



CITY OF MT. VERNON  
1100 MAIN CITY HALL  
MT. VERNON, ILLINOIS 62864

618/242-5000  
FAX 618/244-0746

R05-24-A-003

1. Applicant Identification

City of Mt. Vernon  
1100 Main Street  
PO Box 1708  
Mt. Vernon, IL 62864

2. Funding Requested

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested: \$500,000

3. Location

a) City of Mt. Vernon b) Jefferson County c) Illinois

4. Target Area and Priority Site Information

- Target Area: two census tracts (CTs) covering south-central Mt. Vernon  
CT 17081051000, and CT 17081051100
- Priority Site Information:
  - Former Park Plaza Shopping Center, 736 Newby Avenue, Mt. Vernon, IL 62864
  - Old Boat Shop, 1800 S. 10<sup>th</sup> Street, Mt. Vernon, IL 62864

5. Contacts

a. Project Director

Mary Ellen Bechtel, City Manager  
618-242-6802  
citymanager@mtvernon.com  
1100 Main Street, Mt. Vernon, IL 62864

b. Chief Executive/Highest Ranking Elected Official

Mayor John Lewis  
618-242-6802  
mayorlewis@mtvernon.com  
1100 Main Street, Mt. Vernon, IL 62864

6. Population

City of Mt. Vernon, IL: 14,614 (US Census: 2017–2021 American Community Survey)



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7. Other Factors

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	4
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).	N/A
The priority site(s) is in a federally designated flood plain.	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
At least 30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area.	8, 9
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	N/A

8. Letter from the State or Tribal Environmental Authority  
 See attached.

9. Releasing Copies of Applications  
 Not Applicable



**Subject: State Acknowledgement Letter for the City of Chicago  
FY2024 US EPA Brownfield Multipurpose Grant Application**

10/25/2023

City of Mt. Vernon  
ATTN: Mary Ellen Bechtel  
City Manager  
1100 Main Street  
Mt. Vernon, IL 62864

Dear Mary,

The Illinois Environmental Protection Agency (Illinois EPA) has received your request for a letter of acknowledgement for an upcoming Community Wide Assessment Grant application to U.S. EPA. City of Mt. Vernon is applying for a \$500,000 Community Wide Assessment Grant.

The grant will be a Community Wide Assessment Grant for Both Hazardous Substances and Petroleum.

Illinois EPA acknowledges City of Mt. Vernon's efforts to obtain federal Brownfields funds for this project. If you have any questions, I may be contacted at the above address or telephone numbers below, or at [Jacob.fink@illinois.gov](mailto:Jacob.fink@illinois.gov).

Sincerely,

Jacob Fink  
Brownfield Program Administrator  
Bureau of Land/Office of Site Evaluation  
Office# (217) 785-8726  
Cell# (217) 986-0818  
[Jacob.fink@illinois.gov](mailto:Jacob.fink@illinois.gov)



2125 S. First Street, Champaign, IL 61820 (217) 278-5800  
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120  
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000  
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200  
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760



**Mt. Vernon, Illinois**  
**FY24 Brownfields Assessment Grant**  
**Narrative**

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**a. Target Area and Brownfields** i. Overview of Brownfield Challenges and Description of Target Area: The City of Mt. Vernon (City), population 14,614, is in southern Illinois.<sup>1</sup> **The geographic boundaries for this grant application are the city limits.** When first established in 1817, Mt. Vernon had no roads into the town and was situated far from the large industrial complexes in Illinois and surrounding states. Numerous railroad lines later traversing the country met in Mt. Vernon, turning it into a regional hub for rail transportation and equipment maintenance. A focal point of this rail activity was the former Mt. Vernon Car Manufacturing Shop (Car Shop). Opened in 1889, the Car Shop workers constructed and repaired freight cars and other equipment from caboose and refrigerator cars to car wheels and general foundry work required by railroads. In addition to becoming the largest employer in Mt. Vernon, flooding the local economy with good payrolls, the Car Shop contributed to the local social scene, with employees joining a local traveling baseball team as well as hosting a variety of entertainment activities throughout the city. The Great Depression took a toll on the Car Shop, with production significantly curtailed from 1930 to 1936. The Car Shop continued to operate through World War II, manufacturing bomb casings, but it would never again see the economic boom from the pre-Depression era. After World War II, the properties were sold, with the main Car Shop being completely dismantled and parcels sold off to developers. With the decline of the Car Shop came the decline of the surrounding residential and commercial areas. Commercial development (Park Plaza Mall) that followed failed to prosper. The US Postal Service was the last tenant left when the mall was demolished in 2022, leaving an underused vacant lot in the heart of Mt. Vernon. Now residents are left to deal with the brownfield challenges such as blight, vacant and abandoned buildings, and environmental hazards littered throughout their community.

The **target area** is comprised of **census tracts (CTs) 17081051000 and 17081051100**, both **Justice40 Disadvantaged Communities**.<sup>2</sup> The target area is home to a poverty-stricken community whose residents are living with economic and environmental justice difficulties such as high unemployment, high poverty, blighted and distressed neighborhoods, and a lack of affordable housing. The target area is in the **94<sup>th</sup> percentile in low income, 97<sup>th</sup> percentile in unemployment, and 87<sup>th</sup> percentile in poverty**.<sup>2</sup> As stated in the City's 2022 Comprehensive Plan update, the City has seen a general economic decline, with a **14% loss of population from 16,988 in 1990 to 14,614 in 2021**, due to lack of jobs and blighted conditions leading residents to move elsewhere for work or a better standard of living. The City believes that a collaborative planning effort with project partner organizations, supported by EPA's Brownfields Assessment Grant funding, will allow **additional inventory and refined prioritization, assessment, and cleanup planning** to push redevelopment of **blighted and abandoned brownfields**, bringing prosperity to the **underserved** community.

ii. Description of the Priority Brownfield Site(s) The primary corridor of interest within the target area includes the South 10<sup>th</sup> St. Corridor running north to south from the CSXT rail right of way on the north (location of the former Car Shop) approximately one mile south to its intersection with Illinois Hwy 142. This corridor is the primary entrance to the city from the south and gives visitors a negative perception of the community. Based on a review of Illinois Environmental Protection Agency (IEPA) and EPA databases, along with city staff knowledge of known or suspected contaminated sites, there are dozens of abandoned businesses and warehouses, vacant commercial sites, former gas stations, and vacant lots of concern in the target area alone, with a

<sup>1</sup> US Census: 2017–2021 American Community Survey

<sup>2</sup> CEJST Screening Tool

heavy concentration along the South 10<sup>th</sup> Street Corridor. Contamination associated with priority sites and other known or suspected contaminated properties include **volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), heavy metals, petroleum constituents, polychlorinated biphenyls (PCBs), lead-based paint (LBP) and asbestos-containing material (ACM).**<sup>3</sup> The City will work with target-area residents to identify additional sites through a grant-funded site inventory followed by the creation of an evaluation ranking tool that will prioritize the identified brownfield sites based on community need and viable redevelopment plans.

**Priority site 1** is the former **Park Plaza Shopping Center** (13 acres) located on the north end of the 10<sup>th</sup> Street corridor. Once at the center of the former Car Shop complex, this railroad-servicing facility-turned-shopping-plaza is now abandoned and completely dilapidated. The last tenant of Park Plaza relocated in 2022 due to the deteriorating condition of the building. Most of the 50-year-old mall buildings' remnants have been removed due to roof leaks, partial collapse, and long-deferred maintenance, rendering the buildings functionally and economically obsolete, leaving only slabs and a few loading docks. This vacant, unsecured site is within a block of a shuttered high school, pedestrian walkways, restaurants, and other businesses. A "Limited Site Investigation" completed in November 2019 confirmed potential environmental hazards including VOCs, PAHs, heavy metals, PCBs, petroleum constituents, LBP, and ACM, with confirmed soil and groundwater impacts. Due to the limited nature of the investigation, the City needs further assessment and evaluation completed to determine the extent of the contamination associated with this brownfield. **The City has access to the site for further assessment.**

**Priority site 2** is the **Old Boat Shop** (1.3 acres). The once flourishing boat repair shop built in 1976 has been vacant for the past several years. The site has a dilapidated, one-story building with an add-on storage shed. The site is unsecured and located at a busy intersection of Highway 142 and South 10<sup>th</sup> Street. The site is in a heavily traveled area near gas stations, businesses, and restaurants. Potential contaminants include petroleum, VOCs, metals, chlorinated solvents, and suspected underground storage tanks (USTs). **The City has access to the site for assessment.**

iii. Identifying Additional Sites: The City will work to determine additional eligible sites within the target area. While the City has already identified **over 20** potential sites, a more in-depth, grant-funded site inventory and evaluation ranking criteria process (Budget Task 2) will be established as the City works with target-area residents and partners to identify and prioritize sites within the **underserved** community. Due to the heavy industrial history of the community, there are many underused and abandoned buildings with potential to exhibit brownfields-related challenges in redevelopment and safe reuse. Those properties will be researched further by City staff using the county's GIS website. The evaluation criteria used to determine which sites are added to the inventory will be based on community need, project partner and resident input, and the Climate Economic Justice Screening Tool (CEJST) and US Census data to ensure **underserved** communities benefit from assessment, cleanup, and redevelopment. In the event all funding needs have been addressed in the target area, the City will identify additional sites throughout their geographic boundary using the same evaluation ranking criteria used in the target area.

**b. Revitalization of the Target Area** i. Reuse Strategy and Alignment with Revitalization Plans: The City has continued to address blight in the target area through condemnations and using grant funds, when available, to raze blighted properties. But investment still lags in the area due to the sheer volume of blighted properties the City must contend with. A renewed interest in addressing these challenges was brought forth through the recent update to the City's comprehensive plan titled "**Your Vision, Our Mission! 2022–2032 Comprehensive Plan**" (Plan), that was adopted

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<sup>3</sup> Limited Site Investigation Report, November 19, 2019

by City Council on October 3, 2022. In this Plan, community members and City leadership prioritized Southside renewal (the target area), affordable residential housing, industrial jobs, population growth, and parks and outdoor spaces development as areas to pursue for the next 10 years. Milano Railway Logistics (Milano), a longtime corporate fixture in Mt. Vernon, recently acquired the former **Park Plaza Shopping Center priority site** and intends to convert the property into a rail transloading facility and warehouse, consistent with the industrial uses of other businesses in the immediate vicinity of the CSXT rail line. The Transloading facility will give local companies rail access to distant markets and help local manufacturers and bulk shippers optimize logistics for their freight requirements. Milano’s plan will fill the void of industrial jobs in Mt. Vernon, incrementally growing the city’s tax revenue base. Assessment, cleanup, and mixed-use redevelopment of the **Old Boat Shop priority site** is planned to create new retail, green space, and affordable housing at the corridor’s southern end. South Central Transit (public transit agency in Mt. Vernon) is interested in locations along this corridor for additional bus stops and a potential transit center to better serve the community. The area currently lacks neighborhood services that previously existed, and this has led to the decline of the surrounding neighborhoods. The target area is a USDA **food desert** and the City’s Plan includes courting grocery services to come to the area. The reuse strategies of the addition of green space, affordable housing, new retail/commercial business, improved transit service, and overall revitalization of this blighted area align with the Plan and will address the environmental and economic needs of this disadvantaged community.

ii. Outcomes and Benefits of Reuse Strategy: The redevelopment of the **Park Plaza Shopping Center priority site** into a transloading facility and warehouse will create new, good paying, local employment options (economic), new tax base (economic), improve walkability of the community (noneconomic), and will remove blight and environmental hazards associated with the site (non-economic). The redevelopment of the **Old Boat Shop priority site** into mixed-use development will create affordable housing (noneconomic), green space (noneconomic), retail businesses (economic), tax base businesses (economic), local employment opportunities (economic), and a revitalized area clean of all environmental hazards (noneconomic). All of these reinvestments within this **underserved** community meet the goals associated with the Plan and will provide a vital trend for an improved quality of life for residents in Mt. Vernon.

The City will work with developers to encourage planned redevelopment that will improve **climate adaptation/mitigation capacity and resilience**. Improving **green space**, connecting and **improving the walkability** of the City to help **reduce pollutants**, will improve the quality of life for all residents. The City is currently discussing **energy-efficient/renewable improvements** for the **Park Plaza Shopping Center** redevelopment with the current owner (Milano) to include high efficiency LED – lighting throughout its planned transloading facility. Milano is also in discussions with a solar energy developer to construct a solar array south of the site to provide low cost solar energy to public housing residents in the target area. By working to ensure developers are using **energy-efficient measures** in their designs, **promoting sustainability**, and encouraging the use of **renewable energy**, the City will build a resilient community for all.

**b. Strategy for Leveraging Resources** i. Resources Needed for Site Reuse: The City as a local unit of government, is eligible to apply for county, state, and federal grant funding. The City is working to secure funding to further its Brownfield Program redevelopment goals. Examples of specific leveraged funds as well as more broadly used funding programs are discussed below.

	Agency	Funding Purpose
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Federal	HUD Community Development Block Grant	Demolition of remediated brownfield sites and contribute to affordable housing initiatives
Federal	Environmental Protection Agency	Cleanup and Revolving Loan Fund Grants for cleanup of assessed properties
State	Illinois Department of Natural Resources	Grants for bike paths, parks, and recreational facilities (Mt. Vernon is on IDNR list of “Economically Distressed Communities” qualifying for grants).
State	Illinois EPA Revolving Loan Fund	Up to \$1M per site for cleanup of brownfield sites in target areas after the assessment, and ensures full cycles of assessment, cleanup and redevelopment.
Federal	Illinois EPA Climate Pollution Reduction Grant	Funding for J40 Communities to implement climate pollution reduction projects including solar installations, energy efficiency funding for homes, businesses, and municipal facilities, etc. Projects must be in conformance with the State of Illinois Priority Climate Action Plan to be submitted to EPA March 1, 2024, with applications for implementation projects due April 1, 2024.
Local	HUD – Mt. Vernon Residential Rehab Grant Program	Funding for subsidized maintenance/repair for qualifying low-income residents.
State	Illinois Grocery Initiative	Funding support for new or expanded grocery services in food deserts
<u>Local</u>	City of Mount Vernon Tax Increment Financing (TIF)	TIF can be used to support eligible redevelopment costs including demolition of structures and other site preparation and utility and roadway improvements at a site within the TIF district (target area).

ii. Use of Existing Infrastructure: The City’s plans for target-area redevelopment will include the use of existing infrastructure (streets, water/sewer, gas, and electric utilities). The **infrastructure to support brownfield redevelopment is already in place at the priority sites**. In the event additional infrastructure improvements are needed, the City will look to state and federal funding to support required improvements.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need** i. The Community’s Need for Funding: Revitalizing a target area that is currently in a population and economic downward spiral is the first step to creating a brighter future for this underserved community. The target area is home to **3,788** residents living in a poverty-stricken community with economic and environmental justice (EJ) difficulties such as extremely high unemployment, poverty, and blighted and distressed neighborhoods.<sup>4</sup> The median household income for the target area is \$35,852 compared to the US \$69,021.<sup>4</sup> The target area is in the **94<sup>th</sup> percentile in low income, 97<sup>th</sup> percentile in unemployment, 87<sup>th</sup> percentile in poverty, and 95<sup>th</sup> percentile for energy cost burden.**<sup>5</sup> Target-area residents’ per capita income is just over half of the state average (**\$20,334 vs. \$39,571**) with **39% of households receiving food stamp assistance versus 11% across the US.**<sup>4</sup> Mt. Vernon also has experienced a **dwindling population (14% decline since 1990),**<sup>6</sup> that combined with other attributes, sounds the desperate alarm of a community in need.

The City’s Plan points to a **perpetual underfunding of basic community needs supporting residential rehab programs, traffic improvements, sewer and water infrastructure, disaster preparedness, and parks and trails**. The City has even less ability to pursue renewable energy and electric vehicle infrastructure supporting broader community resilience. With almost the entire City budget allocated for salaries and services such as solid waste, police, and fire—coupled with the **high poverty**—the City lacks the funding for assessments that would allow for redevelopment.

<sup>4</sup> US Census: 2017–2021 American Community Survey

<sup>5</sup> CEJST Screening Tool

<sup>6</sup> 2022 Comprehensive Plan Update



Securing a Brownfields Assessment Grant will set the community on a course of assessing, remediating and redeveloping blighted and contaminated properties in the target area to create jobs, improve living conditions, and battle climate change, funding that would otherwise take away from the city's limited ability to meet basic needs.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: The **sensitive populations** living in the target area are those **living below poverty, minorities, and the unemployed**. In the target area, **19% of all families live in poverty (US 9%), 38% of all families with children under the age of 18 live in poverty (US 14%), 17% are unemployed (US 6%), and 31% are Black minority (US 13%).**<sup>7</sup> This **Justice40 Disadvantaged Community** ranks **95<sup>th</sup> percentile for low-median income** and **97<sup>th</sup> percentile for unemployment**.<sup>8</sup>

The target-area population faces **critical service gaps** (welfare issues) including **transportation access** and residents living in a USDA **food desert**. These challenges of limited mobility and lack of sufficient access to healthy fresh food exasperates health and welfare risks to residents.<sup>9</sup> The underserved area has over **448 households who do not have access to a vehicle**.<sup>9</sup> Specific to Mt. Vernon and the target area, the 2021 Community Health Assessment (CHA) identified a focus on **nutrition, weight, and exercise** as critical health priorities for the community. Lack of safe and accessible walking and recreational space contributes to health disparities as further listed below. Through a Brownfields Assessment Grant, the City will be better able to identify locations where cleanup and redevelopment can help fill critical service gaps of mobility, healthy food, and recreational space as well as to ensure full conformance to the Americans with Disability Act (ADA) requirements in the target area.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Sensitive populations of the target area are more susceptible to health issues stemming from environmental contaminants. Incidence of **asthma (91<sup>st</sup> percentile US), disability (90<sup>th</sup> percentile US) and low life expectancy (94<sup>th</sup> percentile US)** can be correlated to the confirmed and suspected contaminants associated with priority sites including **VOCs, PAHs, heavy metals, PCBs, LBP, and ACM**.<sup>9</sup> LBP exposures contribute to high blood lead levels in children leading to disability. The target area ranks in the **64<sup>th</sup> percentile for homes that likely have LBP in the US**.<sup>9</sup> ACM exposure can lead to significant health risks associated with respiratory ailments, and exposures to VOCs, PCBs, PAHs, and heavy metals manifest in a wide variety of health effects including cancers and developmental disorders. According to the National Cancer Institute, Jefferson County (target-area health data not available) has a **cancer risk that is above average**, with **490/100K in age-adjusted incidence rate** versus the state (442/100K) and US (459/100K). Other concerns listed in the Sisters of Saint Mary Community Health Assessment report included these: **cancer mortality rates in Mt. Vernon far exceeded state and national norms coincidentally dating back to the early 1990s when the City's population decline began**, and Mt. Vernon residents who had "adverse childhood experiences" (often connected to poverty) were three times more likely to contract cancer than other residents. In addition, the report listed **asthma and cancer as two of the top three health priorities for the community**. Further characterization through a Brownfields Assessment Grant leading to cleanup of priority and other sites within the target area will help eliminate exposure scenarios associated with site contaminants, leading to better health outcomes for disadvantaged residents of the community.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: The priority sites and target area are fully encompassed by two census tracts covering south-central Mt. Vernon, each

<sup>7</sup> US Census: 2017–2021 American Community Survey

<sup>8</sup> CEJST Screening Tool

<sup>9</sup> EJ Screen Report

classified as **Justice40 Disadvantaged Communities**. The blight created by the **abandoned and vacant sites** littered throughout the target area present **ongoing environmental concerns**. The target area suffers from **EJ issues** such as **extremely low income (86<sup>th</sup> percentile), high poverty rates (29% all people), high unemployment rates (93<sup>rd</sup> percentile), high rates of government assistance (39% SNAP), and high housing cost burden (78<sup>th</sup> percentile)**.<sup>10</sup> To further escalate the existing health issues, the target area is in the **93<sup>rd</sup> percentile for USTs in the US**.<sup>10</sup> The effects of the EJ issues have taken a toll on these underserved residents. With the help of a Brownfields Assessment Grant, the City will be able to continue to reduce these threats facing the **disadvantaged** community.

(b) Advancing Environmental Justice: Left unresolved, the blight and associated negative consequences will proliferate throughout the underserved community. Reusing the priority sites for retail and commercial businesses, affordable housing, green space, and food stores will remedy many of the **socioeconomic and EJ issues** and benefit the **Justice40 disadvantaged community** residents with enhanced health and wellbeing. The EPA Brownfield Grant funding will allow identification, assessment, and remediation to this target area and bring a new life and sense of community back to it. The planned redevelopment will address Biden’s Justice40 Memorandum initiatives by creating **new employment opportunities with better wages, improving walkability, the addition of green space, and creating new affordable housing options**. The priority sites are currently abandoned. Therefore, **no displacement of businesses or residents** will occur. In the event that other sites identified cause displacement, the City will work with the business or resident to find a place to relocate.

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

Name of Org.	Point of Contact	Specific involvement in the project or assistance provided
Greater Egypt Regional Planning Commission	Cary Minnis <a href="mailto:Caryminnis@greategypt.org">Caryminnis@greategypt.org</a> 618.997.9351	Greater Egypt provides economic development planning assistance in the target area. They will assist with <b>site selection, future reuse planning, and community outreach</b> .
Jefferson County Development Corporation (JCDC)	Tony Iriti <a href="mailto:tonyiriti@jeffcod.org">tonyiriti@jeffcod.org</a> 618.244.3554	JCDC assists local government and businesses with locating project facilities and funding opportunities. They will support <b>site identification and future reuse planning activities</b> .
Mt. Vernon Housing Authority	Sierra Daniels <a href="mailto:hshamv@accessus.net">hshamv@accessus.net</a> 618.244.6275	The Housing Authority creates partnerships in the community to promote safe, affordable housing, including revitalization and maintenance of existing housing and promotion of new housing, and works to counsel families and individuals on home ownership. They will support <b>site selection</b> for affordable housing opportunities and <b>community outreach</b> .
Greater Jefferson Chamber of Commerce	Jamie Storey <a href="mailto:chamberexec@sothernillinois.com">chamberexec@sothernillinois.com</a> 618.242.5725	The Greater Jefferson Chamber of Commerce advocates for the area businesses. They will support <b>future reuse planning</b> activities.
Downtown Mt. Vernon Development Corp.	Monty Jo Clark <a href="mailto:dmdc@mvn.net">dmdc@mvn.net</a> 618.242.6866	Downtown Mt. Vernon Development Corp. helps small businesses find funding and locations and promotes community activities in the area. They will support <b>site selection and community and business outreach activities</b> .

<sup>10</sup> US Census 2017-2021 American Community Survey

iii. Incorporating Community Input: The City informed the public of their intent to pursue an EPA Brownfield Assessment Grant at the City Council Meeting held on **September 18, 2023**. The City understands that working closely with community members is the key to implementing a successful Brownfield Program. The City will create productive interactions between target-area residents, especially those most affected by the project, and community organizations. The City has and will continue to seek valuable input from residents and community organizations to help identify potential brownfield sites, as they are the most aware of where its most important needs lie. After a grant is awarded, the City will create a **Community Involvement Plan (CIP)** that will provide an event schedule, an outline of planned community engagement activities, a project background, and a list of key stakeholders. The CIP will be made available for review at City Hall and on the City’s website and will ensure that the underserved community is represented.

To identify potential brownfield sites in the target area, the City will perform community outreach and review the suggested brownfield sites provided by community members during quarterly meetings. The **Brownfield Project Team** will review and evaluate comments and community input during quarterly meetings, recording all community member suggestions and information in the minutes and posting them on the City’s Brownfield Program webpage. The City will reach out individually to those residents who had concern or comments on the project within two weeks of receipt. The Brownfield Project Team will maintain a site inventory of the suggested brownfield sites and will review the list routinely, updating it at each quarterly meeting. The community and Brownfield Project Team will work together to prioritize sites based on community need and the City’s Brownfield Program goals, giving highest priority to **underserved** residents of the community. The City’s CIP will incorporate several forms of media. Project updates will be posted on the City’s Facebook page and the City’s Brownfield Program webpage.

The City will provide resident **interaction via website and social media as an alternative to in-person community engagement**. The City will disseminate Brownfield Project information through signage in government buildings, press releases, and local newspapers and will update organizations and community members through City Council meetings, community education meetings held throughout the target area, and charrettes/visioning sessions. City news is also printed on the back of water bills, and the mayor has a biweekly radio interview broadcast on WMIX and WDML, local stations that will be used to publicize the program and related events. All promotional materials and the names and contact information of the City’s Brownfield Program Team will be posted on the City’s brownfield webpage, facilitating community-member contact with Brownfield Project Team members.

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

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

<b>Task 1: Outreach</b>	
i.	<i>Project Implementation:</i> The Mt. Vernon Brownfield Project Manager will develop a Community Involvement Plan (CIP), outreach materials, brownfield project website, and social media posts with the assistance of the environmental contractor (EC). Staff will lead community meetings to keep the public informed on project updates. Supplies are budgeted for office supplies and printing outreach materials (brochures/handouts).
ii.	<i>Anticipated Project Schedule:</i> CIP created 1 <sup>st</sup> quarter. Community meetings held in the 2 <sup>nd</sup> and 4 <sup>th</sup> quarters during Y1–3 and 2 <sup>nd</sup> quarter of Y4. Website/outreach materials created 2 <sup>nd</sup> quarter and posted throughout the grant.
iii.	<i>Task/Activity Lead:</i> City: Ms. Mary Ellen Bechtel, Brownfields Project Director
iv.	<i>Outputs:</i> CIP, Brownfield Website, 7 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA-required Quarterly Reports.

<b>Task 2: Site Inventory and Assessment</b>	
i.	<i>Project Implementation:</i> The City’s Brownfield Project Director will work with target-area residents and other stakeholders during community meetings to create a site inventory for assessment. Abandoned and underused properties will be researched further by City staff using Jefferson County’s GIS website. Once a list is compiled, the EC will work with staff to create an evaluation ranking tool to determine the order in which the sites will be addressed, with sites in <b>underserved</b> areas being prioritized. The EC will then conduct Environmental Site Assessment (ESA) activities at sites selected and ranked through the ranking tool, starting first with the two priority sites listed in this application. ASTM-AAI compliant Phase I ESAs; Generic Quality Assurance Project Plan (QAPP); Phase II ESAs which will include the SS-QAPP. Prior to assessment, site access agreements and property eligibility determinations approval will be obtained.
ii.	<i>Anticipated Project Schedule:</i> Community meeting held in 2 <sup>nd</sup> quarter will continue the preliminary inventory process that began with this application. Evaluation ranking process and assessment activities begin in the 2 <sup>nd</sup> quarter and continue through the grant.
iii.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects of the project with oversight from the City: Mr. Nathan McKenna, Brownfields Project Manager
iv.	<i>Outputs:</i> Evaluation Ranking Tool, Site Inventory List, 19 Phase I ESAs, 1 Generic QAPP, 8 Phase II ESAs including SS-QAPP, Site Access Agreements, and Property Eligibility Determinations.
<b>Task 3: Remediation/Reuse Planning</b>	
i.	<i>Project Implementation:</i> For projects identified for cleanup, the EC will prepare the Analysis for Brownfields Cleanup Alternatives (ABCA) and/or Cleanup Plans. Cleanup planning will include evaluating cleanup alternatives, calculating cleanup costs, and determining site-appropriate remediation/reuse planning to reduce health/environmental risks. The EC will assist the City in hosting charrettes/visioning sessions for key properties. A planner will create site reuse assessments and a Brownfield Revitalization Plan.
ii.	<i>Anticipated Project Schedule:</i> Plans & Charrettes begin 6 <sup>th</sup> quarter and continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects of the project with oversight from the City: Ms. Mary Ellen Bechtel, Brownfields Project Director
iv.	<i>Outputs:</i> 4 ABCAs, 3 Vision Sessions/Charrettes, 3 Site Reuse Assessments, 1 Brownfield Revitalization Plan
<b>Task 4: Programmatic Support</b>	
i.	<i>Project Implementation:</i> The City will procure an EC to assist with the Brownfield Grant Project. The City’s Brownfield Project Director will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The EC will assist the City in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant. The travel budget allows for two staff to attend three national/regional/grantee brownfield training conferences/workshops.
ii.	<i>Anticipated Project Schedule:</i> ACRES Reporting begins in the 1 <sup>st</sup> quarter, and Quarterly Reporting begins in the 2 <sup>nd</sup> quarter and continues throughout the grant project. Annual Reporting and Forms created in the 5 <sup>th</sup> , 9 <sup>th</sup> , and 13 <sup>th</sup> quarters and during final closeout (after 16 <sup>th</sup> quarter).
iii.	<i>Task/Activity Lead:</i> City: Ms. Stephanie Bailey, Brownfields Finance Director
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Annual Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend three conferences.

**b. Cost Estimates:** Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks.* The budget for this project includes travel, supplies, and contractual costs only. **Fifty-seven percent (57%)** of the budget will be spent on the **site-specific work through the Assessment Task. Thirty-three percent (33%)** of the budget will be spent on **eligible reuse/area-wide planning activities within the target area. Task 1 Outreach:** Contractual: Community Involvement Plan \$3,000 (24 hrs. x \$125/hr.); Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$2,000 (16 hrs. x \$125); 7 Community

Education Meetings \$10,500 (12hrs. x \$125; \$1,500/per meeting). Supplies: Outreach Supplies \$500 (\$400 printing services, \$100 poster board). **Task 2 Site Inventory and Assessment**: Contractual: Brownfield Site Inventory and Evaluation Ranking Tool Creation \$10,000 (80 hrs. x \$125); 19 Phase I ESAs \$4,500 each for a total of \$85,500; 1 Generic QAPP \$5,500 (44 hrs. x \$125); 8 Phase II ESAs including SS-QAPP at \$23,000 each for a total of \$184,000. **Task 3 Remediation/Reuse Planning**: Contractual: 4 ABCAs \$5,500/ea. (44 hrs. x \$125) for a total of \$22,000. 3 Visioning Sessions/Charrettes \$2,000/ea. (16 hrs. x \$125) for a total of \$6,000; 3 Site Reuse Assessment Plans at \$20,000 each for a total of \$60,000 (Planner: 100hrs x \$150; Market Analysts: 25hrs x \$125; Environmental Professional: 15hrs x \$125); 1 Brownfields Revitalization Plan \$75,000 (Planner: 250hrs x \$150; Market Analysts: 150hrs x \$125; Environmental Professional: 150hrs x \$125). **Task 4 Programmatic Support**: Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period \$24,000 (192 hrs. x \$125). Travel: Two City staff to attend three conferences \$12,000 (flights at \$800, 3 nights in hotel at \$300 each, incidentals and per diem at \$75/day for 4 days x 2 attendees x 3 events).

Category	Tasks				Totals
	<i>Outreach</i>	<i>Site inventory and Assessment</i>	<i>Remediation/Reuse Planning</i>	<i>Programmatic Support</i>	
Travel				\$12,000	\$12,000
Supplies	\$500				\$500
Contractual	\$15,500	\$285,000	\$163,000	\$24,000	\$487,500
<b>Total Budget</b>	<b>\$16,000</b>	<b>\$285,000</b>	<b>\$163,000</b>	<b>\$36,000</b>	<b>\$500,000</b>

**c. Plan to Measure and Evaluate Environmental Progress and Results:** To ensure this EPA Brownfield Project is on schedule the City’s Brownfield Project Team, which will include the EC, will meet quarterly to track all **outputs identified in 3.a.** using an Excel spreadsheet and will report all progress in fulfilling the scope of work, goals, and objectives to the EPA via quarterly reports. In addition, project expenditures and activities will be compared to the project schedule to ensure the grant project will be completed within the four-year time frame. Site-specific information will be entered and tracked in the ACRES database. The outputs to be tracked include the number of neighborhood meetings, public meetings, meetings with community groups and community partners, environmental assessments, ABCAs, visioning sessions and reuse plans. The outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not being completed in an efficient manner, the City has countermeasures in place to address this problem. The City Brownfields Project Director will make monthly calls to their EPA Project Officer and, if needed, will create a corrective action plan to help the project get back on schedule.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability** i. Organizational Capacity, ii. Organizational Structure, & iii.

Description of Key Staff: The City operates under a Mayor–Council form of municipal government. The City has the organizational capacity to handle a project through the office of the City Administrator with support from the City’s government officials (City Council) led by the Mayor. The City Manager, **Ms. Mary Ellen Bechtel**, will be the **Brownfield Project Director**. Ms. Bechtel has been the City Manager since 2015. She is responsible for the oversight and management of municipal departments, budget preparation, and facility and equipment maintenance and management. Before becoming City Manager, she was the Assistant City

Manager. Ms. Bechtel will be responsible for the day-to-day activities, timely and successful expenditure of funds, and completion of administrative and financial requirements of the Brownfields Program. The Assistant City Manager, **Mr. Nathan McKenna**, will be the **Brownfield Project Manager**. He is responsible for project management, zoning administration, Tax Increment Finance administration, preparation of annual budget, oversight of parks and recreation department, grant writing, and grant administration. A City employee since 2012, Mr. McKenna has worked as the Assistant City Manager since 2018. Mr. McKenna will assist Ms. Bechtel with the administration of the City's Brownfields Program. The **Brownfield Finance Director** will be **Ms. Stephanie Bailey**. Ms. Bailey has been the City's Finance Director since 2021 but came to Mt. Vernon with over 17 years of experience as the Certified Illinois Municipal Treasurer for the Village of Louisville in Louisville, Illinois. She is proficient in the City's accounting software, online banking service, accounting, payroll, accounts payable, and grant reporting. Ms. Bailey will be responsible for managing the finances and all drawdowns through ASAP.gov for this EPA Grant project. An environmental contractor will assist with the technical portions of the Brownfields Project.

iv. Acquiring Additional Resources: Using local contracting requirements and procurement process, the City will procure a qualified environmental contractor to assist with technical and reporting portions of the Brownfield Community-wide Assessment, in addition to any other contractors needed to complete the project. The City will ensure compliance with the EPA's "Professional Service" procurement process, including compliance with 2 CFR §§ 200 and 1500. The City will promote strong practices, local hiring, and will link members of the community to potential employment opportunities for all brownfield-related redevelopment via community outreach practices and project updates to project partners and other stakeholders.

**b. Past Performance and Accomplishments** ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements: (1) Purpose and Accomplishments: In June 2022, the City received a \$175,068 grant from the Illinois Department of Commerce and Economic Opportunity under its Local Tourism and Convention Bureau (LCTB) Program. Successfully completed in June 2023, funds from this grant enabled Mt. Vernon Tourism to promote the City by using billboards, digital marketing, social media marketing, and more. An increase in both hotel room nights and revenue from hotel taxes over the prior year were directly attributable to the grant. In May 2023, the City received a three-year grant for \$600,000 from the Illinois Department of Natural Resources under a Land Acquisition and Development Grant (LADG) to resurface walking trail and demolish old structures in Veterans Park (located in the target area). The funds under this project are 60% expended, and the project will be completed in 2024. In September 2022, the City received a Community Facilities Grant (CFG) from the United States Department of Agriculture Rural Development Program in the amount of \$1,000,000 for construction of a new police station (opened July 2023). This five-year grant is 90% expended and the closeout documentation is in process.

(2) Compliance with Grant Requirements: The LCTB Grant was completed in one year and was closed out successfully in compliance, meeting all terms and conditions. The LADG and CFG grants are being executed in accordance with all terms and conditions of their respective granting agencies, which will be verified upon conclusion and reporting for each project. The City has a history of compliance with grant work plans, schedules, and terms and conditions and has an excellent history of timely reporting with all awards. The Brownfield Project Team is skilled in project management and will monitor all grant activities to ensure compliance with all financial and other reporting requirements.



**Mt. Vernon, Illinois**  
**FY24 Brownfields Assessment Grant**  
**Threshold Criteria**

## Threshold Criteria

### 1. Applicant Eligibility

- a. The City of Mt. Vernon, Illinois, is eligible to apply for the EPA Brownfields Community-wide Assessment Grant as a local government as defined under 2 CFR § 200.64.
- b. The City is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

### 2. Community Involvement

The City informed the public of their intent to pursue an EPA Brownfield Assessment Grant at the City Council Meeting held on **September 18, 2023**. The City understands that working closely with community members is the key to implementing a successful Brownfield Program. The City will create productive interactions between target-area residents, especially those most affected by the project, and community organizations. The City has and will continue to seek valuable input from residents and community organizations to help identify potential brownfield sites, as they are the most aware of where its most important needs lie. After a grant is awarded, the City will create a **Community Involvement Plan (CIP)** that will provide an event schedule, an outline of planned community engagement activities, a project background, and a list of key stakeholders. The CIP will be made available for review at City Hall and on the City's website and will ensure that the underserved community is represented.

To identify potential brownfield sites in the target area, the City will perform community outreach and review the suggested brownfield sites provided by community members during quarterly meetings. The **Brownfield Project Team** will review and evaluate comments and community input during quarterly meetings, recording all community member suggestions and information in the minutes and posting them on the City's Brownfield Program webpage. The City will reach out individually to those residents who had concern or comments on the project within two weeks of receipt. The Brownfield Project Team will maintain a site inventory of the suggested brownfield sites and will review the list routinely, updating it at each quarterly meeting. The community and Brownfield Project Team will work together to prioritize sites based on community need and the City's Brownfield Program goals, giving highest priority to **underserved** residents of the community. The City's CIP will incorporate several forms of media. Brownfields updates will be posted to the City's Facebook page in addition to the City's Brownfield Program webpage.

The City will provide resident **interaction via website and social media as an alternative to in-person community engagement**. The City will disseminate Brownfield Project information through signage in government buildings, press releases, and local newspapers and will update organizations and community members through City Council meetings, community education meetings held throughout the target area, and charrettes/visioning sessions. City news is also printed on the back of water bills, and the mayor has a biweekly radio interview broadcast on WMIX and WDML, local stations that will be used to publicize the program and related events. All promotional materials and the names and contact information of the City's Brownfield Program Team will be posted on the City's brownfield webpage, facilitating community-member contact with Brownfield Project Team members.



**3. Expenditure of Existing Grant Funds**

The City of Mt. Vernon, Illinois, affirms it does not have an open EPA Brownfields Assessment or Multipurpose Grant.

**4. Contractors and Named Subrecipients**

The City solicited for a contractor to assist with the grant application and execution of all grant requirements should an Assessment Grant application be successful. The solicitation was publicly advertised. Upon evaluation of the solicitations, a contractor was selected. However, because price was not requested and therefore not considered in the evaluation, if a grant is awarded during this cycle, **a new solicitation will be posted to include pricing**, per the requirements of the FY24 Guidance.