

CITY OF OAKLAND CITY

November 13, 2023

Oakland City, Indiana

Ms. Ashley Green
US EPA Region 5
77 West Jackson Boulevard, Mail Code SB-5J
Chicago, IL 60604-3507

RE:

Application for a US EPA Brownfields Community-Wide Assessment Grant City of Oakland City, Indiana

Dear Ms. Green,

3

IV.D.1 Applicant Identification

City of Oakland City 301 South Franklin Street Oakland City, Indiana 47660 Phone: (812) 749-3222

IV.D.2 Funding Requested:

a. Community-Wide Assessment Grantb. Federal Funds Requested: \$250,000

IV.D.3 Location:

Oakland City, Gibson County, Indiana

IV.D.4. Target Area and Priority Site Information

The target area will include sites located within the City limits of Oakland City. The Census Tract 503 is designated for Oakland City, Indiana. Below is a summary of the priority sites discussed within the grant application that are targeted for assessment within the district.



CITY OF OAKLAND CITY

Oakland City, Indiana

Site Name	U.S. Census Tract No.	Address
Old Rex-All Drug Store	18051050300	210 N. Main Street
Old City Hall	18051050300	210 E. Washington Street
Former Maintenance Shop	18051050300	259 N. Main Street
Abandoned Grocery Store	18051050300	216 South State Road 57
Strickland Building	18051050300	167 N. Main Street

IV.D.5. Contacts

Administrator/Financial Director Debbie Bennett-Stearsman 301 S. Franklin Street Oakland City, Indiana 47660 Phone: (812) 897-8636

Director/Chief Executive Mayor Jim Deffendall 301 South Franklin Street Oakland City, Indiana 47660 Phone: (812) 749-3055

Email: mayor@oaklandcity.in.gov

Population: City/Town (Population) IV.D.6.

Oakland City, Indiana - 2,279

IV.D.7. Other Factors Checklist

Other Factors	Page No.
Community population is 10,000 or less.	1,4,5,6
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority site(s) is impacted by mine-scarred land.	
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).	
The priority site(s) is in a federally designated floodplain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures	
At least 30% 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(s).	
The target area(s) is located within a community which a coal-fired power plant has recently closed (2012 or later) or is closing.	



IV.D.8. Letter from the State:

Please find attached a letter from the Indiana Department of Environmental Management acknowledging our intent to apply for FY24 grant funds and conduct assessment activities.

IV.D.9. Releasing Copies of Applications:

Not applicable.

Thank you for your time and consideration in reviewing this assessment grant application. We look forward to a favorable decision to implement the activities contained in this proposal.

Sincerely,

Jim Defendall

 $Mayor-Oakland\ City$

Jan Hoffendell

LETTER FROM THE STATE



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204 (800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb

Bruno L. Pigott

Commissioner

November 6, 2023

Mayor James Deffendall City of Oakland City 301 S. Franklin Street Oakland City, Indiana 47660

Re: IDEM Acknowledgement Letter

U.S. E.P.A. Brownfields Grant Proposal Community Wide Assessment Grant

City of Oakland City Gibson County

Dear Mayor Deffendall:

This letter is provided in support of the City of Oakland City (Oakland City) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community Wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that Oakland City is requesting \$250,000 for hazardous substances and/or petroleum assessment.

IDEM understands that Oakland City has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered through the Indiana Brownfields Program (Program) and that Oakland City, based on the information it has provided with its request, believes it has the capability to perform the proposed grant-funded activities. The requested coalition assessment grant funding will help Oakland City with community outreach, evaluating and prioritization of site inventory, conducting Phase I and Phase II Environmental Site Assessments, and developing site specific cleanup and reuse plans.

The focus of this initiative is to identify and assess potentially contaminated properties within the City of Oakland City with the greatest potential for community need, job creation, and revitalization. The current inventory includes several target sites through the City and includes abandoned commercial buildings, a maintenance shop, and the original City Hall structure. Oakland City has a high percentage of people living below the poverty line and this assessment is expected to transform local brownfields into a pharmacy, affordable housing, commercial retail, and a farmer's market.



IDEM Acknowledgement Letter U.S. EPA Brownfields Grant Proposal November 6, 2023 Page 2 of 2

Since Oakland City has not yet selected/indicated the specific sites that will benefit from U.S. EPA brownfield grant funding, IDEM cannot make site-specific eligibility determinations at this time. However, should Oakland City be awarded the requested grant funding, the Program will work together with U.S. EPA and Oakland City to determine site eligibility once Oakland City has established the sites intended for funding.

IDEM has worked with Oakland City on several projects. IDEM recognizes that Oakland City is committed to working with the Program and/or the IDEM Voluntary Remediation Program for technical oversight of grant-funded site activities as applicable during the grant project period. The Program and IDEM are committed to continuing to support brownfield redevelopment within Oakland City by providing technical and other assistance through the Program.

Based on the information submitted, IDEM considers the City of Oakland City an excellent candidate to receive U.S. EPA assessment grant funding to continue its brownfields redevelopment efforts, which support Indiana's brownfields initiative. IDEM looks forward to continuing its partnership with Oakland City and its constituent communities. For further assistance, please contact John Morris of the Indiana Brownfields Program directly at (317) 234-0235 and at immirris@ifa.in.gov.

Sincerely,

Andrea Robertson Habeck Technical Staff Coordinator Indiana Brownfields Program

ARH/JTM

cc: (via electronic transmission)

Mr. Brian Kleeman, Cash Waggner & Associates John Morris, Indiana Brownfields Program

NARRATIVE PROPOSAL

IV.E.1. Project Area Description and Plans For Revitalization; a) Target Area and Brownfields; i. Overview of Brownfield Challenges and Description of Target Area: Oakland City is a rural, southern Indiana town with a population of 2,297. Built south of the Patoka River in 1856, it has a history in mining and is surrounded by former coal mines. As coal mines shut down (the most recent in 2019 and 2020), Oakland City lost its economic backbone, creating an underserved community that lacks jobs, medical care, and affordable housing. With a lack of industry, Oakland City's economy relies on property taxes and local commerce to survive. Over the past twenty years, the population has fallen by 15% as young adults pursue opportunities and start families in larger cities, leaving behind an aging population that relies on social services. Still, Oakland City finds ways to grow. Oakland City University helps to anchor the city, and recently invested in an \$800 million sports complex for its 600 undergraduate students. Its Main Street features 19th and early 20th century architecture, and the downtown blocks used to be charming, but today, many of those old buildings stand vacant, with crumbling facades and blown-out-windows that leave interiors exposed. A lack of affordable senior housing has become an issue, which has forced some long-time residents to find homes beyond Oakland City. Former commercial sites on Main Street and gateway corridors now stand in disrepair, with known and potential contamination. Still, the businesses that remain decorate for the holidays and hang flags over their doors. That sense of pride is pushing Oakland City's mayor to find solutions. Oakland City seeks assistance from the EPA in assessing its brownfields so it can move on to cleanup and reuse that will turn blight into spaces that serve the community.

ii Description of the Priority Brownfield Sites:

Old Rex-All Drug Store 210 N Main St. This 2-story, 7,500 sq ft Main St building is partially collapsed and sits on a prominent corner of Oakland City's Main Street corridor. Because it was constructed in 1885, lead-based paint and asbestos are a concern, especially due to the building's condition, which has left it exposed to the elements and turned it into a magnet for pigeon feces. The site is owned by Community Action Program of Evansville (CAPE), a nonprofit that provides senior services, and plans are underway to redevelop this site into 9 apartments for much-needed senior housing through a \$1 million partnership with the Indiana Housing and Community Development Authority. However, due to the building's condition and likely extent of contamination, assessment is a barrier to redevelopment.

Old City Hall 210 E. Washington St. Constructed in 1911, this 2-story, 2600 sq ft brick building used to house City Hall but has been vacant since 2004 and is in poor condition, with likely asbestos and lead-based paint exposed to the elements. After assessment, the City plans to reuse the building and seek a Public Facilities grant through the Office of Community and Rural Affairs to prime this property for reuse as a community center that would include a clinic.

Former Maintenance Shop 259 N. Main St. This 6,300 sq ft building, built in 1923, has a history as a maintenance shop and other commercial uses, but has stood vacant for a decade and is now in disrepair. It sits in the middle of the Main Street corridor and is an eyesore that prevents investment in the area. Due to its former use, age, and condition, petroleum contamination, asbestos, and lead-based paint are a concern. After assessment and any necessary remediation, Oakland City plans to gut the building, save any salvageable materials, and market the property as retail space. The Office of Community and Rural Affairs' Main Street program could help build local capacity for downtown revitalization.

Abandoned Grocery Store 216 South SR 57. Built in 1975, this 16,000 sq. ft. building sits on a 25-acre site that used to house a grocery store and, potentially, a fueling operation. The building is in disrepair, with potential for both hazardous and petroleum contamination. The site is now owned by nonprofit New Hope Services, which provides family services and affordable housing. New Hope will reuse the site in phases, starting with a farmer's market that will make use of the existing parking lot, and then, once any needed remediation is complete, will use \$1 million in housing tax credits to redevelop the site into 8-10 senior housing apartment buildings to meet the need for affordable senior housing.

Strickland Building 167 N Main St. This two-story, 2,100 sq ft brick building was constructed in 1900 and is in severe disrepair, with a partial collapse of both floors. It is bounded by a railroad, and was reportedly used as a dry cleaner. Assessment has begun, and both hazardous and petroleum-based contamination have been found in concerning levels, including lead in the groundwater. Due to the extent of contamination and continued deterioration of the building in the years since assessment, further assessment is warranted. Oakland City will repurpose the site as greenspace and plans to build a rain garden to beautify the downtown area and improve stormwater runoff. Clean Water Indiana, a division of the Indiana State Department of Agriculture, offers grants that could fund a rain garden, and the science department of Oakland City University may be able to provide student interns to help complete the project.

1)a.iii. Identifying Additional Sites: Oakland City officials have already identified additional sites beyond the five priority sites discussed above. Once the priority sites above are addressed, the City will utilize any remaining grant funding to continue to address brownfields within Oakland City's jurisdiction and will continue to identify sites throughout the terms of the grant. Mayor Jim Deffendall, along with Debra Bennett-Stearsman, the City's grant administrator, created a brownfields inventory by walking and driving through the City. They will continue to do a street-by-street assessment of the jurisdiction and work together to identify sites and prioritize them based on the following criteria: site eligibility; location; current and future impact on underserved residents; resident input; potential for reuse that meets underserved resident needs; leveraging potential; and alignment with the City's comprehensive plan. Because Oakland City is a small town where all residents consider each other neighbors, the City will use personal knowledge of the area and conversations with residents combined with analysis of census data to determine which areas are the most underserved. Data never presents a complete picture, so it's vital to spend time with residents to fully characterize the community's need.

b) Revitalization of the Target Area; i. Reuse Strategy and Alignment with Revitalization Plans: In 2022, Oakland City developed its first Comprehensive Plan to move the City from underserved to flourishing. Our Comprehensive Plan will guide the economic and social development for our City as it moves past the Covid-19 pandemic and works to attract investors, developers, and people to the area. The entire community came together to inform the Comprehensive Plan, offering their input on what Oakland City residents need to thrive. Included in the plan's top priorities are the following: downtown revitalization, developing affordable senior housing, providing social services, and quality-of-life improvements such as adding greenspace and increasing access to fresh foods. The City also established two Tax Increment Financing districts to promote downtown development. Additionally, the City is establishing a Redevelopment Commission to aid in economic development that will target its downtown and gateway corridors, and brownfields redevelopment is a key initiative. The planned reuses for our targeted brownfield sites specifically address the priorities in the Comprehensive Plan. Turning the former Rex-All Drug and the Abandoned Grocery Store site into senior housing will meet the need for affordable housing for our aging population. Establishing a farmer's market, which will be the first phase of redevelopment for the Abandoned Grocery Store site, will provide an alternative source for fresh, healthy foods beyond the City's single grocery store. Turning the Strickland Building into a rain garden will beautify a blighted block of Oakland City's Main Street corridor. Redeveloping the Old City Hall and Former Maintenance Shop as a community center with a clinic and a commercial space, respectively, will nourish a struggling downtown area and meet unmet resident needs for local medical care and commerce.

ii. Outcomes and Benefits of Reuse Strategy: For each priority site, the revitalization plans will remove a hazard from our community, stimulate economic development, and meet a community need. No redevelopment will displace residents. When possible, existing buildings will be reused and retrofitted with energy-efficient measures to turn brownfields into brightfields. If building reuse is not feasible, materials will be reused if possible. Old City Hall will be preserved and reused as a community space. The Abandoned Grocery Store's parking lot will be the ideal space for farmer's market vendors to set up their booths as we work towards Phase II of redevelopment, which will turn the site into senior housing. If salvageable, late 19th and early-20th century brick and stonework will be preserved from buildings like the Former Maintenance Shop, Old Rex-All Drug, and the Strickland building. The City is committed to improving local climate adaptation/mitigation capacity. Redevelopment always presents opportunities to improve stormwater management systems to boost climate resilience, as climate change has increased flooding potential in our area. Oakland City is assisting with two \$750,000 bonds to install new sewer lines that will decrease the risk of sewer overflow during heavy rainfall events and increase the City's climate resilience. Creating a rain garden in place of the Strickland Building uses a nature-based solution to mitigate climate change by assisting with stormwater management. To further mitigate climate change and reduce greenhouse gas emissions, the proposed community center could include solar panels that power the facility. The table below outlines reuse plans for each priority site and the outcomes/benefits associated with reuse.

Site	Proposed Reuse	Outcomes	Benefits	Climate adaptation	Sustainable Reuse	Downtown Revitalization	Energy Efficient/ Climate change mitigation Potential	Affordable Senior Housing
Old Rex-All Drug Store	Senior housing	Provide low-income seniors with affordable housing	Hazard removal in downtown area, increased housing opportunities, improved stormwater/sewer management to adapt to climate change	X	X	X	Х	X
Old City Hall	Community center with clinic	Provide community with central gathering space, building or materials reuse	Community or economic development, blight removal, downtown beautification		X		X	
Former Maintenance Shop	Commercial retail space	New commercial site in central location, materials reuse	Improved local economy, blight removal, downtown beautification		X		X	
Abandoned Grocery Store	Phase I: Farmer's Market Phase II: Senior Housing	Providing a healthy food source for the community Provide low-income seniors with affordable housing	Blight removal, increased access to healthy foods, increased housing opportunities, improved stormwater/sewer management to adapt to climate change	X	X		X	X
Strickland Building	Greenspace/rain garden	Creation of needed greenspace in downtown	Downtown beautification, removal of unsafe structure	X	X	X	X	

c) Strategy for Leveraging Resources; i. Resources Needed for Site Reuse: Leveraging plans include the following secured and potential sources of financing:

Source	Purpose / Role	Amount (\$)	Status
Tax Increment Financing (TIF) districts	Funding redevelopment of the Old Rex-All Drug Store and Abandoned Grocery Store for senior housing.	\$2 million	Committed
Community Action Program of Evansville (CAPE)	Purchase of Old Rex-All site to turn into senior housing after assessment and any necessary remediation	\$50,000	Committed
New Hope Services	Purchase of Abandoned Grocery Store for farmer's market and senior housing after assessment and any necessary remediation	\$75,000	Committed
Office of Community and Rural Affairs (OCRA): Planning Grant	Funds downtown revitalization plan development and could fund further environmental assessments if needed	\$100,000	Potential
OCRA Main Street Program	Funding for Main Street preservation and downtown revitalization through design, economic vitality, promotion, and organization	Up to \$2 million	Potential
OCRA Public Facilities Program	Funds creation/improvement of public facilities, could be used to turn Old City Hall into a community center	Up to \$500,000	Potential
OCRA Blight Clearance Program	Funding for building demolition; asbestos remediation	Up to \$500,000	Potential
Indiana Brownfields Program	State Revolving Fund (SRF) for cleanup projects related to wastewater infrastructure	Up to \$400,000	Potential
Indiana Brownfields Program	POSI Funding for Orphan UST site remediation	\$200,000 per site	Potential
Indiana Brownfields Program / EPA Region 5	Funding for Targeted Brownfields Assessment	\$100,000 per site	Potential
Indiana Department of Transportation	Funding for infrastructure upgrades / may include UST removals	\$20,000 average per UST	Potential

Liability Insurance Funding	Claims on general liability policies for site	Generally \$1 to \$3	Potential
	remediation	million	
Indiana State Department of	Funds conservation practices that reduce water	\$125,000	Potential
Agriculture: Clean Water Indiana	pollution, such as the proposed rain garden at the		
Program	Strickland Building site		

We also plan to leverage tax incentives, such as our Tax Increment Financing districts, to attract investors and redevelopers. Additionally, we are partnering with local and state organizations to find the resources for site reuse and have already secured private funding that will bring two of our five targeted sites to reuse. Other funding will be sought as assessment provides a full picture of what each site needs for reuse. In addition to these programs, Oakland City will also leverage partnerships with the County Health Department, community organizations, and other nonprofits who will commit in-kind services to aid in brownfield inventory and prioritization, reuse planning, community monitoring, and community outreach. The City has already committed in-kind services

to support these grant activities. The table below outlines in-kind commitments.

Source	Role and estimated amount	Likelihood
Oakland City	Community outreach, brownfields inventory and prioritization, stakeholder	Committed
-	meetings, redevelopment planning, (\$50hr/150 hrs = \$7,500)	
Gibson County Health	Monitor health statistics in respective Counties; respond to health threats	Pending
Department	(\$50hr/100 hrs = \$5,000)	
Gibson County Chamber	Community outreach and redevelopment planning	Pending
	(\$50hr/100hrs = \$5,000)	
	Job seminars and expos (\$50hr/100hrs = \$5,000)	
Gibson County	Promote brownfields initiatives, marketing support for redevelopment	Pending
Development Commission	opportunities, conduct community meetings (\$50hr/100 hrs = \$5,000)	
Habitat for Humanity	Community outreach, foster communication to individuals/families in need of	Pending
	affordable housing	
	(\$50 hr/50 hrs = \$2,500)	
Oakland City University	Brownfields inventory and outreach, environmental training for students (\$10,000)	Committed

ii. Use of Existing Infrastructure: Our priority sites are in central areas with existing infrastructure like water/sewer, communications, electricity, natural gas, and street access. We will reuse existing structures whenever possible. For example, the Old City Hall building will be preserved and reused as a community center. The parking lot of the Abandoned Grocery Store will be reused in both phases of its redevelopment. Some of Our Main Street sites are in such disrepair that demolition might be the only solution, but we will seek building reuse first. Even if demolition must occur, the existing infrastructure and building materials, especially historically significant pieces such as doorframes, windowsills, and bricks could be reused. In all cases, we will work to use the materials and resources already available on-site before outsourcing for redevelopment. IV.E.2a. Community Need; i. The Community's Need for Funding: There are multiple components that

impact the availability of Oakland City funds, but four driving forces are: "brain drain" of the working-age population, shrinking tax revenues, a general loss of jobs and resources, and increased expenses. The population has diminished by 15% since 2000 as young people leave the city. Nearly one in five of the remaining residents is over 65, and only 26% of those older residents works, meaning they draw on resources without contributing to the economy. Oakland City University is a stabilizing force for the community, but students are not permanent residents, and almost all leave over summer break and winter vacation, meaning they're not patronizing the few local stores for goods and entertainment. The University also does not pay property taxes, and it continues to grow, now taking up 5% of the City's total acreage and cutting into the property tax gap that's been growing since a 2010 tax restructure. Coal mines in southwestern Indiana have been on the decline since the mid-twentieth century, and two in the Oakland City area finally closed in 2019

and 2020, laying off over 300 workers. Over the past year, the City has had multiple expenses they've been forced to pay out of their own budget, including a \$75,000 unsafe building demolition and a \$100,000 LED streetlight upgrade. Due to safety concerns, these expenses could not wait for grant funding. Additionally, the City is undergoing a lead inventory to ensure water safety. Based on survey responses, the City might be responsible for replacing as much as 75% of residential water lines—a multimillion dollar project. Since they're barely keeping up with regular maintenance, Oakland City does not have the resources to address their brownfield sites.

ii. Threats to Sensitive Populations; 1) Health or Welfare of Sensitive Populations: Oakland City is home to sensitive populations that include the elderly, women of childbearing age, and children in poverty. Nearly 20% of adults are over age 65, and families with young children struggle to get by, with one in four Oakland City preschool-aged children living in poverty. As seen in the table below, our community is saddled with lower median household incomes and higher child poverty rates compared to the state, surrounding county, and nation. All of Oakland City is listed as 53% LMI (low-to-moderate income) according to Housing and Urban Development Data, automatically qualifying the City for Community Development Block Grants. Low-income populations tend to have substandard housing condition and poor health, and they live in blighted, unsafe neighborhoods in proximity to brownfields. Oakland City also faces quality-of-life barriers that include lower education rates in spite of the presence of a local university, lack of options for fresh food, and a lack of local healthcare. The most critical unmet need in Oakland City right now is affordable senior housing, made even more critical because of the high concentration of elderly residents in the community. There is only one multi-family housing complex in the City that offers

housing, and affordable that complex is not designed for senior living. The projects in this brownfields initiative directly benefit these sensitive populations and meet these needs. Two sites will become affordable senior housing, and one could become a community center with an on-site clinic, offering our residents walkable access to healthcare.

	Oakland	Gibson		United
Demographic	City	County	Indiana	States
Population	2,279	33,011	6.8 M	331 M
Population with Bachelor's				
Degree (>25 years)	10.3%	13.1%	18.5%	21.2%
Median Household Income	\$42,118	\$56,080	\$62,743	\$69,717
Women of Child-Bearing				
Age (15-44 years)	42.1%	35.2%	38.7%	38.9%
Elderly (Over 65 Years)	19.3%	17.4%	16.4%	16.8%
Poverty Rate (children 0-4)	25.8%	13.0%	17.7%	18.3%
All data from US Census, 2016-	2020		•	

ii. Threats to Sensitive Populations; 2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: The groups most at risk for exposures associated with brownfield sites in our Region

are children in poverty and the elderly. The table below identifies health issues in our communities that could be linked to exposure to the potential chemicals in our brownfield sites. Due to the age and condition of our sites, asbestos is a concern, and cancer rates for breast cancer and colon and rectal cancer are

	Gibson Co	State
Kidney disease mortality rate	28.4	17.4
Breast cancer incidence rate	127.7	121.7
Colon and rectal cancer incidence rate	51.4	42.4
Alzheimer's disease mortality rate	47.8	31.5
Heart disease mortality rate	242.2	183.5
Rates per 100,000; From Indiana State Departn	nent of Health, 2	2016-2020;

elevated in our community. Petroleum contamination impacts on the kidneys, and Gibson County's mortality rate from kidney disease is more than 50% higher than Indiana's. Local health agencies lack the funding to test soil and groundwater in the area, so the impacts from contaminant sources cannot be quantified. Although they have not been tested or measured, impacts from brownfield sites could contribute to these impairments.

Additionally, according to the EPA's Environmental Justice Screening and Mapping Tool, Oakland City has higher rates of lead paint and underground storage tanks when compared to the state, and the City is medically underserved. CountyHealthRankings.org measures Gibson County's population-to-primary-care-physician ratio at 2,800:1, as compared to 1,490:1 in Indiana and 1,310:1 across the US. This means that residents who are struggling with the diseases listed in the table above have fewer options for care. According to the Climate and Economic Justice Screening Tool (CEJST), the census tract that includes Oakland City is not disadvantaged, yet it has multiple abandoned land mines, is in the 76th percentile for transportation barriers, and a high percentage (12%) of people with less than a high school education.

ii. Threats to Sensitive Populations 3) a. Identification of Environmental Justice Issues: The priority sites in Oakland City are not located within a disadvantaged census tract according to CEJST, but Oakland City is still underserved, with 53% LMI (low-to-moderate income) according to Housing and Urban Development data. The low incomes, lack of local jobs, lack of access to healthcare, lack of housing and services for the growing senior population, lack of education, and high mortality and disease incidence rates all challenge Oakland City's limited resources and create environmental justice issues across the City. The aging, low-income population lacks the social mobility to move away from the brownfields and blighted residential areas in Oakland City. The City's health concerns could be exacerbated by the potential contaminants present in our brownfields. Because Oakland City lacks the funds to test their soil, air, and groundwater, the connections between these potential contaminants and increased disease rates cannot be confirmed, but assessing brownfields would be an important step in identifying any health impacts. The City is committed to resident health and environmental justice, as evident in its in-progress lead survey, which will determine which residences are serviced through lead pipes so those pipes can be replaced. This type of action will be continued as the City addresses its brownfields.

b. Advancing Environmental Justice: After assessment, we will use equitable development approaches that prioritize local developers and skilled job creation. Our targeted sites are in a lowincome area where residents lack access to resources. The last thing they need are outside conglomerates creating more barriers to resource access. We will engage in local or first-source hiring and minority contracting whenever possible without imposing geographic preferences for procurements. Additionally, two of our Priority Sites have proposed reuse plans that will ensure access to low-income housing. Due to the small population of our underserved community, these priority sites and other brownfields affect 100% of the population, making this project even more vital. Our sensitive populations, especially the elderly and children in poverty, face greater environmental exposure because they are more likely to live in older, substandard housing near these contaminated sites. Assessment is the first step in outlining the threats to these populations. IV.E.2.b.i-ii. Community Engagement: Project Involvement and Project Roles: The following community-based organizations will work with the City throughout the terms of the grant and beyond. Support from local and national nonprofits will help with our housing redevelopment initiatives, and support from the County Chamber and County Development Commission will promote redevelopment of commercial sites. The local Health Department will be critical in providing health monitoring and community outreach as contaminants of concern are delineated, and they will also provide input on our brownfields inventory. Oakland City University will also assist with brownfields inventory, will offer environmental training for its students, and will offer internship opportunities for students to work on this initiative.

Name of Organization	Specific involvement in the project	Contact
New Hope Services	Redeveloping Abandoned Grocery Store into farmer's market, then 8-10 apartment buildings for senior housing; Committed \$1M via TIF	James Bosley 812-288-8248
Community Action Program of Evansville	Provide affordable housing, brownfields outreach, community investment for redevelopment of Old Rex-All Drug Store into senior housing	Gary Roan 812-386-6576
Indiana Housing and Community Development Authority (IHCDA)	Committed \$1M towards redevelopment of the Old Rex-All Drug Store for senior apartments	Jacob Sipe 317-232-7777
Oakland City University	Brownfields inventory and outreach; provide environmental training and internships for students	Ron Dempsey 812-749-1246
Habitat for Humanity	Community outreach, foster communication to individuals and families in need of affordable housing	Julie Rahman 812-385-2434
Gibson County Chamber	Hold stakeholder meetings, redevelopment planning, community outreach, and job seminars	Patty Vanoven 812-385-2134
Gibson County Health Department	Provide health monitoring and statistical data, perform community outreach regarding exposure concerns to COCs, and build brownfields inventory	Misty Stuckey 812-385-3831
Gibson County Development Commission	Promote brownfields initiatives, provide marketing support for brownfields redevelopment opportunities, conduct community and stakeholder meetings	Tami Muckerheide 812-779-7407

IV.E.2.b.iii. Incorporating Community Input: Upon grant award, we will issue a press release to the Princeton Daily Clarion, our local newspaper, and post the release to the Oakland City Facebook group. In the press release, we will include information about upcoming meetings and outreach sessions. Oakland City will conduct at least four public meetings for community members and community stakeholders to address the following objectives: (1) develop targeted input from community groups through a focus group process; (2) engage the public at critical states such as brownfield site identification, community and site visioning, and brainstorming solutions; (3) spread out engagements into shorter periods during evening hours to get maximum participation; (4) allow participants to see their ideas integrated into the process; (5) and develop support on key issues, such as remediation strategies and solutions. More specifically, Oakland City will include general community engagement workshops at various stages of the process to steer prioritization of the community's brownfield sites. The first workshop will introduce the project, outline the goals and outcomes, explain the process and schedule, and provide details on how to stay involved. We will also gather input on the existing conditions in the targeted area such as current land uses and conditions, opportunities or constraints associated with living or doing business, and brownfield site suggestions. Subsequent workshops will be conducted to gather input on design concepts for the project area and brownfield sites.

Oakland City will continue to involve stakeholders and the affected community through public meetings held throughout the terms of the grant. Oakland City has an active Facebook group that keeps residents informed of important events, so we'll use social media to engage the public in the brownfields initiative. The Princeton Daily Clarion is another tool for engaging stakeholders, especially those in our aging population who don't have access to a computer. We'll use both the print and online features of the Daily Clarion to promote workshops and meetings, report successes, and keep the public apprised of brownfields-related activities. All meetings and

workshops offered throughout this grant term can be held virtually as needed in the event of Covid restrictions and/or to increase accessibility for residents.

IV.E.3. Task Descriptions, Cost Estimates, and Measuring Progress; a) Description of Tasks/Activities and Outputs: Oakland City requests \$250,000 of EPA Brownfields funds to perform the following proposed tasks:

Task/Activity: 1. Programmatic Activities

- i. Project Implementation: The City will develop a public Request for Proposal to contract the services of a Qualified Environmental Consultant (QEC). Oakland City's brownfields team will determine solutions for major components of the plan, evaluate how to incorporate community input, and strategize implementation. The City, with help from the QEC, will manage the project team activities, including all reporting requirements with EPA. These reports will highlight the status of completion for tasks, progress made, challenges, financial expenditures, data and findings, anticipated activities in the upcoming reporting period and any changes in key staff involved.
- ii. Anticipated Project Schedule: This work will be spread across the timeline of this grant.
- iii. Task/Activity Lead: City, with guidance from QEC
- iv. Outputs: Procurement of QEC, Quarterly Reports, annual financial reports, travel to one national EPA Brownfields Convention and one regional workshop

Task/Activity: 2. Inventory and Prioritization

- i. Project Implementation: The City will conduct at least four public meetings (one within 6 months of grant award) to educate the community about the brownfields process and solicit input on potential sites. These meetings will prioritize the brownfields inventory and help secure access from property owners. They will be virtual if needed.
- ii. Identifying additional sites: Additional sites will be identified through public meetings, community surveys via newspapers and/or social media, and touring the community with our QEC and community organizations.
- iii. Anticipated Project Schedule: This work will be spread across the timeline of this grant.
- iv. Task/Activity Lead: Oakland City Project Director, with guidance from QEC
- v. Outputs: Brownfields Inventory, public meeting records

Task/Activity: 3. Phase I & Phase II Environmental Site Assessments (ESA's)

- i. Project Implementation: Once sites are selected and property owners grant access, the appropriate EPA eligibility documentation to enter the site into the program will be prepared. The QEC will conduct Phase I Environmental Site Assessments (ESAs) for selected sites in accordance with ASTM Standard E1527-21 as well as the EPA's "All Appropriate Inquiry" standards. The QEC will prepare a Quality Assurance Project Plan (QAPP), which will be reviewed and approved by the EPA. The Commission will focus funds on performing assessments, especially Phase II ESAs, to determine the nature and extent of the contamination at brownfield sites.
- ii. Anticipated Project Schedule: Years 1-4 of grant period
- iii. Task/Activity Lead: QEC
- iv. Outputs: 1 QAPP, 11 Phase I ESAs, 5 Phase II ESAs

Task/Activity: 4. Cleanup & Reuse Planning

- i. Project Implementation: The QEC will conduct any needed cleanup/reuse planning after evaluation of Phase II data based on the potential reuse scenario(s). Each Analysis of Brownfield Cleanup Alternatives (ABCA) or Remedial Action Plan (RAP) will include remedial actions for each identified contaminant that exceeds the applicable regulatory screening levels. Remedial actions are evaluated based on cost, proposed site use, feasibility, and effectiveness in protecting human health and the environment. We will hold up to 2 public meetings for each site to undergo remediation to inform and solicit feedback from the community.
- ii. Anticipated Project Schedule: Years 1-4 of grant period
- iii. Task/Activity Lead: QEC, with guidance from Oakland City
- iv. Outputs: 4 RAPs/ABCAs

IV.E.3.b) Cost Estimates: Task 1: Personnel: \$4,000 (80 hours at \$50/hr); Contractual: \$8,500 (170 hours at \$50/hr); Travel Expenses: \$5,500 including National Brownfields Conference for 2 at \$4,700 (\$1,800 airfare,

\$1,800 lodging, \$600 per diem, \$500 registration) and Regional Brownfields Workshops at \$800 (\$200 mileage, \$600 lodging); Supplies: \$500 (\$350 printing/\$150 web fees)

Task 2: Personnel: \$5,000 (100 hours at \$50/hr); Contractual \$6,000 (75 hours at \$80/hr); Local Travel: \$500; Supplies: \$500 (\$350 newspaper ad fees/\$150 printing)

Task 3: Contractual: \$184,000 (11 Phase IESA's at \$3,500 each, 5 Phase IIESA's at \$27,500 each, 1 QAPP at \$8,000)

<i>Task 4:</i> Personnel: \$5,000	(100 hours at \$50	/hr); Contractual:	\$30,000 (4)	RAP's at \$7,500 each):	Supplies \$500
				-	

Program Tasks	Task 1: Programmatic Activities	Task 2: Outreach & Inventory	Task 3: Phase I, Phase II	Task 4: Cleanup & Reuse Planning	Total
Personnel (non-administrative)	\$4,000	\$5,000		\$5,000	\$14,000
Travel	\$5,500	\$500			\$6,000
Supplies	\$500	\$500		\$500	\$1,500
Contractual	\$8,500	\$6,000	\$184,000	\$30,000	\$228,500
Total Budget	\$18,500	\$12,000	\$184,000	\$35,500	\$250,000

IV.E.3.c) Plan to Measure and Evaluate Environmental Progress and Results: Oakland City will record, track, measure, and evaluate all project activities while submitting all required reports to the EPA and the ACRES website. We will develop a schedule and periodically review that all tasks are on schedule, taking necessary corrective actions in the event of delays.

Tasks	Success Measure		
Public and stakeholder meetings	# of meetings, # of attendees, participant involvement		
Brownfield inventory	# of additional sites, reuse plans, economic development		
Quality Assurance Project Plan	QAPP approval by third quarter of Cooperative Agreement		
Phase I and Phase II ESAs	# of ESAs performed		
ACRES and Quarterly/Final Reporting	Timely ACRES updates and quarterly/final report submittal		
ABCAs and RAPs	# of ABCAs and RAPs completed		
Develop Reuse Plan	Implement Reuse Plan		
Outcomes	Success Measure		
Reduction of health risks	Contaminated sites remediated, reduced disease/illness rates		
Increase employment opportunities	# of quality jobs created		
Add businesses and community services	# of businesses opened; # community services added		
Expand housing availability	# housing units, # of low-moderate income housing		
Acquisition of additional funding	Further assessment and/or cleanup grants; leveraged		
	development dollars		
Sustainable redevelopment	Green infrastructure, climate change mitigation/adaptation		

IV.E.4.a. Programmatic Capability and Past Performance: Programmatic Capability: Oakland City will lead the brownfields initiative and manage the activities under the grant, including reporting in EPA's ACRES system. In the past decade, Oakland City has successfully managed over \$8.5 million in federal and state funding, including blight elimination programs, stormwater and sewer improvements, comprehensive planning, and downtown demolition and clearance, proving that the City is poised for success. For technical aspects of the grant that require special qualifications (such as Phase I and Phase II ESAs), the City will contract with a QEC through the Qualifications Based Selection compliant with Competitive Procurement Standards 40 CFR Part 31.36 and Indiana Code (IC) 5-16-11.1 and will depend on the guidance of the QEC and Indiana Brownfields Program to provide technical oversight of the project. In the event of a loss of one of the key staff members, Oakland City will ensure continuity of the program by hiring a credentialed individual

possessing the experience necessary to fill the position. In the meantime, our staff members are cross trained and can perform those activities until a replacement is found.

Oakland City's Brownfield Management Team will be led by Mayor Jim Deffendall. Mayor Deffendall has worked with many federal and state grant projects since his term began four years ago, including bringing in Covid relief funds in 2020 and American Rescue Plan dollars to upgrade and maintain the City's infrastructure and parks. Mayor Deffendall served as Oakland City's Fire Chief for 22 years and played a crucial role in the City's award of OCRA grant funds for the construction of a new \$750,000 Oakland City Fire Department in 2000 after the old station burned down. He oversaw acquisition of an \$800,000 fire truck in 2005 and worked with community partners for \$790,000 of private investment. Mayor Deffendall will be the Project Director and will handle personnel, public relations, day-to-day operations, and grant oversight.

Debra Bennett-Stearsman is under contract with the City to assist with grant administration. She will establish accounting and project tracking systems, process invoices for environmental consultants, and advise staff of grant financial progress. Debra oversees all community development activities, including downtown revitalization, infrastructure projects, construction of community service centers, and housing development. Debra brings over twenty years of experience in planning, development, grants management, and program administration. Debra has successfully managed numerous federal (including EPA), state, and foundation grants and is a Master Certified Grant Administrator with the Office of Community and Rural Affairs.

IV.E.4.b.ii. Past Performance and Accomplishments: Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements: Oakland City has not received an EPA Brownfields grant but has a record of successfully managing state and federal funds. The table below summarizes some of our recent grant accomplishments.

Funding Agency / Grant Type	Year	Amount	
OCRA / COVID Phase I and Phase III Assistance: in compliance, met all grant requirements	2020	\$400,000	
Communities received funding to provide grants of up to \$10,000 to their employers who employed 51% or more low-to-			
moderate income persons. Grant funds were used for working capital, operation expenses, and/or remote work expenses.			
Success measures: 20 small businesses received grants in Oakland City, allowing them to continue to employ residents.			
United States Department of Agriculture / Water and Environmental Loan Grant	2017	\$2,500,000	
Program: in compliance, met all grant requirements		* *	
The USDA provided a combination loan and grant for the City's New Lake Park to improve a 100-year-old water			
collection system, repair a dam, and construct a new water plant.			
Success measures: new water treatment plant, 400,000 gallon water tower, dredging the water supply, and dam repairs.			
Indiana Housing and Community Development Authority / Blight Elimination Program:	2015	\$875,000	
in compliance, met all grant requirements			
The Blight Elimination Program reduces the impacts of blighted/abandoned homes by demolishing those beyond repair,			
bringing opportunities for sustainable redevelopment while improving property values and neighborhood identity.			
Success measures: Thirty-five homes in severe disrepair have been demolished in Oakland City.			
Indiana Department of Transportation / Transportation, Community and System	2014	\$600,000	
Preservation Program: in compliance, met all grant requirements			
This program supported new sidewalk and road construction in the downtown area. The project replaced existing sidewalks			
in poor condition while adding new routes for increased mobility of non-vehicle navigation around the community.			
Success measures: Approximately 3 miles of new sidewalks and 2 miles of blacktop were constructed to increase mobility			
options and walkability throughout the city including safer routes for pedestrians and bicyclists.			
American Rescue Plan Act / Support Improvements to Emergency Services, Libraries,	2022	\$551,000	
and Infrastructure: in compliance, meeting all grant requirements	9		
This program brings new picnic tables and shelters to our park areas, sidewalk improvements, as well as the construction			
of a new Splash Park in the City through the City's partnership with Toyota who invested \$125,000 towards the project.			
Success measures: New recreation opportunity, 2 miles of new sidewalks, 15 picnic tables and/or park shelters			

THRESHOLD CRITERIA DOCUMENTATION

SECTION III.B – THRESHOLD CRITERIA FOR COALITION ASSESSMENT GRANTS

1. Applicant Eligibility

The applicant is the City of Oakland City, Indiana, which is considered a local government as defined by 2 CFR 200.64, and is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

2. Community Involvement

The City will administer up to 4 community-wide public meetings throughout the 4-year grant period to ensure continued community engagement. These meetings will provide information, solicit feedback, address concerns, and explain relevant health and environmental impacts. As necessary, meetings may be held virtually in light of the ongoing COVID-19 related regulations.

The initial kick-off meeting will inform community leaders, residents, business owners, and other stakeholders of the grant award, the assessment and remediation process, and to solicit input. Brownfield information and project progress will be communicated to the public via the City's web page, social media, traditional news outlets, and to key community partners, newsletters, websites, and social media. This meeting will discuss our current and future plans for the site, introduce our qualified environmental consultant (QEC), request feedback from the community and partners, respond to comments and explain the basis for any reuse plan decisions. Community input will be a driver towards the ultimate Site reuse plans. As such, as cleanup options are evaluated and reuse plans are developed, the City will focus on gathering input and addressing concerns. The Gibson County Health Department will educate residents on impacts from environmental contaminants.

3. Expenditure of Existing Grant Funds

The City does not have an open EPA Brownfields Assessment or Multipurpose Grant.

4. Contractors and Named Subrecipients

Not applicable, the City has not procured a contractor(s). The City has not named a subrecipient in this application.