



CITY OF EASTON PENNSYLVANIA

Department of Community & Economic Development
123 South Third Street
Easton, PA 18042
(610) 250-6623

Narrative Information Sheet

1. Applicant Identification:

City of Easton, PA
123 S. 3rd Street
Easton, PA 18042

2. Funding Requested:

- a) Type: Single Site Cleanup Grant
- b) Funds Requested: \$500,000

3. Location:

- a) City: City of Easton
- b) County: Northampton County
- c) State: Pennsylvania

4. Property Information:

Former Easton Iron & Metal Property
1111-1164 Bushkill Drive
Easton, PA 18042

5. Contacts:

- a. Project Director

Name: John Kingsley, Director of Community & Economic Development

Phone: 610-250-6719

Email: jkingsley@easton-pa.gov

Mailing address: City of Easton, PA
123 S. 3rd Street
Easton, PA 18042

b. Chief Executive/Highest Ranking Elected Official

Name: Mayor Salvatore J. Panto Jr.

Phone: 610-250-6600

Email: spanto@easton-pa.gov

Mailing address: City of Easton, PA
123 S. 3rd Street
Easton, PA 18042

6. Population:

According to the latest US Census Bureau estimate (Population Estimates, July 1, 2022 – V2022) the population of the City of Easton is 30,341.

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.

| Other Factors | Page # |
|--|--------|
| 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 proposed brownfield site(s) is impacted by mine-scarred land. | NA |
| Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation. | 4 |
| The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them). | 2-3 |
| The proposed site(s) is in a federally designated flood plain. | NA |
| The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | NA |
| The reuse of the proposed cleanup 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 |
| 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 |

8. Releasing Copies of Applications

Not applicable.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a.i. Overview of Brownfield Challenges and Description of Target Area: The City of Easton is located in eastern Pennsylvania (PA), approximately 60 miles north of Philadelphia and 70 miles west of New York City. Easton has a rich industrial heritage, owing much of its original prosperity to the flowing waters of the Delaware and Lehigh Rivers and the Bushkill Creek. At one point Easton was home to 2 saw mills, 2 tanneries, an oil mill, 7 flour and grist mills, 4 breweries, 9 distilleries, and 2 bottling establishments. The Easton area was also home to Crayola and the R&H Simon Silk Company (once the largest maker of black silk ribbon in the world), both of whom operated factories along the Bushkill Creek.

Unfortunately, the economic downturn faced by many former-industrial cities in the Northeast in the mid-20th century left Easton with an array of abandoned and/or underutilized mills and factories. Many of these sat largely vacant for decades, experiencing significant deterioration and creating blight that further disincentivized private investment in the community. Even worse, the legacy of 19th and early-20th century industrial uses has resulted in lingering environmental impacts, which in some cases are near and/or among residential uses.

Easton's Bushkill Creek Corridor ("Corridor") has been the focus of significant public planning and investment over the past several decades. Made up mostly of former industrial sites, the Corridor has attracted substantial attention following the redevelopment of the former R&H Simon Silk Mill and the construction of the Karl Stirner Arts Trail (KSAT) along a former rail line. Lafayette College ("College") has also invested significantly in the Corridor, which is along the city-campus interface. The College recently announced an expansion initiative including new development opportunities along the Corridor including their purchase of the former Rinek Rope Factory. Collectively, these investments have laid the groundwork for the revitalization of the Corridor, but significant obstacles remain. Chief among these is the need to address lingering environmental impacts at several of these properties to make them safe for redevelopment and to ensure the health and wellness of neighboring properties and residents. The requested Cleanup Grant will provide resources to address impacted soil and groundwater at one of the most pivotal properties in the Corridor, the former Easton Iron & Metal Site.

1.a.ii. Description of the Proposed Brownfield Site: The site which is the subject of this Cleanup Grant request is the former Easton Iron & Metal Site, 1111-1164 Bushkill Drive, Easton, PA 18042 ("Site"). Originally developed in the 1800s with a lime making kiln and quarry, the Site later housed an automotive repair shop, filling station, and a metal recycling facility/junk yard known as Easton Iron & Metal, which went out of business in 2015. Totaling ~15 acres with roughly 6 acres suitable for development, the Site is the largest vacant developable property remaining in Easton. The Site is connected to the KSAT, a regionally renowned outdoor sculpture park, via an old railroad trestle over the Bushkill Creek. This trestle is slated to be replaced with a new bridge connecting the Site with the KSAT as part of the redevelopment project. All buildings at the Site were recently demolished and the Site is currently vacant.

A Phase II environmental assessment of the Site identified that several contaminants exceeded their applicable PA residential and nonresidential Sitewide Health Standards (RSHS/NRSHS) in soils and groundwater. Metals like arsenic, lead, and mercury were found to exceed the RSHS and NRSHS. The volatile organic compounds (VOCs) Trichloroethylene and Vinyl chloride

exceeded the RSHS and NRSHS. Semi-volatile organic compounds (SVOCs) exceeded the RSHS in 19 of 46 samples, and exceeded the NRSHS in one location. PCBs were detected above the RSHS in one location but did not exceed the NRSHS. VOC results were also compared to PA soil SHS screening values for Vapor Intrusion into buildings (SVSOIL), showing exceedances at 14 locations. Manganese, iron, and Tetrachloroethylene (PCE), were also detected in the groundwater at concentrations exceeding their respective RSHS/NRSHS.

1.b.i. Reuse Strategy and Alignment with Revitalization Plans: In 2021, the City issued a Request for Proposals (RFP) to identify a developer to work with the City to redevelop the Site through a public-private partnership. The RFP outlined the community's vision for the Site as a dynamic mixed-use development with aesthetics and functionality to compliment the adjacent KSAT. In the RFP, the City committed to contributing \$1.3 million to the project in the form of pedestrian connectivity improvements including the refurbishment of the former railroad bridge connecting the project area to the KSAT, new shared use trail facilities connecting to the Site from the east along Bushkill Drive, and other trails, plazas, sidewalks and crosswalks as funding allows.

Through that RFP process, the City identified VM Development Group (VMDG) as the "preferred developer" for the project. VMDG's development plan, called "The Foundry", is a \$40M+ mixed-use community with ~25,000 square feet of commercial space and parking on the buildings' first floors, 150+ residential units on the upper floors, and unique architecture focused on environmental sustainability, nature and art. The Foundry will also have synergies with the nearby R&H Simon Silk Mill (also redeveloped by VMDG), building upon VMDG's success in attracting commercial tenants to the Corridor that create jobs and foster new business owners and entrepreneurs. The project will add a substantial number of residential units to the city, creating indirect economic impact in the form of disposable income being directed to local businesses. Finally, the plan for The Foundry embraces enhanced pedestrian connectivity in the Corridor by supporting the reconnection of the Site to the KSAT and the continuation of the trail through the Site and connecting to improved pedestrian facilities along Bushkill Drive.

The proposed reuse aligns with local land use plans and regional comprehensive plans. The northern portion of the Site is zoned "Adaptive Reuse" which encourages redevelopment and revitalization of underutilized and underperforming areas of the city. The southern portion of the Site is zoned "River Corridor" which is focused on accommodating appropriate development (including residential, retail, service, and arts/entertainment/recreational development) while protecting waterways and natural resources and assisting in flood management. The proposed project will also fulfill local and county-wide redevelopment goals. The City of Easton's 2035 Comprehensive Plan lists as Objectives "*1.2 Connect and redevelop Easton's River Corridors as an integral part of the City*" and "*1.3 Manage and reduce vacancy, underutilization and blight throughout the City*", each of which are supported by the proposed project. The regional "FutureLV: Comprehensive Plan for the Lehigh Valley" lists as Objectives "*1.2 Direct growth by establishing a network of mixed-use centers and mixed-transportation corridors*" and "*2.1 Develop a mixed-transportation network to support a more compact development pattern, optimize roadway capacity and encourage alternative travel options*", each of which are also supported by the proposed project.

FEMA Flood Zone maps show that a small portion of the Site along the Bushkill Creek is

within regulated floodway/floodplain, but because of topography, reuse plans can account for the impact of the designated floodplain with little to no impact anticipated on the development.

The City has engaged various partners and the public in the development of reuse plans for the Site. Specifically, the City created a committee of community members and 501c3 organizations like KSAT Inc. and Nurture Nature Center to provide input on the redevelopment. This committee reviewed development proposals solicited through the RFP and ensured broad representation of community interests in the planning of future uses of the site and the identification of the private development partner for the project moving forward.

1.b.ii. Outcomes and Benefits of Reuse Strategy: The proposed project will generate significant economic benefits to the community, as well as quality-of-life improvements via enhanced trail and pedestrian connectivity along the Corridor. The Foundry plan will create 35 permanent and 150 temporary construction jobs in a portion of the city in significant need of employment opportunities and result in ~\$500K annually in new real estate, earned income, and business privilege taxes. Community members will also benefit by having increased disposable income which they will undoubtedly spend at other local businesses. The ~200 new residents at the Site will further add to the economic impact via increased spending at local businesses. Beyond these financial benefits, the project will create 150+ new residential units in a neighborhood in need of quality housing options, improve bike/pedestrian connectivity via connection to and expansion of the KSAT through the Site, and strengthen collaborative relationships between the City, local nonprofits, and VMDG that will spur continued improvements to the Corridor.

The project will support the goals of EPA's Climate Adaptation Action Plan (October 2021) and the City of Easton's Climate Action Plan (October 2021). Specifically, the project will improve air quality by encouraging more bike/pedestrian traffic through the trail connectivity improvements, and fewer vehicle miles traveled by creating new residential density in the urban core as opposed in suburban sprawl that requires longer commutes. The cleanup of the Site will also help to address potential water quality impacts to the adjacent Bushkill Creek, particularly if/when increased flooding is experienced due to the impacts of climate change. The importance of these improvements is heightened due to the proximity of the Site to traditionally overburdened and vulnerable communities of color and low-income communities.

The City and VMDG are committed to ensuring that energy efficiency measures are incorporated in the remediation process, as well as in the post-cleanup development. The City will encourage abatement contractors to utilize energy efficient cleanup methodologies such as 1) salvaging, reusing, and recycling uncontaminated materials, 2) minimizing on-site idling of equipment, 3) encouraging the sourcing and/or disposal of materials at locations close to the Site, and 4) requiring rigorous adherence to erosion and sedimentation controls to prevent nutrient loading to the adjacent Bushkill Creek. VMDG also intends to encourage contractors to follow similar green construction methods and plans to incorporate various sustainable design elements into the project including the use of energy-efficient building materials and mechanical systems.

1.c.i. Resources Needed for Site Characterization: Based on the Phase II environmental assessment and discussions with PA Voluntary Cleanup Program (VCP, aka "Act 2") staff, additional sampling and risk assessment is needed to sufficiently characterize the Site for Act 2

purposes. The City was approved to receive support for this additional assessment work through EPA’s Targeted Brownfield Assessment (TBA) program, with the additional sampling work scheduled for the spring of 2024. As such, resources for additional characterization are in place.

1.c.ii. Resources Needed for Site Remediation: The City has secured an Industrial Site Reuse Program (ISRP) grant in the amount of \$981,000 from the PA Department of Community and Economic Development to help fund the remediation of the Site. Unfortunately, preliminary cleanup cost estimates indicate that additional resources are needed to complete the cleanup.

1.c.iii. Resources Needed for Site Reuse: VMDG will privately finance the ~\$43 million post-cleanup redevelopment of the property through a combination of private debt and equity. VMDG provided the City with documentation from Peoples Security Bank & Trust Company that “Based on the proposed project financing up to the amount of \$45 million would be available conditioned upon project approval and typical bank underwriting.”

1.c.iv. Use of Existing Infrastructure: The project will facilitate the use of existing public water and sanitary sewer lines located adjacent to the Site along Bushkill Drive and there is adequate water and sanitary sewer system capacity to serve the proposed development. The project will also receive electric service via existing First Energy/Met Ed electric lines that run along Bushkill Drive, so no significant new or expanded electrical infrastructure is anticipated.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a.i. The Community’s Need for Funding: Easton has distinct challenges drawing funding or private investment for remediation and redevelopment due in part to its status as a low-income community. Table 1 shows that Easton community members’ household income is more than 15% below the U.S. and their poverty level is more than 50% higher than the U.S. Median home values (normally a major source of wealth) in Easton are only 54% of the national median, and the home ownership rate is less than 73% than that of the U.S.

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

| | Easton | Pennsylvania | United States |
|-------------------------|---------------|---------------------|----------------------|
| Median Household Income | \$58,243 | \$67,587 | \$69,021 |
| Poverty Rate | 17.6% | 11.8% | 11.5% |
| Median Home Value | \$132,300 | \$197,300 | \$244,900 |
| Home Owner Occupancy | 46.9% | 69.2% | 64.6% |

2.a.ii. Threats to Sensitive Populations: EPA’s EJScreen Tool indicates that the community within 1 mile of the Site is at or above the 65th percentile nationally in each of the 13 EPA EJ Screening Indices (ranging from the 65th to the 82nd percentile for various indices). The results are more concerning for EPA’s 13 EJ Supplemental Screening Indices, which indicate that the community within 1 mile of the Site ranges from the 65th to the 82nd percentile for these indices. According to the Climate and Economic Justice Screening Tool (CEJST), while the Site is not in a disadvantaged census tract, the tract immediately adjacent to the Site across the Bushkill Creek (Census Tract 143) is designated by CEJST as a disadvantaged census tract. According to US Census Bureau data, in Census Tract 143 minority populations make up over 52% of the community. Economic conditions in Census Tract 143 community are dire, as per capita annual

income is \$21,911 (about 60% of Northampton County) and 13.5% of people live below the poverty line (about 1.5 times the rate in the Northampton County). As such, the proposed cleanup will have a positive impact on populations that have historically been disproportionately impacted by environmental issues.

(1) Health or Welfare of Sensitive Populations: As detailed in Section 2.a.i and .2.a.ii above, US Census data, the EPA EJ Screening Tool, and the CEJST indicate significant potential for negative health impacts to sensitive populations in Easton and within close proximity to the Site. The Cleanup Grant will mitigate various potential threats to the health and welfare of these sensitive populations. The project will improve air quality by encouraging more bike/pedestrian traffic via trail connectivity improvements, as well as fewer vehicle miles traveled by creating new residential density in the urban core versus suburban sprawl that requires longer commutes. The cleanup will also address potential water quality impact to the adjacent Bushkill Creek, particularly if/when increased flooding is experienced due to the impacts of climate change.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Several databases indicate that residents in proximity to the site suffer higher-than-normal rates of disease and/or adverse health conditions that may be associated with exposure to hazardous substances or pollutants. The CDC's National Environmental Public Health Tracking Network indicates that the prevalence of cancer among adults in the census tract immediately adjacent to the Site across the Bushkill Creek (Census Tract 143) is 7.7%, which is higher than in Northampton County (7.4%). Prevalence of asthma in adults in that same tract is 10.8%, compared to 9.7% in Northampton County. Northampton County also exhibits higher rates of the birth defect Spina Bifida (7.1/10K births) than in PA (1.9/10K births). The Cleanup Grant will mitigate various environmental factors that cause or exacerbate these adverse health effects by addressing potential hazardous substance impacts to water resources and improving air quality.

(3.a) Identification of Environmental Justice Issues: EPA's EJScreen Tool indicates that the community within 1 mile of the Site is ranked between the 65th and 85th percentile in all 26 regular and supplemental EJ screening indices. As noted above, while the Site is not located within a disadvantaged census tract for purposes of Justice40, the tract immediately adjacent to the Site across the Bushkill Creek (Census Tract 143) is designated by CJEST as a disadvantaged census tract. This data is clear evidence of negative impact that past and ongoing environmental impacts are having on low-income populations and people of color in our community.

(3.b) Advancing Environmental Justice: The Cleanup Grant will advance environmental justice in our community by addressing potential hazardous substance impacts to water resources, improving air quality by the encouraging more bike/pedestrian travel instead of vehicle miles, and not displacing any residents and/or businesses (and in fact creating new high-quality residential and business location opportunities in the community).

2.b.i. Project Involvement and 2.b.ii. Project Roles: The following organizations will be involved in making decisions with respect to the cleanup and future reuse of the Site.

Organization: City of Easton, contact John Kingsley (jkingsley@easton-pa.gov)

Involvement: Site owner, prospective EPA Cleanup Grant grantee, program management, reuse planning, community engagement lead.

Organization: Karl Stirner Arts Trail, Inc., contact Jim Toia (jtoia@karlstirnerartstrail.org)

Involvement: Reuse planning, future user of portions of the Site to be developed for trail use.

Organization: Nurture Nature Center, contact Rachel Hogan Carr (rhogan@nurturenature.org)

Involvement: Resue planning, potential user of portions of the Site for environmental and or other community programming.

Organization: Lafayette College, contacts Maurice Luker (lukerm@lafayette.edu) and Scott Kennedy (kennedsc@lafayette.edu)

Involvement: Potential user of portions of the Site for academic and/or research purposes.

Organization: VM Development Group, contact Gretchen Rice (grice@vmdgrp.com)

Involvement: Post-cleanup developer, reuse planning, future owner/lessor of commercial and residential space to be developed at the Site.

2.b.iii. Incorporating Community Input: The City intends to 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. Prior to the Cleanup Grant application being submitted:

- The City notified stakeholders of its intent to apply for a Cleanup Grant by emailing them the draft application and Analysis of Brownfield Cleanup Alternatives (ABCA) and inviting input.
- The City notified the community of its intent to apply for a Cleanup Grant and invited input on the draft application and ABCA by running a public notice in the Express Times (local newspaper of record) on 10/27/2023. That public notice indicated that the draft application and ABCA would be discussed at a public meeting scheduled for 11:00 AM on 11/02/2023.
- The City held the public meeting on 11/02/2023 (sign-in sheet and minutes attached).

After the Cleanup Grant application is submitted:

- The City will provide the draft cleanup plan and ABCA, as well as the proposed future use(s) of the site, to the project stakeholders for review and input prior to the cleanup plan being finalized and submitted to EPA for approval.
- The City will present and solicit public input on the draft cleanup plan and ABCA, as well as the proposed future use(s) of the site, at at least one public meeting prior to the cleanup plan being finalized and submitted to EPA for approval. Arrangements will be made so that members of the public may participate in these meetings virtually and Spanish language translation services will be made available to the public as needed.
- The City will respond to public input either at the meeting (in which case the responses will be documented in meeting minutes) and/or via a written responses posted to the City website.
- Upon the commencement of cleanup activities, the City will provide quarterly public updates on the status and results of the cleanup on the City's website.
- The City will implement any/all public notification requirements per PA's VCP/Act 2 program.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan: The site is already enrolled in PA's VCP ("Act 2"). The cleanup is anticipated to address documented exceedances of metals, volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs) in Site soils; VOC exceedances of Soil Vapor Intrusion screening values; and metals and Tetrachloroethylene (PCE) in groundwater. We anticipate the Site will be remediated to achieve a risk-based Act 2 Site-Specific Standard based

on the proposed mixed-use redevelopment through a series of engineering and institutional controls such as exposure pathway elimination (capping with impervious surfaces and/or clean fill) and a deed restriction limiting future uses of the site and restricting use of groundwater.

3.b. 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 Remediation Contractor; tracking accomplishments; preparing performance and financial reporting.

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

ii. Anticipated Project Schedule: October 2024 – December 2025

iii. Task/Activity Lead: City of Easton, Department of Community and Economic Development

iv. Outputs: Minutes from monthly progress meetings; completed quarterly reports; procurement documents for the QEP and Remediation Contractor, performance and financial reports.

Task/Activity: Community Engagement

i. EPA-funded tasks/activities: Coordinating with community stakeholders on cleanup and reuse plans; planning and holding public meeting(s); responding to stakeholder and public input on cleanup and reuse plans; posting draft documents and project updates to the City’s website.

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

ii. Anticipated Project Schedule: October 2024 – December 2025

iii. Task/Activity Lead: City of Easton, Department of Community and Economic Development

iv. Outputs: At least public meeting on cleanup and reuse plans; documentation of the results public meeting and other community input including meeting minutes, input received, City responses, and resulting changes to cleanup and/or reuse plans.

Task/Activity: Cleanup Planning and Oversight

i. Project Implementation of EPA-funded tasks/activities: Preparation of cleanup plan, Quality Assurance Project Plan, stormwater management plans and permits as required to implement cleanup; on-site oversight of cleanup to ensure compliance with approved plans.

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

ii. Anticipated Project Schedule: October 2024 – September 2025

iii. Task/Activity Lead: Contracted QEP

iv. Outputs: Approved cleanup plan including ABCA; approved stormwater management plans and permits; cleanup compliance/approval letters.

Task/Activity: Cleanup

i. EPA-funded tasks/activities: Implementation of the cleanup per approved cleanup plan.

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

ii. Anticipated Project Schedule: April 2025 – September 2025

iii. Task/Activity Lead: Contracted Remediation Contractor

iv. Outputs: One brownfield remediated to meet federal and state VCP/Act 2 cleanup standards.

Task/Activity: Project Administration

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.

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

ii. Anticipated Project Schedule: October 2024 – December 2025

iii. Task/Activity Lead: City of Easton, Department of Community and Economic Development

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

3.c. Cost Estimates

Task 1: Program Management - \$5,000

- City Project Management staff at average of ~\$42/hr for ~120 hours. Includes an average of 8 hrs/per month over the 15-month period of October 2024 – December 2025.

Task 2: Community Engagement - \$10,000

- City Project Management staff at an average of ~\$42/hr for ~120 hours. Includes an average of 8 hrs/per month over the 15-month period of October 2024 – December 2025.
- Contractual expenses to QEP for technical assistance in the community engagement process (\$2,500 for coordinating with community/stakeholders on cleanup & reuse plans; \$1,500 for preparing for/attending public meeting(s); \$1,000 for responding to stakeholder/public input).

Task 3: Cleanup Planning and Oversight - \$45,000

- Contractual expenses to QEP including \$17,500 for preparation of cleanup plan and ABCA; \$2,500 for preparation of Quality Assurance Project Plan; \$15,000 for preparation of stormwater management plans and permits; and \$10,000 for on-site oversight of cleanup.

Task 4: Cleanup - \$430,000

- Contractual expenses to Remediation Contractor including erosion & sedimentation controls (\$25,000), excavation/earthwork (\$200,000), concrete (\$30,000), paving (\$75,000), stormwater management (\$100,000).

Task 5: Project Administration - \$10,000

- City Project Management staff at average of ~\$42/hr for ~240 hours. Includes an average of 16 hrs/per month over the 15-month period of October 2024 – December 2025.

| Budget Categories | Project Tasks | | | | | |
|-------------------|---------------|----------------------|-------------------|-----------|----------------------|-----------|
| | Program Mgmt. | Community Engagement | Cleanup Oversight | Cleanup | Administrative Costs | Total |
| Personnel | \$5,000 | \$5,000 | | | \$10,000 | \$20,000 |
| Fringe Benefits | | | | | | |
| Travel | | | | | | |
| Equipment | | | | | | |
| Supplies | | | | | | |
| Contractual | | \$5,000 | \$45,000 | | | \$50,000 |
| Construction | | | | \$430,000 | | \$430,000 |
| Other | | | | | | |
| Total Direct | \$5,000 | \$10,000 | \$45,000 | \$430,000 | \$10,000 | \$500,000 |
| Total Indirect | | | | | | |
| Total Federal | \$5,000 | \$10,000 | \$45,000 | \$430,000 | \$10,000 | \$500,000 |

3.d. Plan to Measure and Evaluate Environmental Progress and Results: The City will track and evaluate progress in achieving outputs and outcomes by maintaining detailed electronic files of all project-related documents including meeting minutes; notes from community engagement/stakeholder meetings and public meetings; the cleanup plan and ABCA; procurement and contractual documents for the QEP and Remediation Contractor; photos of cleanup progress; and quarterly progress reports and fiscal reports. The City will also track and

report on outcomes of the cleanup including the successful elimination/minimization of exposure to contamination; acreage made ready for reuse; square footage of commercial and residential space developed at the Site; number of temporary jobs created during construction (from the remediation and the post-cleanup development); number of permanent jobs created at the project Site; and acreage of recreational and other greenspace developed to support the KSAT.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a.i. Organizational Structure: The City will manage the Brownfield Grant and the proposed redevelopment through the staff of its Department of Community and Economic Development (DCED). DCED staff will lead all program management, community engagement, project administration and financial oversight under the grant, and be supported by a contracted QEP who will be responsible for cleanup planning and on-site oversight, and a contracted Remediation Contractor who will implement the cleanup per the approved plan.

4.a.ii. Description of Key Staff: The City's DCED is led by Director John Kingsley, who has 24 years of community/economic development and finance experience with several local and regional economic development organizations. While assisting hundreds of businesses to expand or locate in the region, John has managed more than \$500 million in financing on behalf of related conduit issuers and PA Certified Economic Development Financing Organizations. John holds a BA and Master of Public Administration from Shippensburg University. John's efforts will be supported by City DCED Administrator Sean Ziller. Sean currently oversees ~\$20.7 million in federal American Rescue Plan Act (ARPA) funding allocated to the City to mitigate impacts from the pandemic. He also helps in bolstering community outreach, increasing business recruitment and engagement, and advancing critical development within the city. Sean holds a BA in Political Science from King's College (PA) and a Master of Public Administration with a graduate certificate in Public Budgeting & Financial Mgmt. from Penn State University.

4.a.iii. Acquiring Additional Resources: The City has well-established procurement systems in place and routinely solicits proposals and/or bids from contractors when outside resources are needed. The City is well-versed in procurement that complies with federal requirements and regulations, including Buy America Sourcing, Davis-Bacon compliance, and disadvantaged business participation. The City anticipates utilizing these systems to obtain the services of the QEP and the Remediation Contractor under the Brownfield Cleanup grant. When advertising procurement opportunities through the Brownfield Cleanup grant, the City will notify local trade organizations including the Easton Area Chamber of Commerce, Easton Business Association, and Lehigh Valley Contractors Association to ensure local contractors and workers have an opportunity to benefit from opportunities from the cleanup planning and remediation project.

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: The City has significant experience managing federally and state funded redevelopment projects. Recent projects facilitated by the City of a similar scope and relevance to the proposed project (brownfield projects completed via public-private partnerships, using multiple state and/or federal funding sources) include the redevelopment of

the R&H Simon Silk Mill and the redevelopment of the Stewart Silk Mill. How key state and federal assistance programs were successfully utilized on these projects is described below.

4.b.ii (1) Purpose and Accomplishments and 4.b.ii (2) Compliance with Grant Requirements

Project: R&H Simon Silk Mill (671 N. 13th Street, Easton)

Scope/Description: This 13+-acre industrial complex includes 20 buildings and was redeveloped as an integrated mixed-use project through a public-private partnership that included the City, Redevelopment Authority of Easton, and VM Development Group. The master plan included art studios, light manufacturing space and complementary residential and commercial spaces.

Community Engagement. This project spanned the better part of a decade and included many public meetings, significant coordination with community stakeholders, and was discussed at various public meetings of Easton Planning Commission and City Council.

Funding Sources & Amounts: The project received over \$9 million in state and federal grants and tax credits including Preserve America (\$150K), EPA Assessment Grant (\$140K via Lehigh Valley EDC), EPA Brownfield Cleanup Revolving Loan Funds via Northampton County (\$200K subgrant and \$277K loan), EPA Brownfield Cleanup grant (\$200K), PA ISRP grant (\$1M), PA Redevelopment Capital Assistance Program grant (\$5.5M), and a federal EDA grant (\$1.5M).

Outputs and Outcomes: Outputs from the federal and state grants included a completed Phase II assessment; asbestos survey; soil remediation; asbestos abatement; demolition and infrastructure development. Outcomes from the redevelopment included a mixed-use community which is now listed on the National Register for Historic Places and currently houses 170 apartments and 30+ commercial businesses including retail, office, fitness & restaurant uses.

Grant Compliance and Reporting: The City and/or its partners successfully complied with grant administrative requirements and prepared and submitted all grant compliance reporting.

Project: Stewart Silk Mill (620 Coal Street, Easton)

Scope/Description: The City partnered with PIRHL Developers and TCH Development to redevelop this 100+ year-old vacant 4-acre mill site that carried a blight designation and was contaminated after decades of industrial milling operations. The City assisted with environmental assessment and cleanup needed to safely redevelop the property.

Community Engagement: The City and its partners hosted a community meeting at Cheston Elementary School on 1/9/2020 to discuss the project, environmental issues, and other development topics with residents and the public. The redevelopment project was also discussed at various public meetings of Easton Planning Commission and City Council.

Funding Sources & Amounts: Two (2) Industrial Site Reuse Program (ISRP) grants, which were used for environmental assessment (\$153,382) and remediation (\$1M).

Outputs and Outcomes: Outputs from the ISRP grants included completed Phase II assessment; asbestos and lead-based paint surveys; soil remediation and underground storage tank (UST) removal; asbestos and lead abatement. Outcomes from the redevelopment included 55 residential units and a complementary community support center and playground; a Dollar General + store that includes a grocery; and a medical office/urgent care clinic. The project is expected to provide 90 new jobs to the area, while providing much-needed workforce housing.

Grant Compliance and Reporting: The City successfully complied with ISRP grant administrative requirements and prepared and submitted all grant compliance reporting.

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

Threshold Criteria

1. Applicant Eligibility

1.a. A statement of applicant eligibility if a city, county, state, or Tribe

The City of Easton, 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 Easton, PA is eligible for the requested FY2024 Cleanup Grant funding.

1.b. A statement of the applicant's 501(c)(4) tax-exempt status and, if applicable, legal opinion regarding lobbying activities

Not applicable

2. Previously awarded Cleanup Grants

We affirm that the City of Easton, PA has not been the recipient of previously awarded EPA Brownfield Cleanup Grant funding.

3. Expenditure of Existing Multipurpose Grant Funds

We affirm that the City of Easton, PA does not have an open EPA Multipurpose Grant or Cleanup Grant.

4. Site Ownership

The site which is the subject of this EPA Cleanup Grant funding request is owned by the City of Easton, PA.

5. Basic Site Information

The site which is the subject of this EPA Cleanup Grant funding request is:
Former Easton Iron & Metal Site
1111-1164 Bushkill Drive
Easton, PA 18042

6. Status of History of Contamination at the Site

6.a. Whether this site is contaminated by hazardous substances or petroleum

The site is contaminated by both hazardous substances and petroleum.

6.b. The operational history and current use(s) of the site;

The property was initially developed in the 1800s with a lime making kiln and quarry, and later housed an automotive repair shop, a filling station, an auto salvage yard, a metal recycling facility, a salvage yard, and a junk yard. The site is currently vacant with access controlled and monitored by the City of Easton, PA.

6.c. Environmental concerns, if known, at the site

Environmental concerns stem from the long history of industrial operations at the site, with specific contamination documented by a Phase II environmental site characterization.

6.d. How the site became contaminated, and to the extent possible, describe the nature and extent of the contamination.

The site became contaminated by various historical industrial operations at the site including as an automotive repair shop, a filling station, an auto salvage yard, a metal recycling facility, a salvage yard, and a junk yard.

A Phase II environmental site characterization identified that several contaminants exceeded their applicable Pennsylvania residential and nonresidential Sitewide Health Standards (RSHS/NRSHS) in soils and groundwater.

The metals antimony, arsenic, iron, lead, manganese, mercury, nickel, and selenium were found to exceed the RSHS and NRSHS. Thallium and vanadium only exceeded the RSHS. The locations of the exceedances were distributed sporadically throughout the site. The volatile organic compounds (VOCs) Trichloroethylene and Vinyl chloride exceeded the RSHS and NRSHS. Semi-volatile organic compounds (SVOCs) exceeded the RSHS in 19 of 46 samples. The SVOC exceedances were primarily in surface soil. The NRSHS for SVOCs was only exceeded in one location. PCBs were detected above the RSHS in one location but did not exceed the NRSHS in any of the samples collected. VOC results were also compared to the applicable PA soil SHS screening values for Vapor Intrusion into buildings (SVSOIL). SVSOIL screening values (SV) were exceeded at 14 sample locations. Trichloroethene exceeded the SV of 0.17 mg/kg in 12 soil samples. Methylene Chloride and tetrachloroethylene exceeded their SV of 1.5 mg/kg and 0.43 mg/kg, respectively in one sample each.

The metals manganese and iron were detected in the groundwater at concentrations exceeding their respective RSHS/NRSHS. Tetrachloroethylene (PCE) was detected above its RSHS/NRSHS of 0.5 ug/l at concentrations ranging from 13.6 ug/l to 22.7 ug/l.

7. Brownfield Site Definition

We affirm that the Former Easton Iron & Metal Site meets the definition of the brownfield under CERCLA Section 104(k) as described in the “Info on Sites Eligible for Brownfields Funding under CERCLA Section 104(k)”.

We further affirm that the Former Easton Iron & Metal Site is a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

A written ASTM E1903-19 or equivalent Phase II environmental site assessment report was issued by HDR Engineering Inc. in December 2019 (“*Phase II Environmental Site Assessment, Easton Iron and Metal, 1111 Bushkill Drive, Easton, Northampton County, PA, December 31, 2019*”).

9. Site Characterization

9.a. For an applicant that is a State or Tribal Environmental Authority

Not applicable

9.b. For an applicant other than a State or Tribal Environmental Authority that is proposing a site(s) that is eligible to be enrolled in a voluntary response program

Please see the attached letter from the appropriate State or Tribal Environmental Authority (in this case, Pennsylvania Department of Environmental Protection (PADEP)), which a) affirms that the site is eligible to be enrolled in the state voluntary response program, b) indicates whether the site is enrolled, or intends to be enrolled, in the state voluntary response program, and c) indicates that while additional assessment is needed to sufficiently characterize the site for the remediation work to begin, there will be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2024, for the remediation work to begin on the site.

9.c. For an applicant other than a State or Tribal Environmental Authority that is proposing a site(s) that is not eligible to be enrolled in a voluntary response program or State or Tribal equivalent oversight program

Not applicable

10. Enforcement or Other Actions

We affirm that there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is being sought.

11. Sites Requiring a Property-Specific Determination

We affirm that a “Property-Specific Determination” for the site for which Brownfields Grant funding is being sought is not required.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

The site is contaminated with both Hazardous Substances and Petroleum Substances, but Hazardous Substances are the predominant contamination. As such, we have provided responses to Threshold Criteria under section 12.a.

12.a. Property Ownership Eligibility – Hazardous Substance Sites

- *Exempt from CERCLA liability:* Not applicable.
- *Qualify for funding because the property is publicly owned and was acquired prior to January 11, 2002:* Not applicable.
- *Meet the requirements for asserting an affirmative defense to CERCLA liability through one of the landowner liability protections (e.g., the bona fide prospective purchaser liability protection per CERCLA § 101(40)):* We are eligible for Brownfields Grant funding at a site as a bona fide prospective purchaser (BFPP)

Demonstrate that the applicant meets the requirements for the BFPP CERCLA liability protection.

(a) Information on the Property Acquisition

The City of Easton, PA (“City”) has sole ownership of the site via fee simple title. The City acquired ownership to the site on 11/08/2023 via a voluntary sale from the Redevelopment Authority of Easton, PA (“RDA”). The RDA was formed based on Pennsylvania’s Urban

Redevelopment Law (Act 385 of 1945), which states “There are hereby created separate and distinct bodies corporate and politic, one for each municipality and one for each county of the Commonwealth, as herein defined. Each such body shall be known as the Redevelopment Authority of the municipality or the county, as the case may be, but shall in no way be deemed to be an instrumentality of such municipality or county, or engaged in the performance of a municipal function.”

The City has various contractual and/or other financial relationship or affiliations with the Redevelopment Authority including but not limited to the administration of federal funding programs like the Community Development Block Grant program and others. Other than the Redevelopment Authority, the City has no familial, contractual, corporate, or other financial relationship or affiliations with any prior owners or operators (or other potentially responsible parties) of the property.

(b) Pre-Purchase Inquiry Describe any inquiry by you or others into the previous ownership, uses of the property, and environmental conditions conducted prior to taking ownership.

Prior to purchasing the site, the City coordinated with EPA Region 3’s Brownfields staff and Targeted Brownfield Assessment (TBA) program technical support contractor to conduct an ASTM E1527-21 Phase I environmental assessment of the site (“Phase I”). The Phase I was issued by Tetra Tech Inc. on 9/18/23, approved by EPA Region 3 staff on 10/10/23 and has an Initial All Appropriate Inquiries (AAI) date of 5/25/23. The Phase I was conducted for the U.S. Environmental Protection Agency (EPA) on behalf of the intended Users, the City of Easton and the Redevelopment Authority of Easton, Pennsylvania, to characterize conditions at the Subject Property because it is under consideration for planned redevelopment or reuse. Tetra Tech Inc. staffers Courtney R. Watts (Project Manager/Environmental Scientist) and Loni King (Program Manager/Environmental Professional) signed off on the Phase I and are experienced professionals, as evidenced by the fact that they serve as one of EPA Region 3’s technical support contractors for the TBA program. The Phase I was conducted within 180 days prior to the City’s purchase of the site.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

We affirm that all disposal of hazardous substances at the site occurred before the City acquired the property and we have not caused or contributed to any release of hazardous substances at the site. We further affirm that we have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses

Since the City acquired the site, there has been no use of the site.

(e) Continuing Obligations

Since acquiring the site, the City has taken steps to stop any continuing releases, prevent any threatened future release, and prevent or limit exposure to any previously released hazardous substance by maintaining access controls (primarily fencing), and monitoring the site for unauthorized uses (of which the City is aware of none).

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

12.b. Property Ownership Eligibility – Petroleum Sites

Not applicable.

13. Cleanup Authority and Oversight Structure

We acknowledge and affirm that we will be required to comply with all applicable federal and state laws and ensure that the cleanup project protects human health and the environment.

13.a. Describe how you will oversee the cleanup at the site(s)

The site is already enrolled in Pennsylvania’s voluntary cleanup program. We also plan to contract with an experienced Qualified Environmental Professional (QEP) who has the necessary technical expertise to oversee and manage the cleanup process, as well as an experienced Remediation Contractor who will perform the actual cleanup work at the site. In contracting with both the QEP and the Remediation Contractor, we will comply with the competitive procurement provisions of 2 CFR §§ 200.317 through 200.327. This will include, but not be limited to:

- Excluding contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals from competing for such procurements;
- Not imposing state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference;
- Incorporating a clear and accurate description of the technical requirements for the material, product, or service to be procured;
- Following documented procurement procedures consistent with the standards of §§ 200.317, 200.318, and 200.319 and 200.320; and
- Taking all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

We also affirm that QEP will be in place prior to beginning cleanup activities.

13.b. Access to neighboring properties

No access is required to neighboring properties so this section is not applicable

14. Community Notification

14.a.a Draft Analysis of Brownfield Cleanup Alternatives

The City prepared and made a draft Analysis of Brownfield Cleanup Alternatives (ABCA) for the Site available for public comment at least 14 days prior to submission of the Cleanup Grant application via grants.gov.

14.b. Community Notification Ad

The City ran the following public notice in the Legal Notices section of the Express Times (Easton are newspaper of record) on October 27, 2023 (more than 14 prior to the submission of the Cleanup Grant application via grants.gov).

The City of Easton, PA hereby gives public notice of its intent to apply for an EPA Brownfields Cleanup Grant for the former Easton Iron and Metal site, 1111-1164 Bushkill Drive, Easton, PA 18042. A copy of the grant application, including a draft Analysis of Brownfield Cleanup Alternatives (ABCA), is available for public review online at easton-pa.com/181/Community-Economic-Development or in person at the office of the City of Easton Department of Community & Economic Development, 123 S. Third Street 3rd Floor, Easton, PA 18042. The application, including the draft ABCA, will be discussed at a public meeting held at 11:00 AM on November 2, 2023 in the 3rd Floor Conference Room of Easton City Hall, 123 S. Third Street 3rd Floor, Easton, PA 18042. Public comments on the grant application, including the draft ABCA, can be submitted at the public meeting, in writing by US mail to City of Easton (Attention: John Kingsley), 123 S. Third Street 3rd Floor, Easton, PA 18042, or via email to jkingsley@easton-pa.gov.

14.c. Public Meeting

A public meeting to discuss the draft application, including the draft ABCA, was held at 11:00 AM on November 2, 2023 in the 3rd Floor Conference Room of Easton City Hall, 123 S. Third Street 3rd Floor, Easton, PA 18042.

14.d. Submission of Community Notification Documents

The items listed below are attached to this application for funding:

- a copy of the draft ABCA(s);
- a copy of the newspaper ad that demonstrates solicitation for comments on the application and that notification to the public occurred at least 14 calendar days before the application was submitted to EPA.
- the comments or a summary of the comments received;
- the applicant's response to those public comments;
- meeting notes or summary from the public meeting(s); and
- meeting sign-in sheet/participant list.

15. 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.