



IV.D. Narrative Information Sheet

IV.D.1 Applicant Identification

City of Indianapolis
City County Building, 200 E. Washington Street, Suite 1522
Indianapolis, Indiana 46204
Phone: (317) 327-5828

IV.D.2 Funding Requested:

- a. Community-Wide Assessment Grant
- b. Federal Funds Requested: \$450,000

IV.D.3 Location:

Indianapolis, Marion County, Indiana

IV.D.4. Target Area and Priority Site Information

The target area is the Urban Core North District located in downtown Indianapolis, and is bound by White River to the west, Emerson Avenue to the east, 16th Street to the south, and 38th Street to the north. Below is a summary of the priority sites discussed within the grant application that are targeted for assessment within the district.

Site Name	Tract No.	Address
Former Oilway Site	351200	1176 Roache Street
Former Railroad Turnaround	352300	2505 N. Sherman Drive

IV.D.5. Contacts

Project Director
Margarette Webb
City-County Building
200 E. Washington Street, Suite 2042
Indianapolis, IN 46204
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Director, DMD
Rusty Carr
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200 E. Washington Street, Suite 2042
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IV.D.6. Population: City/Town (Population)

Indianapolis, Indiana: 887,642

IV.D.7. Other Factors Checklist

Other Factors	Page No.
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	2
The priority site(s) is in a federally designated floodplain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	3, 4
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures	3, 4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	8,9
The target area(s) is located within a community which a coal-fired power plant has recently closed (2013 or later) or is closing.	

IV.D.8. Letter from the State:

Please find attached a letter from the Indiana Department of Environmental Management acknowledging our intent to apply for FY24 grant funds and conduct assessment activities.



Department of Metropolitan Development

2042 City County Building, 200 E. Washington Street, Indianapolis, IN 46204



IV.D.9. Releasing Copies of Applications:

Not applicable.



Department of Metropolitan Development

2042 City County Building, 200 E. Washington Street, Indianapolis, IN 46204



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 6, 2023

Margarette Webb, Project Manager
Brownfields Redevelopment Program
City of Indianapolis
200 E. Washington Street, Suite 2040
Indianapolis, Indiana 46204

Re: IDEM Acknowledgement Letter
U.S. E.P.A. Brownfields Grant Proposal
Community Wide Assessment Grant
City of Indianapolis
Marion County

Dear Ms. Webb:

This letter is provided in support of the City of Indianapolis (Indianapolis) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community Wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that Indianapolis is requesting \$450,000 for hazardous substances and/or petroleum assessment.

IDEM understands that Indianapolis has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered through the Indiana Brownfields Program (Program) and that Indianapolis, based on the information it has provided with its request, believes it has the capability to perform the proposed grant-funded activities. The requested assessment grant funding will help Indianapolis with community outreach, evaluating and prioritization site inventory, conducting Phase I and Phase II Environmental Site Assessments and developing site specific cleanup and reuse plans.

The focus of this initiative is to identify and assess potentially contaminated properties within the Urban Core North District (inside Indianapolis City Limits) with the greatest potential for community need, job creation, and revitalization. The current inventory includes several target sites throughout the neighborhood and includes industrial sites, a bulk oil facility, and former railyard properties. The Urban Core North District has a high percentage of people living below the poverty line and the City's residential market has taken a hit as owners are unable to make necessary renovations

to their homes. This assessment is expected to help transform local brownfields into affordable housing, greenspace, and a food hub. The redevelopment of these sites will promote the removal of blighted and contaminated sites and create new housing opportunities that should improve the quality of life for neighborhood residents.

Since Indianapolis has not yet selected/indicated the specific sites that will benefit from U.S. EPA brownfield grant funding, IDEM cannot make site-specific eligibility determinations at this time. However, should Indianapolis be awarded the requested grant funding, the Program will work together with U.S. EPA and Indianapolis to determine site eligibility once Indianapolis has established the sites intended for funding.

IDEM has worked with Indianapolis on several projects. IDEM recognizes that Indianapolis is committed to working with the Program and/or the IDEM Voluntary Remediation Program for technical oversight of grant-funded site activities as applicable during the grant project period. The Program and IDEM are committed to continuing to support brownfield redevelopment within Indianapolis by providing technical and other assistance through the Program.

Based on the information submitted, IDEM considers the City of Indianapolis an excellent candidate to receive U.S. EPA assessment grant funding to continue its brownfields redevelopment efforts, which support Indiana's brownfields initiative. IDEM looks forward to continuing its partnership with Indianapolis and its constituent communities. For further assistance, please contact John Morris of the Indiana Brownfields Program directly at (317) 234-0235 and at jmorris@ifa.in.gov.

Sincerely,



Andrea Robertson Habeck
Technical Staff Coordinator
Indiana Brownfields Program

ARH/JTM

cc: (via electronic transmission)

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 Indianapolis (City) is applying for a \$450,000 Brownfields Community-Wide Assessment Grant. The capitol city of Indianapolis (population 887,642) was founded in 1821. Due to the convenient design of highways and railroads, the City flourished as an industrial hub of the Midwest. Our target area is located just north of downtown Indianapolis in the Urban Core North Neighborhoods, a conglomerate of neighborhoods in Indianapolis that used to be industrial, commercial, and transportation hubs, currently populated by 71% people of color. The Urban Core North Neighborhoods (UCNN) is bound by the White River to the west, Emerson Avenue to the east, and spans between 16th Street and 38th Street. Seven neighborhoods including Martindale-Brightwood, Forest Manor, Meadows, Mapleton Fall Creek, Near Northside, Crown Hill, and Near NW-Riverside are located within the Urban Core North Neighborhoods. These neighborhoods flourished in the nineteenth and early twentieth centuries, with manufacturing as their economic backbone. In the 1970s, interstate construction displaced residents and disrupted the local economy. Major industrial employers closed and left nearly a thousand residents jobless—and left behind blighted, contaminated sites requiring federal and state emergency intervention to address, most notably the American Lead and Site 0153 areas which are managed by the Indiana Department of Environmental Management. Our priority sites are located within 3 miles of these major emergency action sites in areas that are largely utilized as residential, industrial, and commercial. They are in the neighborhoods of Martindale-Brightwood and Near NW-Riverside, two historically African American neighborhoods that have coalesced in recent years around quality-of-life plans and subsequent community-led plans to address brownfield properties. The stakeholder-driven development that stems from plans like these benefits neighborhood residents. Instead of outside-in urban renewal, which can result in gentrification and resident displacement, stakeholder-driven development involves local community members at every step of the process. These neighborhoods are home to historically racially marginalized and economically disadvantaged populations who have a strong sense of pride in their community and are eager to see vacant or underutilized brownfields redeveloped into community assets as their neighborhoods are revitalized. Funding provided by the EPA FY24 Community-wide Assessment grant would help finance the assessment of the priority brownfield sites listed below, as well as similar sites in the Urban Core North eliminating hazardous sites that are impacting the neighborhood and allowing these sites to be reused

ii. Description of the Priority Brownfield Sites: The Urban Core North contains dozens of brownfields in various stages of assessment, including large former industrial sites, vacant lots with concerning former uses, old fueling stations, and shuttered, dilapidated “Main Street”-type commercial properties. The priority sites below are examples of the types of sites that will be assessed under this grant.

Former Railroad Turnaround & Gas Station, 2505&2507 N Sherman Dr., Martindale-Brightwood: This ~13-acre site is currently vacant, with nothing left but a strip of pavement in very poor condition. In the 1800s, it operated as a railroad roundhouse. In 1965, it opened as Indianapolis’s largest drive-in movie theater, which closed in 1983 and has since been demolished, leaving the entire site abandoned and subject to decades of dumping and overgrowth. It also contains a former fueling station that has an Environmental Restrictive Covenant due to the presence of petroleum products in groundwater. Across the street is a neighborhood of single-family homes. Adjacent to this site is the community’s only full-service grocery store; just across the street is the Martindale-Brightwood branch of the Indianapolis Public Library. Due to the former use as a railroad roundhouse and the potential for environmental impacts, subsequent dumping, and surrounding site use, this large site in an urban mixed commercial-residential-industrial area requires assessment so it can be redeveloped and serve the Martindale-Brightwood community. This site is currently privately owned but is on the Martindale-Brightwood Community Development Corporation’s (MBCDC) asset map and part of the Jumpstart Martindale Brightwood focus area (Learn more about both organizations in the table on page 4.) Because of its size and prime location in the neighborhood’s central hub, redevelopment of this site is a priority

of both the Martindale-Brightwood neighborhood and the City. Former Railroad Turnaround would be poised for commercial, greenspace, and/or community space development once assessment and any necessary remediation is complete.

Former Oilway Site, 1176 Roache St., Near NW-Riverside: This 0.77-acre site was historically used as a coal yard in the 1920s and a bulk oil storage facility from the 1950s through 1980s. It sits adjacent to the Indianapolis Central Canal greenway, a source of drinking water for the City of Indianapolis and is identified in the Northwest Indianapolis Community-Led Environmental Action Plan as a priority catalyst site with a high need for environmental action. The site has stood vacant for decades, with two abandoned buildings, one 2,000 sq ft, one 2,860 sq. ft, both constructed in 1950. Due to their age, asbestos and lead-based paint are of concern. Today, the site is a blighted eyesore in a residential area, surrounded by compromised fencing, and is a magnet for vandalism and crime. Even after UST removal in 2011, the site contains known petroleum contamination that requires further assessment to fully delineate. Due to the presence of contamination in soil and/or groundwater in a poor, primarily African American neighborhood, and because of its proximity to a canal which provides drinking water, this site is a strong environmental justice concern. The City of Indianapolis is in the process of acquiring the site to manage further assessment and cleanup. If any remaining contamination can be remediated to acceptable levels, this site would be in a prime area for creative placemaking. City long-range plans have identified this location as ideal for a canal-facing park.

iii. Identifying Additional Sites: Additional sites in the Target Area will be identified and prioritized through engaging the community at stakeholder or public meetings, touring the community with our Qualified Environmental Professional (QEP), and close coordination with community organizations. Site selection criteria will include as priorities proximity to sensitive receptors, presence within historically underserved or marginalized communities, nuisance/blight severity, and potential beneficial redevelopment outcomes. Identified sites will be further prioritized using the CEJST to confirm highest community need. Should funds remain after prioritizing the UCNN, sites throughout the city may be considered following a similar process focusing on HUD Neighborhood Revitalization Strategic Areas (NRSA).

b) Revitalization of the Target Area; i. Reuse Strategy and Alignment with Revitalization Plans: The City of Indianapolis created the UCNN map to focus City planning efforts on neighborhoods that have high need but also strong internal community support. This project springs from the convergence of several land use and revitalization planning efforts which create a vision for long-term regional vitality and resilience through City policy. Additionally, one of our priority sites is in an Opportunity Zone, which provides tax incentives for redevelopment as part of the Tax Cuts and Jobs Act of 2017. Sustainable and equitable development on the priority sites will be assured via the removal of environmental barriers through remediation, the reuse of existing infrastructure, improved walkability of the area, the provision of opportunities for new businesses and new jobs, and the provision of affordable housing options near places of employment. The projected reuses for these priority sites fit the community-based placemaking plans summarized below. While final reuse for each priority brownfield site can only be cemented when all sites have completed assessment, reuse planning will align with the community-led plans below which include a vision of greenspace, mixed-use neo-urban affordable housing, and new locally owned commerce.

Martindale-Brightwood Quality of Life Plan (revised 2018), the 25th and Monon Brownfields Cluster Vision Plan (2021), and Jumpstart Martindale-Brightwood (2022): Martindale-Brightwood residents created the Martindale-Brightwood Quality of Life Plan to increase local quality of life, and remediating contaminated properties has always been a priority item. In 2022, the MBCDC launched the Jumpstart Martindale-Brightwood program to promote the growth of local residential developer capacity through training, mentoring, relationship-building, and a loan program. Brownfield redevelopment is built into the training schedule.

Northwest Area Quality of Life Plan (2014) and Community-Led Environmental Action Plan

(C-LEAP) (2022): Three thousand residents joined together to craft a six-point quality of life plan for their community’s future that included community health and resource development. This plan was the first of its kind in the area to be community-led instead of driven by outside stakeholders. Community health in relation to local brownfields was a primary concern, and that concern led to developing the C-LEAP, which includes creating and prioritizing a brownfields inventory and initiating brownfield interventions on sites like the Former Oilway Site. Two high-priority brownfield sites from the C-LEAP are already deep in the reuse planning phase.

The Bicentennial Plan (2020): The Indianapolis Department of Metropolitan Development (DMD) has completed an integrated planning effort to modernize the Comprehensive Plan for Marion County, the Official Thoroughfare Plan, the Regional Center Plan, the Community Development Consolidated Plan, and the inaugural Regional Comprehensive Economic Development Strategy Plan. Together, these plans form a cohesive roadmap of policies, priorities, and processes necessary to improve the region’s quality of life. This will be accomplished by anticipating the demand for greenspace, infrastructure, and infill development. Brownfield remediation and redevelopment is a top strategy to fulfill this goal.

ii. Outcomes and Benefits of Reuse Strategy: The community-led plans driving brownfields assessment, cleanup, and reuse in the Urban Core North Neighborhoods, including Near NW-Riverside and Martindale-Brightwood, are all focused on an overall improvement in quality of life for these neighborhoods. One major barrier to these plans is the presence of brownfield properties. In the priority sites table below, we have identified various potential outcomes and benefits associated with redeveloping our priority sites. This assessment grant initiative will reduce current reuse barriers at the sites, making reuse environmentally and economically feasible. Assessment, cleanup, and reuse will remove neighborhood health hazards, revitalize blighted neighborhoods, provide low and mixed-income housing, and improve the local economy. Currently, the priority sites and others like them in the Urban Core North Neighborhoods face vagrancy, drug dealing, illegal dumping, and vandalism. Assessment, cleanup, and eventual reuse will remove these threats to the community.

Site	Potential Reuse	Potential Outcomes	Potential Benefits	Sustainable Reuse Potential	Energy Efficient Potential	Affordable Housing	Opportunity Zone
Former Railroad Turnaround & Gas Station	Commercial, community, or green space	Hazard removal, creation of community-sustaining space	Improved physical and environmental health, economic development	X	X	X	
Former Oilway Site	Canal-facing greenspace	Blight removal, provide needed access to greenspace	Improved physical and environmental health, improved walkability	X	X		X

Reuse of existing buildings will happen whenever possible, but when new construction must take place, the City is committed to encouraging energy-efficient, high-performance buildings. The City of Indianapolis Office of Sustainability is taking steps to improve development patterns through strategies established in its Thrive Indianapolis Action Plan that will better support our infrastructure, evolve our economy, and make our City more resilient towards our end goal of achieving zero greenhouse emissions by 2050. Thrive Indianapolis is driving new development into “green buildings,” establishing objectives that require all new commercial construction to meet electric vehicle (EV) readiness requirements for 20% of parking spaces, with the goal of significantly increasing charging infrastructure of businesses and workplaces. The City provides low-interest loans to owners that are willing to invest in energy efficient and renewable energy improvements in new and existing buildings. With new redevelopment resulting from brownfields funding, there will be additional opportunities to implement sustainable development practices. By focusing on sustainable development in these

areas, the City of Indianapolis and its partners will develop neighborhoods that can be used as models and case studies for additional sustainable development in the future.

c) Strategy for Leveraging Resources; i. Resources Needed for Site Reuse: The City of Indianapolis has already committed over \$490,900 to the Urban Core North Neighborhoods brownfields initiative in the form of site research, acquisition, and demolition. The City will partner with local and state organizations to identify resources needed for site reuse, including tax incentives, such as Opportunity Zones and Tax Increment Financing, to attract investors and redevelopers when appropriate. Other sources of funds that that may be leveraged as site environmental conditions are de-mystified using assessment funds include \$36M in American Rescue Plan Act (‘ARPA’) funds to Indianapolis for neighborhood redevelopment activities, a FY2023 \$35M New Market Tax Credit Award, CDBG, and HOME funds. So far, the City has invested \$177,000 in this effort through its EPA Assessment grants in 2012, 2015, 2017, and 2018. Additionally, the City has a 2013 EPA Revolving Loan Fund (RLF), and \$700,000 has been loaned out thus far. Although the RLF cannot fund brownfields assessment or fund work on City-owned properties, this is an important resource that might bring non-City-owned sites to full reuse. Additionally, the City’s leveraging plans include the following sources:

Source	Purpose / Role	Amount (\$)	Status
City of Indianapolis/Indiana Brownfields Program Petroleum Orphan Sites Initiative	Completed acquisition and research, then removed USTs on the 25th and Monon Brownfields Cluster	\$455,000	Committed
Local Demolition Funds	Demolish unsafe structures on priority sites	\$80,900	Committed
Private Property Owner	Donation of Former Oilway Site	\$90,100	Potential
Indiana Brownfields Program	State Revolving Fund (SRF) for cleanup projects related to wastewater infrastructure	Up to \$400,000	Potential
Jumpstart Martindale-Brightwood	Provides loans to community-based redevelopers in the Martindale-Brightwood area	Up to 85% acquisition and construction cost	Potential
Martindale-Brightwood CDC	Provides small business loans to small, minority, and at-risk businesses	up to \$10,000 per site	Potential
Indiana Brownfields Program	Funding for Orphan UST site remediation	\$200,000 per site	Potential
Indiana Department of Transportation (INDOT)	Funding for infrastructure upgrades / may include UST removals	\$20,000 average per UST	Potential
Liability Insurance Funding	Remediation claims on general liability policies	Generally \$1-3 M	Potential
Indiana State Department of Agriculture: Clean Water Indiana Program	Provides financial assistance to implement conservation practices which reduce nonpoint sources of water pollution	\$125,000	Potential

ii. Use of Existing Infrastructure: Our priority sites are in urban areas with existing infrastructure and a commitment to infill development, thus cleanup and reuse epitomizes sustainable redevelopment. Each priority site is surrounded by usable streets and is in proximity to major interstates. Basic infrastructure such as electric, gas, sewer, water lines, and Internet access already exist on all priority sites in the Target Area, and the City and local community partners are committed to infill development. Tax dollars and private funds normally spent on new infrastructure will be focused on reuse of the sites themselves, which is a financial boon to residents, the City, and developers. If new infrastructure, such as buildings, are needed, sustainable building methods will be used whenever possible. The City is committed to green infrastructure in new projects, and utilizes best management practices such as bioswales, rain gardens, and other impervious surfaces for storm water management, as well as net-zero and LEED development. Incentives such as Opportunity Zones and Tax Increment Financing will help attract community developers to undertake construction, as will microloan programs through organizations like Jumpstart Martindale-Brightwood and the MBCDC.

2. Community Need and Community Engagement a. Community Need; i. The Community’s Need for Funding: Community organizations serving residents in the Urban Core North Neighborhoods often lack the capacity to fund environmental assessments on their own. This is at least partially attributable to the fight against

poverty in these areas. According to the IU Polis Center SAVI Community tool, when compared to the state and national averages, most neighborhoods in the Urban Core North Neighborhoods have double the rate of low-income households. Resources within these communities are often deployed for direct assistance to area residents. Indianapolis, too, is facing an ever-tightening budget as property tax caps increase the discrepancy between certain properties and the amount of revenue collected by the City. The Indiana General Assembly adopted property tax caps in 2008 to provide relief and limit future increases. These rate caps, coupled with major business closures in years past, decreased property tax revenues by millions, crippling the City’s ability to maintain its extensive infrastructure while effectively providing municipal services, already strained due to a state road funding formula which puts urban centers at a disadvantage. Indianapolis’ Brownfield Redevelopment Program (BRP), administered by the DMD, is the primary City program for removing the barriers to redevelopment of brownfields and returning sites to productive use. The BRP’s budget is limited to less than 0.9% of the DMD budget, which is already dedicated to specific sites, other programs, or administrative expenses. Additional funding is needed to assess brownfields in the Urban Core North so the City can be an effective partner on revitalization projects.

ii. Threats to Sensitive Populations; 1) Health or Welfare of Sensitive Populations: Our priority brownfield sites are in census tracts 352300 and 351200, which all contain multiple sensitive populations: the very young, the poor, and people of color, as seen in the table below. All these groups have been shown to be disproportionately impacted by environmental contamination and are especially at-risk when exposed. More than 10% of the population is under age 5 for tract 351200, which is nearly twice the state and national average. Unemployment rates are nearly double that of the state and nation, while high school graduation rates are nearly

	Tract 352300 Former Railroad Turnaround & Gas Station	Tract 351200 Former Oilway Site	State	USA
People of Color	89%	95%	22%	40%
Low Income	61%	70%	31%	30%
Unemployment Rate	23%	11%	5%	5%
Population with Less Than High School Education	31%	19%	11%	12%
Population under Age 5	2%	16%	6%	6%
Population over Age 64	31%	13%	16%	16%

half. Nearly every resident of these census tracts is a person of color, and more than half qualify as low-income.

Because these sites are unsecured and much of the contamination can become airborne, it poses exposure risks to these populations as well as the

population at large. The table to the right identifies health issues in the census tracts of our priority sites. These issues could be linked to exposure to the potential chemicals in our brownfield sites. Metals, semi-volatile organic compounds, and polyaromatic hydrocarbons are some of the known and potential contaminants at the Former Railroad Turnaround & Gas Station and the Former Oilway Site. These contaminants can negatively affect almost every organ system, and many are carcinogens. Marion County cancer rates are higher than the state average, according to the Indiana State Department of Health. Furthermore, according to EJScreen, the health indicators for our priority sites’ census tracts rank above the 90th percentile for low life expectancy, heart disease, and asthma. Additionally, the percentile for persons with disabilities is 71 for tract 351200 and 94 for tract 352300. These data points indicate that citizens in these areas experience extreme health disparities, which may be mitigated by improving the brownfields in the UCNN.

ii. Threats to Sensitive Populations; 2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Groups most at risk for exposures associated with brownfield sites in our Target Area are people of color, the poor, children under five, and the elderly. The assessment, cleanup and reuse of these sites will lead to the identification and reduction of these health threats to these sensitive populations. The combination of a high unemployment rate, lack of education, and low income combine to threaten the overall quality of life for

residents near our priority sites. Community revitalization plans are aimed at reducing these quality-of-life threats. The brownfields funding requested will be used for assessments that will demystify environmental considerations for vacant and underutilized properties, ultimately leading to informed revitalization efforts that will increase access to mixed-income housing, improve access to greenspace in an urban area, and improve the local economy. Our primary objective with this brownfields initiative is to identify, assess, clean-up, and reuse those blighted properties and turn them into community assets that serve these sensitive populations

ii. Threats to Sensitive Populations 3) Environmental Justice (a) Identification of Environmental Justice Issues: Both of our priority sites are located within a disadvantaged census tract, according to CEJST. Our

EJ Indicator (by national percentile, using supplemental indexes)	351200 (Former Oilway Site)	352300 (Former Railroad Turnaround and Gas Station)
Particulate Matter 2.5	96	98
Ozone	88	93
Diesel Particulate Matter	95	97
Air Toxics Cancer Risk	89	94
Lead Paint	94	96
Superfund Proximity	93	97
Hazardous Waste Proximity	91	94
Underground Storage Tanks	87	93
All data from EPA's EJScreen, retrieved November 2023.		

sensitive populations, especially children and the poor, are at greater health risk to suffer from environmental exposure. Additionally, according to the EPA's EJScreen Tool, the two census tracts where our priority sites are located have strong environmental justice concerns, with some of the highest rankings on the EPA's EJ Index when compared with the nation. Pollution indicators and proximity to hazardous waste, lead paint, and superfund sites are all problematic,

especially when considering the socioeconomic makeup of our target area's population. As assessment progresses into cleanup planning and eventual reuse, the City will use equitable development approaches that prioritize local developers, co-operatives, and urban placemaking efforts. Our targeted sites are in a predominantly African American, low-income area where residents lack access to many resources. We will engage in local or first-source hiring and minority contracting whenever possible without imposing geographic preferences for procurements.

(b) Advancing Environmental Justice: The population in the UCNN is largely low-income people of color who face unequal health outcomes. This historically underserved population is continuously shouldered with the additional burden of negative environmental consequences. Reducing brownfields in our Target Area is a key element of ensuring the EPA's environmental justice tenet of "fair treatment". By assessing, cleanup planning and later, reusing these brownfields, we may begin to restore the health and well-being of the UCNN, and equalize the burden placed on these communities. **2.b.i-ii. Community Engagement: Project Involvement and Project Roles:** The following community-based organizations will work with the City throughout the terms of the grant and beyond.

Name of Organization	Specific involvement in the project	Contact name and number
Martindale-Brightwood Environmental Justice Collaborative	Brownfields inventory and outreach; provide environmental impact information to residents	Elizabeth Gore, Chair [REDACTED]
Groundworks Indy (Riverside/Near NW)	Reuse planning, developing community-based partnerships to promote environmental, economic, and social well-being	Adam Velazquez adam@groundworkindy.org
Keep Indianapolis Beautiful (county wide)	Brownfields inventory and outreach; foster community partnerships	Jeremy Kranowitz jkranowitz@kibi.org
Hoosier Environmental Council (county wide)	Community outreach, foster communication to residents and stakeholders	Sam Carpenter / (317) 685-8800 / scarpenter@hecweb.org

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Name of Organization	Specific involvement in the project	Contact name and number
Marion County Health Department	Help identify and/or confirm any health threats posed by local contamination, identify related toxicological issues, perform risk evaluations, design and conduct education/notification programs, and coordinate health testing if migration of contamination from a site is confirmed.	Pam Thevenow / (317) 221-2000 / HealthDept@marionhealth.org
Develop Indy (county wide)	Promote brownfields initiatives, marketing support for brownfields redevelopment opportunities, conduct community and stakeholder meetings	Drew Kincius, Ombudsman dkincius@indychamber.com
Flanner House (Near NW/Riverside)	Connect local community organizations and foster partnerships	Dr. Brandon Cosby, Exec. Director bdcosby@flannerhouse.org
Riverside Civic League	Brownfields inventory and prioritization, conduct community and stakeholder meetings	Peggy Gamlin / contact@riversidecivicleague.org
Kheprw Institute (Mapleton-Fall Creek)	Foster partnerships between residents and community-based organizations, conduct community and stakeholder meetings	Imhotep Adisa, Exec. Director (317) 329-4803
Jumpstart Martindale-Brightwood	Education for potential developers on brownfields opportunities	Dr. JoAnna M. Brown / (317) 778-7664 / jbrown@mbcdc.org
Martindale-Brightwood CDC	Brownfields inventory and prioritization, conduct community and stakeholder meetings	Amina Pierson, Exec. Director (317) 924-8042

2.b.iii. Incorporating Community Input: Community-wide public meetings will be held throughout the 4-year grant period to ensure continued community engagement. These meetings will provide information, solicit feedback, address concerns, and explain relevant health and environmental impacts. Meetings regarding this grant have been held to date with the MBCDC, organizations in the Near Northwest/Riverside area, and Jumpstart Martindale-Brightwood. Over the 4-year grant period, up to 20 community-wide public and stakeholder meetings are expected to be held, including initial kick-off meetings and an end-of-grant wrap-up meeting. Neighborhoods will also be engaged to provide public input for the site-specific reuse and cleanup planning portion of the grant.

The initial meetings will inform community leaders, residents, business owners, and other stakeholders of the grant award, the assessment and planning processes, and to solicit input. Brownfield information and project progress will be communicated to the public via the City’s web page, social media, traditional news outlets, and to key community partners, listed above in Section 2.b.i. These partners will disseminate the information to their stakeholders by way of meetings, newsletters, websites, and social media. Current and future plans for sites, and community input will be the drivers towards the ultimate Site reuse and cleanup plans. In addition to public meetings, pertinent cleanup and reuse planning documents will be made public by providing reports to the Indiana Brownfields Program for listing on the Virtual File Cabinet. The City’s Director of International and Cultural Affairs will advise the City on the need to provide language interpreters/translated documents for non-English speaking or hearing-impaired residents. In the event of the reemergence of Covid-19 as a public health crisis or a similar event, City staff and their QEP have extensive experience implementing social distancing measures during the planning process, including virtual meetings, meetings outdoors or other venues allowing for distancing, online forums and providing masks and hand sanitizer at in-person events.

3. Task Descriptions, Cost Estimates, and Measuring Progress; a) Description of Tasks/Activities and

Outputs: The City of Indianapolis requests \$450,000 of EPA Brownfields funds for the following tasks:

Task/Activity: 1. Programmatic Activities
i. Project Implementation: The City will develop a public Request for Qualifications to contract the services of a QEP. Indianapolis’s brownfields team will determine solutions for major components of the plan, evaluate how to incorporate community input, and identify critical implementation strategies. The City, with help from the QEP, will manage the project team activities, including all reporting requirements with EPA. These reports will highlight the status of completion for tasks,

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progress made, challenges with project implementation, financial expenditures, preliminary data and findings, anticipated activities in the upcoming reporting period and any changes in key staff involved.
ii. Anticipated Project Schedule: QEP procurement will occur October 2024-March 2025. Quarterly reporting to ACRES and staff training will occur throughout the grant cycle.
iii. Task/Activity Lead: City, with guidance from QEP
iv. Outputs: Procurement of QEP, 16 Quarterly Reports, annual financial reports, ACRES updates, travel for one staff member to 2 national EPA Brownfields Conferences and one regional Convention
Task/Activity: 2. Outreach and Inventory
i. Project Implementation: The City will conduct up to 20 public and stakeholder meetings throughout the Cooperative Agreement period (at least one within the first 6 months of grant period) to educate local communities and officials about the Brownfield process and solicit input regarding potential sites. These meetings will further prioritize the current Brownfield inventory and to secure access agreements from property owners and will be held virtually as needed to comply with COVID-19 safety regulations.
ii. Anticipated Project Schedule: Initial outreach and inventory will occur October 2024-March 2025. Subsequent community meetings and inventory updates will occur at least quarterly throughout the life of the grant.
iii. Task/Activity Lead: City staff, with guidance from QEP
iv. Outputs: Brownfields Inventory, public meeting records
Task/Activity: 3. Phase I & Phase II Environmental Site Assessments (ESA's)
i. Project Implementation: Once sites are selected and the property owner grants access, the appropriate EPA eligibility documentation to enter the site into the program will be prepared. The QEP will conduct Phase I Environmental Site Assessments (ESAs) for selected sites in accordance with ASTM Standard 1527-21 as well as the EPAs "All Appropriate Inquiry" standards. The QEP will prepare a Quality Assurance Project Plan (QAPP), which will be reviewed and approved by the EPA. The City will focus grant funds on performing assessments, especially Phase II ESAs, to determine the nature and extent of the contamination at brownfield sites.
ii. Anticipated Project Schedule: January 2026-September 2027
iii. Task/Activity Lead: QEP
iv. Outputs: 1 QAPP, 17 Phase I ESAs, 8 SAPs, 8 HASPs, 8 Phase II ESA reports
Task/Activity: 4. Cleanup & Reuse Planning
i. Project Implementation: The QEP will conduct cleanup/reuse planning, if needed, after evaluation of Phase II data based on the potential reuse scenario(s). Each Analysis of Brownfield Cleanup Alternatives (ABCA) or Remedial Action Plan (RAP) will include remedial actions for each identified contaminant that exceeds the applicable IDEM regulatory screening levels. Remedial actions are evaluated based on cost, intended or proposed site use, feasibility, and its effectiveness in protecting human health and the environment. We will hold up to 2 public meetings for each site to undergo remediation in order to inform and solicit feedback from the community. Additionally, we will produce a community-led vision plan for each our priority sites.
ii. Anticipated Project Schedule: October 2027-September 2028
iii. Task/Activity Lead: QEP, with guidance from City
iv. Outputs: 4 RAPs/ABCAs, 2 community-led vision plans

3.b) Cost Estimates

Task 1: Personnel: \$2,500 (50 hours at \$50/hr); Contractual: \$8,500 (85 hours at \$100/hr); Travel to 2 National Brownfields Conference: \$5,500 (transportation=\$2,000; hotels=\$3,000; \$200=per diems; \$300=registration) Supplies: \$750

Task 2: Personnel: \$2,500 (50 hours at \$50/hr); Contractual \$6,000 (60 hours at \$100/hr); Local Travel: \$500; Supplies: \$1,000

Task 3: Contractual: \$287,500 (17 Phase I ESAs at \$3,500 each, 8 Phase II ESAs at \$27,500 each, 1 QAPP at \$8,000)

Task 4: Personnel: \$2,500 (50 hours at \$50/hr); Contractual: \$132,000 (4 RAPs at \$8,000 each, 2 Community Vision Plans at \$50,000 each); Supplies \$750

Program Tasks	Task 1: Programmatic Activities	Task 2: Outreach & Inventory	Task 3: Phase I, Phase II	Task 4: Cleanup & Reuse Planning	Total
Personnel	\$2,500	\$2,500		\$2,500	\$7,500

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Travel	\$5,500	\$500			\$6,000
Supplies	\$750	\$1,000		\$750	\$2,500
Contractual	\$8,500	\$6,000	\$287,500	\$132,000	\$434,000
Total Budget	\$17,250	\$10,000	\$287,500	\$135,250	\$450,000

3.c) Measuring Environmental Results: The City of Indianapolis will be responsible for recording, tracking, measuring, and evaluating all project activities and progressions while submitting all required reports to the EPA and the ACRES website. We will develop a comprehensive schedule for implementing the aforementioned tasks and periodically review that all tasks are on schedule for completion taking necessary actions should activities be delayed.

Tasks	Success Measure
Public and stakeholder meetings	# of meetings, # of attendees, participant involvement
Brownfield inventory	# of additional sites, reuse plans, economic development
Quality Assurance Project Plan	QAPP approval by third quarter of Cooperative Agreement
Phase I and Phase II ESAs	# of ESAs performed
ACRES and Quarterly/Final Reporting	Timely ACRES updates and quarterly/final report submittal
ABCAs and RAPs	# of ABCAs and RAPs completed
Develop Reuse Plan	Implement Reuse Plan
Outcomes	Success Measure
Reduction of health risks	Contaminated sites remediated, reduced disease/illness rates
Increase employment opportunities	# of quality jobs created
Add businesses and community services	# of businesses opened; # community services added
Expand housing availability	# housing units, # of low-moderate income housing
Acquisition of additional funding	Further assessment and/or cleanup grants; leveraged development
Sustainable redevelopment	Mixed-use development, green infrastructure, and livability principles

4. Programmatic Capability and Past Performance

a. Programmatic Capability:

- i. Organizational Capacity,**
- ii. Organizational Structure,**
- iii. Description of Key Staff:**

The City of Indianapolis’s Brownfield Redevelopment Program (BRP) will be the lead agency managing this assessment grant. The BRP will be responsible for procuring all grant-related contractual services and submitting all grant reports to the EPA. **Mr. Piers Kirby** is the Administrator of the Real Estate and Brownfield Redevelopment Division. Mr. Kirby has over 9 years of experience in coordinating environmental contractors and communicating with neighborhood groups, specifically in relation to EPA grants. He has successfully administered over \$4M in federal and state grant funds. He will be supported **Ms. Margarette Webb**, Project Manager for the BRP, with 4 years of community development experience (1 year in the BRP), along with a dedicated program counsel in the Office of Corporation Counsel. The role of Principal Program Manager is anticipated to be filled by December 2023. This person will oversee the execution of the grant. The Project Team also includes staff from the City’s Long Range Planning, Community Economic Development Division, Metropolitan Planning Organization, and the Department of Public Works. The Project Team will provide guidance on site prioritization and resource leveraging throughout the funding period. The City’s Office of Finance and Management has a full-time staff of 7, which includes a full-time Grants Financial Manager. This team currently manages over \$50M in grants annually and will assist the BRP in the administration and management of the funds requested. They will dedicate two financial services employees with experience managing EPA grant funds and tracking fund appropriations. The City has adopted monitoring policies in its published Federal Grants Management Policies, which guides City employees, subcontractors, and project sponsors responsible for administering federal funds. The City issues performance-based contracts for all of its subcontractors and project sponsors and includes the Federal Grants Management Policies in contract language.

iv. Acquiring Additional Resources: Should the need arise to hire additional BRP staff or recruit new leadership, the BRP will ensure that new hires have experience in managing EPA brownfields grants. The City will use a qualifications-based selection process in compliance with 2 CFR § 200 to contract with a QEP for contractual portions of this grant. The City has adopted monitoring policies in its published Federal Grants Management Policies, which serves as guidance for all City employees, subcontractors, and project sponsors responsible for administering funds from federal agencies. The City issues performance-based contracts for all its subcontractors and project sponsors and includes the Federal Grants Management Policies as part of the contract language. We do not anticipate needing any additional resources outside of a QEP but will use these same procedures for any additional procurement.

4.b. Past Performance and Accomplishments: i. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments: The BRP serves as the primary public entity providing technical and financial assistance for brownfield redevelopment efforts within the City. The BRP is self-funded and has a significant track record of securing and successfully administering a variety of resources including EPA Community Wide Brownfields Assessment grants, EPA Area-Wide Planning grants, EPA Revolving Loan Fund grants, EPA Multipurpose grants, Indiana Office of Community & Rural Affairs grants, and litigation proceeds. A summary of three recent grant accomplishments are outlined below.

Grant Type	Grant Term	Remaining Funds	ACRES Status
\$600,000 US EPA FY19 Multipurpose Grant	10/1/2019 – 9/30/2024	\$15,265.46	Current
Outputs to Date: Selection of 1 QEP, 12 quarterly reports submitted, 2 public meetings conducted, 1 EPA-approved QAPP, 1 Phase I report, 1 EPA approved SAP, 1 asbestos survey, 1 Phase II Report, 1 additional site investigation report, 1 ABCA, 1 EPA approved remediation work plan, 475 tons of soil removed, 1 remediation completion report			
Outcomes to Date: 12.5 acres of land made available for redevelopment			
\$300,000 US EPA FY18 Community-Wide Assessment Grant	10/1/2018 – 9/30/2022	\$0	Closed
Outputs to Date: Selection of 1 QEP, 1 approved QAPP, 16 Phase I ESAs, 18 Phase II ESA reports, 3 Hazardous Building Material Assessments, 10 Vapor Intrusion investigations, 2 public meetings, 16 quarterly reports			
Outcomes to Date: 23.4 acres of land assessed			
\$1.3M US EPA FY13 Revolving Loan Fund Grant	10/1/2013 – 9/30/2024	\$542,088.22 (unrevolved)	Current
Outputs to Date: The selection of financial consultants and QEP, program marketing, creation of intake and pre-screening forms/materials. One loan of \$700k has been made to assist with redevelopment of a 3.8-acre site formerly used as a paint and varnish manufacturing facility.			
Outcomes to Date: Development of 242-unit multifamily residential development called The Vue. The loan funded the removal and disposal of over 51.8k tons of contaminated soil, allowing redevelopment. For every dollar of EPA financing involved in the project, \$40 of private funds was leveraged. The loan accounted for the entire hazardous materials portion of the City’s RLF grant, which accounts for 75% of the City’s total RLF award. An additional \$300k of Hazardous Materials funding was awarded to the City in 2016.			
Remaining Funds: We have one developer that intends to submit two applications for two different stages of a redevelopment on E. Wabash Street in downtown. A second developer has reached out to us about a loan for a large-scale adaptive reuse project downtown. We are also awaiting an application from a local community development corporation for a subgrant for the installation of a vapor mitigation system in a building that will become multi-family housing.			

(2) Compliance with Grant Requirements: The BRP developed Work Plans and successfully negotiated Cooperative Agreements with the EPA for the aforementioned grants. The BRP submitted and received approval for QAPPs, has complied with quarterly and annual reporting requirements, and has submitted site information and assessment data to the EPA via the ACRES database for all grants. The BRP complied with all work plans, schedules, and terms and conditions of all prior grants awarded, proving its ability to quickly and effectively deploy EPA funds to assist with catalytic community-driven brownfield redevelopment projects.

SECTION III.B – THRESHOLD CRITERIA FOR COALITION ASSESSMENT GRANTS

1. Applicant Eligibility

The applicant is the City of Indianapolis, which is considered a local government as defined by 2 CFR 200.64, and is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

2. Community Involvement

The City will administer up to 20 community-wide public meetings throughout the 4-year grant period to ensure continued community engagement. These meetings will provide information, solicit feedback, address concerns, and explain relevant health and environmental impacts. Meetings regarding this grant have been held to date with the MBCDC, the Mapleton Fall Creek CDC, and Jumpstart Martindale-Brightwood. As necessary, meetings may be held virtually in light of the ongoing COVID-19 related regulations.

The initial kick-off meeting will inform community leaders, residents, business owners, and other stakeholders of the grant award, the assessment and remediation process, and to solicit input. Brownfield information and project progress will be communicated to the public via the City's web page, social media, traditional news outlets, and directly to key community partners. These partners will disseminate the information to their stakeholders by way of meetings, newsletters, websites, and social media. This meeting will discuss our current and future plans for the site, introduce our qualified environmental consultant (QEC), request feedback from the community and partners, respond to comments and explain the basis for any reuse plan decisions. Community input will be a driver towards the ultimate Site reuse plans. As such, as cleanup options are evaluated and reuse plans are developed, the City will focus on gathering input and addressing concerns. The City's Director of International and Cultural Affairs will develop and manage a Latinx outreach effort for this grant. Neighborhood Liaisons will advise the Indianapolis Brownfield Redevelopment Program (BRP) on the need to provide language interpreters/translated documents for non-English speaking or hearing-impaired residents.

3. Expenditure of Existing Grant Funds

The City has an open Multipurpose Grant (Cooperative Agreement BF00E02747). More than 70% of funds have been drawn down/disbursed by October 1, 2023. See attached financial records.

4. Contractors and Named Subrecipients

Not applicable. The City has not procured a contractor(s) where the amount of the contract was more than the micro-purchase threshold of \$10,000 in 2 CFR 200.320(a)(1), and does not apply to fair and open competition requirements. No consultants were procured to develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals as noted in 2 CFR 200.319(b). No subrecipients have been named as part of this application for Brownfields Grant Funding.