

ECIDA | Erie County Industrial Development Authority

R03-24-A-005

FY 2024 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT APPLICATION

Narrative Information Sheet

November 8, 2023

1. Applicant Identification

Erie County Industrial Development Authority
1314 Griswold Plaza
Erie, PA 16501

2. Funding Requested

- a) Assessment Grant Type: Community-Wide Assessment Grant
- b) Federal Funds Requested:
 - i. \$500,000
 - ii. Not Applicable

3. Location: All of Erie County, Pennsylvania

4. Target Area and Priority Site/Property Information:

- Community-Wide Assessment Grant Applicants, other than tribes:
 - Target Areas: Communities throughout Erie County, Pennsylvania
 - Priority Site Addresses:
 - Former Erie Coke – East Avenue, Erie, PA
 - Former Erie Mill & Press Co., 953 E 12th Street, Erie, PA
 - Corry Rubber – 601 W Main Street, Corry, PA
 - Former Chemetron – 10162 Railroad Street, Lake City, PA
 - Former Ethan Allan Site – 77 South Main Street, Union City, PA

5. Contacts:

- a) Project Director:

Ti Sumner, Director of Brownfields & Grants
Erie County Industrial Development Authority
1314 Griswold Plaza
Erie, PA 16501
Phone: 814-480-0337 ext. 202
Email: tsumner@ecrda.net

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b) Chief Executive:

Tina Mengine, Executive Director
 Erie County Industrial Development Authority
 1314 Griswold Plaza
 Erie, PA 16501
 Phone: 814-480-0337 ext. 101
 Email: tmengine@ecrda.net

6. Population:

The Erie County Industrial Development Authority covers the entirety of Erie County, Pennsylvania. The County’s population according to the 2020 US Census was 270,876.

The populations of the 5 selected priority sites are summarized below.

- a) Priority Site #1 – former Erie Coke – City of Erie, PA 93,511*
- b) Priority Site #2 – former Erie Mill & Press Co. – City of Erie, PA 93,511
- c) Priority Site #3 – former Corry Rubber – Corry, PA: 6,120*
- d) Priority Site #4 – former Chemetron – Lake City, PA: 2,887**
- e) Priority Site #5 – former Ethan Allen – Union City, PA: 2,887**

*2022 US Census population data.

**2022 US Census Annual Estimates Resident Population for Incorporated Places

7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield 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).	1-2
The priority site(s) is in a federally designated flood plain.	1-2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficient measures.	
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments	
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in <u>Section I.B.</u> , for priority site(s) within the target area.	
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.	

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8. Letter from the State Environmental Authority is attached.

9. Releasing Copies of Applications

n/a

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'Tina M. Mengine', with a long horizontal flourish extending to the right.

Tina M. Mengine
Executive Director



October 31, 2023

Ms. Tina M. Mengine, Executive Director
Erie County Industrial Development Authority
1314 Griswold Plaza, Suite 100
Erie, PA 16501

RE: U.S. EPA Brownfields Grant Proposal | State Letter of Acknowledgement
Erie County Industrial Development Authority
City of Erie
Erie County, Pennsylvania

Dear Ms. Mengine:

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

The DEP supports the Erie County Industrial Development Authority's application for a US EPA Brownfields Assessment Grant in the amount of \$500,000 to further develop the inventory of priority brownfield sites throughout Erie County, conduct environmental assessments, and develop remedial plans to facilitate revitalization and redevelopment of brownfield sites.

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Maddigan".

Michael Maddigan
Land Recycling Program Manager
Bureau Environmental Cleanup and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area:

The Erie County Industrial Development Authority (ECIDA) recognizes the challenges associated with brownfields redevelopment along with the persistent and often disproportionate environmental impacts to disadvantaged communities that brownfields present. The ECIDA's mission includes identifying and actively pursuing resources to support brownfields redevelopment, community revitalization, and equitable growth throughout Erie County, Pennsylvania (the County), including the financial support made possible through this US EPA Brownfields Assessment Grant. The County is located in rural, northwestern Pennsylvania along the shores of Lake Erie. The County has a long and proud history of agriculture and manufacturing and was a location for the Underground Railroad. Historically, the County was a center for shipbuilding and fishing, and a hub for rail commerce. Like much of western Pennsylvania, the County became a central location for iron and steel manufacturing which relied heavily on the local coal industry. Steel and heavy manufacturing, along with the associated rail and coal industries, fueled economic and population growth throughout the County for most of the 20th Century. However, shifting trends away from the reliance on the coal, steel, and manufacturing industries in the late 20th Century are having acutely harmful impacts on the County's economy and quality of life. Industrial manufacturing operations have closed or relocated, rail commerce has declined, and the reliance on coal has diminished significantly. Since 2001, Erie County has experienced over 3,000 layoffs in the manufacturing sector. These industries were the backbone of the County's economy and with their decline, so too went the jobs and prosperity that had allowed the County to prosper. While the City and County of Erie are committed to re-establishing themselves in the modern economy, the legacy of heavy manufacturing and industry has created a landscape of blighted, underutilized, and abandoned properties that continue to represent a disproportionate burden on disadvantaged communities throughout the County and are inhibiting renewed and equitable prosperity in northwestern PA and across the Great Lakes Region. Funding made available by this EPA Brownfields grant will allow the ECIDA to quantify the unknown environmental impacts of these sites and facilitate equitable and sustainable redevelopment goals and revitalization not only in the immediate surrounding communities but across the county.

The negative impacts of more than a century of manufacturing and intensive land use centered around the steel and coal industries have created hundreds of brownfields sites across the County with myriad environmental and physical hazards. Coal ash piles, blighted and abandoned manufacturing space, underutilized lakefront industrial sites, and the deteriorating rail infrastructure are ubiquitous throughout the County, including the priority communities of Erie City (pop., 95,537 US Census Data 2022), Corry (6,332), Lake City (pop. 2,887), and Union City (pop. 2,887)¹. Within the City, the priority brownfields sites are centrally located within Climate & Economic Justice Screening Tool (CEJST) identified disadvantaged census tracts near churches, community centers, and schools. Beyond the larger towns, the communities near brownfields are primarily small and rural and lack the resources to confront the complex challenges of meaningful brownfields redevelopment and equitable growth. The assessment and redevelopment of brownfield sites has been identified as a goal of the 2016 Comprehensive Plan which includes focused redevelopment on infill sites with existing infrastructure.

1.a.ii. Description of the Priority Brownfield Site(s):

The legacy of heavy manufacturing and the steel industry across Erie County is proving to be a challenging impediment to contemporary social and economic progress as the County reinvests and adapts to changing social priorities and economic situations. The County is rife with brownfields sites as a result of the continued decline in these industries which are preventing the County from realizing its full growth potential. The Pennsylvania Department of Environmental Protection (PADEP) Environment Facility Application Compliance Tracking System (eFACTS) database of regulated environmental sites lists over 3,000 regulated or potentially impacted sites throughout Erie County. These sites are negatively impacting sensitive and disadvantaged populations by exposing them to contaminants that include heavy metals, waste oils, volatile organic compounds, and asbestos through multiple pathways. Moreover, the vacant and crumbling buildings on these sites represent physical hazards and attract crime, vandalism, and substance abuse. Importantly, brownfields within Erie County communities are located near Lake Erie which is the sole regional drinking-water source and is an internationally important commercial and ecological resource. Mitigating the contributions of pollution to Lake Erie and the Lake Erie watershed from brownfields is necessary and represents an opportunity for the ECIDA to promote healthy waterways and sustainable water quality at local, state, and international scales.

¹ (2022 US Census American Community Survey estimates data)

The table below provides brief descriptions of select priority brownfields sites that will be targeted for assessment by the ECIDA because of their size, potential for contamination to impact disadvantaged communities, environmental liabilities, and potential to become a community and economic asset.

Site	Community	Adjacent Body of Water?	Identified as Disadvantaged (CEJST) ?	Potential Impacts	Reuse Potential
Former Erie Coke	Erie (city)	Yes Lake Erie	Yes	VOCs, SVOCs, PCBs & Metals	Mixed-Use / Commercial / Open Space
Former Erie Mill & Press Co.	Erie (city)	No	Yes	VOCs, SVOCs, PCBs & Metals	Industrial / Office Space
Corry Rubber	Corry	No	No	VOCs, PCBs, Metals	Community center/flex office space
former Chemetron	Lake City	No	No	VOCs, SVOCs, PCBs & Metals	Warehouse / Office Space
former Ethan Allen	Union City	French Creek	No	VOCs, SVOCs, Metals	Industrial / Office Space

One of the highest priority sites is the former Erie Coke facility which processed coal into coke for use in the steel industry from the mid-1800s until the early 2000s. This brownfields site is located within a disadvantaged community along the shores of Lake Erie and has long been associated with Pennsylvania Department of Environmental Protection Notices of Violations and penalty assessments. In 2019 Erie Coke shut down and has sat vacant since. Initial assessment activities have identified extensive environmental conditions associated with historical operations; benzene has been identified in groundwater at over 1,000 times the PADEP groundwater standards, myriad volatile organic compounds, semi-volatile organic compounds and metals have been identified at concentration orders of magnitude above their corresponding PADEP groundwater standards. This site is located not only adjacent to Lake Erie but also is located in a CEJST identified disadvantaged community and in close proximity to residential areas and schools.

1.a.iii. Identifying Additional Sites:

The ECIDA has developed tools and strategies to identify brownfields sites specifically in alignment with Justice40 and Environmental Justice initiatives. ECIDA understands many brownfields are disproportionately located in and impacting disenfranchised and disadvantaged communities. Utilizing the Justice40 model, ECIDA has demonstrated a track record of utilizing over 40% of their previous EPA Brownfields Assessment grants in disadvantaged communities that are marginalized, underserved, and overburdened by pollution. The ECIDA utilizes the EPA Climate and Economic Justice Screening Tool (CEJST) to factor into a weighted scoring system for identifying brownfields sites for assessment. CEJST-identified “Disadvantaged Communities” are targeted first for assessment activities. Additionally, the census tracts which are identified by the CEJST will be targeted for community outreach to gain input from the impacted community both for site identification and the redevelopment planning process. The identification of sites via this approach will be paired with public community meetings targeting the identified disadvantaged communities to solicit an open dialogue to gather community input for redevelopment needs.

1.b.i. Reuse Strategy and Alignment with Revitalization Plans:

Expanding the ability to assess brownfields and restore their potential as both economic and community resources will allow the ECIDA to support the goals and objectives outlined in numerous revitalization plans such as Erie Refocused: City of Erie, PA – Comprehensive Plan and Community Decision-Making Guide (2016), the Target Industry Analysis “Garner Report” (2019), and the Erie County Hazard Mitigation Plan (2018). A priority recommendation of those plans is to target the removal or rehab of distressed properties to encourage reinvestment in these communities. These plans were developed by both the County and City of Erie and the Erie Chamber using extensive and targeted input from residents and community organizations that are directly impacted by the blight and environmental legacy of brownfields. The most recent Erie County Land Use Plan specifically identifies the preferential development of brownfields sites to positively impact and promote growth and economic development throughout the County. Overall, the goals of these plans are to promote responsible development and reuse of existing brownfields sites, protect Lake Erie by mitigating environmental hazards in the coastal zone, encourage sensible growth throughout the County by utilizing

existing public utility infrastructure, and provide greenspace access to disadvantaged and sensitive populations. These long-term, capital improvement, community revitalization, and hazard mitigation plans have all identified brownfields as priority targets to meet their goals. Overall, the ECIDA will work with community partners to identify and assess those priority brownfields sites which have the greatest potential for redevelopment and align with the goals and vision of city and county comprehensive plans.

1.b.ii. Outcomes and Benefits of Reuse Strategy:

The ECIDA will use a systematic approach to brownfields redevelopment by identifying and assessing those brownfields which are consistent with the principles and goals of the various revitalization and land use plans across the County and preferentially benefit disadvantaged communities in both economic and non-economic ways. A major goal of the City of Erie's Comprehensive Plan is to develop the City as a stronger regional core as the City remains the development center of the County and functions as the County Seat. By revitalizing blighted, abandoned, and potentially contaminated brownfields sites throughout the City, ECIDA's revitalization approach promotes economic stability and equitable growth while strengthening the social fabric of the City. These land reuse plans will mitigate existing hazardous conditions and create jobs and opportunities for the disadvantaged neighborhoods in the City and communities throughout the County. Accordingly, the former Erie Coke site, which is located on the City's banks of Lake Erie, within a CEJST "disadvantaged community" area, is a known source of contamination, the vacant buildings are a public hazard and a known location for arson and substance abuse. This site was identified as a high-priority site and assessment was initiated by the Erie Coalition with their FY19 US EPA Brownfields Assessment Grant (the ECIDA is the lead coalition partner) and redeveloping this site will replace a public health hazard with a source of jobs, open space and community pride, consistent with the County Land Use Plan goal to prioritize the preservation of existing neighborhoods.

By identifying, assessing, and prioritizing development of existing brownfields sites, ECIDA's redevelopment strategy will support the County in achieving their goal to promote the revitalization of existing urban places which will also "create good jobs" for the community, consistent with the County Land Use Plan. Brownfields revitalization within the Lake Erie Coastal Zone will also help to meet County Department of Planning, Coastal Zone Management plan goals by strategically redeveloping those sites within the coastal zone, such as the identified Erie Coke priority site. Redevelopment of coastal zone Brownfields will mitigate climate change concerns through implementation of modern stormwater management systems to reduce localized flooding events. Supporting the County Land Use Plan, ECIDA is also engaging more rural communities, such as Corry, Lake City and Union City, where individual brownfield sites have a disproportionately larger impact on these comparatively low-population towns (2-6,000 population). Additionally, the location of the County along Lake Erie and the availability of open space makes the County an attractive location for renewable energy projects such as wind and solar, which align with the Destination Erie Regional Plan (2015) goal to support development of locally generated renewable energy in addition to mitigating the input of pollution to Lake Erie and improving watershed quality and conditions. ECIDA has identified several brownfields sites planned for solar farms and electric vehicle charging stations.

1.c.i. Resources Needed for Site Reuse:

ECIDA has a demonstrated record of leveraging public funding to support community revitalization projects and initiatives at priority sites. ECIDA has leveraged their eligibility as a development authority to access additional public funding from numerous sources and extend the influence of their brownfields program beyond their previous US EPA Brownfields assessment grants to include remediation and redevelopment. ECIDA can also use the EPA Brownfields grant as match for state brownfields grants such as the Department of Community and Economic Development Industrial Sites Reuse grant, which they leveraged in the past. The following is a list of redevelopment resources the ECIDA and their affiliate organizations have secured to support previous priority brownfields site and will leverage for future projects.

- Pennsylvania Department of Community and Economic Development (DCED) – The Industrial Sites Reuse Program (ISRP) provides grants and financing for environmental assessment and remediation activities. (*Value: up to \$1 million*)
- Internal Revenue Service Opportunity Zone – The investment potential in the eight designated opportunity zones within Erie County will help to attract financial investment in projects beyond the assessment and planning work eligible under Assessment Grant Program. (*Value: variable*)
- US EPA Targeted Brownfields Assessments (TBA) Program – This US EPA program provides additional, site-specific funding to support assessment and remediation activities and is a useful tool to supplement the assessment program funded by this assessment grant. (*Average Value: \$100,000*)
- Coastal Resources Management Program – This PADEP program provides grant funding for planning, design, engineering, construction, and acquisition projects within the designated Erie Coastal Zone. (*Value: up to \$75,000*)

1.c.ii. Use of Existing Infrastructure:

ECIDA will prioritize brownfields sites with existing infrastructure throughout the County by using US EPA Smart Growth concepts and data-driven tools such as Geographic Information Systems (GIS) to guide planning and implementation of the assessment program. By utilizing existing infrastructure, the redevelopment of priority sites identified by ECIDA reduces the need for additional capital investment, preserves rural and greenspaces, and minimizes greenhouse gas contributions generated by redevelopment activities. The targeted priority sites are all located within existing utility and infrastructure networks. Within the City of Erie, the 2016 Comprehensive Plan emphasizes the need to focus future development around existing transportation and public utility corridors. Similarly, a primary goal of the most recent County Land Use Plan is to promote development across the County in areas with existing sewer and water facilities. Owing to the largely rural nature of the County, access to existing infrastructure and public utilities is paramount to equitable development and is consistent with US EPA Smart Growth approaches to reuse already-developed land. Accordingly, ECIDA's site-ranking criteria will identify sites for assessment that utilize existing infrastructure and will consider future reuse which utilizes existing infrastructure. In the event additional infrastructure needs are identified, ECIDA has the proven ability to acquire additional state funding, as exemplified through the Redevelopment Assistance Capital Program (RACP), which has provided more than \$9 million for ongoing ECIDA infrastructure and site improvement projects.

2.a.i. The Community's Need for Funding:

Erie County is primarily a collection of small, rural communities with limited opportunities for employment and economic growth due to their population size, limited financial resources, and the decades-long decline in the steel, coal, and manufacturing industries. Overall, US Census Bureau, American Community Survey estimates indicated that the population in Erie County decreased 4.6% from 2010 to 2022. This has contributed to an on-going reduction in the county-wide workforce which has effectively decreased the county tax base and placed an increasing and unsustainable reliance on social services and public assistance programs (US Bureau of Labor Statistics, July 2022 data). Because ECIDA serves the entirety of Erie County, they also represent the small, rural communities that do not have the resources to revitalize the brownfields that are negatively impacting their residents. These small rural communities include the identified priority sites of Corry, population of 6,120; Lake City population of 2,887; and Union City, population of 2,887 (US Census Bureau 2022). ECIDA's goal is to continue to support the growth and economic development of communities throughout the County by removing the barriers to brownfields revitalization and supporting social equity principles in disadvantaged communities such as The Justice40 Initiative.

Comparative measures of income and wages indicate greater inequality and disproportionately higher impacts to disadvantaged communities in Erie County which limit their capacity to acquire the resources needed to remove community blight and mitigate environmental hazards to improve public health conditions. According to US Bureau of Labor Statistics (BLS) data (May 2020), the mean hourly wages in Erie County (\$21.65) were 25% lower than national (\$27.07) and 20% less than Pennsylvania (\$25.94) wages. Moreover, US Census Bureau data (July 2022 in 2021 dollars) indicated median household income in Erie County (\$55,949) was 17% less than Pennsylvania (\$67,587) and 19% less than national (\$69,201) averages. These income disparities are contributing to disproportionately elevated rates of poverty in Erie County. U.S. Census Bureau data from 2022 indicated the overall poverty rate in Erie County (24.7%) is more than double that in Pennsylvania (11.8%) and the U.S. (11.5%). Overall, the economic disruptions experienced across the County are limiting the ability of small, rural, and disadvantaged communities of Erie County to respond to the environmental and public health issues represented by brownfields. Funding made available through this grant will help to provide a much-needed resource to assess and ultimately revitalize these sites.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations:

A 2021 report from the New American Economy indicated as of 2019, over 11,000 immigrants were living in Erie County, more than 3,000 of whom were refugees. The report also found that population was more likely to live at or below 150% of the federal poverty threshold². Further, the Pennsylvania Department of Environmental Protection's (PADEP) Office of Environmental Justice (EJ) has identified over 65 EJ areas throughout Erie County where 20% or more individuals live at or below the federal poverty line, and/or 30% or more of the population identifies as a non-white minority. Additionally, higher rates of reliance on public health insurance have been reported in Erie County. When compared to state (40.3%) and national rates (43.4%), children under 6 years old in Erie County (51.5%) were more reliant on public coverage in communities targeted by the assessment grant such as Corry (60.5%) and the City of Erie (80.8%; 2019 U.S.

² New American Economy, "The Demographic and Economic Contributions of Immigrants in the County", June 2021 (Data from 5-year samples of the American Community Survey from 2014-2019).

Census data). Across Erie County, there is also an increased reliance on the Supplemental Nutrition and Assistance Program (18.7% of households), which is highest in the target communities of Erie City (32.7%), Corry (28.4%), and Union City (19.9%), compared to Pennsylvania (13.5%; 2019 US Census American Community Survey data).

Results from the EPA EJSCREEN Tool rank the Toxic Releases to Air, Lead Paint, and Wastewater Discharge indicator Environmental Justice Index for the City of Erie, where the Erie Coke and Erie Mill & Press Co. priority sites are located, in the 90-100th percentile compared to the rest of the US. Over 35% of county residents live within the City of Erie which has elevated poverty rates (24.7%), the highest of which are among children (44.9%) and the African American community (52.2%; data from 2019 US Census American Community Survey). Further, childhood (under age 18) poverty rates in Erie County (23.8%) are higher than in the surrounding counties of Warren (20.8%) and Crawford (21.0%) and higher than that of Pennsylvania (16.3%), indicating the issues of food and housing insecurity are endemic in the most vulnerable populations of Erie County (data provided by the US Census 2021). Accordingly, this Environmental Justice index suggests sites, including brownfields, are having a disproportionate and negative impact on the welfare and human and environmental health in disadvantaged communities. Overall, mitigating the human health and environmental conditions at brownfield sites in disadvantaged communities will support direct investment, revitalization, social equity, and help to improve the welfare of sensitive populations across Erie County. The cleanup and redevelopment of these two sites will address each of these issues as well increase investment in these communities.

(2) Greater Than Normal Incidences of Disease and Adverse Health Conditions:

The environmental conditions associated with brownfields sites in Erie County represent persistent sources of contamination that are adversely impacting the health of county residents. As reported in the most recent Erie County Community Health Needs Assessment (2018), elevated lead levels in children throughout the County (2.1%) were higher than the Pennsylvania average (1.3%). The same report also indicated the prevalence of asthma (2011-2013) was greater in lower income communities (18%) and the prevalence of asthma in adults increased from 2011-13 to 2016-17. Given that sensitive populations often reside in disadvantaged communities which are disproportionately impacted by brownfields, public-health data suggest hazards at these sites are having measurable and negative impacts on the health of those communities. This can be seen in the target communities in Erie County. The Climate and Economic Justice Screening Tool (CEJST) revealed that the health-related disparities of Heart Disease, Asthma, and Low Life Expectancy all fall above the 90th percentile within the priority sites’ census tracts, with Diabetes in the 75th percentile. The table below summarizes additional public-health measures for those conditions prevalent in disadvantaged communities and those associated with pollutants commonly related to brownfields.

	Death Rate per 1,000 ^{1,2}	Black Infant Mortality Rate ^{1,2}	Cancer Deaths ^{1,2}	Incidences of Lung Cancer ^{1,2}	Incidences of Prostate Cancer ^{1,2}	Diabetes Deaths ^{1,3}
Erie County	799.3	21.1	164.9	19.8	118.0	23.6
Pennsylvania	762.3	13.1	156.7	14.1	104.0	20.7

¹Pennsylvania Department of Health, available: <https://www.phaim1.health.pa.gov/EDD/>
²age-adjusted per 100,000 individuals for 2017-2019 ³age-adjusted per 100,000 individuals for 2015-2019

ECIDA’s planned assessment and cleanup of the priority sites will remove environmental contamination associated with the above health disparities and help to reduce the prevalence of these negative health outcomes.

(3) (a) Identification of Environmental Justice Issues:

ECIDA recognizes the legacy of racism and environmental discrimination that have led to a disproportionate number of low-income residential areas in close proximity to industrial and often contaminated sites. Utilizing tools such as the EPA EJScreen, PADEP EJ Screen, and CEJST, ECIDA has targeted their priority sites, located in CEJST identified disadvantaged census tracts, such as Erie Coke and Erie Mill & Press, for assessment and re-investment, to help correct these historic injustices. Data below was pulled from CEJST and is presented in comparison to the United States as a whole.

Priority Site 1: Erie Coke (Census Tract 42049000400) – CEJST Disadvantaged Census Tract, Population 2,380, People of Color 47%, Unemployment 96th percentile, Low Income 88th percentile, Poverty 74th percentile. This disadvantaged community is further burdened by the following environmental conditions; Proximity to hazardous waste facilities 68th percentile, Proximity to Risk Management Plan Facilities 96th percentile, Proximity to Superfund 73rd percentile and Wastewater Discharges 89th percentile.

Priority Site 2: Erie Mill & Press (Census Tract 42049001400) – CEJST Disadvantaged Census Tract, Population 2,342, People of Color 47%, Low Income 98th percentile, Poverty 96th percentile, Unemployment 98th percentile. This disadvantaged community is further burdened by the following environmental conditions; Proximity to hazardous waste facilities 91st percentile, Proximity to Superfund 73rd percentile, and Wastewater Discharges 79th percentile.

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

The goal for the ultimate redevelopment of the two highest priority sites, Erie Coke and Erie Mill & Press, include open space and commercial and office space. The redevelopment of these sites will advance EJ issues by cleaning up contaminated sites, creating well-paying jobs, and creating new green open spaces and parks. Based on the CEJST rating for these sites, the census tracts data, above, shows higher rates of unemployment, poverty, and lack of green space. The cleanup and redevelopment of these two sites will address each of these issues as well as increase investment in these communities. ECIDA is preparing to combat potential displacement of existing community members by the potential for property increases due to the planned redevelopment of the high priority sites via ongoing community engagement and working with the City on zoning modifications to ensure the inclusion of low-income housing in the communities targeted for assessment and redevelopment.

2.b.i. and ii. Project Involvement and Project Roles: Only by engaging the civic groups, residents, and local organizations representing communities adversely affected by brownfields can a revitalization program be successful and impactful. Below are some of the community partners ECIDA has been working with to identify and prioritize sites throughout the County. Throughout the duration of the program, ECIDA will continue to engage additional partners to broaden community connections and outreach. Stakeholders and community groups listed below are true “grassroots” local community organizations and have been vital in moving the mission of brownfields redevelopment forward for over 10 years.

<u>Organization Name</u>	<u>Point of Contact</u>	<u>Specific involvement in the project or assistance provided</u>
Booker T. Washington Center	Shauntelle Hilliard shilliard@btwcenter.org 814-453-5744	Provide space for public meetings and will coordinate outreach to their members
Union City Pride	David Nothum [REDACTED]	Engage membership to participate in the program, assist in identifying local priority sites, distribute program information, and solicit site-reuse input
Infinite Erie	Kim Thomas 814-480-0337 kthomas@infiniterie.com	Economic Development, Environmental Justice Community Engagement, Infrastructure Growth, & Job Training Support
IMPACT Corry	Chuck Gray director@impactcorry.com 814-688-7559	Coordinate to identify priority sites, use member network to engage Corry residents, gather community reuse ideas and input

2.b.iii. Incorporating Community Input:

Soliciting, incorporating, and responding to community input is necessary to ensure program success, transparency, and progress toward achieving equitable economic, social, and EJ outcomes. ECIDA developed a community engagement approach as the lead agency of the Erie Coalition’s current US EPA Brownfields Assessment grant to facilitate reciprocal, collaborative, and constructive dialogue with the community using targeted multimodal outreach followed by review and response feedback. To kick off the program, the Erie Coalition will announce the award to the community through a press release to the local newspapers (*Erie Times News, Corry Journal*), local trade and commerce publications (e.g., Erie Regional Chamber & Growth Partnership, Manufacturer & Business Association), local TV stations (e.g., WICU and WJET), and the Erie County Economic Development’s social media pages (Twitter and LinkedIn). Additionally, ECIDA will post announcements on their website (www.ecrda.net) and send program updates as part of their monthly newsletter to their email listserv of over 1,200 recipients. ECIDA will also livestream public meetings as alternative methods to in-person community engagement. Additionally, any in-person events will follow the most up-to-date US Centers for Disease Control (CDC) and PA Department of Health guidance regarding in-person gatherings. As part of their current coalition assessment grant, ECIDA organized press conferences at their

two previous highest priority sites (Quin-T and Erie Malleable Iron) to announce redevelopment plans for each site. The events were attended by local television and print media as well as officials from local, county, and state governments and organizations. As assessment milestones are achieved and new priority sites are entered into the brownfields program, additional such press conferences will be organized to actively engage the community through multiple, high-profile media outlets. Community input will be tracked via sign-in sheets and the collection of comments and engagement with our community partners. Applicable comments will be addressed via follow up meetings and responses on the ECIDA website and social media outlets.

3.a. i.-iv. Description of Tasks/Activities and Outputs:

Task 1: Programmatic
<p>i. <u>Project Implementation:</u></p> <ul style="list-style-type: none"> ▪ Overall programmatic and administrative oversight along with cooperative agreement (CA) compliance ▪ Solicitation, selection, and contracting an experienced, qualified environmental professional (QEP) ▪ Annual and quarterly progress reporting (US ACRES), ASAP accounting updates, and grant closeout ▪ Travel for applicant attendance at conferences to present program success stories ▪ Development and submission of the Quality Management Plan (QMP)
<p>ii. <u>Anticipated Project Schedule:</u> The solicitation for and selection of the QEP will be completed within 3 months following execution of the CA. The QMP will be developed and submitted within 90 days of the beginning of the grant-performance period. All other administrative tasks will be completed, as required in the CA, over the grant-performance period. Conference attendance, annually, as available.</p>
<p>iii. <u>Task/Activity Lead:</u> Erie County Industrial Development Authority (Applicant)</p>
<p>iv. <u>Outputs:</u> CA execution, QEP solicitation and contracting, US EPA approved QMP, 16 quarterly progress reports (US ACRES), monthly ASAP accounting updates, annual FFR and MBE/WBE reporting, 1 kickoff meeting with US EPA, travel for ECIDA staff for up to 3 conferences, and grant closeout reporting.</p>
Task 2: Community Outreach
<p>i. <u>Project Implementation:</u></p> <ul style="list-style-type: none"> ▪ Public announcements of grant progress, updates, and meetings via print, electronic, and TV media ▪ Solicitation of community input through ECIDA social media accounts and email newsletters ▪ Secondary information distribution via ECIDA community engagement partners ▪ Kick-off meeting in Erie (and livestream) to inform the community and solicit input ▪ Outreach to community engagement partners, local governments, and private stakeholders
<p>ii. <u>Anticipated Project Schedule:</u> Initial public meeting will be scheduled during the first quarter following grant award. Program updates, announcements, and solicitations for input will be posted regularly via ECIDA social media accounts and websites and public update meetings will be held annually, or as needed, based on community input, site selection, and program progress.</p>
<p>iii. <u>Task/Activity Lead:</u> Erie County Industrial Development Authority (Applicant)</p>
<p>iv. <u>Outputs:</u> Host up to 3 public meetings, regular social media and website updates, creation of marketing materials, press releases/conferences, and regular outreach to community partners.</p>
Task 3: Site Inventory and Selection
<p>i. <u>Project Implementation:</u></p> <ul style="list-style-type: none"> ▪ Maintain, update, rank, and prioritize brownfields inventory sites ▪ Coordinate with community engagement partners and coordinate with the selected QEP to expand the list of brownfields sites and revise ranking criteria to incorporate EJ criteria ▪ Site owner outreach, site access coordination, and completion of site access agreements ▪ Preparation of Property Approval Questionnaires (PAQs) and coordination of requisite eligibility determination for petroleum sites with the PA Dept. of Environmental Protection
<p>ii. <u>Anticipated Project Schedule:</u> The existing site inventory will be actively expanded during the first 6-9 months following grant award and updated for the duration of the performance period. Site selection will be completed and access agreements, PAQs, and petroleum eligibility determination coordination, as necessary, will be completed continuously during the 4-year grant-performance period.</p>
<p>iii. <u>Task/Activity Lead:</u> Erie County Industrial Development Authority (Applicant)</p>
<p>iv. <u>Outputs:</u> Update and expand site inventory list, rank and identify priority sites, complete up to 20 PAQs and 20 site access agreements (14 hazardous sites), including eligibility determination coordination for up to 6 petroleum products sites, and complete up to 5 site inventory evaluation visits.</p>
Task 4: Site Assessments
<p>i. <u>Project Implementation:</u></p>

<ul style="list-style-type: none"> ▪ Prepare and submit a quality assurance program plan (QAPrP) for both hazardous substances and petroleum products to be used for the duration of the performance period for all sites ▪ Coordinate site access at eligible sites to complete Phase I/II activities ▪ Complete up to 20 Phase I ESAs (and accompanying US EPA All Appropriate Inquiry Checklists) in accordance with ASTM E1527-21 and All Appropriate Inquiry requirements ▪ Complete up to 9 Phase II ESAs, which include the completion of site-specific health and safety plans (HASPs) and submission of Field Sampling Plans (FSPs) to evaluate environmental conditions, consistent with PA’s Voluntary Cleanup Program (Land Recycling Program) requirements
ii. <u>Anticipated Project Schedule</u> : Phase I ESAs will be initiated within 6 months of the start of the program and will be ongoing throughout the duration of the performance period. A FSP, HASP, and a Phase II ESA report will be initiated for each site, as appropriate, based on the findings of the Phase I ESA on a rolling basis. The QAPrP will be completed and submitted to the US EPA within the first 6 months of the program and prior to initiation of any Phase II ESA activities.
iii. <u>Task/Activity Lead</u> : The selected Qualified Environmental Professional, under the direction of the ECIDA
iv. <u>Outputs</u> : Up to 20 Phase I ESA reports (14 hazardous & 6 petroleum), 1 QAPrP, 9 FSPs, 9 HASPs, 9 Phase II ESA reports, and US ACRES updates.
Task 5: Remedial Planning and Design
i. <u>Project Implementation</u> : <ul style="list-style-type: none"> ▪ Complete up to a total of 4 Remedial Action Plans (RAPs) for hazardous substances and petroleum products sites, based on the results of the Phase I and Phase II ESAs and reuse needs/requirements ▪ The RAPs will outline the remediation plans and will be used to leverage additional assessment and cleanup funds and satisfy PA Land Recycling Program requirements.
ii. <u>Anticipated Project Schedule</u> : RAPs will be developed and submitted to the US EPA within 3 months following the completion of Phase II ESA activities for a given site, as appropriate.
iii. <u>Task/Activity Lead</u> : The selected Qualified Environmental Professional, under the direction of the ECIDA (Applicant)
iv. <u>Outputs</u> : Complete up to 4 RAPs, identify secondary funding programs to leverage with the completed RAPs.

3.b.i. and ii. Cost Estimates: The table below summarizes the funding allocation for each proposed task.

Budget Categories		Project Tasks (\$)					Total
		Task 1: Programmatic	Task 2: Community Outreach	Task 3: Site Inventory and Selection	Task 4: Site Assessments	Task 5: Remedial Planning and Design	
Direct Costs	Personnel	\$12,100	\$2,750	\$6,325	\$4,400	\$1,925	\$27,500
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0	\$0
	Travel	\$2,400	\$0	\$0	\$0	\$0	\$2,400
	Equipment	\$0	\$0	\$0	\$0	\$0	\$0
	Supplies	\$1,200	\$1,000	\$0	\$0	\$0	\$2,200
	Contractual	\$2,500	\$7,200	\$31,200	\$395,000	\$32,000	\$467,900
	Other	\$0	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$18,200	\$10,950	\$37,525	\$399,400	\$33,925	\$500,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0	\$0
Total Budget		\$18,200	\$10,950	\$37,525	\$399,400	\$33,925	\$500,000

Cost Estimate Development

All cost estimated and presented herein are based on costs received from QEP and other sub-contractors utilized during the ECIDA’s previous US EPA Brownfields Assessment grant.

Task 1 Programmatic: *Personnel* – 220 hours at an average rate of \$55/hour = \$12,100; *Travel* - \$800 for ECIDA staff attendance at three conferences (travel, food and lodging) = \$2,400; *Supplies* - \$1,200 for printing and distribution of program information materials, website maintenance and remote-hosting service (e.g., Zoom) fees; *Contractual* – The QEP will assist the ECIDA in development and submission of the QMP = \$2,500.

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

Task 3 Site Inventory and Selection: *Personnel* – 115 hours at an average rate of \$55/hour = \$6,325; for ECIDA staff to visit potential sites; *Contractual* – 26 days for the QEP to assist in contacting site owners, completing Property Approval Questionnaires, canvassing, inventory database updates, and maintenance at an average rate of \$1,200/day = \$31,200.

Task 4 Site Assessments: *Personnel* – 80 hours at an average rate of \$55/hour = \$4,400; *Contractual* – The QEP will complete up to 20 Phase I ESAs at an average cost of \$6,000 each = \$120,000, a QAPrP at a cost of \$5,000, and up to 9 Phase II ESAs (including Site Access Agreements, FSPs, HASP, and Phase II ESA report) at an average cost of \$30,000 each = \$270,000 (Total Contractual: \$395,000).

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

3.c. Plan to Measure and Evaluate Environmental Results:

ECIDA will assess up to 6-7 sites per year and evaluate overall progress toward that goal by performing an annual review of the requisite quarterly progress reports. ECIDA will also utilize software products such as Airtable to track program progress and adjust resources as necessary. Additionally, the solicitation for the QEP will require the submission of a project timeline based on the expected outputs identified in Section 3.b to ensure the program schedule is being met and deliverables are being completed in a timely and efficient manner. ECIDA will also track accomplishments, in addition to assessments completed by monitoring additional funds leveraged and how this grant moves projects toward ultimate redevelopment. Moreover, ECIDA will update ACRES when additional resources beyond the Assessment Grant are leveraged. Consistent with the summary of tasks and activities above, the following table summarizes the expected outputs and outcomes of the assessment grant program.

Outputs		Outcomes	
<ul style="list-style-type: none"> • Number of community-involvement meetings • Number of assessment sites identified • Number of Phase I ESAs completed 	<ul style="list-style-type: none"> • Number of Phase II ESAs completed • Number of sites where remediation planning was conducted 	<ul style="list-style-type: none"> • Acres of land assessed • Number of sites assessed • Acres of greenspace preserved/created • Additional funding leveraged 	<ul style="list-style-type: none"> • Number of sites redeveloped • Jobs created/retained • Tax-base increase • Redevelopment value added

4.a.i. - iii. Organizational Capacity, Structure & Description of Key Staff:

The Erie County Industrial Development Authority’s specialized brownfields staff, previous US EPA Brownfields Assessment Grant experience, and community connections provide it with the capacity to carry out the programmatic, administrative, and financial requirements to successfully manage and implement this grant program. Under the guidance of the current CEO, Ms. Tina Mengine, utilizing US EPA Brownfields Assessment Grant funding, ECIDA has successfully managed and implemented a county-wide brownfields assessment program. Ms. Mengine has 20 years of public service and economic development experience and will oversee the overall administration and management of the assessment grant. Ms. Mengine has been responsible for completing assessment activities at more than 10 brownfields sites and has leveraged over \$27 million dollars in additional public funding for assessment, remediation, and redevelopment activities at multiple sites. ECIDA will dedicate one staff member, Ms. Ti Sumner, from their brownfields and real estate development team to oversee the day-to-day management of this program and direct the selected QEP throughout the grant performance period. Ms. Sumner currently serves in a similar role for the ECIDA US EPA Assessment Grant and has experience simultaneously managing numerous state and federal grant programs of similar scale and scope.

ECIDA CFO, Ms. Linda Robbins, has extensive experience with the ASAP financial accounting program and is familiar with US EPA grant-specific financial compliance requirements. Ms. Linda Robbins has managed the ASAP accounting for the current US EPA Brownfields Assessment grant. Ms. Robbins has over 30 years of financial and accounting experience and manages the financial compliance for numerous state and federal grant programs. Further, ECIDA employs a Compliance Officer as well as an experienced, solutions-oriented capital finance and lending team to help bridge the transition from environmental assessment to successful economic and industrial redevelopment. The organizational structure of ECIDA, along with its previous brownfields experience, provides it with the capacity to manage and administer all aspects of this grant program and acquire the resources necessary to support all aspects of brownfields revitalization.

ECIDA has the organizational structure necessary to ensure the timely and successful expenditure of funds to complete all technical, administrative, and financial requirements of the grant. Upon authorization of the Cooperative Agreement by the US EPA, ECIDA will issue a request for proposal, in accordance with all state and federal procurement regulations, to select a qualified environmental professional (QEP) to assist in completing select technical project tasks and activities as identified in Task 4 and 5 of Section 3a. The QEP will coordinate directly with Ms. Sumner on day-to-day activities who will coordinate with Ms. Mengine on overall grant program performance and Ms. Robbins on accounting requirements. Ms. Sumner will also coordinate with the QEP throughout the grant performance period to secure additional funding resources to extend the impact and reach of the assessment grant program.

4.a.iv. Acquiring Additional Resources: ECIDA has a demonstrated record of acquiring the additional resources necessary to lead a successful brownfields assessment program. Together, Ms. Mengine and Ms. Sumner were responsible for soliciting and retaining a QEP to complete technical environmental tasks and reporting required by the grant program. ECIDA has internal processes for the hiring of qualified contractors which adhere to the EPA's Solicitation Clauses. ECIDA does not anticipate any subrecipients as part of this grant program. Additionally, ECIDA has worked directly with their affiliate economic and industrial development organizations in Erie County and led the team which leveraged federal and state assistance to effectuate job creation and remove environmental hazards similar in scope and purpose to the proposed county-wide brownfields assessment grant program currently being led by the ECIDA. The ECIDA procurement guidelines require that all contractors must make good faith attempts to hire a minimum 10% from local minorities.

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant:

ECIDA was awarded a Community-Wide Brownfields Assessment Grant for \$500,000 in FY22 (BF 95301401). The funding for the current grant has been drawn down below the 70% threshold, but additional assessment work is necessary and the need in Erie County to support assessment on myriad brownfields is growing. Copies of the ASAP budget ledger are attached dated October 1, 2023.

(1) Accomplishments: ECIDA has compiled an inventory of over 50 potential sites; developed a US EPA-approved QMP and QAPrP; completed two Phase I ESA reports and completed two Phase II ESA's as well as Site Characterization and remedial designs on the two priority sites listed in their previous US EPA Assessment grant application, EMI and Quin T. Completing the assessment activities enabled ECIDA to leverage over \$3.5 million in state and federal grant funding for the demolition and engineering design for the redevelopment of EMI and Quin T. The previous targeted priority sites, both located in CEJST identified disadvantaged communities, are owned by the Enterprise Development Center of Erie County (EDCEC). The assessment, characterization and remedial planning completed utilizing the previous US EPA grant has enabled the EDCEC to pursue a US EPA Brownfields Cleanup grant for both sites.

(2) Compliance with Grant Requirements: ECIDA has completed timely submission of requisite updates (e.g., quarterly reports, annual MBE/WBE and FFR forms), regular ACRES updates, and monthly ASAP accounting updates. ECIDA regularly communicates with the US EPA project officers and solicits their input to ensure tasks and actions are compliant. The focus of ECIDA's work was to complete and support as much direct assessment work as possible throughout the grant performance period. As of FY23 Q4, ECIDA had utilized more than 70% of its available funding to complete direct assessment tasks and activities (e.g., Phase I/II ESAs/Remedial Planning). Accordingly, ECIDA is making timely progress toward achieving its assessment goals on an accelerated timeframe and has drawn down their current funding below 75% as of FY22 Q4. ECIDA plans to expend the remaining funding on final characterization, to reduce the volume of soils to be excavated at its two highest priority sites while continuing community engagement and building their site inventory. Final characterization activities at each site will exhaust the remaining funding prior to June 15, 2024. All remaining funding is expected to be expended in FY24 Q2, prior to the expiration of the current performance period.