



# The City of Morgantown

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 Morgantown, West Virginia 26505  
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 www.morgantownwv.gov

Office of the City Manager

R03-24-C-010

## FY24 USEPA Brownfields Cleanup Grant Application

### Narrative Information Sheet

1. Applicant Identification: City of Morgantown, 389 Spruce Street, Morgantown, WV 26505
2. Funding Requested
  - a. Grant Type Single Site Cleanup
  - b. Federal Funds Requested \$2,000,000
3. Location: Morgantown, Monongalia County, West Virginia
4. Property Information: White Park Woodlands, 1001 Mississippi St., Morgantown, WV 26501
5. Contacts
  - a. Project Director: **J. Drew Gatlin**, Staff Engineer for the City
    - i. Phone: 304-284-7411
    - ii. Email: [jgatlin@morgantownwv.gov](mailto:jgatlin@morgantownwv.gov)
    - iii. Mailing Address: 430 Spruce Street, Morgantown, WV 26505
  - b. Chief Executive/Highest Ranking Elected Official: **A. Kim Haws**, City Manager
    - i. Phone: 304-225-4213
    - ii. Email: [khaws@morgantownwv.gov](mailto:khaws@morgantownwv.gov)
    - iii. Mailing Address: 430 Spruce Street, Morgantown, WV 26505
6. City of Morgantown Population: 30,277
7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	4
The proposed site 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).	1,2,3,6,10
The proposed site(s) is in a federally designated flood plain.	3
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site will incorporate energy efficiency measures.	3,7

The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
The target area is located within a community which a coal-fired power plant has recently closed (2013 or later) or is closing.	1

8. Releasing Copies of Applications

The City of Morgantown requests that contact information (email and phone numbers) for Project Partners in Section 2.b.i remain confidential.

# 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

## a. Target Area and Brownfields

### i. Overview of Brownfield Challenges and Description of Target Area

The City of Morgantown (the City) is the third-largest city in West Virginia, sitting 60 miles south of Pittsburgh along the banks of the Monongahela River. Its municipal infrastructure supports an estimated daily population of nearly 70,000, formed by a mix of over 30,000 residents and more than 140,000 persons in the MSA. Of the top 5 largest cities in West Virginia, Morgantown is the only one to have experienced population growth over the past twenty years. Morgantown serves as the MSA's principal city, the seat of Monongalia County, and the regional center of finance, medicine, commerce, and education. The city hosts an average fall enrollment of nearly 26,000 students at West Virginia University's (WVU) flagship campus and is the headquarters of West Virginia's largest employer, WVU Medicine.

Chartered in 1785, Morgantown has hosted several industrial booms and remains a busy port city serving active nearby mining and gas industries. Early discovery of fossil fuels in the surrounding area led to the city's first major growth and through-service expansion of the B&O Railroad in the 1890s. Industrial corridors developed along the mountainous city's river valleys, which have transformed from glass, tin, and sheet metal factories in the early to late 1900s to dense commercial and residential corridors today. In the late 1990s, two railroads bisecting the urban area were land-banked and transformed into now-beloved recreational rail-trails.

Along with most of West Virginia, Morgantown is a designated energy community where fossil fuel industries make up a significant percentage of the tax base ([NETL 2023](#)). A recent study by researchers at WVU and the University of Tennessee found that Monongalia County exhibits a high dependence on the coal industry ecosystem and is at high risk of experiencing economic hardship due to the continued decline of the coal industry ([Bowen, et al., 2018](#)). The area has indeed experienced hardship due to shifting energy markets: several mines and two of the five coal fired power plants within 25-miles of the project site have shuttered within the last decade. The legacy of these and other industrial sites stymies Morgantown's development and contributes to a broad sense of disempowerment within its vulnerable communities.

White Park is a 170-acre greenspace nestled between multiple neighborhoods on the city's south side in Census Tract 110 (54061011000). The park boasts five ball fields, basketball courts, an ice rink, picnic shelters and upwards of 17 miles of trail - both sanctioned and unsanctioned - in what has been described as the densest and most labyrinthian trail network in the state. Although the park is one of the busiest greenspaces in the city's network, an industrial past hinders recent desires to modernize, expand, and correct some of the extreme deficiencies in its trail system. Previous assessments and limited cleanup efforts have attempted to mitigate risk for users in some areas of the park, but approximately 40% of the former tank sites remain impacted by legacy petroleum contamination. Several recent community and regional plans have targeted White Park for redevelopment to provide non-motorized transportation routes and improved community greenspace and recreational opportunities. This cleanup grant will help the City reduce visitor risk by building a trail system that integrates risk reduction remedies. The risk reduction remedies will combine traditional capping of areas of concern with a more novel approach of directing users to mitigated areas of the park through the principles of modern and sustainable trail design.

### ii. Description of the Proposed Brownfield Site(s)

The White Park Woodlands (WPW) (the site) sits wholly within City limits in Census Tract 110. The WPW comprises just over 100 acres of the City's 170-acre White Park (the park) and forms over half of the shoreline of the City's secondary drinking water reservoir operated by the Morgantown Utility Board (MUB). The site is embedded in several mixed-income residential neighborhoods and serves as a buffer between them and two state-owned 4-lane roads - Greenbag Rd and Rt 119/Don Knotts Blvd. South Middle School and Monongalia County Technical Education Center campuses are immediately adjacent to the East. The park's existing trails provide lower-stress connections between these neighborhoods and serve as vital links on important safe routes to school.

The City acquired the land in 1973 as part of a succession of transfers of real estate that eventually formed White Park. Immediately prior to the City's ownership, the site, the rest of White Park lands, and several other surrounding properties sat largely vacant for decades after the decommissioning of Eureka Pipeline Company's 700-acre South Morgantown Tank Farm. The Tank Farm began crude oil storage operations around 1890 and operated throughout the first half of the 20th century. Aerial imagery and other records suggest the farm once housed at least 64 ASTs, with a total capacity of at least 2 million barrels. Primary and secondary containment berms formed by large earthen dikes largely remain, suggesting at least 23 of these ASTs previously existed on the Site and at least 38 existed in White Park.

Since the 1980s, multiple environmental assessments have been conducted within White Park, resulting in a CERCLIS listing as WVD988766168. These assessments identified elevated concentrations of metals (particularly Arsenic) and PAHs in soil, surface water, and sediment. A 2010 site inspection identified free product near a former tank within the WPW area, and approximately 1,300 cubic yards of soil was removed at that time. In 2018, the City confirmed with EPA Region 3 that the site was archived as No Further Remedial Action Planned (NFRAP) status and is not listed on the National Priorities List (NPL). In 2019 and 2022, Phase II ESAs were completed for White Park during MUB's utility connections to a new reservoir further upstream on Cobun Creek. The Phase IIs identified Arsenic, Cobalt, Iron, and several PAHs in site soils above recreational screening levels, an unacceptable community exposure risk. The City proactively entered White Park into the West Virginia Voluntary Remediation Program (VRP) on October 2, 2022. In FY23, the City was awarded a U.S. EPA Brownfield Cleanup grant for the Southside (Parcel A) of White Park. Site assessment and human health and ecological risk assessment reports for the Southside have since been approved by the VRP. Development of the Remedial Action Plan centered around the community's recreational trail plan is underway. The City also completed VRP site assessment for the much larger 100-acre White Park Woodlands (Parcel B) Site, with cleanup ready to follow the same successful approach being implemented on the Southside.

## **b. Revitalization of the Target Area**

### **i. Reuse Strategy and Alignment with Revitalization Plans**

The reuse strategy for the site centers on strategic redevelopment and redesign of a poor quality but heavily used existing trail network. The redesign and redevelopment will incorporate protective cover and other managed controls to mitigate risk to users. Most importantly, the sanctioning, proper signing, and maintenance of a formal, modern trail system in this section of the park will discourage unsanctioned soil excavations and ad hoc trail development that cause undue ecological damage and increased exposure to Arsenic, Cobalt, Iron, Manganese, and PAHs in site soils. Signage, limited fencing, and native vegetation that forms thick barriers will direct users to mitigated and lower-risk areas of the site.

The reuse strategy is rooted in the community response that followed MUB's 2016 announcement of the proposed water line route through the previously undeveloped White Park Southside. In a series of publicly recorded meetings and work sessions, numerous at-large community members and organizations (including current project partners such as: the White Park Trail Advisory Group, First Ward Neighborhood Association, Morgantown Greenspace Coalition, South Middle School Bike Club, and Morgantown Trail Hawks) joined with City administration, City Council, the Board of Parks and Recreation, and MUB. These events continued through the first two years of the COVID-19 pandemic and included live-stream, re-broadcasted events and several outdoor site tours facilitated by the WVU's Brad and Alys Smith Outdoor Economic Development Collaborative (WVU-OEDC) and the Greenspace Coalition. Collectively, these groups organized to prioritize restoration and redevelopment strategies for White Park, recognizing an opportunity to implement a new management approach for maximizing use of limited greenspace and correcting legacy issues caused by White Park's soil contamination and network of unsanctioned and loosely managed trails.

These events tie into a backdrop of growing community demand for recreation and low-stress bike and pedestrian transportation routes. This demand spurred significant planning efforts focusing on development and expansion of the city's existing trail network. Morgantown's 2013 and 2023 Comprehensive Plans, 2020 Regional Bike/Ped

Plan, 2020-2023 Strategic Plan, and others prioritize reuse and revitalization strategies for brownfield properties. The 2023 Comprehensive plan targets mitigation of decreased biodiversity and increased flooding from climate change. The WPW cleanup will incorporate green stormwater infrastructure into the remedial design and re-use remnant tank secondary containment earthworks to retain and infiltrate unchecked stormwater flows entering the park. Site cleanup will also improve biodiversity through replacement of invasive species (honeysuckle, barberry) with selective native plantings. Trail redevelopment and remedial construction will mitigate negative impacts from historical excavations, unsanctioned trails, and damaged or missing vegetation to help manage stormwater flow, increase stormwater retention, and restore biodiverse habitats. These improvements will decrease stresses on portions of the Site situated along the City's reservoir and Cobun creek that lie in the [Zone AE Floodway](#). The Strategic plan's primary goal, Attractive Amenities, centers on creating and preserving greenspaces, family friendly resources, and recreational opportunities. Recreational trails and related infrastructure are cited in the Comprehensive and Strategic plans as strategic investments for the City to transition its economy, retain workers, and improve the quality of neighborhoods. WVU-OEDC, in conjunction with the State of West Virginia, recently launched an aggressive remote worker program that is centered around attracting new residents by showcasing West Virginia's outdoor recreation. Morgantown is the host city for the first class of these remote workers.

Morgantown is ready to develop new, connected recreational sites and trails by linking the White Park trails to its keystone network of rail-trails. Redevelopment of the site's trails will serve as the city's second phase in this regional and multi-agency redevelopment effort. Cleanup will follow the innovative and technically sound approach being implemented for the adjacent White Park Southside cleanup under oversight of the VRP.

## ii. **Outcomes and Benefits of Reuse Strategy**

The reuse strategy directly facilitates the preservation and expansion of existing greenways and recreational properties in the target area. Underdeveloped portions of the site will be incorporated into the redesigned trail network, and existing deficient trails will be rebuilt with modern and sustainable techniques to reduce operating costs and unintended erosion. Overall, the strategy will help increase the park's capacity to serve its visitors.

The reuse strategy's lightweight construction impact characteristics showcase more energy efficient cleanup techniques and are further discussed in section 3.a. The strategy minimizes large tree removal and other habitat destruction sometimes expected with traditional cleanups, eliminating the time and expense of replacing trees and dramatically reducing the time and energy/resources needed to complete restoration.

Lower ecological disruption of existing vegetation and lower impacts to the long-term stability of soils surrounding the Cobun Creek Reservoir also help to provide resiliency against climate change induced stresses. Current climate models for the Mid-Atlantic region – and, specifically, northcentral West Virginia – predict continued warming and an increased frequency and intensity of extreme precipitation events. An increase in precipitation abundance is predicted overall but shifting patterns will stress water availability for human and ecological consumers. These conditions likewise stress local government's ability to provide a sufficient quantity and quality of drinking water. This strategy will help mitigate the stresses – increased rates of erosion and supply variations – that climate change places on the City's trail systems and its Cobun Creek Reservoir.

Implementing the WPW reuse plan will provide new and improved trail connections for a community underserved by low-stress transportation routes. It will give the City a template for modern trail development to improve and expand its other trails. It will help build on the momentum of WVU's recent trail investments, improve public perception of stakeholder cooperation and effectiveness, provide more accessible trails for a more diverse set of visitors, and help jumpstart the creation of local trail construction firms to provide new economic opportunity for workers displaced by the declining coal economy. As the home of WVU, residents and transients are educated here at the state's flagship university but are often forced to leave for lack of economic opportunity. Development of the WPW trail will help Morgantown grow its economy and succeed against growing competition from other towns that have invested in trail tourism and community recreation. The WPW's acres of mature hardwood forests of oak and hickory provide abundant shade that relieves the community from heat stress exacerbated by climate

change. Well-designed trails will protect trunks, root systems, and encourage forest regeneration that preserves this vital greenspace. Researchers have shown that proximity to greenspace, especially when well-managed, is positively correlated with both [residential property values](#) and [community well-being](#).

### **c. Strategy for Leveraging Resources**

#### **i. Resources Needed for Site Characterization**

No additional site characterization is anticipated and a complete Site Assessment Report has been submitted to the VRP. However, in case of overages, the WVDEP has committed funding from its current U.S. EPA Brownfield Assessment Grant should the need arise for supplemental assessment. The City is committed to cover any funding gaps for additional assessment, if needed, through its capital budget lines.

#### **ii. Resources Needed for Site Remediation**

The City expects this grant to cover full site remediation costs. However, it has confirmed with the WVDEP that gap coverage is available from the Brownfields Revolving Loan Fund low-interest loan program. The City has committed funds to complete the VRP process, estimated at \$41,125.

#### **iii. Resources Needed for Site Reuse**

A March 29th, 2023 bid call obligated MUB to cover \$142,810.00 for City-coordinated tree planting services for an ad-hoc specified variety of 326 trees and shrubs at White Park. The City expects to allocate up to 50% of these funds for the Woodlands site (proportional to its geographic size compared to the overall VRP-covered boundary). This fund will supplement plantings needed to complete the reuse plan. The City will cover staff time related to site reuse oversight and administration.

#### **iv. Use of Existing Infrastructure**

No additional infrastructure needs are anticipated. The Site and its new trail system will directly connect to all existing White Park infrastructure including parking, restroom facilities, lighting, and shelters. Although there are no plans for structures at the site, adjacent parcels have existing water, sewer, natural gas, and electricity utility services. The earthen primary and secondary former tank containment berms provide a micro-topography that will continue to serve a good canvas for dynamic and modern trail development and be re-used during construction of wetlands and green infrastructure infiltration sites. After remediation, several actual tank sites will serve as programmed and educational areas that require minimal grading and clearing for flatter ground (a relative rarity in Morgantown).

## **2. Community Need and Community Engagement**

### **a. Community Need**

#### **i. The Community's Need for Funding**

The City of Morgantown has significant financial need due to a variety of factors contributing to its weak tax base and low annual budget. More than half of its housing is renter-occupied and about half was built prior to 1960. Its median home value is about \$15,000 less than the national average. The local state university's significant land holdings are tax exempt, and restrictive state annexation laws have led to urban sprawl with dense housing and commercial areas adjacent to but outside city limits. The residents of Morgantown also have significantly lower median household incomes (\$42,474 compared to \$64,994, nationally), and an extremely high poverty rate (34.7% compared to 11.6%, nationally) ([Neighborhoods at Risk](#)). Cost estimates for the cleanup of White Park amount to a burdensome share of its annual budget and a need to seek multiple rounds of grant funding to make this comprehensive cleanup possible.

#### **ii. Threats to Sensitive Populations**

##### **(1) Health or Welfare of Sensitive Populations**

About half of the population in Census Tract 110 is low income and around 20% of families with children live in poverty, which is twice that of Morgantown as a whole and three times the national rate. While Morgantown is predominantly white, CEJST shows that Tract 110 has a much higher percentage of Black/African American and

Hispanic/Latino residents than any other Tract in the area. The immediately adjacent presence of major ballfields, the area’s only ice rink, daycares, the county’s largest middle school, and the county’s only technical education school draw significant numbers of young people to and through the Site, while EJScreen shows several environmental indicators for Tract 110 exceeding State and/or national values:

<b>Environmental Indicator</b>	<b>Tract 110 Value</b>	<b>State Value</b>	<b>National Value</b>
Ozone (ppb)	57.9	57.1	61.6
Diesel Particulate Matter (µg/m)	0.145	0.129	0.294
Air Toxics Cancer Risk* (lifetime risk per million)	30	28	25
Traffic Proximity (daily traffic count/distance to road)	80	56	210
Lead Paint (% Pre-1960 Housing)	0.39	0.36	0.3
RMP Facility Proximity (facility count/km distance)	1.8	0.35	0.43
Hazardous Waste Proximity (facility count/km distance)	3.6	0.6	1.9
Underground Storage Tanks (count/km)	3.2	2	3.9

Visitor awareness of White Park’s industrial past is now rapidly fading – the tank farm’s decommissioning began at least 80 years ago. Unsanctioned and unplanned trail building occurs frequently within the park and on the site, often performed by neighborhood teenagers seeking to develop bike trail features that match their experience levels. The site’s soil contaminants Arsenic, Cobalt, Iron, Manganese, and PAHs are all either carcinogens, respiratory stressors, or both ([ATSDR, 2007, 2023, 2012, 1995](#)). Exposure occurs through inhalation, ingestion, and dermal contact. Elevated breathing and contact with soil during exercise and hand excavation dramatically increase community exposure to the site’s soil contaminants. Cleanup of the site will reduce community exposure to carcinogens where exposure to ozone, diesel particulate matter, Air Toxins, and proximity to traffic, RMP Facilities, and Hazardous Waste facilities is already above state or national averages.

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

EJScreen shows that in Census Tract 110, 14% lack health insurance compared to 6% in Morgantown as a whole and 9% nationally. West Virginia has the highest rate of obesity (39.5%), the highest rate of cardiovascular disease (15.5%), the sixth highest rate of cancer (14.1%), and the second highest rate of residents considered in fair or poor health (26.3%). Even within Monongalia County, which many perceive as “better off” than the rest of the state, 62.7% of residents are considered obese or overweight, and 20.2% do not participate in physical activities. The cancer rate in Monongalia County is 8.5%. 9.1% of residents have asthma ([WVDHHR, 2018](#)). Chronic lower respiratory disease was the fourth leading cause of death in West Virginia in 2020, exceeding the total deaths from COVID-19 in the same year ([WVDHHR, 2020](#)).

As discussed in Section 2.a.ii.(1), cleanup of Arsenic, Cobalt, Iron, Manganese and PAHs in site soils will decrease community exposure to contaminants known to cause cancer and asthma. Environmental remediation of tank sites for expansion of trails and other outdoor recreation opportunities will provide additional exercise options and ways to address obesity rates, leading to improvement in overall health and addressing top concerns of county residents.

(3) Promoting Environmental Justice

Low-income and minority populations bear a disproportionate amount of the burden of the negative environmental impacts of industrial legacy, and multiple studies have determined that poorer Americans are less likely to have access to outdoor recreation at home and less likely to participate in outdoor recreation activities ([Scott, 2013](#)). Although CEJST does not list Tract 110 as disadvantaged, White Park is known regionally for its size and diverse greenspace amenities (trails, ballfields, playgrounds, ice rink). As a regional greenspace attraction, the park serves several adjacent and nearby disadvantaged tracts that have high rates of asthma in the 98<sup>th</sup> and 92<sup>nd</sup> percentiles, respectively.

EJScreen considers Tract 110 a food desert. Improvement to and reroutes of the trails through the White Park Woodlands area will help improve the accessibility of existing low-stress connections while simultaneously reducing exposure pathways. They will help connect neighborhoods that sit north of the reservoir to a full-service grocery store south of the reservoir, reducing by half the current 30-minute walk mostly along roads with no sidewalks. In a tract where an estimated 10% of households do not own a car ([Neighborhoods at Risk](#)), these trails will add safer and more direct routes to schools, fresh foods, and other places people need and want to travel. Remediation of the site and implementation of the recreational use will promote environmental justice by targeting an area with higher populations of people of color and the population with low income. The disadvantaged/EJ communities surrounding the property will be included in discussions regarding end use to ensure the intended outcome of promoting environmental justice in the community.

**b. Community Engagement**

**i. Project Involvement & ii. Project Roles**

The City of Morgantown [1] (Grantee) has worked for years with several partners to identify and address issues and opportunities at the site and within White Park at large. Both the Morgantown Utility Board [3] and the Board of Parks and Recreation Commissioners [2] have binding and/or chartered agreements to assist with the remedy and reuse. BOPARC will serve as the site’s long-term operations and programmatic manager.

During the project, BOPARC will provide on-site meeting venues and will help direct the participation of various trail user groups, including the White Park Trail Advisory Group [10], the Greenspace Coalition [9], the Morgantown Area Mountain Bike Alliance [6], the Morgantown Trail Hawks Scholastic MTB Team [8], and the South Middle Bike Club/Outride Program [7]. The First Ward Neighborhood Association (representing White Park’s neighborhood) will also aid in wide outreach for community input meetings and project milestones. All of these groups have given input on general needs for trail design during cleanup planning. During the project, they have all committed to help contracted signage designers review the legibility and understandability of proposed wayfinding and educational signage.

The WVU-OEDC [4] assisted in review of site trail planning/design and will help the City create draft trail construction bid packages. The Northern WV Brownfields Assistance Center [5] assisted with review of this grant application and technical planning and commits to doing similarly in the future with its TAB grant.

<b>Org. #</b>	<b>Contact Name</b>	<b>Email</b>	<b>Organization Role</b>
[1]	Drew Gatlin	[REDACTED]	Staff Engineer
[2]	Melissa Wiles	[REDACTED]	Executive Director
[3]	Rich Rogers	[REDACTED]	Chief Engineer
[4]	Rich Edwards	[REDACTED]	Outdoor Rec. Infrastructure Coordinator
[5]	Carrie Staton	[REDACTED]	Director
[6]	Andrew Walker	[REDACTED]	President
[7]	Jeremy Bartholow	[REDACTED]	Industrial Arts Teacher
[8]	Bonnie Ammons	[REDACTED]	Coach
[9]	JoNell Strough*	[REDACTED]	Chair
[10]	Colin Dierman*	[REDACTED]	Head Volunteer

\*First Ward Neighborhood Resident

**iii. Incorporating Community Input**

The City plans to integrate project discussion and information dissemination into the existing City, MUB, BOPARC, neighborhood, and other public meetings. We will include announcements for future project-specific meetings (at least three before on-site cleanup to allow for incorporation of input) and methods available for providing input. Materials and public documents will be available via meeting handouts published in accordance with WV sunshine laws and the Open Governmental Meeting Act. Communication materials will be written in



plain language. An existing webpage on the City’s website serves as a hub for project information. We will prepare a Community Involvement Plan (CIP) at the notice of award if the project is selected by EPA for funding. This CIP will be informed by lessons learned from the 2016-2022 waterline restoration and the adjacent cleanup site trail plan community engagement process. The CIP will outline a series of on-site outdoor and in-person meetings to gather community input and participation. For at least one month preceding the first meeting, the City will solicit input from at-large community members, organizations, and park users through electronic messages posted to the project website, social media, and organization listservs. We will also use physical signs at trailheads and other strategic locations in the park – including neighborhood connectors, parking areas, and along existing trails – to solicit input with instructions to participate in person, by phone, email, QR code, or paper survey boxes posted at the sign location. We will post written responses after reviewing input from the initial outreach to the same outlets in advance of the first meeting. The first meeting is planned for a BOPARC venue, in person or virtually attended, walkable to White Park. Print or electronic maps of the proposed cleanup approach will be displayed for facilitating discussion of the ABCA. We will work to accommodate any language barriers that may arise - over 98% of the population in the area speaks English as a primary language. Project contact telephone numbers and e-mail addresses will be provided through all communications to allow access for members of the public to ask questions, express concerns, and provide input. The City will maintain a repository at the City Hall Annex and Morgantown Public Library and post periodic updates to the project website and stakeholder listservs.

### **3. Task Descriptions, Cost Estimates, and Measuring Progress**

#### **a. Proposed Cleanup Plan**

The City will perform cleanup under the WV Voluntary Remediation Program (VRP), ensuring regulatory compliance and community engagement with the cleanup method. It will integrate remedy and reuse to expedite the already delayed reuse and make the most efficient use of limited financial and physical resources. The integrated process will center around the development of a recreational trail system that meets the demonstrated needs of the community and user groups, while ensuring protection of human and ecological receptors and the site’s mature forests.

The recommended cleanup (ABCA Alternative 4) utilizes a combination of risk assessment and exposure pathway elimination through construction of protective cover in accordance with the VRP’s Cap and Cover Guidance. It integrates cleanup planning with a trail plan to be updated from the 2016-2023 community engagement process following best design principles of the VRP, Professional Trail Builders Association, and International Mountain Biking Association. Integrating remedy and reuse will incur substantially lower cost and ecological impacts compared to other alternatives via the light construction footprint associated with modern trail building. First, the plan utilizes the narrow, linear trail corridor for access and materials handling during trail and cover construction, eliminating additional access roads and restoration required by more traditional remedies using off-site soil disposal and/or hauling of clean fill. Second, the smaller, light duty equipment utilized by professional trail contractors is fuel efficient and creates less ecological disturbance. Third, trail construction is performed linearly and stabilized daily, minimizing soil disturbance. This allows use of less impactful stormwater management practices – avoiding the need for retention ponds. The remedy will also clean up the basins from tank containment earthworks and convert several into stormwater management structures, repurposing the berms as trail features.

Cleanup effectiveness and long-term reliability will be guided by a VRP-approved Human Health and Ecological Risk Assessment and Remedial Action Work Plan. It will reduce current site risks posed by exposure to soil contaminants through proper closure and ecological restoration of over 4,100 linear feet of unauthorized trails and excavations. Exposure to soil contaminants will be mitigated by constructing 38,714 linear feet of new, primarily natural-surfaced trail tread and features, meeting VRP-approved protective cover guidance where indicated by risk assessment, through a fully assessed and cleaned up trail corridor. The trail corridor will be a VRP-approved engineering control enforced through a Land Use Covenant (LUC). The LUC will prescribe a routine schedule for inspection and maintenance of the WPW trail corridor. The City and BOPARC will maintain the LUC and ensure the long-term effectiveness of the cleanup plan.

## **b. Description of Tasks/Activities and Outputs**

### **Task 1: Project Oversight**

**Project Implementation:** The Project Manager will be responsible for the overall execution and management of the project and will track tasks, schedule, and budget; procure and oversee the QEP, a WV Licensed Remediation Specialist (LRS) and cleanup contractors; and report on project activities and accomplishments to stakeholders. The LRS will support reporting activities and will develop the Final Cleanup Report.

**Anticipated Project Schedule:** October 2024 – October 2028

**Task/Activity Lead:** City Project Manager, QEP

**Outputs:** 16 Quarterly Reports, 16 ACRES updates, administrative record, and 32 project status meetings, 3 Disadvantaged Business Enterprise reports, 3 Federal Financial Reports, 1 Final Cleanup Report.

### **Task 2: Community Outreach**

**Project Implementation:** The City's Project Manager will lead Community Outreach activities with support from the QEP. The Project Manager will plan and conduct a series of community meetings at key milestones throughout the project and provide quarterly updates at public City Council and relevant Board meetings. The City will maintain a repository at the City Hall Annex and Morgantown Public Library and post periodic updates to the project website and stakeholder list servs. The QEP will prepare a Community Involvement Plan, develop outreach materials, and facilitate public meetings.

**Anticipated Project Schedule:** October 2024 – October 2028

**Task/Activity Lead:** City Project Manager, QEP

**Outputs:** Community Involvement Plan, 4 Public Meetings, 4 information sheets, 4 website updates, 16 quarterly reports to City Council and Boards.

### **Task 3: Cleanup Planning**

**Project Implementation:** The contracted QEP will lead cleanup planning activities and incorporate public comments to finalize the ABCA, provide specifications suitable for City bid documents and procurement of a cleanup contractors, prepare written responses to contractor comments, secure all necessary permits, and complete Voluntary Remediation Program reports such as the QAPP. The City's Project Manager and QEP will hold bi-weekly progress meetings and participate in contractor procurement.

**Anticipated Project Schedule:** October 2024 – October 2028

**Task/Activity Lead:** City Project Manager, QEP

**Outputs:** Final ABCA, bid documents/RFPs, response to contractor comments, QAPP, permits, retained cleanup contractor

### **Task 4: Site Cleanup**

**Project Implementation:** The contracted LRS will perform risk assessment, prepare all required VRP report submittals, secure VRP approval for the cleanup plan, acquire any necessary permits, and oversee cleanup contractors during placement of protective cover. The LRS will create any land use covenants needed to meet applicable VRP risk-based standards and secure a Certificate of Completion for the site. The City's Project Manager will perform oversight of trail construction cleanup contractors. The contractor will fill, grade, cover, pave, and implement other engineering controls identified in the VRP-approved Remedial Action Work Plan.

**Anticipated Project Schedule:** March 2025 – October 2027

**Task/Activity Lead:** City Special Projects Coordinator, LRS

**Outputs:** Human Health and Ecological Risk Assessment, Remedial Action Work Plan, Remedial Action Completion Report, Land Use Covenant, VRP-approved protective cover and trail system, as-built drawings, remedy education and historical signage, Final Report, and Certificate of Completion. 100 acres cleaned up and redeveloped.

## **c. Cost Estimates**

### **Task 1 – Oversight**

- \$4,000 to attend WV Brownfield Conferences (\$350 for transportation, \$300 for registration, \$200 for lodging, \$150 per diem for two staff to attend x 4 years = \$4,000)
- Contracted QEP-160 hours x \$150/hour = \$20,000 to coordinate team meetings, prepare ACRES updates, and a Final Report

**Task 2 – Community Outreach**

- \$1,000 supplies (newspaper advertisements, posters, site signage, mailings, and graphics)
- \$10,000 for QEP: assist preparing the Community Involvement Plan (\$2,000), plan and facilitate public meetings (4 meetings at \$1,500 = \$6,000), and design electronic outreach materials (\$2,000)

**Task 3 – Cleanup Planning**

- \$9,000 for QEP: incorporate public comments and finalize the ABCA (10 hours at \$150/hour = \$1,500), provide specifications cleanup contractor Bid Documents (RFP) (20 hours at \$150/hour = \$3,000), plan and lead the pre-bid site meeting (10 hours at \$150/hour = \$1,500), prepare written responses to contractor comments (10 hours at \$150/hour = \$1,500), and secure all necessary permits (10 hours at \$150/hour = \$1,500).

**Task 4 – Cleanup**

- \$483,925 for 38,714 linear ft (lf) of VRP-approved protective cover trail at \$13/lf; \$9,600 for 800 lf puncheons at \$120/lf; \$274,014 for 18,268 square feet (sf) rock armor at \$15/sf; \$103,640 for 1,974 lf clean fill at \$53/lf; \$4,590 for 17,167 sf trigger layer at \$155/sf; and \$96,217 for 10% contingency.
- \$120,000 for 12 interpretive kiosks at \$10,000/ea.; \$112,500 for 150 intersect signs at \$750/ea.; \$90,000 for 60 secondary access signs at \$1,500/ea.; \$1,048 for 70 trail blazes at \$15/ea.; \$75,000 for large stormwater structure; \$120,000 for 4 stormwater infiltration galleries at \$30,000/ea.; \$20,000 for 1,000 plantings at \$20/ea.; \$30,000 for one interactive exhibit; \$200,000 for 4 observation points at \$50,000/ea
- \$5,000 QEP oversight VRP controls (40 hours); \$17,500 VRP oversight fees
- \$20,000 surveying; \$75,000 trail design; NPDES BMP design (25hrs x \$125/hour=\$3,125); As-built documents (45 hours x \$100/hour=\$4,500); cleanup bid and procurement (30 hours x 100/hour=\$3,000)

Budget Categories	Project Tasks (\$)				
	Oversight	Community Outreach	Cleanup Planning	Site Cleanup	Total
<b>Direct Costs</b>					
<b>Personnel</b>	\$0	\$0	\$0	\$0	\$0
<b>Fringe Benefits</b>	\$0	\$0	\$0	\$0	\$0
<b>Travel*</b>	\$4000	\$0	\$0	\$0	\$4000
<b>Equipment**</b>	\$0	\$0	\$0	\$0	\$0
<b>Supplies</b>	\$0	\$1000	\$0	0	\$1000
<b>Contractual</b>	\$20000	\$10000	\$9000	\$128,125	\$167,125
<b>Construction</b>	\$0	\$0	\$0	\$1,826,937	\$1,826,937
<b>Other</b>	\$0	\$0	\$0	\$0	\$0
<b>Total Direct Costs</b>	\$24000	\$11000	\$9000	\$1,955,062	\$1,999,062
<b>Indirect Costs</b>	\$0	\$0	\$0	\$0	\$0
<b>Total Federal Funding (Not to exceed \$2,000,000)</b>	\$24000	\$11000	\$9000	\$1,955,062	\$1,999,062
<b>Total Budget</b>	\$24000	\$11000	\$9000	\$1,955,062	\$1,999,062

**d. Measuring Environmental Results**

The City will update ACRES at least quarterly to track progress with task outputs and use of grant funds throughout the grant period. We will measure work progress during bi-weekly calls or on-line meetings utilizing spreadsheets and web-based tools. The City will update the public during monthly City Manager Reports to

Council, Boards, and community stakeholder groups; community meetings; and periodic updates to the project website. During cleanup, the City and QEP will perform direct oversight of remediation contractors to ensure specifications are met and will produce daily reports. All VRP documents, such as the Risk, Assessment, Remedial Action Completion and Final Reports, will be available in the public repository. Key project outcomes will include elimination of unacceptable ecological and community exposures to heavy metals and PAHs; redevelopment of 100-acres as recreational greenspace to meet community need and planning objectives; ecological restoration of a brownfield property bordering the Cobun Creek Reservoir; rebuilding public confidence in site safety through a public cleanup under EPA and VRP oversight; durable educational kiosks and trail signs that communicate the area history that caused contamination and champions the success of the cleanup and reuse strategy; a reproducible cleanup and reuse model for the rest of White Park and other city recreation properties; successful leveraging of funding commitments for site reuse.

#### **4. Programmatic Capability and Past Performance**

##### **a. Programmatic Capability**

##### **iii. Organizational Structure (combined 4.a.i-iii)**

The City of Morgantown’s long and stable history (originally chartered in 1785) has built a resilient organizational structure practiced at expending federal funds and accomplishing grant goals within the planned 4-year project timeframe. The regular public meeting schedules provide lower-complexity, well-known, and efficient opportunities for community input. The Council-Manager form of government resists staff turnover and fosters longer-term thinking and project performance. All individuals identified to assist in grant activities have extensive project and grant management experience. **Drew Gatlin (BS, Civil Engineering)** is the City’s Staff Engineer and will serve as the grant’s Project Manager due to his familiarity with the park, its trail users, and area stakeholders. He regularly designs, reviews, bids, administers, and manages City projects with budgets in excess of \$1M, including several federal grants. Drew reports to **Damien Davis**, a PE with over twenty years of experience in civil engineering and project management in West Virginia. The City’s Finance Department will review and approve grant drawdown requests and record funds received in the appropriate revenue line for the grant. The Assistant City Manager, **Emily Muzzarelli**, is a PE who holds over a decade of experience working on federal projects.

All named project staff (and the City in general) have extensive experience procuring and managing contractors and consultants through the state of West Virginia’s 5G process and will follow all competitive procurement standards in 2 CFR 200.317-326 when hiring additional needed contractors.

##### **b. Past Performance – i. Has Previously Received an EPA Brownfields Grant**

##### **(1) Accomplishments**

The City won a FY23 \$500K Brownfield Cleanup Grant for an adjacent parcel (White Park - Southside) and has successfully entered into a cooperative agreement with the EPA. We submitted our first round of reports on time and began grant activities in the first quarter. We expect to begin construction in the FY23 grant’s third quarter. We also received a \$200K FY14 Brownfield Assessment Grant to conduct five Phase I Environmental Site Assessments (ESA) and two Phase II ESA. The Dinsmore Tire location – subject of a FY14 grant-funded Phase II ESA – received a FY22 Cleanup Grant for redevelopment activities under MUB. The second location with a Phase II ESA, the Beechurst Corridor, also included a Site Reuse Plan: the *Sunnyside Neighborhood Brownfields Redevelopment Plan*.

##### **(2) Compliance with Grant Requirements**

The City has complied with all grant work plans, schedules, and terms and conditions as mandated by granting agency guidelines. We received a six-month extension to complete reporting and grant close out activities on the 2014 Assessment Grant. No funds were remaining when the FY14 grant closed.

# Threshold Criteria for Cleanup Grants

## 1) Applicant Eligibility

The applicant is the City of Morgantown, West Virginia. Morgantown is a Unit of Local Government as defined under 2 CFR § 200.64 and is therefore an eligible entity for a Cleanup Grant.

## 2) Previously Awarded Cleanup Grants

The City of Morgantown has not previously received EPA cleanup grant for this site.

## 3) Expenditure of Existing Multipurpose Grant Funds

The City of Morgantown does not have an open EPA Brownfields Multipurpose Grant.

## 4) Site Ownership

The City of Morgantown is the fee simple, sole owner of the White Park Woodlands cleanup site. The City acquired the property through purchase in 1973 and plans to remain owner of the site through and after the cleanup grant.

## 5) Basic Site Information

- a. White Park Woodlands
- b. 1001 Mississippi St., Morgantown, WV, 26501
- c. The City of Morgantown is the current owner of the site.

## 6) Status and History of Contamination at the Site

- a. The White Park Woodlands property is contaminated by petroleum.
- b. The site was part of the 700-acre area that was operated as a crude oil tank farm by Standard Oil and successors from the late 1800s to the 1950s. The site was purchased by the City of Morgantown in 1973 and is currently managed as a wooded trail network in a city park.
- c. Environmental concerns include elevated concentrations of Arsenic, Cobalt, Iron, Manganese in surface and subsurface soil, and the polycyclic aromatic hydrocarbons (PAHs) benzo[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, benzo[k]fluoranthene, dibenz[a,h]anthracene, and indeno[1,2,3-cd]pyrene in surface soil.
- d. Contamination occurred when the site was part of the crude oil tank farm, and was likely the result of spills or leaks from the large storage tanks. The contamination is generally located within the containment berms that were constructed around the tanks.

## 7) Brownfields Site Definition

- a. The site meets the definition of a brownfield under CERCLA § 101(39): (a) The site is not listed, nor is it proposed for listing on the National Priorities List. (b) The site is not believed to be subject to Federal unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. And (c) The site is not subject to the jurisdiction, custody, or control of the US government.

## 8) Environmental Assessment Required for Cleanup Applications

- a. A Site Assessment Report was completed for the White Park Woodlands and submitted to the West Virginia Voluntary Remediation Program in November 2023, prior to this grant application.

## 9) Site Characterization

- a. The White Park Woodlands property is eligible to be enrolled in a regulatory program. The site was enrolled in the West Virginia Voluntary Remediation Program on October 5, 2022. West Virginia Department of Environmental Protection Brownfields Coordinator provided a State Environmental Authority Acknowledgement Letter on November 2, 2023 attesting that there has been a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site. This letter is attached to this application.

## **10) Enforcement or Other Actions**

The site is not subject to any ongoing or anticipated environmental enforcement actions.

## **11) Sites Requiring a Property-Specific Determination**

It is not believed that a Property-Specific Determination is needed. The West Virginia Department of Environmental Protection Brownfields Program Manager provided a Written Determination, Petroleum Property Eligible for Brownfields Grant Funding letter dated January 11, 2022. The letter is attached to this application.

## **12) Threshold Criteria Related to CERCLA/Petroleum Liability**

### **12.b Property Ownership Eligibility - Petroleum Sites**

A State Eligibility Determination letter has been attached to this application.

## **13) Cleanup Authority and Oversight Structure**

### **13.a. Cleanup Oversight**

White Park, which includes the White Park Woodlands property, was accepted into the West Virginia Voluntary Remediation Program as VRP Project #22015 on October 5, 2022. A Voluntary Remediation Agreement was executed for the site on October 24, 2022. The WVDEP Office of Environmental Remediation (OER) administers the WV Voluntary Remediation Program (VRP) and provides regulatory oversight for all brownfield cleanup projects. The program provides a Certificate of Completion to applicants who successfully demonstrate their site has met the state's most current risk-based human health and ecological standards, which are reviewed annually and published as the WVDEP VRP De Minimis Standards and Relevant Benchmarks within Interpretive Rule 60CSR9. The WVDEP OER and its predecessor have been actively engaged with site assessments at White Park since 1988 and were specifically consulted for the VRP site assessment completed for the White Park Woodlands prior to this grant application.

Cleanup of sites under the VRP must be supervised by a WV Licensed Remediation Specialist (LRS) who is certified by the VRP. The City will contract with a LRS as its qualified environmental professional (QEP) to oversee and complete the cleanup of the site through a competitive process in accordance with the competitive procurement provisions of 2 CFR 200, EPA's rule at 2 CFR 1500 and the City's procurement requirements.

### **13.b Access to Adjacent Properties**

The Site is directly accessible from several city-owned streets and parking areas in a generally interconnected network. The Adjacent property to the south is also city-owned and can be accessed from the Site, or through a business park owned by Commercial Land Development, Inc. (CLD) which also serves as access to a current EPA grant on an adjacent site. In May 2022 the agreement with CLD was updated to a permanent, 20-foot wide, publicly accessible, easement to ensure unencumbered access to the Site during cleanup and planned reuse of the site as the WPW trail. Construction of the trail bridge from the northern to the southern section will allow direct access to the entire site from City-owned parcels.

## **14) Community Notification**

### **14.a Draft Analysis of Brownfields Cleanup Alternatives**

A draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the site and is attached to this application.

### **14.b Community Notification Ad**

The City published community notification advertisements on its website and in the following local newspaper of record: The Dominion Post on Saturday, October 28, 2023. A copy of this notice is attached.

**14.c Public Meeting**

On November 7, 2023, the City held a special public meeting to discuss their intent to apply, a draft of their grant application, and a draft of the ABCA. Thirteen people were in attendance. A copy of the meeting sign-in sheet, meeting notes, and responses to community questions and comments is attached to this application.

**14.d Submission of Community Notification Documents**

Associated documentation is attached to this application.

**15) Name Contractors and Subrecipients**

Contractors will be procured in accordance with State and Federal procurement requirements in an open competition upon receipt of award as per 2 CFR Part 200 and 2 CFR Part 1500. There are no subrecipients envisioned under this project.



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west virginia department of environmental protection

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Office of Environmental Remediation  
601 57th Street SE  
Charleston, WV 25304  
Phone: 304-926-0499

Harold D. Ward, Cabinet Secretary  
dep.wv.gov

November 2, 2023

Ms. Emily Muzzarelli  
City of Morgantown  
389 Spruce Street  
Morgantown, WV 26505

RE: State Environmental Authority Acknowledgement Letter  
FY24 U.S. EPA Brownfields Cleanup Grant Application  
EPA-I-OLEM-OBLR-23-15

Dear Ms. Muzzarelli,

Thank you for your continued efforts to further enhance the state's environment, economy, and quality of life by applying for an FY24 U.S. EPA Brownfields Cleanup Grant. The WVDEP acknowledges that the City of Morgantown plans to conduct cleanup of the White Park Woodlands brownfield site located at 1001 Mississippi Street, Morgantown, WV.

The WVDEP affirms that the White Park Woodlands site:

- i. Is eligible to be enrolled in the WVDEP Voluntary Remediation Program;
- ii. Is currently enrolled in the WVDEP Voluntary Remediation Program; and,
- iii. Has a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site. Note that remediation work can begin on sites that have enrolled in WVDEP's Voluntary Remediation Program at any time provided that WVDEP is notified in writing.

The 100-acre Woodlands portion of White Park forms the north shore of the City's Cobun Creek drinking water reservoir. Cleanup will follow the successful approach already in use for cleanup of the White Park Southside that centers on redevelopment and expansion of a modern, optimized recreational trail system. The cleanup combines remedy and reuse activities into an integrated process that meets the demonstrated needs of the community and user groups, mitigates climate change stresses on drinking water resources, helps to address area stormwater challenges, and protects mature forest resources while ensuring protection of human and ecological receptors through WVDEP oversight of the project in the Voluntary Remediation Program.

Additionally, should assessment needs arise in the future, funding may be available through WVDEP's current CWAGST Brownfields Assessment Grant to fund the additional site characterization. Also,



should the site receive the Brownfields Cleanup Grant and if all funding is expended but additional remediation remains, funding may be available through WVDEP's Brownfields Revolving Loan Fund Grant to fund the additional remediation.

As you prepare your application for this funding, the WVDEP Office of Environmental Remediation is in full support of your efforts. We are committed to assist you throughout the remediation process at the White Park Woodlands site and look forward to future redevelopment.

Should you have any questions or needs, please do not hesitate to contact me at 304-951-7527.

Sincerely,

A handwritten signature in blue ink that reads "Jackson Porter". The signature is written in a cursive style with a large, looping initial "J".

Jackson Porter  
Brownfields Specialist