

NARRATIVE INFORMATION SHEET

R06-24-C-001

Applicant Identification	Houston Land Bank (HLB) P.O. Box 131106 Houston, Texas 77252	
Funding Requested	Grant Type: Single Site Cleanup	
	Federal Funds Requested: \$5,000,000	
Location	Houston, Harris County, Texas 77003	
Property Information	Former City of Houston Velasco Incinerator 0 N. Velasco Street Houston, Texas 77003	
Contacts	Project Director	Chief Executive Officer
	Name	Christa Stoneham
Phone Number	281-655-4600	281-655-4600
Mailing Address	P.O. Box 131106 Houston, Texas 77252	P.O. Box 131106 Houston, Texas 77252
Population	Population of Houston, Texas: 2,920,003 Population of Target Area: 29,053	
Other Factors		Page #
Community population is 10,000 or less.		N/A
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.		N/A
The proposed brownfield site(s) is impacted by mine-scarred land.		N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.		3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).		2
The proposed site(s) is in a federally designated flood plain.		N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.		N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.		N/A
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.		3
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

Releasing Copies of Applications

Please redact the following information from public record, as it is considered confidential, privileged, or sensitive:

- All Point of Contact information on Page 6, **Section b. Community Engagement i. Project Involvement/ii. Project Roles** are considered sensitive. sign-in sheet with names, phone numbers, and emails of attendees at the Public Meeting, located both in the meeting notes section and copy of sign-in sheets and comment cards.
- All contact information provided on the public meeting sign-in sheet, included in Appendix F (page 6 of meeting notes) is considered sensitive information.

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 Houston (City) (pop. **2,920,003**),¹ located in Harris County (HC), Texas, was founded in 1836 on the banks of the Buffalo Bayou, fifty (50) miles west of the Gulf of Mexico. Houston was originally established as a port city with an early economy built on shipping cotton, lumber, and other manufactured goods produced on nearby plantations or made domestically by enslaved African Americans and Mexican immigrants. In 1901, oil was discovered in Texas, propelling Houston on its path to becoming the petrochemical capital of the United States—based on its extensive oil and gas infrastructure comprised of several thousand miles of pipeline connecting chemical manufacturers, refineries, and fractionation plants along the Gulf Coast—and ultimately became the energy capital of the world. With a rapidly growing economy tied to petrochemicals and goods movement, Houston's East End (*target area for this grant*) was established along the banks of the Buffalo Bayou and Houston Ship Channel, which fed the Port of Houston. By the 1890s, Houston had become known as "Where Seventeen Railroads Meet the Sea", and the East End became a community of commercial junctions.

The **East End (pop.² 29,053)** Target Area (TA), is an approximately four thousand (4,000) acre area bound by downtown to the west, Buffalo Bayou to the northeast, Harrisburg light rail to the south, and Brays Bayou to the east at the Port of Houston (CTs 3101.01, 3101.02, 3104, 3105, 3109, and 3111). At its inception, the East End had a large concentration of working-class German, Italian, Irish, and Asian immigrants. As opportunities grew in the early 1900s, an influx of Hispanic immigrants settled in East End, establishing what is now two of Houston's oldest Hispanic neighborhoods: 2nd Ward and Magnolia Park. Today, the East End is one of Houston's most culturally vibrant neighborhoods, with public art, colorful murals, Tex-Mex cuisine, street festivals, and pop-up vendor markets reflecting its diverse past. However, the East End has experienced significant economic challenges and environmental burdens for over a century, impacting generations of residents.

Houston's growing freight economy and an oil boom in the early-mid 1900s coincided with the now-illegal Jim Crow laws restricting where African Americans and Hispanics could live and work. Houston had and continues to have **no zoning regulations or land use restrictions, which has allowed for incompatible development patterns**, where railyards, processing plants, manufacturing and industrial facilities, concrete crushers, and city incinerators infiltrate residential areas, leaving residents limited access to green space, parks, recreational facilities, and other community amenities. By the mid-1900s, the East End, fragmented by this incompatible development, experienced a sharp economic decline as companies moved manufacturing operations overseas. This decline was exacerbated by a variety of factors, including public disinvestment, environmental degradation, interstate expansion projects, redlining, and the boom-and-bust cycle of the oil and gas industry, resulting in decades of persistent poverty (26.45% of households making less than \$25,000, 48% children in poverty, and 28% seniors).

As industrial and manufacturing operations abandoned their facilities, they left behind shells of warehouses, vacant lots, and other decaying infrastructure. Of the hundreds of brownfields in East End, the former City of Houston (COH) Velasco Street Incinerator (Velasco Incinerator) has presented the greatest burden to community residents and adjacent property owners since it was operational in the 1930s through '60s. Furthermore, this site represents a pattern of historic environmental racism in the COH, as documented by Dr. Robert Bullard's 1979 research findings, which demonstrated that one hundred percent (100%) of City-owned landfills and seventy-five percent (75%) of City-owned incinerators were in neighborhoods of color.³ For the past 60 years, this site has sat idle, attracting crime, contributing to the blight in East End, and perpetuating environmental injustice. As efforts advance to clean up and transform the East End's industrial waterfront along Buffalo Bayou into a destination park system, complemented by residential affordable and market-rate housing, retail, entertainment, and other community amenities, the Velasco Incinerator continues to be a significant barrier, hindering such progress and burdening adjacent developments.

¹ American Community Survey (2017-2021).

² American Community Survey (2017-2021).

³ <https://drrobertbullard.com/wp-content/uploads/2014/07/Final-2014-Bullard-Cite-Article.pdf>

ii. Description of the Proposed Brownfield Site: The Velasco Incinerator site is 4.56 acres of vacant land located at the 800 Block of Velasco Street in Houston's East End. It is located just north of Navigation Boulevard and south of Buffalo Bayou. The site was formerly operated as a municipal incinerator facility by the COH from the 1930s through the late-1960s. Municipal waste from across the city was brought to this site for incineration. The byproduct of incineration is ash and fill material that did not burn, such as glass, brick, and metals. This ash and fill material was spread on the property during its more than forty (40) years of operation, resulting in the deposition of up to thirty-five (35) feet of incinerator waste on approximately two-thirds of the site.

All site buildings were removed by 1995, except for incinerator stacks, a concrete building foundation, and a sanitary sewer lift station. Today, the site is bound on all sides by chain-link fencing and is so heavily covered in native grasses and trees that it remains unusable. Due to the high cost of cleaning up environmental contamination, the site has been **vacant for nearly sixty (60) years** since the City abandoned it in the late-1960s. Environmental testing between 2006 and 2019 demonstrated that the waste and impacted soil contain elevated levels of arsenic, lead, mercury, polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), semi-volatile organic compounds (sVOCs), dioxins, and furans above applicable Texas Risk Reduction Act (TRRP) Protective Concentration Limits (PCLs). Groundwater is also impacted by lead, VOCs, and SVOCs above applicable PCLs.

b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans: With this clean-up grant, HLB will prepare the Velasco Incinerator site for reuse as a public park, per community input. This simple green space will connect residents to healthy outdoor recreational and civic activities at the Buffalo Bayou Park to the north along the Buffalo Bayou waterfront. This reuse plan intentionally advances goals and objectives identified in various community revitalization plans, including the *Greater East End Livable Centers Master Plan* (2011), *ULI Redeveloping the East End Study* (2015), *Complete Communities Action Plans for 2nd Ward* (2018) and *Magnolia Park-Manchester* (2020), *Buffalo Bayou East Master Plan* (2022), *Bayou Greenways Initiative* (2020), *Resilient Houston* (2020), and *Climate Action Plan* (2020). **The Velasco Incinerator project will play a key role in bringing together these plans' goals to mitigate historic inequities and advance inclusive economic development and resilience initiatives in the East End.**

Through the extensive community engagement conducted by the recent plans and studies mentioned above (with feedback from over 1,000 residents), the public has expressed overwhelming support for parks, recreation, and innovative design strategies to increase access to the Buffalo Bayou Park and for repurposing industrial properties into key community assets. Directed by public dialogue, a strategic goal of the *Complete Communities Action Plan* states, "Create and expand linear park space along Buffalo Bayou, including acquiring and redeveloping industrial properties into parks as part of the Buffalo Bayou."⁴ As a former industrial property in close proximity to the southern edge of Buffalo Bayou Park, the Velasco Incinerator cleanup is key unlocking access to the greater park system for the community. The plans for reclaiming the project site as a public park with trail connections and amenities are included in both the *Buffalo Bayou East Master Plan* and *Complete Communities Action Plan*. HLB will continue to engage the community to understand their desire to include additional park amenities like pavilions, botanic gardens, recreational space, and community art. HLB will also work with key stakeholders to implement the community's full vision for park enhancements.

ii. Outcomes and Benefits of Reuse Strategy: According to the Kinder Institute of Urban Research, parks provide crucial health, environmental, and economic benefits. Recent studies by Kinder have concluded that "*more and better parks would thus mean better lives for all Houstonians.*"⁵ The reuse of the Velasco Incinerator as a park will **add 4.56 acres of green space to the City's park system, and in turn,**

⁴ *Secord Ward Complete Communities Action Plan*: 44.

⁵ <https://kinder.rice.edu/urbanedge/houston-parks-green-space-health-climate>

improve quality of life conditions. The new park is also expected economically benefit the TA community by directly creating investment of up to ten (10) quality jobs in park maintenance, attract small business (like Houston’s thriving food truck economy and pop-up art vendors), and drive tourism into East End, which will increase consumer spending in the TA. The greenspace will also help mitigate climate threats, including extreme heat, which is imperative as Houston was ranked as one of the worst cities in the US for urban heat island. Additionally, evidence from a study of 301 major U.S. cities demonstrated that, on average, areas with more greenspace have lower rates of property and violent crime.⁶ Moreover, the project will unlock the community’s access to the Buffalo Bayou's waterfront and connect directly into the Buffalo Bayou East Master Plan, which anticipates over 44 miles of new and improved trails and bikeways, seven (7) new pedestrian bridges, four (4) miles of accessible waterfront, seven (7) new water access points, 263 acres of new and improved parks, and 341 acres of expanded and enhanced tree canopy.⁷ Collectively, these bayou trails and park system contribute to the physical and mental health of residents in East End by promoting outdoor recreation, active lifestyles, and social connection, as well as restoring natural ecosystems and biodiversity to improve air, soil, and water quality through ecological restoration, riverbank clean-up, slope stabilization, and the installation of native plants and trees.

c. Strategy for Leveraging Resources i. Resources Needed for Site Characterization: The Voluntary Cleanup Program (VCP) agreement with the Texas Commission on Environmental Quality (TCEQ) has committed HLB to completing an Affected Property Assessment Report (APAR) by June 14, 2024. To ensure compliance with the June 14, 2024 deadline, the COH has committed \$800,000 to HLB to fund assessment activities through June 2024. Although no further assessment is anticipated after June 14, 2024, should TCEQ require additional characterization to support remediation decisions, HLB also has a balance of \$174,340 remaining in their existing FY21 Community-wide Assessment Grant.

ii. Resources Needed for Site Remediation: The Analysis of Brownfield Cleanup Alternative (ABCA) cost estimates indicate that the EPA request will be sufficient to complete the remediation of the Velasco Incinerator brownfield site. No additional resources are needed.

iii. Resources Needed for Site Reuse: **The reuse plan immediately following clean-up is simply green space and additional reuse funding is not required.** However, if the community desires additional amenities or park enhancements, HLB has several options for leveraging funding, including local philanthropic organizations like the Kinder Institutes and Houston Endowment, as well as Tax Increment Reinvestment Zone (TIRZ) #23, which has a parks and recreation budget of \$15M, public utilities of \$8M, and infrastructure improvements of \$55M.

iv. Use of Existing Infrastructure: The vacant property is not served by municipal utilities. The existing site improvements (concrete pads) will be removed during clean-up; however, the historic smokestacks of the former incinerator will be preserved and incorporated into the final reuse design. Improvements to stormwater and drainage infrastructure are a priority of the COH Mayor's Office to alleviate flooding and reduce contaminated stormwater runoff into Buffalo Bayou. Velasco Street provides site access and will require repaving and drainage improvements to support future reuse plans. Necessary public infrastructure updates are included in the City's annual capital improvement budgets for East End through TIRZ-23. Funding for infrastructure improvements can be supported by TIRZ-23, which has a goal of supporting the construction of key streets and utility systems to improve functionality and replace aged facilities.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. The Community's Need for Funding: Over the past seven (7) years, Houston has

⁶ Ogletree, Scott, *Urban greenspace linked to lower crime risk across 301 major U.S. Cities*, Science Direct, December 2022

⁷ *Buffalo Bayou East Master Plan*: 22.

suffered unprecedented economic impacts from catastrophic climate events, such as the Memorial Day Flood (2015; damages of \$460M), Tax Day Flood (2016; damages of \$65M), Hurricane Harvey (2017; damages of \$125B), Tropical Storm Imelda (2019; damages of \$5B), and Winter Storm Uri (2021; \$295B state-wide). Additionally, in 2020, Houston suffered the worst economic loss from the COVID-19 pandemic compared to any other major US metropolitan area and is significantly lagging in recovery compared to other major Texas cities.⁸ Since March 2020, Houston has lost 367,000 jobs to the initial lockdown period and **only 57.4 percent of those jobs have returned as of July 2021** (compared to 98.9% in Dallas, 74.9% state-wide). As a result of these issues, COH has no reserves available to assist with the cleanup of the Velasco Incinerator site, or other contaminated sites in the city. HLB's operating, program, and project funding relies heavily on restricted funding granted to the organization through the COH, Harris County, philanthropy, and other resources. In recent years, philanthropic resources have been scarce and, when available, restricted for use to address the City's affordable housing crisis, disaster recovery, critical infrastructure, and other urgent needs. As a result of this demand on private funds, **HLB is limited in its ability to raise private funds specifically for the environmental remediation of the Velasco Incinerator without EPA assistance.**

ii. Threats to Sensitive Populations: (1) *Health/Welfare:* Sensitive populations in the TA include children in poverty, people 65 years of age or older who live in poverty (27.3%), and unhoused individuals. Rates of children in poverty are nearly double in East End CTs (40-61%) as compared to thirty-two percent (32%) in Houston, twenty-three percent (23%) in TX, and seventeen percent (17%) nationally). Poverty rates in homes with children are strongly associated with environmental and social determinants of health. Children are at higher risk of exposure to hazardous chemicals, as evidenced by Houston's high rates of childhood lead poisoning and asthma.⁹ Another sensitive population is unhoused individuals who are known to take shelter in the overgrown area of the Velasco Incinerator. In 2023, the Coalition for the Homeless counted 1,242 people living unsheltered in Houston.¹⁰ The unhoused individuals occupying the Velasco Incinerator site are potentially at risk of various site hazards (including overgrowth and illegal dumping) and HLB is actively engaging with the Mayor's Office of Homeless Initiatives to prevent this sensitive population from exposure.

The cleanup and reuse will eliminate human and ecological exposure to hazardous pollutants on-site. It will also add nearly five acres of vegetation to the site, such as plants (in above-grade planters) and shrubs, which effectively remove particulate matter from the air, reducing resident exposure to vehicle exhaust and other industrial pollutants in the area. Significant reductions of existing and future pollutants in the TA as a result of cleanup and reuse will directly and positively impact the community's health.

(2) *Greater Than Normal Incidence of Disease and Adverse Health Conditions:* The Houston Health Department (HHD) has identified the East End as "**environmentally disadvantaged**" and a "**severe-needs community**" with high risk for childhood **lead poisoning, asthma, and cardiac arrest**. Exposure to lead is associated with a range of serious health effects in children, including anemia, impaired hearing, and detrimental effects on cognitive and behavioral development with serious personal and social consequences that may be life-long. According to the 2023 American Lung Association's *State of the Air Report*, Houston's air quality ranks eleventh (11th) for high-ozone days and twentieth (20th) for annual particulate pollution out of about two hundred (200) metropolitan areas across the U.S. Air pollution in Houston poses an increased risk of asthma attacks and cardiac arrest, according to researchers at the HHD, Houston Fire Department, Rice University and Baylor College of Medicine. HHD's 2021 *Asthma Burden Report* identifies the TA as having "High Burden Zip Codes" in which asthma exacerbations are more prevalent and access to care is limited (collectively representing

⁸ <https://www.bauer.uh.edu/centers/irf/houston-updates.php>

⁹ Interview with Houston Health Department (11/18/2021).

¹⁰ <https://www.homelesshouston.org/2023-pit-results>

22.6% of all asthma hospitalizations in 2019).¹¹ HLB is actively working with the HHD, Harris County Health, and other local public health stakeholders to address health disparities in the East End TA.

The containment of VOCs and SVOCs at the project site, in combination with adding nearly five acres of vegetation to remove harmful particulate matter in the air, will help reduce the amount of ozone in the TA. The containment and greening of the site will positively impact air quality and will aid in reducing the severity and frequency of both asthma and cardiac arrest amongst TA residents. Similarly, any exposure to lead via the project site will be eliminated, which will in turn help to reduce rates of anemia, hearing impairment, and cognitive and behavioral health issues.

3) *Environmental Justice: (a) Identification of Environmental Justice Issues:* Data downloaded from EPA's EJScreen tool confirms that the CT 3101.02 (Velasco Site) and the East End TA are above the ninetieth (90th) percentile of most of EPA's Environmental Justice Indexes. Climate vulnerability and social inequities further exacerbate environmental justice problems, impacting residents who are concerned about the distribution of hazardous chemicals to their properties from nearby EPA facilities and brownfields, including the Velasco Incinerator. In addition to EJScreen data, the CEJST Tool shows that CT 3101.02, which contains the Velasco Incinerator, is disadvantaged in the categories of **climate change** (96th percentile for expected building loss/71st percentile low-income), **energy** (90th for PM/71st low-income), **housing** (96th for lack of greenspace/71st low-income) **legacy pollution** (>90th for proximity to RMP (91st) & Superfund (97th)/71st low-income) and **workforce development** (92nd poverty/15% high school education). Moreover, the East End is considered "low income and low access" with a significant number of residents living >1 mile from the nearest food store.¹²

EJ Index	CT 3101.02	East End
Particulate Matter	97	97
Ozone	97	97
Diesel PM	96	96
Air Toxics Cancer Risk	91	97
Air Toxics Respiratory	93	93
Toxic Releases to Air	98	98
Traffic Proximity	97	89
Lead Paint Indicator	87	94
Superfund Proximity	98	97
RMP Proximity	93	93
Hazardous Waste Proximity	93	95
Underground Storage Tanks	84	93
Wastewater Discharge	96	95
Downloaded from EJ Screen 10.21.23. Percentile comparison in TX is similar to US.		

(b) *Advancing Environmental Justice:* The cleanup of the project site advances environmental justice by removing and containing hazardous substances that have a negative cumulative health impact on the TA, particularly its most vulnerable populations, and creating equitable livelihood opportunities by generating 10 new, quality jobs. The project will bring positive health impacts in the form of a park that provides opportunities for physical and social activity, and ecosystem services that clean the air and regulate the microclimate. HLB is sensitive to green gentrification that this project proposal is susceptible to and works to stave off gentrification by providing community-level support to protect against property tax increases driven by associated increases in area property values. HLB also promotes and supports local businesses that hire and train the local workforce, which directs economic growth created by redevelopment projects, such as this, to economically benefit the existing community. Keeping the benefits of economic growth within the neighborhood strengthens existing households, making them more resilient to displacement, and supports improved health by ensuring better access to healthy food and medical care.

b. Community Engagement

i. Project Involvement/ii. Project Roles: HLB affirms the Principles of Environmental Justice, and specifically *demands the right of communities to participate as equal partners at every level of decision-making*¹³. The following table identifies local organizations/entities/groups and their roles in grounding this project in meaningful community engagement and local stakeholder support.

¹¹ <https://www.houstontx.gov/health/asthma/documents/houston-asthma-burden-report.pdf>

¹² <https://www.ers.usda.gov/data-products/food-access-research-atlas/download-the-data/>

¹³ EJ Principle #7

Name	Point of Contact	Specific Involvement
TCEQ (State Reg. Agency)	Kristian Livingston, (512) 239-2252, kristian.livingston@tceq.texas.gov	Provide additional technical assistance on sites ineligible for this funding or supplemental assessments on complex sites
Houston City Council Member At Large Position 4	Dr. Leticia Plummer, (832) 393-3012, atlarge4@houstontx.gov	Community engagement support to solicit community feedback, comments, and concerns during the cleanup process.
City of Houston Mayor's Office	Mayor Sylvester Turner, (713) 837-0311, mayor@houstontx.gov	Support from various city departments and initiatives to ensure the success of this project, including Mayor's Office of Homeless Initiatives, Complete Communities, Resilience and Sustainability.
Harris County Commissioner Adrian Garcia	Commissioner Adrian Garcia, (713) 755-6220, commissioner@pct2.hctx.net	Committed to the identification and leveraging of additional resources once the site is ready for reuse to fulfill the community's vision for amenities beyond greenspace.
Houston Health Department	Dr. Loren Hopkins, (832) 393-5169; Loren.Hopkins@houstontx.gov	Public health communication and education; technical assistance services to ensure compliance with public health standards.
Harris County Pollution Control	Dr. Latrice Babin, (713) 920-2831, pollution.control@pcs.hctx.net	Provide technical assistance and community engagement support to educate residents on expected best practices for cleanup.
Greater East End Management District	Veronica Chapa Gorczyński, (713) 928-9916, veronica@eastenddistrict.com	Community engagement support by invitations of project team to speak at public meetings, disbursement of information, and collection of community insights to influence decision making.
Buffalo Bayou Partnership	Anne Olson, (713) 752-0314, aolson@buffalobayou.org	Environmental advocacy and alignment of development with the northern boundary entering Buffalo Bayou Park.
Super Neighborhoods	Roy Lira, (713) 320-9368, superneighborhood63@gmail.com	Assist with communication for community engagement with Hispanic residents & Spanish translation
Black United Fund of Texas	Cleo Johnson, (832) 465-4487, buftx1981@gmail.com	Community engagement guidance, collaborative problem solving, environmental justice strategies
Coalition of Community Organizations	Rev. James Caldwell, (832) 231-9176, coconow@gmail.com	Environmental justice advocacy and support with ensuring community feedback is considered with project decision.
Air Alliance Houston	Jennifer Hadayia, (713) 528-3779, jennifer@airalliancehouston.org	Technical guidance and third-party opinion relative to community concerns of air quality during construction.

iii. Incorporating Community Input: Community engagement, integrity of ethics and transparency, and meaningful partnerships with community stakeholders will be paramount to the success of this clean-up and reuse project. Upon acquiring the property in November 2023, HLB launched www.bankingvelasco.org to communicate project status updates, reports, and other critical information to stakeholders. HLB will also create a Community Engagement Plan detailing opportunities to inform the community, engage stakeholders, and give and receive feedback regarding project decisions. HLB will (1) host in-person public meetings at least once a quarter to give project updates and receive critical community feedback; (2) engage the community "where they are," accepting invitations to speak at civic club and grassroots events to actively listen and provide project information; and (3) hire a dedicated community liaison representative of the East End who can offer deeper insights into community feedback on the project. HLB will respond to community feedback received on www.bankingvelasco.org and shared through various communication channels, including social media, newsletters, public media and news outlets, and City Hall communications. Communication will be offered in both English and Spanish, with virtual options for participation via Microsoft Teams, Zoom, Facebook Live, or other similar platforms.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Clean-up Plan: As described in the ABCA, Remedial Alternative (RA) #2 is the selected clean-up plan for the Velasco Site. The soil response actions proposed under RA#2 are twofold. First, the entire site will be cleared and grubbed of all vegetation, and the concrete foundation will be removed. A sufficient volume of buried fill/waste material and overburden soil (about 10,500 cubic yards (CY) loose volume) will then be removed from the site's southwest portion to support the future construction of an extension of Ball Street (approximately 14,000 square feet (SF)). Second, an additional 14,000 SF area will be excavated to support future amenities or other improvements at the site. The approximately

10,500 CY of buried fill/waste material and overburden soil from this area will be redistributed across the site to reuse the material to grade the site prior to constructing a cap. The onsite areas outside the Ball Street right-of-way (ROW) and the additional excavation area where buried waste/fill materials are suspected will then be capped with a two-foot-thick compacted engineered clay cap constructed over the underlying fill/waste materials to prevent human exposure to the affected media and assure long-term waste containment with minimum post-closure maintenance. The post-closure care will include operation and management (O&M) of the engineered clay cap for up to 30 years. The groundwater exposure pathways at the site will be controlled by obtaining a Municipal Setting Designation (MSD) ordinance from the COH for the site and an MSD Certificate from TCEQ. The combined MSD ordinance and certificate will prohibit the withdrawal and use of groundwater at the site for potable purposes, thus controlling the human groundwater contact and ingestion exposure pathways at the site. Specific task details are outlined in the ABCA.

b. Description of Task/Activities and Outputs

Task 1 – Community Engagement
<i>i. Project Implementation:</i> HLB will direct community engagement and hire a specialized contractor to support implementation efforts, which will include (1) project communications and updates through www.bankingvelasco.org , social media, Councilmember newsletters, HLB newsletters, and East End civic organizations; (2) public meetings; (3) invited speaking engagements at other community meetings and events; (4) community visioning workshops; (5) educational materials; (6) Spanish translation and interpretation; and (7) hiring of a dedicated community liaison from East End to provide localized guidance, enhance communications, and build relationships to inform engagement strategies.
<i>ii. Schedule:</i> Start in Q1 and continue updates and communications throughout the grant period. Event/meeting schedules to include once-per-month outreach activities and quarterly public meetings.
<i>iii. Task Lead:</i> HLB
<i>iv. Output(s):</i> (1) Outreach meetings (at least 16 total) with notices, agendas, presentations, sign-in sheets, and meeting notes; (2) outreach materials (fact sheets; summary sheets; website updates with all materials prepared in both Spanish and English); (3) report and summary of community feedback and response to comments; (4) notes and summary of activities from the project's community liaison.
Task 2 – Clean-up Planning
<i>i. Project Implementation:</i> HLB will engage a Qualified Environmental Professional (via a competitive procurement process per 2 CFR Part 200) to complete final specifications for clean-up in a Response Action Plan (RAP), which will incorporate feedback from community visioning sessions. Clean-up planning will also include finalizing and seeking EPA approval on the ABCA, Quality Assurance Project Plan (QAPP), and Health and Safety Plan (HSP). A contingency budget for remedial investigation has also been included <i>if necessary</i> to close data gaps required to finalize the remedial design specs, including ongoing groundwater monitoring, as required by TCEQ before, during, and after clean-up. Bid documents and procurement of construction contractors per 2 CFR Part 200 and Davis Bacon. TCEQ reporting, correspondence, and project plan approval will also be included in this task.
<i>ii. Schedule:</i> Oct. 2024 – Sept. 2025
<i>iii. Task Lead:</i> HLB & Environmental Professional
<i>iv. Output(s):</i> (1) Final ABCA; (2) QAPP; (3) Health and Safety Plan; (4) RAP; (5) quarterly status & groundwater monitoring reports (est. 3); (6) bid documents and procurement results
Task 3 – Clean-up & Post-Closure Activities
<i>i. Project Implementation:</i> HLB will manage the selected environmental professional and construction contractor to implement clean-up activities, including (1) site clearing; (2) excavation; (3) site grading; (4) construction of grass and clay cap; (5) preparation for Ball Street extension; (6) air and runoff monitoring and mitigation; (7) confirmation sampling; (8) continued groundwater monitoring; (9) documentation and reporting; and, (10) installation of additional monitoring wells for post-closure monitoring. Upon TCEQ

- approval that the response action is complete, post-closure activities will include closure of unnecessary groundwater monitoring wells, operation and maintenance (O&M) of the cap, post-closure groundwater monitoring, and reporting.
- ii. Schedule: Oct 2025-Dec 2026, Jan 2027-Oct 2028 (post-closure)
 - iii. Task Lead: HLB, Environmental Professional, & Construction Contractor
 - iv. Output(s): (1) Quarterly status reports (including groundwater analysis, construction monitoring, daily logs, laboratory reporting, and waste manifests); (2) Response Action Completion Report (including final construction details, quality assurance confirmations, laboratory results, etc.); (3) MSD Ordinance and Certification; and (4) TCEQ VCP Conditional Certificate of Completion
- Task 4 – Cooperative Agreement (CA) Compliance & Project Management (PM)**
- i. *Project Implementation:* HLB will dedicate staff to managing grant requirements established in the EPA's CA, including ACRES reporting, contractor procurement, quality assurance, budget, and schedule. Grant funds will also be used to pay for additional support from contractors and fund travel costs for two HLB staff member to attend two regional or national brownfield conferences.
 - ii. *Schedule:* Oct 2024 – Sept. 2028
 - iii. *Task Lead:* HLB
 - iv. *Output(s):* (1) Quarterly progress reports; (2) annual DBE and Davis Bacon reports; (3) final closeout report; (4) ACRES updates (as needed); (5) Documentation and reporting required to be provided to EPA.

Note – In-kind services are expected from key stakeholders in the form of staff and volunteer time, as well as from HLB board members, interns, and non-essential staff in support of public meetings.

c. Cost Estimates:

Budget Categories		Project Tasks (\$)				
		Community Engagement	Cleanup Planning	Cleanup Activities	CA Compliance & PM	Total
Direct Costs	Personnel	\$ -	\$ -	\$ -	\$ 160,000	\$ 160,000
	Fringe Benefits	\$ -	\$ -	\$ -	\$ 32,000	\$ 32,000
	Travel ¹	\$ -	\$ -	\$ -	\$ 20,000	\$ 20,000
	Equipment ²	\$ -	\$ -	\$ -	\$ -	\$ -
	Supplies	\$ 9,600	\$ -	\$ -	\$ -	\$ 9,600
	Contractual	\$ 288,000	\$ 284,000	\$ 865,200	\$ -	\$1,437,200
	Construction ³	\$ -	\$ -	\$ 3,072,000	\$ -	\$3,072,000
	Other	\$ 19,200	\$ -	\$ -	\$ -	\$ 19,200
Total Direct Costs ⁴		\$ 316,800	\$ 284,000	\$ 3,937,200	\$ 212,000	\$4,750,000
Indirect Costs ⁴					\$ 250,000	\$ 250,000
Total Budget		\$ 316,800	\$ 284,000	\$ 3,937,200	\$ 462,000	\$5,000,000

Task 1 – Community Engagement [Total Budget = \$316,800]

Supplies [\$9,600]: Estimate of \$3,000/year (x4yrs) for public meeting supplies, like pens, markers, ink for printing, name tags, and poster board. **Contractual [\$288,000]:** Average quarterly cost of \$27,000 (\$150/hr @ 40hrs/mo x 48mo) for public relations, engagement, language justice, and communications consultant(s). **Other [\$19,200]:** Community Liaison hired at \$50/hour @ 8hr/mo for 48mo for meetings/outreach.

Task 2 – Clean-up Planning [Total Budget = \$284,000]

Contractual [\$284,000]: Includes 8 quarters of groundwater sampling [\$20,500/quarter x 8 = **\$164,000**] which assumes a 3-day sampling event, 14 monitoring wells, and 112 groundwater samples; **\$80,000** of regulatory reporting, including updates to the Affected Property Assessment Report (100 hrs @ \$150/hr = \$15,000), Response Action Plan (200 hrs @ \$150/hr = \$30,000), QAPP/HSP (100 hrs @ \$150/hr = \$15,000), and status or misc. reports/regulatory correspondence (133hrs @ \$150/hr = \$20,000); **\$40,000** remedial investigation with 4 mobilizations to collect soil data at \$10,000/event.

Task 3 – Clean-up Activities [Total Budget = \$3,937,200]

Contractual [\$865,300]: Includes 8 quarters of groundwater sampling [\$20,500/quarter x 8 = **\$164,000**] which assumes a 3-day sampling event, 14 monitoring wells, and 112 groundwater samples during remedy action and into closure; Regulatory reporting, including Response Action Closure Report (200 hrs @ \$150/hr = **\$30,000**), 2 annual reports (2 x 100 hrs @ \$150/hr = **\$30,000**), and status or misc. reports/regulatory correspondence (400 hrs @ \$150/hr = **\$60,000**); and, **\$40,000** for 1 year of post-closure O&M and reporting (\$10,000/quarter). Also includes Groundwater Response Action (**\$302,000**) for the preparation and submittal of a COH and TCEQ Municipal Setting Designation to restrict the use of groundwater for drinking, and continued groundwater, as well as permanent plugging and abandonment of up to 11 monitoring wells; Project/construction management project management, quality control, third-party reviews, meeting facilitation, and documentation of progress towards project goals and objectives at an average of 150 hrs/quarter @ \$150/hr for 16 quarters. **Construction [\$3,072,000]:** costs based on environmental professional estimates for Soil Response Action, which assumes limited excavation of 14,000 SF area or 300 CY contaminated soil, waste characterization sampling, disposal of Class 2 non-hazardous waste, 40 confirmation soil samples, site grading, construction of 106,568 SF clay cap at 2-foot thick with 6 inches of topsoil and hydro-mulch grass installation, and 105 days onsite. Deed restriction, construction management, stormwater pollution prevention plan, and Davis Bacon rates are included.

Task 4 – CA Compliance & PM [Total Budget = \$462,000]

Personnel [\$160,000]: HLB project manager dedicated 50% of time to project (4 x \$80,000/year x 50%). **Fringe [\$32,000]:** 20% fringe benefits. **Travel [\$20,000]:** Travel Costs of \$5,000/year for up to two HLB members to attend EPA/state brownfield conferences; Costs are estimated at \$2,500/person/ conference based on recent conference costs of approximately \$750 airfare, \$1000 hotel (5 nights x \$100/night x 2 people), \$250 ground transportation, and \$500 incidentals per 5-day event. **Indirect [\$250,000]:** 5% administrative fee for HLB to cover overhead expenses.

d. Plan to Measure and Evaluate Environmental Progress and Results

HLB Brownfields Program staff are dedicated to having weekly management meetings to track and monitor the progress and results of projects. These meetings are typically internal, but often HLB will invite contractors, EPA staff, project partners, and other stakeholders to report on or work through project plans. HLB uses the software Asana to track project milestones and ensure both internal and external project team members are well informed of expected tasks, actions, and outcomes. HLB has a dedicated finance department, which will track project financing, invoicing, and compliance with the CA. HLB will establish regular monthly project meetings with EPA staff and ensure compliance with EPA reporting requirements, including ACRES updates. Metrics on project progress will also be shared with the public during regular community engagement events and on the website. Progress metrics include schedule updates, # meeting participants, # public comments received, funding spent, # tons of soil removed, amount of funding leveraged, acres of parks created, and results of any public surveys conducted during the process.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure: HLB has the systems, processes, procedures, and staff in place to effectively manage this grant. HLB is a state nonprofit and local government corporation or a "general purpose unit of local government" as defined in 2 CFR 200.64 and is therefore eligible to receive EPA funds for assessment of brownfields. A copy of HLB's current bylaws and equivalent articles of incorporation are provided in Attachment A. HLB has a 13-member board of directors and dedicated staff, including a president, legal counsel, real estate professionals, construction managers, and administrative staff.

ii. Description of Key Staff: HLB will oversee all aspects of the project to ensure the timely completion of key milestones. The following staff have direct experience managing HLB's current FY21 EPA brownfields grant. **Christa Stoneham**, CEO/President (*Role: Project Director, Experience: 15+ years*,

Education: Bachelor of Architecture (B.Arch), Master of Architecture (M.Arch), Master of Community Development from Prairie View A&M Univ.), will oversee the overall management of the project. Prior to her appointment at HLB in 2021, Christa fundraised over thirty million dollars (\$30M), directed six hundred (600) community development projects and programs, and impacted over twenty thousand (20,000) residents in Houston's most vulnerable and disadvantaged communities. **Lindsey Williams, AIA, NOMA**, Director of Community Development (*Role: Project Manager/QAQC Officer, Experience: 15+ years, Edu: B.Arch, M.Arch*), will manage projects and ensure quality control, including meaningful community engagement and incorporation of community feedback into clean-up and reuse plans. Lindsey has a diverse project management background with direct experience in architecture and construction, including her experience as a Senior Planner for Mayor Sylvester Turner's Complete Communities Initiative. **Isai Mendez**, Director of Finance (*Role: Grant Finance Manager, Experience: 10 years, Edu: B.S. Accounting & Nonprofit Management Certificate*), will oversee the finance and accounting of the grant. With over 8 years of experience as an auditor and finance controller for non-profit/government organizations, Isai currently leads HLB's accounting and finance department. **LaTosha Okoiron**, Counsel (*Role: Compliance Manager, Experience: 15+ years, Edu: Juris Doctorate, B.S. Political Science*), will ensure compliance with EPA's CA, HLB bylaws, Texas state statutes, and any other applicable regulations governing the administration of this grant and projects.

iii. Acquiring Additional Resources: HLB has significant resources available to ensure project success, including technical and support staff to assist with implementation activities. HLB has proactive succession plans if staff changes are required to eliminate project delays and ensure staff who are reassigned to the project have appropriate qualifications and experience. HLB routinely contracts with consultants and has established equal opportunity procedures to ensure a fair bidding process. Utilizing HLB's procurement policy, and in conformance with 2 CFR 200.317-200.326, HLB has procured multiple consultants to assist with EPA funding under multi-year contracts. HLB has also engaged with Kansas State University's Technical Assistance to Brownfields (TAB) program to support community engagement efforts, resource road mapping, community visioning, and general program advisory services to support grant administration and management.

b. Past Performance and Accomplishments:

i. Currently Has or Previously Received an EPA Brownfields Grant: HLB will draw upon its experience in successfully managing an **FY21 Community-wide Coalition Assessment Grant (Active): 1. Accomplishments:** Although still active, just over seventy percent (70%) of this grant has been spent on community engagement, brownfields inventory activities, Phase I and II Environmental Site Assessments, site reuse planning, and cleanup planning. Accomplishments include (a) creating a GIS-based brownfields inventory to collect information about community-identified brownfields (20 sites identified to date); (b) 1 Infrastructure Evaluation/Plan; (c) 1 reuse vision and rendering; (d) 6 Phase I ESAs; (e) 2 Phase II ESAs; (f) 1 large Phase II ESA; (g) 33 Property Eligibility Determination (PED) forms submitted; (h) 4 QAPPs approved (17 pending); (i) 2 National Brownfields Conferences (with speaker session in Detroit 2023); and (j) over 100 of community members and stakeholders engaged. **2. Compliance with Grant Requirements:** All ongoing, quarterly, and annual reporting requirements for past and current funding agreements have been submitted to the EPA per the CA in a timely manner. Each project has met or exceeded the programmatic goals stated in the work plans. Outputs and outcomes associated with all EPA-funded projects have been, and will continue to be, entered into the ACRES database upon project completion.

THRESHOLD CRITERIA

THRESHOLD CRITERIA RESPONSE

1. Applicant Eligibility

The Houston Land Bank (HLB) is a quasi-governmental, nonprofit organization and therefore eligible to receive federal funding. Detailed documents of HLB's eligibility are provided in **Attachment A**.

2. Previously Awarded Cleanup Grants

HLB has not received a previous EPA Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

HLB has not received a previous EPA Multipurpose Grant.

4. Site Ownership

The property ownership – fee simple deed - was transferred from the City of Houston to the Houston Land Bank on November 7, 2023. The Houston Land Bank is the sole owner of the site, which is the subject of the Cleanup Grant application. A copy of the deed is included in **Attachment B**.

4. Basic Site Information

- a) Former City of Houston Velasco Incinerator
- b) 0 N. Velasco Street, Houston, Texas 77003

5. Status and History of Contamination at the Site

The site is contaminated with hazardous substances. The site was formerly operated as a municipal incinerator facility by the COH from the 1930s through the late-1960s. Municipal waste from across the city was brought to this site for incineration. The byproduct of incineration is ash and fill material that did not burn, such as glass, brick, and metals. This ash and fill material was spread on the property during its more than forty (40) years of operation, resulting in the deposition of up to thirty-five (35) feet of incinerator waste on approximately two-thirds of the site.

All site buildings were removed by 1995, except for incinerator stacks, a concrete building foundation, and a sanitary sewer lift station. Today, the site is bound on all sides by chain-link fencing and is so heavily covered in native grasses and trees that it remains unusable. Due to the high cost of cleaning up environmental contamination, the site has been vacant for nearly sixty (60) years since the City abandoned it in the late-1960s. Environmental testing between 2006 and 2019 demonstrated that the waste and impacted soil contain elevated levels of arsenic, lead, mercury, polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), semi-volatile organic compounds (sVOCs), dioxins, and furans above applicable Texas Risk Reduction Act (TRRP) Protective Concentration Limits (PCLs). Groundwater is also impacted by lead, VOCs, and SVOCs above applicable PCLs.

7. Brownfield Site Definition

The site meets the definition of a brownfield under CERCLA § 101(39). HLB affirms that the site is: a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

A written ASTM E1903-19 Phase II was completed by Leaf Environmental in October 2019 through the EPA's Technical Assistance to Brownfields program. A Phase II was also conducted in November 2006 by Terracon on behalf of the City of Houston.

9. Site Characterization

State letter included as **Attachment C**.

10. Enforcement or Other Actions

There are no known or anticipated environmental enforcement or other actions related to the site for which the Brownfields Grant funding is sought.

11. Site Requiring a Property-Specific Determination

No

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

The Houston Land Bank is a Bona Fide Prospective Purchaser of the site and, therefore, exempt from CERCLA liability.

(a) Information on the Property Acquisition

The property ownership was transferred to the Houston Land Bank from the City of Houston on November 7, 2023. The Houston Land Bank is the sole owner of the property (fee simple). Houston Land Bank is an independent local government corporation established by Texas State Bill SB 1679.

(b) Pre-Purchase Inquiry

On September 20, 2023, ESE Partner, LLC conducted an AAI compliant, ASTM E1527-21 Phase I Environmental Site Assessment for the Houston Land Bank for the site.

(c) Timing and/or Contribution Towards Hazardous Substance Disposal

All disposal of hazardous substances at the site occurred before HLB acquired the property. HLB did not cause or contribute to any release of hazardous substances at the site. HLB affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses

The property has been vacant since Houston Land Bank acquired ownership of the property. No additional owners or users have been associated with the property since Houston Land Bank has taken ownership.

(e) Continuing Obligations

Upon acquiring ownership of the property, Houston Land Bank has taken the following actions to prevent disturbance of on-site soil and prevent/limit exposure to contaminants of concern and other site hazards:

1. The property is secured with a fence and monitored on a weekly basis by the Houston Police Department for trespassers, illegal dumping, and other unauthorized site activities. If and when the fence becomes compromised, Houston Land Bank immediately repairs it.
2. Houston Land Bank has partnered with homeless advocacy organizations to rehome individuals living on the site.

Houston Land Bank confirms its commitment to the following:

- (i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls;
- (ii) assist and cooperate with those performing the cleanup and provide access to the property;
- (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- (iv) provide all legally required notices.

13. Cleanup Authority and Oversight Structure

- a. The Houston Land Bank was accepted into the Texas Commission of Environmental Quality Voluntary Cleanup Program (VCP) as site no. VCP 3308 (Former City of Houston Velasco Incinerator Site) on October 26, 2023.
- b. Cleanup response activities are anticipated to impact adjacent or neighboring properties. Houston Land Bank, project stakeholders, and community partners have relationships with the owners of these properties, which include Lead Products to the South, Buffalo Bayou Partnership to the North, Houston Housing Authority to the West, and Southern Pacific Railroad Company to the east.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

A copy of the Draft grant application and ABCA was made available for public comment online at www.bankingvelasco.org and a hard copy was located at Flores Neighborhood Library, located at 110 N Milby St, 77003. A copy of the draft ABCA is included in **Attachment D**.

b. Community Notification Ad

A public notice was advertised to the community following a press release on October 18, 2023, which directed people to www.bankingvelasco.org for more details. Public advertisements were also shared via social media channels (primarily LinkedIn and Instagram) from Houston Land Bank's account, which were shared by various partners including the Mayor's office, and Second Ward Super Neighborhoods (local civic organization). For advertising specific to target area residents, Councilmember Karla Cisneros included news of the public meeting in her weekly newsletter on October 16 and 22nd. Additionally, the story was picked up by several major news outlets, including a story on ABC Eye Witness New and the Houston Landing. Copies of advertisements are included in **Attachment E**.

<https://abc13.com/houston-city-council-transfers-ownership-of-contaminated-land-velasco-incinerator-site-turns-into-public-park-bank-christa-stoneham-ceo/13946820/>

c. Public Meeting

A public meeting was held on October 26 from 6:30-8:00 p.m. at Houston Community College – Felix Fraga Campus 301 N. Drennan St, Texas 77003. Meeting materials were presented in English and Spanish. Spanish language translators were present for real-time interpretation. The meeting was live streamed via Microsoft Teams, which was advertised through www.bankingvelasco.org and Houston Land Bank's social media channels. Public Meeting Summary & Response to Comments is included in **Attachment F**.

d. Submission of Community Notification Documents

Attachments include:

Attachment D:

- a copy of the draft ABCA(s);

Attachment E:

- a copy of the newspaper ad (or equivalent) that demonstrates solicitation for comments on the application and that notification to the public occurred at least 14 calendar days before the application was submitted to EPA;

Attachment F:

- the comments or a summary of the comments received;
- the applicant's response to those public comments; meeting notes or summary from the public meeting(s); and
- meeting sign-in sheet/participant list.

15. Contractor and Named Subrecipients

Not Applicable. Upon award, HLB will select a contractor(s) in full compliance with the procurement standards at 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33 and including, but not limited to Chapter 431 of the Texas Transportation Code, and the Texas Non-profit Corporation Law, Chapters 20 and 22 of the Texas Business Organization Code, and the Uniform Grant Guidance. Additionally, Houston Land Bank will also follow any procurement methods as outlined in the corporation Bylaws and other organizational charters.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Kelly Keel, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 8, 2023

Ms. Christa Stoneham, President & CEO
Houston Land Bank
P.O. Box 131106
Houston, Texas 77219

Re: Houston Land Bank Application for a U.S. Environmental Protection Agency
Brownfields Cleanup Grant for the Former City of Houston Velasco Incinerator Site,
located at 0 North Velasco Street, Houston, Harris County

Dear Ms. Stoneham:

The Texas Commission on Environmental Quality (TCEQ) is pleased to offer this letter of support for the Houston Land Bank's application to the U.S. Environmental Protection Agency for a Brownfields Cleanup Grant for the Former City of Houston Velasco Incinerator Site.

The Houston Land Bank was accepted into the Voluntary Cleanup Program (VCP) as site no. VCP 3308 on October 26, 2023.

In connection with the remedial action to be conducted at the site through the VCP, the Houston Land Bank has formally represented in its VCP application and agreement that it will submit an Affected Property Assessment Report (APAR) by June 14, 2024. The APAR, once approved by TCEQ, is expected to provide a sufficient level of site characterization from the environmental site assessment for remediation work to begin on the site.

The Houston Land Bank intends to develop the property for green space and community development purposes. TCEQ believes that receiving the cleanup grant will significantly benefit the City of Houston, Texas and the surrounding area by improving the environment, and will contribute to the Houston Land Bank's efforts to complete cleanup requirements under the VCP.

The TCEQ looks forward to working with the Houston Land Bank on its Brownfield initiative and supports the grant application. You may contact me at 512-239-2009 or Eric.White@tceq.texas.gov if you have any questions or would like additional information.

Sincerely,

A handwritten signature in cursive script that reads "Eric White".

Eric White, P.E.
Section Manager
Voluntary Cleanup Program and Corrective Action Section
Remediation Division

EW/jdm