CRESSON TOWNSHIP

771 Portage Rad Cresson, PA 16630

Narrative Information Sheet

1. Applicant Identification: Cresson Township Supervisors; 771 Portage Road Cresson, PA 16630

2. Funding Requested

a. Grant Type: Single Site Cleanupb. Federal Funds Requested \$325,000

3. Location

a. City: Cresson

b. County: Cambria County

c. State: PA

4. Property Information

a. Cresson Ridge: 8191-8215 Admiral Peary Hwy, Cresson, PA 16630

5. Contacts

a. Project Director

i. Renee K. Daly, 814-472-6711, <u>rdaly@co.cambria.pa.us</u>, 401 Candlelight Drive, Suite 209, Ebensburg, PA 15931

b. Chief Executive/Highest Ranking Elected Official

i. Scott Decoskey, 814-886-7444, cts771@verizon.net, 771 Portage Road Cresson, PA 16630

6. Population: 2,820 (2020 Census)

7. Other Factors:

	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	7
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).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy	3

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The reuse of the proposed cleanup site(s) will incorporate energy	3
efficiency measures.	
The proposed project will improve local climate adaptation/mitigation	3
capacity and resilience to protect residents and community	
investments.	
The target area(s) is located within a community in which a coal-fired	1
power plant has recently closed (2013 or later) or is closing.	

8. Releasing Copies of Applications: Budget and financial information in the Narrative on page 8, section 3.c. Cost Estimates are sensitive information and should not be shared. Contact information for project members and project partners in the Narrative on page 6, sections 2b.i. Project Partners and 2.b.ii Project Partner Roles is sensitive information and should not be shared.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a Targeted Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area: The targeted area is the rural community of Cresson Township, Cambria County, Pennsylvania (Cresson) and a former gas station site on the Admiral Peary Highway Corridor. Cresson sits just off State Route 22 which traverses east-west through Western Pennsylvania with an exit at the Admiral Peary Highway. Cresson Township lies on the south side of Admiral Peary Highway, while Cresson Borough lies on the north side. Cresson is struggling with population decline, economic stagnation, environmental degradation, and chronic human health burdens due to the rise and fall over recent decades of steel and heavy industry and resultant job loss. The State Correctional Institute (SCI) located in Cresson once employed 500 people, but closed in 2013. The Cambria Cogen coal-fired power plant in nearby Ebensburg closed in 2019. Cambria County lost 7% of its population between 2010 and 2020, and currently faces an 8.1% unemployment rate. Cresson Township's population has dropped from 4,250 in 2012 to 2,820 as of the 2020 Census. While the jobs and people that natural resource extraction and operations once supported have left, significant environmental and human health impacts remain. Cambria County is littered with contaminated and blighted properties which endanger residents, pollute the natural environment, and hinder economic revitalization. The site targeted in this cleanup project is representative of the extensive harm that Brownfield sites cause to area residents. Cresson is working with partner organizations, including the Redevelopment Authority of Cambria County (RACC), to remake and improve the prospects for the region and this site. There are significant assets to build on in the targeted area, including: Saint Francis University, a Division I athletic university, located in nearby Loretta, PA.; Mount Aloysius College located just down the road on Admiral Peary Highway; and the National Park Service Allegheny Portage Railroad National Historic Site, immediately across the street from the Cresson Ridge site. Cresson aims to take advantage of its historical and recreational assets to build a new outdoor recreation and heritage tourism economy and expand job opportunities while promoting human and environmental health. Cleaning and redeveloping this brownfield site is a key step in advancing these priorities.

1.a.ii. Description of the Brownfield Site: The "Cresson Ridge" site is located at 8191-8215 Admiral Peary Hwy, Cresson, PA 16630. It consists of 13.5 acres, and was once a combination motel, service station, and rest stop facility but has been closed for decades. Four asbestos-laden structures in various states of deterioration remain on the site, and are currently undergoing demolition by the RACC. Cresson Township acquired the property through tax foreclosure in 2009. A Phase I Assessment was conducted in 2010 and a Phase II was recently completed using funds from an EPA Community Wide Coalition Assessment Grant to the City of Johnstown, PA with coalition partner RACC. This Phase II revealed five underground storage tanks (USTs) on the site. Soil tests show the presence of 1,2,4 Trimethylbenzene in excess of statewide standards and groundwater samples detected the presence of benzene, ethylbenzene, and 1,2,4 Trimethylbenzene in excess of statewide standards. The site borders the former State Correctional Institute (SCI), which was recently sold to a developer who leases the space to a historic preservation organization who will offer military reenactments, a museum to showcase the old prison, and maintain public space available for outdoor usage.

1.b Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalizations Plans: Due to a lack of flat land in the surrounding region, Cresson Township has significant potential to redefine itself as a charming travel stop and outdoor recreation destination between Philadelphia and Pittsburgh. Recognizing the strategic value of the Admiral Peary Corridor, the Cambria County Planning Commission identified it as one of the "Community Growth areas in the County". Cresson Township and Cambria County subsequently engaged the community in an extensive planning study of the Corridor over a 12-month period from 2016 to 2017. As part of the study, they completed community surveys and conducted a three-day community workshop with nine focus groups and forty-five participants, including all the support organizations listed in **Section 2.b.** A stakeholder group was then formed to advance this plan. The Corridor Plan makes several recommendations of relevance to the subject sites:

- **Develop overnight lodging in the Cresson area.** There is only one hotel within a 20-mile radius of the Corridor, forcing college and university visitors, parents, and traveling sports teams to stay in Altoona. Visitors to the National Park Site and other recreational attractions in the area such as historic railroad sites, Laurel Highlands trails, the Castle Tower Bicycle Tour, and the Allegheny Mountains Motorcycle Tour also have no local lodging.
- Connect the Corridor with the National Park Site via an off-street trail system to enhance connections to recreational opportunities for visitors.
- Redevelop the former SCI site and connect it to local businesses along the Corridor.
- Conduct environmental assessments on the Cresson Ridge site and complete cleanup.
- Boost "main street" development along the Corridor by removing blight, remediating contamination, and fostering the growth of local businesses while preserving Cresson's small-town character.

1.b.ii. Outcomes and Benefits of Reuse Strategy: Activating the Allegheny Portage Railroad National Historic Site is a key element of these revitalization plans. Located across the street from the Cresson Ridge site, Allegheny Portage was the first railroad constructed through the Allegheny Mountains in central Pennsylvania. Today, the National Park service operates a visitor center with interpretive exhibits. At the Site is the Samuel Lemon House, a tavern located alongside the railroad near Cresson that was a popular stop for railroad passengers; it has been converted into a historical museum by the National Park Service. The NPS also maintains a length of reconstructed track, an engine house with exhibits, a picnic area, and hiking trails. A skew arch bridge, a masterwork of cut stone construction, is another feature of the site near the Lemon House. Educational programming, hiking, and biking opportunities make the site a popular regional tourist and recreation destination with greater potential to spur economic redevelopment in Cresson with leveraged investments into food, lodging, services, and retail.

The Cresson Ridge Site has received strong interest from prospective developers with plans to invest in new business once the site has been properly remediated. The site could accommodate a larger hotel/motel along with a restaurant or other service business. This prospective hotel project would generate an investment of approximately \$15 million, using industry averages of \$225,000 per room for a 65 room three-star hotel. An adjacent restaurant would generate another \$5,000,000 investment. Together, they would generate as many as 100 local jobs. Such a hotel would improve the prospects for full redevelopment of the former SCI site into a full business/industrial park. It

would also leverage the investment in the Allegheny Portage Railroad National Historic Site, opening joint marketing opportunities with the Park Service to promote overnight packages. Developing new hospitality, service, and retail businesses will help Cresson Township rebuild its tax base and increase future capacity to internally fund infrastructure investments.

In light of the significant environmental and human health burdens heavy industry has wrought on the region, Cresson leadership is committed to boosting adaption and mitigation measures to the impacts of climate change by encouraging prospective developers to incorporate renewable energy generation and energy efficient measures into new development. This includes insulating to an R-20 factor on exterior walls and up to R-30 for ceilings, using double or triple pane windows with a low E-factor, utilizing energy efficient heating and cooling systems, and using renewable energy to the maximum extent possible. Implementing these measures at the reuse of the Cresson Ridge site will boost its long-term resiliency to the accelerating and unpredictable impacts of climate change, making it a cost-effective long-term investment in economic revitalization for this small, under-resourced community. On 90 acres owned by RACC that is adjacent to the SCI site and near the Cresson Ridge site, RACC is making progress on an agreement with a private developer to install a solar farm producing 15 megawatts of electricity. These efforts will support the concurrent development and marketing of Cresson's recreation assets.

1.c Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Characterization: Extensive site characterization has already been conducted to identify all hazards and contaminants. Cresson is confident that cleanup funds will be sufficient to completely remediate the site. In the unlikely event that further site characterization is needed, Cresson will pursue support from the Pennsylvania Industrial Sites Reuse Program, PA Department of Environmental Protection support, and/or Cambria County ARPA Recovery Fund resources to fund assessments as needed and complete cleanup.

1.c.ii Resources Needed for Site Remediation: Given the extensive assessment and characterization of the site, and detailed remedial planning already completed, Cresson is confident in its cost estimations, and funds from this requested EPA cleanup grant will be sufficient to completely remediate the site and move on to the reuse/development stage.

1.c.iii Resources Needed for Site Reuse: Cresson and its partners will leverage resources from the private and public sectors to facilitate site reuse immediately after cleanup has been completed. RACC will market the Cresson Ridge site to the regional hotel industry to bring in prospective buyers. Several public programs exist to help leverage this private investment. The most significant is the Commonwealth of Pennsylvania's Redevelopment Capital Assistance Program, which can provide 50% matching funds for a private investment. The project team will work closely with State Senator Representative offices to secure RCAP funding. For other, complementary pieces to the Corridor Strategy, sources of funding to access include:

- U.S. Department of Interior/National Park Service Land & Water Conservation Grants and Outdoor Recreational Legacy Partnership funding for the connecting trails between the Corridor and the National Park Service Allegheny Portage Railroad Site.
- U.S. Economic Development Administration ("EDA") Economic Adjustment Assistance Program funding for infrastructure for the development of the SCI site as a business park.

- U.S. Appalachian Regional Commission POWER Grants source for developing tourism related infrastructure in the Corridor or advancing the hydroponics sector in the region.
- PA. Business in Our Sites- potential source of funding for the site work (after the environmental remediation) on the two subject sites, and prior to sale to a developer.
- PA. Industrial Site Reuse Program potential matching source for remediation, but funds are currently not appropriated under state funding programs in the short term.

1.c.iv Use of Existing Infrastructure: The site is fully serviced by water, sewer, electricity, and gas, avoiding the need for costly new infrastructure investments. The Cresson Township Water and Sewer Authority provides both water and sewer, the Pennelec electric utility provides power, and People's Gas provides natural gas to the site. Additionally, Comcast provides cable and internet service capabilities. Direct road access is already provided via curb cuts along Admiral Peary Highway, the central arterial corridor through Cresson. The site is also connected to and a very short distance away from State Highway 22, which provides direct access to Interstate 95 and communities including Altoona. Cresson Township's flexible zoning affords significant flexibility to final use and design. Additional infrastructure needs have not been identified at this time, making the Cresson Ridge site primed for speedy and cost-effective redevelopment once cleanup and remediation are completed.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a Community Need

2.a.i The Community's Need for Funding: Cresson Township lacks the internal resources to cleanup this site due to the economic fallout of job loss and depopulation. As previously detailed, the Cresson area (Borough & Township) has lost over 20% of its already small population. Due to this loss, as of 2020, Cresson Township no longer reaches the threshold of 4,000 residents that makes it eligible for "entitlement" funding through the HUD Community Development Block Grant program. It now will lose approximately \$70,000 per year in CDBG funding. Cresson has a total operating budget of under \$2,000,000; this budget has also suffered revenue losses due to shortfalls in the occupational tax. The State has the Industrial Site Reuse Program (ISRP), but that requires a 25% match, and Cresson Township does not have the matching funds, and the state's ISRP program currently does not have funds available. Funding assistance is needed to jumpstart economic revitalization and create a development-friendly environment with a focus on reimagining Cresson as a historical and recreational travel stop and destination. Cleaning up contaminated sites will spur new business development, replace permanently lost jobs, attract visitors and new residents, and rebuild Cresson from the bottom up. Community leaders are confident that outside funding assistance can help put Cresson on a self-sustaining path of recovery.

2.a.ii Threats to Sensitive Populations

2.a.ii.1 Health or Welfare of Sensitive Populations: As mentioned, the former SCI is now in use by a historic preservation organization. The SCI site had its own water and sewer system, which is now no longer operational, and the Cresson Township Water and Sewer Authority does not provide water or sewer service to the site. Operators of the property are currently working with the necessary entities to bring utility services to the property in order to occupy the structures and host

public events. The Cresson Ridge site is adjacent and downgradient to the SCI, raising concerns that the groundwater under the SCI may contain contaminants from Cresson Ridge posing safety risks to visitors at the SCI site. This Cleanup project will eliminate the sources of contamination to the groundwater supply of the former SCI property. Cresson Township will eliminate this threat by removing tanks and cleaning contaminated soils. In addition, the Cresson Ridge site is a blighting influence on the community and a haven for illegal activity, such as drug dealing. Cresson and Cambria County as a whole have been devastated by drug addiction and the opioid epidemic. Cambria County has logged 237 deaths due to drug overdoses from 2015 to 2017 alone according to state data. It is estimated that there are 4,361 people with drug use disorders across the county. According to a 2018 study, between 2006 and 2012, nearly 3.1 billion opioid painkiller pills were shipped to Pennsylvania - with Cambria County receiving the highest per capita rate of pills at 61.5 pills per resident annually. More recently, fentanyl has emerged as the leading cause of overdose deaths, with 64 out of 94 total deaths involving fentanyl. This substance abuse crisis places a significant burden on public resources and exacerbates existing human health issues stemming from industrial pollution and environmental contamination. Rehabilitating this blighted site is an important step in stemming the proliferation of illicit drugs in the community.

2.a.ii.2 Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to the Pennsylvania Department of Health's Profile for Cambria County, residents suffer disproportionately from a number of health conditions compared to the Commonwealth as a whole, largely attributed to the high prevalence of coal mining and energy generation operations as well as the significant number of contaminated industrial sites in the area. Compared to the Commonwealth, Cambria County had higher age adjusted rates of all causes death (881 per 100,000 vs. 764), heart disease (188 vs. 175), cancer (171 vs. 160), chronic respiratory diseases (41 vs. 36) and influenza and pneumonia (21 vs. 14). Cleaning up these contaminated sites will eliminate direct health risks to Cresson residents and reduce the overall amount of environmental toxins negatively affecting human health.

2.a.ii.3 Environmental Justice: Widespread job loss and the severe lack of public resources burden all Cresson residents, but especially those with already lower incomes, who are also more likely to be burdened by environmental and health inequities. Cresson Township has a per capita income of \$25,498, 3/4 of the state's \$35,518 per capita income. Cleaning contaminated sites and preparing them for reuse as drivers of economic revitalization will increase job opportunities for Cresson's large number of low-income residents while removing environmental hazards contributing to poor health outcomes. These proposed revitalization efforts would not cause any displacement, as they would be building on a site that has been abandoned and blighted for several years. Rather, redevelopment efforts will create an investment- friendly environment to support the rebirth of Cresson's main street, boost visitorship to recreational opportunities, and reverse the job and population loss that Cresson faces, promoting environmental justice for this poor and environmentally burdened community.

2.b Community Engagement

2.b.i Project Involvement and 2.b.ii Project Roles

Organization	Contact – Phone & E-Mail	Role
National Park Service	Doug Bosley, doug_bosley@nps.gov 814-886- 6150	Work with Township to attract reuse (particularly lodging) to Cresson Ridge site which borders NPS site.
Cambria County Planning Commission	Chris Allison: callison@co.cambria.pa.us 814-472-2106	Work with Township for attractive reuse of site.
Cambria County Commissioners	Tom Chernisky, tchernisky@co.cambria.pa.us 814-472-1602	Assist Township in marketing site. Possible financial support for reuse.
Redevelopment Authority of Cambria County	Renee Daly, rdaly@co.cambria.pa.us	Assist Township with management of grant and other leveraged resources.
Cambria County Conservation District	John Dryzal, dryzal@co.cambria.pa.us	Facilitate the permitting on the site once a reuse projects is identified.
Eastern Cambria County Chamber of Commerce	Lois Smith,	Generate interest in the site among Chamber members.

2.b.iii. Incorporating Community Input: The Cresson community was closely involved in the Admiral Peary Highway Corridor Study, identifying the site as a top redevelopment priority. The Study included community surveys and a three-day community workshop with nine focus groups and 45 participants involving all the support organizations listed above and others. A stakeholder group was then formed to advance this plan. A public meeting attended by community members, stakeholder organizations, and project partners was held on November 3, 2023 to solicit input on the proposal. Comments were highly supportive of this application, and specific uses of the site were suggested based on community needs, including housing, overnight lodging, restaurants, and general services. Community input from support organizations listed above and from the public will continue to inform remediation activities and reuse planning. Monthly Board of Supervisors meetings are open to the public and will be a source of updates on the project. Mainliner, the local newspaper, will be invited to these meetings. The project team will continue to document public comments, respond as necessary, and highlight how community input has shaped the cleanup project and related development efforts. In addition to these in-person outreach opportunities, the project team is also making available email and online communication channels as an alternative to in-person participation.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a Proposed Cleanup Plan: The Analysis of Cleanup Alternatives recommends removal of the USTs, excavation and off-site disposal of the impacted soil, and monitored natural attenuation of groundwater. The objective of this work will be to attain the PADEP Act 2 Statewide Health and/or the Site-Specific Standard. This was based on an evaluation of feasibility, effectiveness, cost, and the ability to implement. This alternative was selected because it allows for the redevelopment of

the site without long-term continuing obligations. Other alternatives (i.e., #1- No Action and #2-In-Situ Remediation) would be ineffective at protecting public health and the environment, and would not enable a revitalization project to proceed. The recommended alternative provides the safest environment for renovation by completely removing tanks and fully remediating the soil beneath the tanks. This will prevent exposure to workers, as well as eliminate the potential exposure to future occupants. This also prepares the site for subsequent redevelopment. Moreover, it enables Cresson Township to take potential investors and tenants onto the site, knowing that there is no threat of exposure. See the attached ABCA for full details.

3.b Description of Tasks/Activities and Outputs

3.b.i Project Implementation, ii. Anticipated Project Schedule, iii. Task/Activity Lead

Key Project Activities*	Schedule	Task/Activity Lead		
TASK1: PROGRAM MANAGEMENT				
Completion of Work Plan	Month 1-2	Cresson Twp./RACC		
Procurement of Consultants	Months $2-3$	Cresson Twp./RACC		
EPA Reporting – Quarterly/ACRES	Ongoing	Township & Qualified Program Manag (QPM)		
EPA Close-Out Report	Months 17- 18	Twp. & QPM & Qualified Environmental Professional (QEP)		
TASK 2: COMMUNITY PARTICIPATION/REUSE PLAN	Ongoing	Cresson Twp/RACC		
Updates to Township Board of Supervisors and Public	Monthly	Cresson Township and QEP		
Reuse Planning - with Users	Ongoing	Cresson Township, RACC & QPM		
TASK 3 – CLEAN-UP ACTIVITIES				
RFP & Select Remediation Contractor	Months 4 -5	Cresson Township & QEP		
Mobilize/Implement	Month 6	Remediation Contractor (sub. to QEP)		
Demobilize/Close-out	Months 12-24	Remediation Contractor & QEP		
Documentation Report	Months 24- 25	Remediation Contractor & QEP		

^{*} Redevelopment Authority of Cambria County (RACC) will receive a sub-award to cover administrative costs related to managing these project activities for Project Implementation.

3.b.iv Outputs: The primary output is remediation of the site including tank removal and any necessary soil removal. This would allow potential investors and developers to tour the property and increase safety for the general public. Related outputs include the hiring of a Qualified Program Manager (QPM) and a Qualified Environmental Professional ("QEP"), completing a final Analysis of Brownfield Cleanup Alternatives, selecting the Clean-Up Alternative, selecting the remediation contractor, and providing updates at public meeting. The applicant, Cresson Township Supervisors, is covering the costs of procuring both the QEP and QPM, representing a commitment of leveraged funds that will materialize during the grant period. As such, these costs are not included in the below budget.

3.c Cost Estimates:

TOTAL

Cresson Township		Task 1	Task 2	Task 3	TOTAL
Cleanup Budget	P	rogram	Com. Participation	Abatement &	
Categories	Mana	gement	& Reuse Planning	Clean Up	
Personnel	\$0		\$0	\$0	\$0
Fringe	\$0		\$0	\$0	\$0
Travel	\$0		\$0	\$0	\$0
Equipment	\$0		\$0	\$0	\$0
Supplies	\$0		\$0	\$0	\$0
Contractual		\$0	\$5,000	\$310,000	\$315,000
Other - Administrative		\$10,000	\$0	\$0	\$10,000
TOTAL DIRECT					
COSTS		\$10,000	\$5,000	\$310,000	\$325,000
Indirect Costs		\$0	\$0	\$0	\$0
Total Federal Funding		\$10,000	\$5,000	\$310,000	\$325,000
TOTAL BUDGET		\$10,000	\$5,000	\$310,000	\$325,000
Task 3 – Cleanup	Cos	t	Explanation		
Supplemental sampling	\$84,000 10 additional soil boring & 3 wells with soil sampling; 8 rounds of groundwater sampling			ing; 8	
Tank removal	\$	887,000	Remove 5 USTs/piping & contents		
Soil removal		36,000	300 tons @\$120/ton nonhazardous, load, transportation & disposal.		
Act 2 Remedial Inv. Repor & Risk Assessment (RA)	2 Remedial Inv. Report (RI) \$55,000 Act 2 RI - \$25,000; RA- \$15,000; Cleanup Plan - \$15,000 isk Assessment (RA)			515,000	
Act 2 Final Report & Act 2 Approval	\$	20,000			
10% contingency		28,000	Covers cost inflation and unexpected remediation needs not previously identified		

Task 1. Program Management and Reporting: Because Cresson Township has only one employee, with many responsibilities, the RACC will assist the Township with program management and reporting. To simplify administration, Cresson Township will make RACC a subrecipient and apply an administrative fee of \$10,000, and not budget or invoice for salaries or fringes. The management and reporting tasks include selecting consultants, managing consultants, preparing quarterly reports, maintaining ACRES updates, preparing draw requests to the EPA, and preparing the close-out report. Because neither the Township nor RACC has managed a Cleanup Grant, \$10,000 of consulting time is budgeted to assist with these tasks.

\$310,000

Task 2. Community Participation & Reuse Planning: The Cresson Board of Supervisors will spearhead community participation with the public, media, and potential purchasers of the site. This will occur over the entire 4-year Grant period and beyond, and all the Board's time is provided as in-kind service. \$5,000 is budgeted to assist with reuse planning and community outreach.

- **Task 3. Abatement and Cleanup:** The selected QEP will prepare the final specifications and then publicly bid the project. The QEP together with the project team will select the remediation specialist. The QEP will then subcontract directly with the remediation specialist, monitor progress, and file regular reports to the Board of Supervisors. The entire team will coordinate and complete the Close-Out report. See cost estimates above based on work by Tetra Tech environmental consulting professionals, who prepared the Phase II Reports for the site.
- **3.d Measuring Environmental Results:** Cresson will routinely track progress through on-site visits, digital photographs, and regular meetings with the consulting team. At regular meetings the project team will review contractor invoices in comparison to work performed and address any lack of progress by reviewing all team assignments. Cresson will report this progress to EPA through both Quarterly Reports and ACRES Updates. The immediate Output is a remediated site that is environmentally safe, allowing prospective users and investors to tour the site. After the remediation is completed, as property owner, Cresson will continue to track project Outcomes, including leveraged investment and jobs created. At the end of the grant Cresson will assemble the data into a Close-Out Report. The project team will continue to track Outcomes after the Close-Out report, and report progress on investment and job creation to the EPA.

4. PROGRAMMATIC ABILITY AND PAST PERFORMANCE

4.a Programmatic Capability

4.a.i Organizational Structure and ii. Key Staff: Cresson Township is governed by a three-person Board of Supervisors that meets monthly. Scott Decoskey is the Chairman of the Board of Supervisors and has been on the Board for 19 years. Scott is assisted by secretary and treasurer Janelle Aldrich who has 14 years of experience working for the Township. Because of its small size and limited staff, Cresson Township anticipates executing an Intergovernmental Agreement with the RACC to assist with program management. The Executive Director of the RACC is Renee Daly, and she reports to a 5-person Board of Directors. Renee has a 20-year career in economic development – first with the City of Johnstown and now in her current position with RACC since 2017. The RACC annually manages approximately \$3 million of Federal Community Block Grant ("CDBG") funding from the U.S Department of Housing and Urban Development. Those funds are subject to all Federal procurement requirements, and Renee is responsible for bidding, awarding, and managing those contracts. In addition, RACC has worked as a Coalition Partner with the City of Johnstown on an EPA Community Wide Assessment Grant and received its own EPA Community Wide Assessment Grant in 2008.

4.a.iii. Acquiring Additional Resources: With this Cleanup Grant, Cresson Township will publicly advertise for a Qualified Environmental Professional (QEP), rank responses based on experience and skills, and select a QEP. Due to its lean structure, Cresson can act quickly to advertise for consultants, review qualifications, and make final selections. Cresson anticipates the need to hire a Qualified Program Manager (QPM) with EPA Cleanup Grant Program experience. The QPM will assist in fulfilling the protocol and reporting requirements under the Cleanup Grant. This includes developing the Community Relations Plan, managing environmental consultants, managing public comment, quarterly reporting, ACRES reporting, and close-out reports. Cresson will fulfill Federal bidding and minority business/women business reporting requirements, and make efforts to advertise the open procurement to local businesses to solicit bids and provide

opportunities for local workers. The project team will meet monthly to review costs relative to budgets, pursue leveraged resources, and monitor project activity. The project team (Cresson, RACC, QPM, QEP) will meet monthly to review project costs relative to budgets, pursue leveraged resources, and monitor all project activity and review the overall status of the project quarterly to submit the Quarterly Report.

4.b Past Performance and Accomplishments

4.b.i Currently Has or Previously Received an EPA Brownfields Grant: The Township was awarded FY23 Cleanup grant funding to conduct remediation at another gas station site. Because this previous grant was just recently awarded, there are few substantive updates to demonstrate the project team's performance and accomplishments, thus additional information is included below in regard to past performance.

4.b.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements: Proposed subrecipient RACC was a direct recipient of a 2008 EPA Assessment Grant and is a current Coalition Partner to the City of Johnstown on an EPA Community Wide Assessment Grant. Cresson Township has received a number of Federal and State Grants over the last several years.

4.b.ii.1 Purpose and Accomplishments: Cresson Township received three grants from the Department of Justice for public safety purposes. The grants were used to purchase a police car, update its information system with computers installed in police vehicles, and purchase bulletproof vests for police officers. These improvements helped the police modernize and improve communications and the safety of officers. RACC has successfully managed the Federal CDBG program for the County for decades, using funding to improve the Admiral Peary Corridor, including nearby Veterans Park. Funds were used for site preparation, paving for a pavilion floor, paving for walkways, and overall site restoration. With previous Assessment Grants as well as the current EPA Assessment Grant, RACC and the City of Johnstown have cleaned underutilized brownfield sites to prepare them for successful redevelopment. This includes transforming the former Cambria Iron Works site into the world-renowned Center for Metal Arts, and similar efforts at the Johnstown Corporation factory, Johnstown Urban Industrial Park, and others. With the current Assessment Grant, RACC is working with the City of Johnstown on several innovative projects. This includes environmental assessment and site evaluation for several industrial sites for an urban agricultural pilot project called Food 21. It also includes site assessment and evaluation at defunct mining sites under the iconic Johnstown Inclined Plane. These former mines pollute waterways with orange, sulfuric acid drainage at the "Point Park" in downtown Johnstown at the confluence of the Stonycreek and Conemaugh Rivers, negatively impacting outdoor recreational development. Grant funds have been deployed to address the acid mine drainage and create a riverfront park and trailhead that links to the 9/11 National Memorial Trail.

4.b.ii.2 Compliance with Grant Requirements: Cresson Township satisfied all grant and reporting requirements for the Department of Justice grants. RACC manages \$3,000,000 in Federal grants annually. In all cases, grant activities and reporting followed work plans, terms and conditions, expenditures and reporting requirements. As a Coalition Partner, RACC also has an exemplary record assisting the City of Johnstown and the Johnstown Redevelopment Authority with EPA grant requirements.

Threshold Eligibility Criteria

- **1. Applicant Eligibility:** As a General Purpose Unit of Local Government, Cresson Township Supervisors is eligible to apply for a Cleanup Grant.
- **2. Previously Awarded Cleanup Grants:** The proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.
- **3. Expenditure of Existing Multipurpose Grant Funds:** Cresson Township Supervisors does not have an open EPA Brownfields Multipurpose Grant.
- **4. Site Ownership:** Cresson Township Supervisors is the sole owner of the project site that is the subject of its Cleanup Grant application.
- **5. Basic Site Information**: Cresson Ridge: 8191-8215 Admiral Peary Hwy, Cresson, PA 16630.
- **6. Status and History of Contamination at the Site:** The 13.5 acre Cresson Ridge site is located at 8191-8215 Admiral Peary Hwy, Cresson, PA 16630. The Site had historically been used as a service station, barber shop, restaurant, living quarters, motel, and an ice cream/fruit stand, but has been closed for decades. The site became contaminated as a result of these prior uses. Four asbestos-laden structures in various states of deterioration remain on the site. Cresson acquired the property through tax foreclosure in 2009. A Phase I Assessment was conducted in 2010 and a Phase II was recently completed using funds from an EPA Community Wide Coalition Assessment Grant to the City of Johnstown, PA. This Phase II revealed five underground storage tanks (USTs) on the site. Soil sample analytical results indicate 1,2,4-trimethylbenzene was detected in concentrations exceeding the Act 2 Soil to Groundwater MSC. The groundwater data indicate that benzene, ethylbenzene, naphthalene, and 1,2,4-trimethylbenzene are present in concentrations exceeding the Act 2 MSC. The depth to groundwater is between approximately 6 and 8 feet below ground surface and the aquifer is comprised of sandy clay. Groundwater flow is to the north, northwest, from the south side of the Highway towards the township property on the north side of the Highway.
- **7. Brownfields Site Definition:** The site meets the definition of a brownfield under CERCLA §101(39). The site is (a) not listed or proposed for listing on the National Priorities List; (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) not subject to the jurisdiction, custody, or control of the U.S. government.
- **8. Environmental Assessment Required for Cleanup Grant Applications:** A Phase II environmental site assessment report was completed for the site using Coalition Assessment grant funding in 2021.
- **9. Site Characterization:** c. 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.
- **i.** Attached is a current letter from the Pennsylvania Department of Environmental Protection that explains why the site is not eligible to be enrolled.

- ii. An Environmental Professional (as defined in 40 CFR § 312.10) who has conducted assessment activities at the site has certified that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site.
- **10. Enforcement or Other Actions:** There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.
- 11. Sites Requiring a Property-Specific Determination: The site does not need a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability:

b. Property Ownership Eligibility – Petroleum Sites: The Pennsylvania Department of Environmental Protection has provided a petroleum site eligibility determination letter for the site, attached here. This letter affirms that (a) there is no viable responsible party, (b) the applicant is not liable for cleaning up the site, and (c) the site is not subject to a RCRA corrective action order.

13. Cleanup Authority and Oversight Structure:

- a. The project team does not plan to enroll in a state or tribal response program. With this Cleanup Grant, Cresson Township will publicly advertise for a Qualified Environmental Professional (QEP), rank responses based on experience and skills, and select a QEP. Due to its small size, Cresson can act very quickly to advertise for consultants, review qualifications, and make final selections. Cresson anticipates the need to hire a Qualified Program Manager (QPM) with EPA Cleanup Grant Program experience. The QPM will assist in fulfilling the protocol and reporting requirements under the Cleanup Grant. This includes developing the Community Relations Plan, managing the environmental consultants, managing the public comment period, quarterly reporting, ACRES reporting, and close-out reports. Leveraging its experience conducting procurement processes for other Brownfields grants and related projects, the project team will ensure that its procurement process meets the competitive procurement provisions of 2 CFR §§ 200.317 through 200.327. As part of the selection, Cresson will fulfill Federal bidding and minority business/women business reporting requirements. The project team will meet monthly to review project costs relative to budgets, pursue leveraged resources, and monitor all project activity. The project team (RACC, QPM, QEP) will meet monthly to review project costs relative to budgets, pursue leveraged resources, monitor all project activity, and review the overall status of the project quarterly to submit the Quarterly Report.
- **b.** The project team does not anticipate needing access to neighboring properties for cleanup activities. In the event that access is needed, the project team will leverage previous contact and existing relationships with adjacent property owners to coordinate on conducting these activities, which have been established as a result of previous assessment activities at the site.
- **14.Community Notification:** The project team held a community meeting on November 3, 2023 to inform the community of the intent to apply for funding and solicit feedback on the application.
 - **a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA):** ABCA for the site is attached here, and was made available at the public meeting for comment and input.
 - **b.** Community Notification Ad: A community notification ad was published in the local newspaper, the Mainliner, on October 19, 2023. Documentation of the notification's

publishing is attached here. The as makes clear that a copy of the application and ABCA are available for public review and comment; directs readers on how to comment on application materials and receive copies of them; and the date, time, and location of the public meeting.

c. Public Meeting: A public meeting was held on November 3, 2023 at 1:00 pm at the Cresson Township Building. A summary of the public comments received, the applicant's response to those comments, meeting notes, and a meeting sign-in sheet are attached here.

15. Contractors and Named Subrecipients:

Contractor: N/A

Subrecipient: Redevelopment Authority of Cambria County (RACC) is a subrecipient of the award and is eligible as a subrecipient as a General Purpose Unit of Local Government. Documentation of RACC's status as an eligible entity for a subaward is attached.