose and Accomplishments: The *GWRC* current areas of focus include economic development, environmental services, housing and community health, transportation demand management, rural transportation, urban transportation, legislative services, and other services as needed. According to the GWRC's Annual Report FY-2022¹⁰, some of the recent regional highlights include: generating a return on investment of \$10.76 to \$1 for every dollar invested by our local governments; developing the five-year *GWRC* strategic plan (2022-2027); award and program implementation of \$2,000,000 grant for affordable housing development; supporting regional efforts around healthcare worker development, cybersecurity, a coastal resiliency economy, and entrepreneurial accelerator creation through *GWRC's* work with GO Virginia Region 6; meeting and exceeding *GWRC's* goals for the placement of those experiencing unsheltered homelessness through the work of the Continuum of Care; taking a full lane of traffic off of Interstate 95 each weekday through the nationally recognized work of GWRideConnect. The *GWRC's* past performance accomplishments using local and state money has had a significant impact on the economy of the Region

(2) Compliance with Grant Requirements: As noted above, the **GWRC** has managed Regionally funded projects and is fully capable of successfully completing all phases of work under this cooperative agreement. The **GWRC** is familiar with and understands the necessity of developing work plans, creating and maintaining schedules, and assuring adherence to project terms and conditions.

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George Washington Regional Commission PROPOSAL FOR USEPA'S COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT RFA NO. EPA-OLEM-OBLR-23-12/ CFDA NO. 66.818 Section III.A. – Threshold Criteria November 13, 2023

1. Applicant Eligibility

The *GWRC* is the "planning district commission" established by the Virginia General Assembly for the region comprising the City of Fredericksburg and the counties of Caroline, King George, Spotsylvania, and Stafford (not eligible under this application), known collectively as "Planning District". The *GWRC* is responsible for encouraging and facilitating local government cooperation within this "Planning District" and provides a broad array of planning and support services for the benefit of the nearly 400,000 residents. For this grant application, *GWRC*'s focus is to assist the *City of Fredericksburg (City)* and *Spotsylvania County (County)* (collectively hereinafter referred to as '*Alliance*'); however, *GWRC* can also assist other eligible members within the "Planning District". Articles of Incorporation are attached. *GWRC* is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. <u>Community Involvement</u>

Recognizing the importance of community involvement in the brownfields prioritization and redevelopment process, the *GWRC* will engage the *Alliance*, made up of elected officials, administrative officers, economic developers, and public/private sector representatives from each locality to serve as the *Alliance Brownfields Redevelopment Advisory Group (Alliance BRAG)*. Among the first tasks of the *BRAG* will be development of a *community involvement plan* to guide broader community support for the overarching goals of the program and engage affected stakeholders to better understand their needs, concerns, and interests related to the brownfields program. The purpose of this plan is to provide a voice for the broader community and a forum for those who may not be directly represented by the *BRAG*. Based on initial outreach efforts by the *GWRC*, the following *Project Partners* have committed to participation in the program: City of Fredericksburg and Spotsylvania County.

GWRC and the Alliance will use a hybrid approach to communicate project progress and receive and incorporate feedback from the local community in consideration of the community's capabilities and limitations. In-person and virtual meeting will be organized with consideration for different work schedules, and meetings will be advertised via the BRAG members, through the GWRC's website, social media, an e-mail list collected from the website and prior meetings, local print, and fliers. In-person meetings will be organized at locations within the target areas. The GWRC will also host virtual meetings and has been successful using this approach for the past several years, to reach out to the community. The GWRC will solicit comments, recommendations for site selection and prioritization, and redevelopment ideas during in-person and virtual meetings as well as at local events and through online and e-mail surveys. Core stakeholder groups will be formed in each target area to include community organizations, property owners, businesses, and staff as well as relevant BRAG members. These stakeholder groups will act as the interface between the GWRC, the BRAG, and the community to provide a means for dialog beyond initial meetings and to incorporate and respond in an

intentional way to community input on site prioritization, site selection and reuse planning. Partner organizations, by their very structure, can communicate and disseminate information directly to and act as representatives for the targeted communities. This method of communication using stakeholder groups will be beneficial for those communities where internet or phone access is limited. All forms of media and meetings can be offered with bilingual options to better reach and serve all communities.

3. Named Contractors and Subrecipients

Not applicable – the applicant has not identified a procurement contractor nor subrecipient to conduct work proposed in this application.

4. Expenditure of Assessment Grant Funds

Not Applicable: The applicant affirms it does not have an active EPA Brownfields Assessment Grant.