



# CITY OF BETHLEHEM

ECONOMIC DEVELOPMENT

10 East Church Street, Bethlehem, Pennsylvania 18018-6025

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[www.bethlehem-pa.gov](http://www.bethlehem-pa.gov)

## **Narrative Information Sheet**

### **1. Applicant Identification:**

City of Bethlehem, PA  
10 E. Church Street  
Bethlehem, PA 18018

### **2. Funding Requested:**

- a) Type: Community-wide Assessment Grant
- b) Federal funds requested: \$500,000

### **3. Location:**

- a) City: City of Bethlehem
- b) County: Northampton and Lehigh Counties
- c) State: Pennsylvania

### **4. Target Area and Priority Site Information:**

While eligible activities will take place throughout the city, we intend to focus the use of EPA grant funding on the target area of South Side Bethlehem ("South Side"). South Side is defined as the part of Bethlehem south of the Lehigh River and is comprised of the following census tracts: 42095010900, 42095011000, 42095011100, 42095011200 and 42095011300.

The following priority sites have been identified:

#### **Bethlehem Steel Historic Foundry Area**

19 parcel, 68.34-acre site along E. 1<sup>st</sup>, E. 2<sup>nd</sup>, and E. 3<sup>rd</sup> Street, Bethlehem, PA 18015  
Census Tract: 42095011300

#### **Auto Repair Shop**

130 W. Goepp Street, Bethlehem, PA 18018  
Census Tract 42095010700

#### **Steel General Office building (SGO)**

701 E. 3rd Street, Bethlehem, PA 18015  
Census Tract: 42095011300

Eastern Gateway Affordable Housing Project  
 1414 E. 4th Street, Bethlehem, PA 18015  
 Census Tract: 42095011300

**5. Contacts:**

a. Project Director

Name: Alicia Karner  
 Phone: (610) 865-7000  
 Email: akarner@bethlehem-pa.gov  
 Mailing address: City of Bethlehem, PA  
 10 E. Church Street  
 Bethlehem, PA 18018

b. Chief Executive/Highest Ranking Elected Official

Name: Mayor J. William Reynolds  
 Phone: (610) 865-7000  
 Email: jreynolds@bethlehem-pa.gov  
 Mailing address: City of Bethlehem, PA  
 10 E. Church Street  
 Bethlehem, PA 18018

**6. Population:**

According to the latest US Census Bureau estimate (Population Estimates, July 1, 2022 – V2022) the population of the City of Bethlehem is 77,617.

**7. Other Factors**

Several other factors apply to our community and/or proposed project and are summarized in the Narrative on the following page numbers.

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

The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA
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**8. Letter from the State or Tribal Environmental Authority**

Please see attached for a letter from the Pennsylvania Department of Environmental Protection.

**9. Releasing Copies of Applications**

Not applicable.



November 2, 2023

Ms. Darlene Heller, AICP  
Director of Planning and Zoning  
City of Bethlehem  
10 E. Church Street  
Bethlehem, PA 18018

RE: U.S. EPA Brownfields Grant Proposal | State Letter of Acknowledgement  
City of Bethlehem  
Lehigh and Northampton Counties, Pennsylvania

Dear Ms. Heller:

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 City of Bethlehem's application for a US EPA Brownfields Community-Wide Assessment Grant in the amount of \$500,000 to create a brownfield site inventory, conduct Phase I and Phase II environmental site assessments, conduct reuse planning, and community engagement activities.

The city'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 City of Bethlehem and U.S. EPA Region 3 on this project.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Maddigan", is written over a light blue horizontal line.

Michael Maddigan  
Land Recycling Program Manager  
Bureau Environmental Cleanup and Brownfields

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

**1.a.i. Overview of Brownfield Challenges and Description of Target Area:** The geographic boundary where eligible activities under the Community-wide Assessment grant will be conducted is the City of Bethlehem, PA. Bethlehem has an incredibly rich cultural and industrial heritage. While the 18<sup>th</sup> century saw a pottery, tannery, butchery, dye house, smith complex, and waterworks spring up along the Monocacy Creek and Lehigh River, it was the completion of the Lehigh Canal in the early 19<sup>th</sup> century that truly gave rise to Bethlehem as the heart of America's Industrial Revolution. Bethlehem established itself as a significant supplier of forged products, steel rail, and ordnance, with the Bethlehem Steel Corporation growing to becoming the 2nd largest steel company in the US. Bethlehem Steel was used to build the Chrysler Building, Empire State Building, George Washington Bridge, and Golden Gate Bridge. During its peak, Bethlehem Steel employed 300,000 people and almost 33,000 at the Bethlehem Plant.

Unfortunately, Bethlehem was hit hard by the economic downturn that many former-industrial cities in the Northeast and Midwest faced in the mid-20<sup>th</sup> century, as many manufactures either went out of business or left the area seeking less-expensive labor in other regions or overseas. Bethlehem Steel filed for bankruptcy in 2001 and was dissolved in 2003. This downturn left the city with an array of abandoned and/or underutilized mills and factories, many of which sat vacant for decades, experiencing significant deterioration and creating blight that disincentivized private investment in the community. Even worse, the legacy of 19<sup>th</sup> and early-20<sup>th</sup> century industrial uses resulted in lingering environmental impacts on the community, which in some cases includes residential uses near environmentally-impacted former industrial sites.

While eligible activities will take place throughout the city, we intend to focus the use of EPA grant funds on the target area of South Side Bethlehem ("South Side"). South Side is defined as the part of Bethlehem south of the Lehigh River and is comprised of census tracts 109-113. South Side was historically the most industrial part of the city and was long dominated by the ~1,800-acre Bethlehem Steel plant, which stretched for 4.5 miles along the Lehigh River and was the largest brownfield under single ownership in the country. Today, South Side is the most ethnically diverse and economically-challenged part the city and is the community most in need of public and private investment to help overcome the legacy of brownfields in our community.

**1.a.ii. Description of the Priority Brownfield Site(s):** Bethlehem has an array of brownfield types, from commercial infill redevelopment opportunities impacted largely by asbestos and/or lead paint, to former mills and factories that are often located in mixed-use and/or residential neighborhoods, to large industrial redevelopment opportunities at or near the former lands of Bethlehem Steel. One of the priority sites that will be targeted for use of Assessment Grant funding is the Bethlehem Steel Historic Foundry Area ("Foundry"), an ~68-acre area along East 1st, 2nd, and 3rd Streets that was once part of Bethlehem Steel's South Side Plant. The Foundry area houses several of the few remaining historic structures of the South Side Plant including the Iron Foundry and High House. The Foundry area is part of the former South Side Plant known as "*BethWorks*", portions of which have been redeveloped through a series of public-private partnerships including ArtsQuest's SteelStacks arts and cultural center, the preserved former blast furnaces and Hoover Mason Trestle elevated linear park, the Smithsonian-affiliated National Museum of Industrial History, and Northampton Community College's Fowler Center. Most of the tracts that make up the Foundry area are owned by Wind Creek Bethworks Retail

LLC, a limited liability company affiliated with the owner of the Wind Creek Casino Resort, located just east of the Foundry area. Despite the success of these nearby developments and some environmental cleanup through PA's voluntary cleanup program, the Foundry area has remained largely vacant and undeveloped. The Foundry area is located near the southern bank of Lehigh River and is in a 0.2% annual chance Flood Hazard Area, the impacts of which can be managed during the redevelopment. The City, Wind Creek Bethworks Retail LLC, and the other stakeholders in and around the Foundry area see tremendous potential for additional community and economic benefits from the redevelopment of the Foundry area and the City is planning to spearhead a collaborative reuse planning project through the Assessment Grant.

Another priority site for Assessment Grant funding is the Steel General Office building (SGO) (701 E. 3rd Street), which served as Bethlehem Steels' headquarters for decades and has now remained vacant for nearly 30 years. Located on an ~3.1-acre site, the SGO is in significant disrepair with leaking roofs, water damage, asbestos, mold and lead paint issues.

Like many older urbanized communities, Bethlehem is plagued with legacy industrial and automotive nonconforming sites throughout its neighborhoods that can also be prioritized for support through the Assessment Grant. One such site is a .67-acre former automobile garage at 130 West Goepp Street which has received zoning approval for 18 residential units, which better fits the character of the residential neighborhood surrounding it. In addition, a pair of properties at 1414 E. 4th Street in South Bethlehem totaling 3.84 acres whose prior uses include gas station/auto repair and a fuel oil distribution site were recently purchased as a needed opportunity site for affordable housing. Site assessment and clean up are anticipated at both sites. Finally, the city was awarded state and federal funds for the acquisition of ~0.9 -miles of abandoned railroad. Once acquired, this stretch of future recreation greenway will connect a priority trail gap not just for Bethlehem, but for Eastern Pennsylvania.

***1.a.iii. Identifying Additional Sites:*** We plan to use a portion of the Assessment Grant to develop an inventory of brownfield redevelopment opportunities in Bethlehem. That inventory will then serve as a primary tool to help identify additional sites at which eligible Phase I/II and/or cleanup planning activities can be completed under the Assessment Grant, and beyond. Key criteria that will be used to prioritize additional sites include 1) the potential to address conditions potentially impacting human health and the environment; 2) the economic need of the neighborhood as measured by income and other wealth-related metrics; 3) the potential to generate positive community and/or economic benefits in the form of job creation, private investment, increased tax revenues, and creating more affordable housing; and 4) the potential environmental justice benefits for underserved or disadvantaged communities.

***1.b.i. Reuse Strategy and Alignment with Revitalization Plans:*** The City and its partners' intention is that the reuse of the Foundry area will complement the existing developments in the BethWorks redevelopment area. This will likely include a mix of retail, commercial, entertainment, institutional, and/or residential development, with complimentary greenspace and open spaces. The proposed mixed-use redevelopment of the Foundry area aligns with multiple City ordinances and plans. The site is zoned Industrial Redevelopment – Residential Option (IR-R), which allows for a flexible mix of uses including residential options. Bethlehem's Comprehensive Plan identifies the proposed future use of the Foundry area as Mixed-Use

Redevelopment – Residential Option. The Foundry area is also within the BethWorks Tax Increment Financing (TIF) district, which was created specifically to spur investment in the BethWorks TIF district. Regarding the brownfield inventory and other potential sites in South Side Bethlehem, “*Southside Vision 2012 - Southside Bethlehem Residential Master Plan 2002-2012*” gave as a recommendation to “Identify and reuse abandoned parcels and buildings”, which clearly aligns with the City’s intended use of Assessment Grant funding.

***1.b.ii. Outcomes and Benefits of Reuse Strategy:*** The reuse plan developed for the Foundry area via Assessment Grant funds will bring an underutilized property back into productive use; create permanent jobs and temporary construction jobs in a part of our community in severe need of economic development; create much-needed new residential opportunities; encourage the preservation and adaptive reuse of the existing historic structures; and build upon development synergies with nearby land uses at the BethWorks development. Additionally, Phase I/II site assessments to be completed through the Assessment Grant will spur the redevelopment and reuse of ~4 brownfields in our community, facilitating the reuse of underutilized properties, creating new jobs and residential options, and eliminating blight that is discouraging private investment in the targeted South Side community.

The Assessment Grant will also provide a platform to further the goals of the City’s 2021 Climate Action Plan, including encouraging public disclosure of aggregated energy and water use for all commercial and multifamily buildings; incentivizing the mitigation of urban heat island effects with white roofs, partial green roofs, or solar panels; and utilizing the free Energy Star Portfolio Manager for energy efficiency benchmarking that can provide potential buyers or tenants information on energy usage. In addition, the Climate Action Plan promotes compact urban design with higher densities and mixed uses, especially in development centers and major corridors. The proposed planning study and reuse strategies will specifically allow for redevelopment and reuse of abandoned structures and vacant land in Bethlehem’s urban core.

***1.c.i. Resources Needed for Site Reuse:*** Similar to other developments completed as part of the BethWorks area redevelopment, the City anticipates the redevelopment of the Foundry tracts will be accomplished largely through one or more public-private-partnerships. Depending on the specific uses and partners involved, redevelopment funding will likely come from a combination of private debt and equity and state grant funding. The planning work completed via the Assessment Grant is critical to unlocking these additional resources for the reuse of the site.

***1.c.ii. Use of Existing Infrastructure:*** The BethWorks Tax Incremental Financing (TIF) District was created in 2000 and was administered by the Bethlehem Redevelopment Authority (RDA) in cooperation with the City, Bethlehem Area School District, and Northampton County. Through the BethWorks TIF, these taxing bodies agreed to dedicate a portion of the real estate taxes received from parcels located within the designated TIF District to be used for public improvements within the TIF District. Real estate taxes in excess of the 2000 base year assessment were transferred to the RDA for use in this manner. In total, the TIF invested \$44 million into the district for infrastructure, public facilities, and to leverage private investment, all of which were essential for the future development of this site. The future reuse of the Foundry area will facilitate the further utilization of the public infrastructure improvements previously constructed through the TIF.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**2.a.i. The Community’s Need for Funding:** The City of Bethlehem has distinct challenges drawing funding and/or private investment for environmental remediation and redevelopment due in part to its status as a low-income community. Table 1 summarizes income and wealth-related metrics for the target census tracts in South Side Bethlehem compared to Pennsylvania.

**Table 1. Income and Wealth Data (US Census Bureau 2017-2021 ACS 5-year estimates)**

	CT 109	CT 110	CT 111	CT 112	CT 113	PA
Med. HH Income	\$42,808	\$25,300	\$64,583	\$40,060	\$50,139	\$67,587
Poverty Rate	16.2%	51.2%	36.4%	25.4%	14.2%	11.8%
Med. Home Value	\$108,600	\$126,300	NA	\$113,100	\$223,200	\$197,300
% People of Color	72%	54%	37%	72%	55%	25.5%

As the data shows, South Side community members generally have household income that is well below the state as a whole and their poverty level is often double or triple that of the state. Additionally, median home values (normally a major source of wealth) in South Side generally trail median values for PA (except for Tract 113). The diversity of the South Side is showcased by the fact that the percent of the community that are People of Color is often double that of the state. The use of Assessment Grant funding in this target community will therefore help spur much needed economic development in the form of private investment and job creation, while also protecting the health and welfare of underserved and disadvantaged communities in the city.

**2.a.ii. Threats to Sensitive Populations:** EPA’s EJScreen Tool indicates that Bethlehem’s South Side community is at or above the 69<sup>th</sup> percentile nationally in each of the 13 EPA EJ Indices, which combine data on low income and people of color populations with a single environmental indicator, as well as each of the 13 Supplemental Indices, which combine data on rates of low-income, linguistically isolated, less than high school education, unemployed, and low life expectancy with a single environmental indicator (ranging from the 69<sup>th</sup> percentile for “Air Toxics Respiratory HI” to the 93<sup>rd</sup> percentile for “Toxic Releases to Air”).

The Climate and Economic Justice Screening Tool (CEJST) identifies five of the six targeted census tracts that make up the South Side, including tract 113 where the Foundry site is located, as disadvantaged census tracts for the purposes of Justice40. As such, the Assessment Grant and associated community and economic development benefits will have a positive impact on populations that have historically been disproportionately impacted by environmental issues.

**2.a.ii (1) Health or Welfare of Sensitive Populations:** As detailed in Section 2.a.i and .2.a.ii above, the EPA EJ Screening Tool and the CEJST indicate significant potential for negative health impacts to sensitive populations in the target community for the Assessment Grant. The Assessment Grant will help mitigate various potential threats to the health and welfare of sensitive populations in the target community by identifying potential health threats from exposure to contaminated soil, groundwater and building materials; encouraging the reuse or redevelopment of abandoned sites that may be “attractive nuisances” that present risks from vandalism or arson; and helping to improve economic conditions which will positively impact social determinants of health in the community.



**2.a.ii (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:** EPA's EJScreen Environmental and Socioeconomic Indicator data shows that the target South Side community is in the 79<sup>th</sup> percentile both in Pennsylvania and US for the asthma indicator. This result is unfortunately not surprising when coupled with the previously noted statistic of the community ranking in the 93<sup>rd</sup> percentile nationally for EJScreen's "Toxic Releases to Air" index. The Assessment Grant will help mitigate the health effects of asthma and other respiratory health issues on the community by facilitating the reuse of existing sites in the urban core instead of suburban sprawl that requires more trips and longer commutes, thereby reducing overall vehicle miles traveled and associated emissions.

**2.a.ii (3a&b) Identification of Environmental Justice Issues & Advancing Environmental Justice:** The CEJST Screening Tool identifies five of the six targeted census tracts that make up the South Side, including tract 113 where the Foundry priority site is located, as disadvantaged census tracts for the purposes of Justice40. EPA's EJScreen Tool also indicates that Bethlehem's South Side community is at or above the 69<sup>th</sup> percentile nationally in each of the 26 EPA EJ Indices and Supplemental Indices. Much of the target South Side community, including tract 113 where the Foundry priority site is located, is also identified as an Environmental Justice Area by Pennsylvania's "PennEnviroScreen" Environmental Justice Mapping and Screening Tool. PennEnviroScreen places the census block group where the Foundry area is located in the 96<sup>th</sup> percentile of environmental justice areas in the state. This data makes it very clear that there are significant environmental justice issues that need to be addressed in the South Side community.

The Assessment Grant will provide a unique opportunity to address environmental justice in Bethlehem and the South Side community. Our plan to focus on environmental justice as a key criterion in the identification and prioritization of sites that will benefit from the Assessment Grant will ensure that health risk mitigation efforts through the grant will focus on underserved and disadvantaged communities. Benefits to these communities will include 1) identifying potential exposure to contaminated soil, groundwater and building materials, 2) addressing public health concerns associated with abandoned sites that may be "attractive nuisances", 3) mitigating the effects of asthma and other respiratory issues by facilitating the reuse of existing sites and encouraging fewer vehicle trips and shorter commutes, 4) improving economic conditions which will positively impact social determinants of health, and 5) not displacing residents and/or businesses, and creating new high-quality residential and business opportunities in the community. Additionally, the community engagement process will empower residents to be involved in redevelopment decisions that impact their lives. We believe the community engagement framework built through the Assessment Grant can lay the groundwork for considering environmental justice issues throughout future public involvement efforts in the city.

**2.b.i. & 2.b.11 Project Involvement and Project Roles:** The following organizations will provide assistance and/or information to assist in the performance of the project.

Organization: City of Bethlehem, PA

Contact: Darlene Heller, AICP, Director of Planning & Zoning ([dheller@bethlehem-pa.gov](mailto:dheller@bethlehem-pa.gov))

Involvement: Prospective Assessment Grantee and overall program management, site reuse planning, brownfield inventory creation/maintenance, community engagement lead.

Organization: Redevelopment Authority of the City of Bethlehem

*Contact:* Alicia Miller Karner, Executive Director ([akarner@bethlehem-pa.gov](mailto:akarner@bethlehem-pa.gov))

*Involvement:* Reuse planning, inventory support, redevelopment financing support (as needed).

*Organization:* ArtsQuest

*Contact:* Kassie Hilgert, President & CEO ([khilgert@artsquest.org](mailto:khilgert@artsquest.org))

*Involvement:* Key target community stakeholder, site reuse planning.

*Organization:* Northampton Community College

*Contact:* Lauren A. Loeffler, Dean of the Fowler South Side Center ([lloeffler@northampton.edu](mailto:lloeffler@northampton.edu))

*Involvement:* Key target community stakeholder, site reuse planning.

*Organization:* Peron Development

*Contact:* John Callahan, Director of Business Development ([jcallahan@floriolaw.com](mailto:jcallahan@floriolaw.com))

*Involvement:* Key target community stakeholder, owner/developer of target site, reuse planning.

*Organization:* Wind Creek Hospitality

*Contact:* Patrick Ryan, Executive VP – General Manager ([patrick.ryan@windcreek.com](mailto:patrick.ryan@windcreek.com))

*Involvement:* Key target community stakeholder, owner/developer of target site, reuse planning.

*Organization:* Community Action Development Bethlehem

*Contact:* Anna Smith, Director ([asmith@caclv.org](mailto:asmith@caclv.org))

*Involvement:* Key target community stakeholder and connection to underserved and disadvantaged community members.

*Organization:* Hispanic Center of the Lehigh Valley

*Contact:* Raymond Santiago, Executive Director ([Rsantiago@hclv.org](mailto:Rsantiago@hclv.org))

*Involvement:* Key target community stakeholder and connection to underserved and disadvantaged community members.

*Organization:* National Museum of Industrial History

*Contact:* Andria Zaia, Director ([azaia@nmih.org](mailto:azaia@nmih.org))

*Involvement:* Key target community stakeholder, owner/developer of target site, reuse planning.

**2.b.iii. Incorporating Community Input:** The City will implement a robust community engagement process aimed at soliciting input from and communicating progress about the project to a broad array of stakeholders including local residents (with particular focus on underserved communities), community groups, partners, and the general public. This engagement process will include 1) the creation of an advisory committee consisting of the aforementioned populations who will hold periodic meetings to solicit input on each brownfield site at which assessment and/or reuse planning activities are conducted. Virtual attendance options will be provided as an alternative to in-person attendance; 2) holding meetings with community stakeholder groups involved with or impacted by assessments and/or reuse planning; 3) depending on the needs of the neighborhood where sites are located, providing meeting materials in Spanish and Spanish-language translation services; and 4) utilizing the City’s multilingual websites, such as “*We Build Bethlehem*” community engagement website ([webuild.bethlehem-pa.gov](http://webuild.bethlehem-pa.gov)) to disseminate information like public meeting minutes, input received, City responses, and resulting changes to reuse plans, etc.

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

#### **3.a. Description of Tasks/Activities and Outputs**

##### **Task/Activity: Program Management**

*i. EPA-funded tasks/activities:* Coordinating monthly progress meetings; preparing quarterly reports; procuring the Qualified Environmental Professional (QEP) and Planning Consultant(s); tracking accomplishments and preparing performance and financial reporting.

*Non-EPA grant resources needed to carry out tasks/activities, if applicable: None*

*ii. Anticipated Project Schedule: October 2024 – September 2028*

*iii. Task/Activity Lead: City of Bethlehem*

*iv. Outputs: Minutes from monthly progress meetings; completed quarterly reports in ACRES; DBE utilization reports; procurement documents for the QEP and Planning Consultant(s); property approval questionnaires; performance and financial reports.*

*Task/Activity: Community Engagement*

*i. EPA-funded tasks/activities: Coordinating advisory committee of community stakeholders on assessment and reuse plans; planning and holding public meeting(s); responding to stakeholder and public input; posting documents and updates to City's website.*

*Non-EPA grant resources needed to carry out tasks/activities, if applicable: None*

*ii. Anticipated Project Schedule: October 2024 – September 2028*

*iii. Task/Activity Lead: City of Bethlehem*

*iv. Outputs: At least 2 public meetings on reuse plans; meetings with advisory committee of community stakeholders on reuse plans and future sites; documentation of community & stakeholder input including minutes, input received, City responses, & resulting changes.*

*Task/Activity: Community-Wide Brownfield Inventory*

*i. EPA-funded tasks/activities: Coordinating with stakeholders to identify brownfields; developing list of data/fields to be maintained for the inventory; gathering data and developing the electronic brownfield inventory.*

*Non-EPA grant resources needed to carry out tasks/activities, if applicable: None*

*ii. Anticipated Project Schedule: October 2024 – September 2028*

*iii. Task/Activity Lead: Contracted QEP will serve as lead due to their technical expertise.*

*iv. Outputs: Community-wide inventory of brownfields*

*Task/Activity: Phase I/II Site Assessments*

*i. EPA-funded tasks/activities: Preparing assessment plans and Quality Assurance Project Plans (QAPP); implementing site assessment field work; developing Phase I/II assessment reports; coordinating with EPA and PADEP staff as needed.*

*Non-EPA grant resources needed to carry out tasks/activities, if applicable: None*

*ii. Anticipated Project Schedule: October 2024 – September 2028*

*iii. Task/Activity Lead: Contracted QEP will serve as lead due to their technical expertise.*

*iv. Outputs: Approximately four (4) Phase I assessment reports, approximately two (2) Phase II assessment reports (including associated QAPPs).*

*Task/Activity: Reuse Planning*

*i. EPA-funded tasks/activities: Developing a site reuse plan for the Foundry area plus one (1) additional site, including visioning and alternatives analysis, market feasibility, conceptual site plans, infrastructure analysis, design and construction cost estimates, financial *pro formas* and identification of public funding opportunities, etc.*

*Non-EPA grant resources needed to carry out tasks/activities, if applicable: None*

*ii. Anticipated Project Schedule: April 2025 – December 2025 for the Foundry area and April 2027-December 2027 for the one (1) additional site.*

*iii. Task/Activity Lead: Contracted Planning Professional will serve as lead due to their expertise.*

*iv. Outputs: Two (2) brownfield reuse plans, as well as minutes from project team meetings and stakeholder coordination meetings from each planning process.*

*Task/Activity: Project Administration*

**Applicant: City of Bethlehem, PA  
Project Narrative**

*i. EPA-funded tasks/activities:* Record-keeping associated with grant compliance; preparing revisions and changes in the workplan and budget; operating financial management systems; preparing payment requests and handling payments; and grant closeout activities.

*Non-EPA grant resources needed to carry out tasks/activities, if applicable:* None

*ii. Anticipated Project Schedule:* October 2024 – September 2028

*iii. Task/Activity Lead:* City of Bethlehem

*iv. Outputs:* Administrative record including any workplan and/or budget revisions; payment request forms; close out documentation.

**3. b. Cost Estimates**

Budget Categories	Project Tasks						
	Program Mgmt.	Community Engagement	Inventory	Phase I/II	Reuse Planning	Admin. Costs	Total
Personnel	\$40,000	\$20,000				\$15,000	\$75,000
Fringe Benefits							
Travel							
Equipment							
Supplies							
Contractual		\$15,000	\$20,000	\$115,000	\$275,000		\$425,000
Construction							
Other							
Total Direct	\$40,000	\$35,000	\$20,000	\$115,000	\$270,000	\$15,000	\$500,000
Total Indirect							
Total Federal	\$40,000	\$35,000	\$20,000	\$115,000	\$270,000	\$15,000	\$500,000

**Task 1: Program Management - \$40,000**

City Project Management staff at average of ~\$50/hr for ~800 hours. Includes an average of ~16 hrs/per month over the period of October 2024 – September 2028.

**Task 2: Community Engagement - \$35,000**

City Project Management staff at an average of ~\$50/hr for ~400 hours. Includes an average of 8 hrs/per month over the period of October 2024 – September 2028. Contractual expenses to Planning Professional to provide technical assistance in the implementation of the community engagement process. Includes \$10,000 for coordinating with community stakeholders on reuse plans; \$3,000 for preparing for and attending public meeting(s); and \$2,000 for responding to stakeholder and public input on reuse plans.

**Task 3: Community-Wide Brownfield Inventory - \$20,000**

Contractual expenses to the QEP at average of ~\$100/hr for ~200 hours. Includes an average of ~4 hrs/per month over the period of October 2024 – September 2028.

**Task 4: Phase I/II Site Assessments - \$115,000**

Contractual expenses to the Remediation Contractor including four (4) Phase Is at ~\$3,500 each and two (2) Phase IIs at ~\$50,000 each

**Task 5: Reuse Planning- \$275,000**

Contractual expenses to Planning Professional(s) to develop a site reuse plan for the Foundry area at ~\$200,000 and one additional site at ~\$75,000.

**Task 6: Project Administration - \$15,000**

City Project Management staff at average of ~\$50/hr for ~300 hours. Includes an average of ~6 hrs/per month over the period of October 2024 – September 2028.

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

The City will track and evaluate progress in achieving the project outputs and eventual outcomes by maintaining detailed electronic files of all project-related output documents including minutes from monthly progress meetings; completed quarterly reports in ACRES and DBE utilization reports; property approval questionnaires; documentation of the results public meeting(s) and community stakeholder input including meeting minutes, input received, City responses, and resulting changes to reuse plans; procurement and contractual documents for the QEP and Professional Planner; completion of the community-wide brownfield inventory, number of Phase I and Phase II assessments completed; and number of reuse site plans created. The City will also track and report on outcomes of the assessments and planning work including acres of brownfield property assessed; acres of brownfields where reuse plans were developed; brownfields cleaned up in the future where Assessment Grant funds were spent; future public and private investment leveraged at brownfields where Assessment Grant funds were spent; economic development benefits (jobs, new businesses, new tax revenues) created at brownfields where Assessment Grant funds were spent; community development benefits (acres of parks or greenspace, new housing opportunities, etc.) at sites where Assessment Grant funds were spent.

***4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE***

***4.a.i. - 4.a.iii. Organizational Capacity, Organizational Structure, and Description of Key Staff***

The City will manage the Assessment Grant through its Department of Community & Economic Development (“DCED”). The City’s DCED guides land use, zoning and preservation of historic structures, and promotes the comprehensive growth and well-being of the City and its neighborhoods. DCED administers the City’s federal CDBG and HOME programs, geared towards improving low/moderate income census tracts and supporting the development of low/moderate income housing and eliminating blight through the City. DCED staff will lead all program management, community engagement, project administration, and financial oversight to ensure timely and efficient expenditure of the Assessment Grant. DCED staff will be supported by a contracted QEP who will be responsible for technical Phase I/II assessment and inventory work, and contracted Professional Planner(s) who will develop the site reuse plans through the grant. DCED routinely works with technical and planning consultants to implement specific projects and is experienced with collaborating and managing the work of third-party contractors.

Alicia Miller Karner is DCED’s Deputy Director for Economic Development and Executive Director of the City’s Redevelopment Authority. Ms. Karner oversees strategic programs impacting economic development and increased quality of life in Bethlehem. She has managed multimillion dollar grant initiatives involving state and federal funding and regularly attends public meetings, frequently as a subject matter expert. She holds a BA in Political Science from the University of North Carolina Wilmington. Working with Ms. Karner will be Darlene Heller, AICP, who has served as the City’s Director of Planning & Zoning since 2000. In that time the City adopted many planning studies including a Comprehensive Plan and Zoning Ordinance, the South Side Vision Plan, Greenway Master Plan, Historic Preservation Plan, and Downtown Walkability Study. During Ms. Heller’s tenure, Bethlehem has been recognized internationally

for its remarkable transition after the closure of the Bethlehem Steel Plant. Ms. Heller received her degree in Urban & Regional Planning from Penn State University.

**4.a.iv. Acquiring Additional Resources:** The City has well-established procurement systems in place and routinely solicits proposals and/or bids from professional service providers and contractors when specific expertise or outside resources are needed. The City is well-versed in procurement that complies with federal funding requirements and regulations, including the use of Buy America Sourcing, Davis-Bacon Wage Rates, participation by disadvantaged businesses, etc. The City anticipates utilizing these systems to obtain the services of the QEP and the Planning Professional(s) under the Assessment Grant. When advertising procurement opportunities through the Assessment Grant, the City will notify local trade organizations including the Bethlehem Area Chamber of Commerce and Lehigh Valley Economic Development Corporation to ensure that local contractors and workers have an opportunity to benefit economically from contracts and employment opportunities via Assessment Grant funds.

**4.b.i. Currently Has or Previously Received an EPA Brownfields Grant:** N/A

**4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements:** Bethlehem is an entitlement community through the Department of Housing and Urban Development's Community Development Block Grant (CDBG) and HOME programs. The City also recently received a \$500,000 Choice Neighborhoods (CN) Planning Grant from HUD to transform the Pembroke Village target housing site and the surrounding Stefko/Pembroke Neighborhood. The CN grant requires extensive community engagement, focused on neighborhood residents, local partners, and other stakeholders to develop a CN Transformation Plan that is based on community-defined goals and principles. This grant was awarded September 2023 and the planning process is getting underway.

**4.b.ii (1) Purpose and Accomplishments and 4.b.ii (2) Compliance with Grant Requirements**  
The City received \$5.7 million in CDBG/HOME funding from 2017 to 2022 and has extensive experience in engaging the community through the Annual Action Plan process as well as the 5-Year Consolidated Planning. These funds are awarded to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. At the conclusion of each CDBG/HOME award year, the city produces the Consolidated Annual Performance and Action Report (CAPER). Additionally, the City has procurement and financial policies and procedures for federally funded grant programs in place and works with sub-grantees to ensure compliance. The City has annually complied with the timely submission of the CAPER. During the 2022 program year, Bethlehem expended 100% of its CDBG funds for activities benefiting low- and moderate-income persons, meeting the primary Housing and Community Development Act objective. Bethlehem also met its public service and planning and administration caps. Since 2021, accomplishments included the rehabilitation and façade repairs to more than 100 owner-occupied homes. In 2022, the city supported 28 transitional housing families through a roof replacement program and helped fund the rehabilitation of 22 affordable housing units.

**4.b.iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements:** N/A

## **Threshold Criteria**

### ***1. Applicant Eligibility***

#### ***1.a. Indicate your applicant type and provide information that demonstrates how you are an eligible entity for an Assessment Grant***

The City of Bethlehem, PA is a General Purpose Unit of Local Government and meets the definition of *Local government* at 2 CFR § 200.1. We affirm that the City of Bethlehem, PA is eligible for the requested FY2024 Assessment Grant funding.

#### ***1.b. Indicate if your organization is exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code***

Not applicable.

### ***2. Community Involvement***

The City of Bethlehem will implement a robust community engagement process aimed at soliciting input from and communicating progress about the project to a broad array of stakeholders including local residents (with particular focus on underserved communities), community groups, partners, and the general public. This engagement process will include 1) the creation of an advisory committee consisting of the aforementioned populations who will hold periodic meetings to solicit input on each brownfield site at which assessment and/or reuse planning activities are conducted. Virtual attendance options will be provided as an alternative to in-person attendance; 2) holding meetings with community stakeholder groups involved with or impacted by assessments and/or reuse planning; 3) depending on the needs of the neighborhoods where sites are located, providing meeting materials in Spanish and Spanish-language translation services; and 4) utilizing the City's multilingual websites, such as "*We Build Bethlehem*" community engagement website ([webuild.bethlehem-pa.gov](http://webuild.bethlehem-pa.gov)) to disseminate information like public meeting minutes, input received, City responses, and resulting changes to reuse plans, etc.

### ***3. Expenditure of Existing Grant Funds***

We affirm that the City of Bethlehem, PA does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

### ***4. Contractors and Named Subrecipients***

Contractors: We affirm that no contractors who will complete work under the requested Brownfield Grant have been procured, so this is not applicable.

Subrecipients: We affirm that no subrecipients will be named under the requested Brownfield Grant, so this is not applicable.