



DEPARTMENT OF DEVELOPMENT

City Hall - 100 South Union Street

Kokomo, Indiana 46901

development@cityofkokomo.org

(765) 456-7375

NARRATIVE INFORMATION SHEET

CITY OF KOKOMO

FY24 U.S. EPA BROWNFIELD ASSESSMENT GRANT APPLICATION

1. Applicant Identification:

City of Kokomo
100 South Union Street
Kokomo, Indiana 46901

2. Funding Requested:

- a) Assessment Grant type: Community-wide
- b) Federal Funds Requested: \$500,000

3. Location: Kokomo, Indiana

4. Target Area and Priority Site Information:

- Target Area 1: Downtown/Riverfront District
- Target Area Census Tracts: 18067000200, 18067000900 and 18067001200
- Priority Site:
 - Former Substation Site
359 Main Street, Kokomo, Indiana
- Target Area 2: Warren's Auto District
- Target Area Census Tracts: 18067000900 and 18067001200
- Priority Sites:
 - 1200 S Home Avenue, Kokomo, Indiana
 - 1200 S Union Street, Kokomo, Indiana

5. Contacts:

a) Project Director:

Mr. Steve Geiselman, Development Specialist, City of Kokomo

100 South Union Street, Kokomo, Indiana 46901

Phone: (765) 456-7389, Email: sgeiselman@cityofkokomo.org

b) Chief Executive:

Mr. Tyler Moore, Mayor, City of Kokomo

100 South Union Street, Kokomo, Indiana 46901

Phone: (765) 456-7444; E-mail: mayor@cityofkokomo.org



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6. Population: 57,947
(U.S. Census Bureau, census.gov, 2021: American Community Survey 1-Year Estimates Data Profiles)

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	No
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	No
The priority brownfield site(s) is impacted by mine-scarred land.	No
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).	Page 1
The priority site(s) is in a federally designated flood plain.	Pages 1,5
The reuse of the priority site(s) will incorporate energy efficiency measures.	Page 3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Pages 2, 3
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).	No
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013) or is closing.	No

8. Letter from State or Tribal Environmental Authority: Attached



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 8, 2023

Mr. Steve Geiselman
City of Kokomo
100 S. Union Street
Kokomo, Indiana 46901

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

Dear Mr. Geiselman:

This letter is provided in support of the City of Kokomo (Kokomo) 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 Kokomo is requesting \$500,000 for hazardous substances and/or petroleum assessment.

IDEM understands that Kokomo has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered through the Indiana Brownfields Program (Program) and that Kokomo, based on the information it has provided with its request, believes it has the capability to perform the proposed grant-funded activities. The requested coalition assessment grant funding will help Kokomo 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 within three targeted areas of Kokomo: Downtown/Riverfront District, North and Main District, and Warren's Auto district.

Spurred by the success of two previous USEPA Brownfields Assessment Grants, Kokomo has leveraged to-date approximately \$6 billion dollars of publicly announced investment from automotive companies for the construction of two electric vehicle battery plants. Approximately \$1 billion additional leveraged dollars have resulted from direct suppliers to the battery plants also pursuing facilities in Kokomo and surrounding areas. However, Kokomo completed a Housing Analysis in early 2023 which detailed a current 96.5% occupancy rate across multi-family developments. Without rapid development of additional housing options, these new industrial facilities will struggle to maintain a full workforce, disproportionately affecting the impoverished/minority members of the community.

As of March 2023, Kokomo estimated a need for an additional 400-500 multi-family units and 200-300 single family units to meet of the demands of ongoing industrial development. The City's ability to offset brownfield redevelopment costs is limited because increased tax income from these industrial developments will not be realized for some time, so the City hopes to spur the necessary residential redevelopment using the USEPA Brownfields Assessment Grant funds. Funding due diligence and cleanup planning activities for the numerous former industrial and commercial facilities throughout Kokomo help make viable residential redevelopment that would otherwise be untenable in the current economic climate.

Since Kokomo 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 Kokomo be awarded the requested grant funding, the Program will work together with U.S. EPA and Kokomo to determine site eligibility once Kokomo has established the sites intended for funding.

IDEM has worked with Kokomo on several projects and in 2019, the City of Kokomo was honored with an U.S. EPA Brownfield Redevelopment award for investment in its downtown revitalization project. IDEM recognizes that Kokomo 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 Kokomo by providing technical and other assistance through the Program.

Based on the information submitted, IDEM considers the City of Kokomo 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 Kokomo 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)*
Mr. Mitchell Cline, SME

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1. Project Area Description and Plans for Revitalization

a. Target Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area: The grant will focus on redevelopment of brownfields within the geographic boundary of the City of Kokomo, a central Indiana city with a storied industrial past, stands 60 miles north of Indianapolis along U.S. Highway 31. Having flourished from the 1800s with the discovery of natural gas, the area has been a hotbed of industrial innovation, boasting landmarks such as the first American car in 1894 and the inaugural transistor car radio in 1957. The City began to experience a marked decline at the turn of the millennium, exacerbated by the 2008/2009 Chrysler and General Motors (GM) bankruptcies, leaving the City dotted with numerous neglected brownfields. These sites, tainted with various contaminants, not only pose a grave threat to the health of nearby vulnerable communities but also endanger the local waterway, Wildcat Creek. Even with a decade of rigorous budgeting and strategic leveraging of EPA grants, Kokomo grapples with the challenge of rejuvenating these neglected areas. The prevailing perception among residents and businesses is that these sites are irredeemable. This further perpetuates their dereliction, emphasizing the crucial necessity of securing additional grant funding to initiate targeted revitalization efforts in the identified priority areas. Housing is a crucial need in Kokomo. The City has successfully executed three previous USEPA grants with the assistance of the Indiana Brownfields Program (IBP) and is working hand in hand with IBP on redevelopment of many sites throughout the City. They need additional grant funds to focus on brownfields remaining in two target areas:

- **Target Area (1) Downtown/Riverfront District** – 0.5 square-mile area that includes the historic downtown district and an east-west corridor along Wildcat Creek.
- **Target Area (2) Warren's Auto District** – The Warren's Auto District is an area in central Kokomo characterized by a mixture of historic industrial/commercial facilities and single-family residences.

1.a.ii. Description of the Priority Brownfield Sites: The **Downtown/Riverfront District** target area includes smaller, former commercial operations (print shops, dry cleaners, gas stations) as well as large, vacant former industrial sites (former metals manufacturers and manufactured gas plants) along Wildcat Creek. **The priority site in this target area is the 359 Main Street site (Former Substation Site).** This site is currently vacant except for an approximately 550-square foot utility building. The site was historically occupied by an electrical substation and adjacent to an active railroad. Soil on the site and surrounding areas is likely to contain contamination related to previous operations. U.S. EPA brownfields assessment grant funding was previously used to assess the property east of the Former Substation Site, and contamination was identified that required remediation. The City's U.S. EPA Brownfields RLF grant was successfully used to facilitate cleanup prior to redevelopment as the thriving apartments we see today. This priority site is located along the heavily traversed Industrial Heritage Trail and near Wildcat Creek; the site is in a federally designated flood hazard area (aka floodplain). This site is a priority because the presumed contamination poses an exposure concern to nearby residential neighborhoods, visitors, and the adjacent creek. The priority site is in a prime location for redevelopment due to waterfront location and proximity to both the trail and downtown.

The **Warren's Auto District** target area is a prime location with proximity to both the Industrial Heritage Trail and downtown. The district is dominated by the former Warren's Auto Salvage, a large, blighted building that has been extensively characterized using funding from previous U.S. EPA brownfields assessment grants. Multiple developers have expressed interest in a revitalized mixed-use district featuring the Warren's Auto building, which would require extensive remediation for hazardous materials and other contamination associated with former operations. However, because of the known impact at Warren's Auto, questions about potential brownfield conditions at surrounding properties are slowing redevelopment. **The priority sites identified within this target area include 1200 South Home Avenue and 1200 South Union Street.** The environmental conditions of these sites are unknown; however, they are vacant/underutilized, and it is likely that former maintenance operations impacted soil and groundwater. The sites are also adjacent to single family residences and the well-trafficked Industrial Heritage Trail, potentially harming nearby receptors but also creating the potential for successful mixed-use development if brownfield conditions can be overcome.

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1.a.iii Identifying Additional Sites: If grant funds remain after assessing the priority sites, additional eligible sites will be identified within the City for assessment using grant dollars. Community outreach is an important component to the success of this type of grant project to ensure use of the funds in a manner supported by the community. We will incorporate brownfields education and outreach at scheduled public meetings. Brownfield inventorying is a dynamic process and the City will work with community stakeholders to develop a prioritization matrix. High priority will be placed on sites that can create near-term housing solutions, community investment, and/or job creation. The Climate and Economic Justice Screening Tool will be cross-referenced to determine if a proposed site is within a disadvantaged census tract. Additionally, priority will be given to sites where other funding can be leveraged. Prioritization of sites will continue throughout the term of the grant as projects are selected to receive assessment activities and cleanup planning resources.

1.b. Revitalization of the Target Area: Propelled by the notable achievements stemming from three USEPA Brownfields Assessment Grants and in alignment with the 2017 Kokomo Comprehensive Plan, the City has orchestrated an impressive influx of approximately \$6.3 billion in publicly-announced investments from automotive giants for the establishment of two electric vehicle battery plants. This development has, in turn, catalyzed an additional \$225 million from direct suppliers, signaling a burgeoning wave of industrial prosperity in and around Kokomo. However, the prevailing housing crunch, as underscored by a notable 96.5% occupancy rate in multi-family developments¹, looms as a formidable obstacle. The escalating demand for housing, exacerbated by the imminent workforce requirements of the burgeoning local industrial sector, threatens to intensify the already burdensome housing costs, disproportionately impacting the marginalized members of the community. With the anticipated demand for an additional 400-500 multi-family units and 230-340 single-family units, as projected by the City in March 2023¹ and now further exacerbated by the recent announcement of a second battery plant, rapid residential development is imperative. Compounded by land scarcity for multi-family residential housing within the City, the prevailing economic challenges of inflation and soaring interest rates create considerable hurdles for developers to overcome in making new residential ventures financially viable. The City's capacity to address the costs of brownfield redevelopment is currently limited, significantly hindering the necessary influx of revenue from prospective residents. To overcome this barrier, the City intends to channel the U.S. EPA Brownfields Assessment Grant funds towards critical due diligence and cleanup planning activities. This approach not only addresses the pressing issue of contamination in the vicinity but also paves the way for the initiation of viable residential redevelopment projects, essential for the City's sustainable growth amidst the prevailing economic landscape.

1.b.i. Reuse Strategy and Alignment with Revitalization Plans: The City's vision for the **Former Substation priority site** in the Downtown/Riverfront target area entails a comprehensive approach², blending commercial and residential elements in a mixed-use complex. With the integration of the access points along the Industrial Heritage Trail, this proposed redevelopment strategy aligns with the City's overarching Comprehensive Plan objectives and land use plans for the Downtown/Riverfront target area. Its primary aim is to curate a vibrant hub that offers abundant housing options, an array of entertainment, retail, and dining options for both locals and visitors, thereby fostering a sense of community. Moreover, development of the target areas seeks to bolster walkability and enhance connectivity between key destinations, ultimately fostering a more dynamic and accessible urban landscape while reducing emissions.

Also situated along the City's Industrial Heritage Trail corridor, the City's vision for the **1200 S. Home and 1200 S. Union priority sites** in the Warrens Auto District is to supplement the overall district revitalization effort focused around the former Warren's Auto property. The location is primed for successful mixed-use development, adding much-needed housing while creating another walkable commercial hub. A developer has already submitted a draft plan to the City for consideration to achieve such a development. However, removing environmental hurdles to redevelopment at sites surrounding former Warren's Auto (and therefore limiting developer risk) is critical to getting the overall district revitalization off the ground.

¹ Kokomo Housing Analysis, 2023

² Kokomo Comprehensive Plan, 2017

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1.b.ii. Outcomes and Benefits of Reuse Strategy: The approach for the **Former Substation priority site** within the Downtown/Riverfront target area promises transformative outcomes, effectively dispelling concerns about its usability among developers. Through site assessment and cleanup, the project aims to address existing health, safety, and buildability apprehensions, thereby paving the way for successful development. The site's prime location, once relieved of the burdensome extra costs associated with assessment and cleanup planning, is poised to become an economically viable prospect for both public and private stakeholders while simultaneously increasing walkability, reducing automotive emissions, and further protecting Wildcat Creek. Where feasible, additional energy efficiency measures will also be incorporated into redevelopment plans.

The proposed transformation of the **1200 S. Home and 1200 S. Union priority sites** within the Warren's Auto District target area holds the promise of kickstarting the long-awaited redevelopment of the former Warren's Auto property at 1105 S. Home Avenue. Redevelopment of the district stands to elevate the tax value of the all surrounding properties, increase walkability, and decrease emissions with increased access to the Industrial Heritage Trail. This tangible community growth will signal the area's positive trajectory to prospective investors and residents alike. The anticipated economic stimulus resulting from the assessment and cleanup of additional brownfield sites across the district is expected to usher in a snowball of redevelopment, fostering an improved standard of living and a more robust tax base.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: The City has leveraged over \$6.5 billion of private investment from past grants (see Section 4.b) and all priority sites are within designated tax increment financing (TIF) allocation areas intended to assist developers fund projects through the capture of future tax dollars. The City has identified additional resources that can be used to support assessment, remediation, or reuse/redevelopment of priority sites and additional sites identified during the grant project. The following table identifies the source/type, the City's eligibility for the funding, the funding in general and the use on priority sites.

Funding Source	Description	City Eligibility	Funding Use
Economic Development Income Tax (EDIT) funds (\$3.8M currently available)	Income tax collected from County residents that is placed in a fund held by Howard County	Municipalities in the county are eligible for funds	Redevelopment/revitalization of brownfield sites. Support mixed-use commercial and residential redevelopment on the Former Substation and 1200 S Home/1200 S Union priority sites.
IDNR Land and Water Conservation Fund (up to \$200,000 per grant)	Grants for 50% of the cost for development of outdoor recreation sites, requires 50% local match	City's Parks & Recreation Department can apply	Inclusion/redevelopment of brownfields into trails/greenways/parks/rec facilities. Support access to the Industrial Heritage Trail at all priority sites.
Community Development Block Grants (CDBG)	Funding for improvements in low-moderate income areas	City is a CDBG entitlement community. The two target areas include low-moderate income neighborhoods.	Rehabilitation/reuse of structures on brownfields and redevelopment of brownfields into public-use facilities. Support medium to high-density affordable residential redevelopment at all priority sites.

The grant will support assessment of brownfields, to prepare the sites for remediation and redevelopment activities that will be funded by the EDIT, CDBG, and EPA RLF dollars. The grant may also directly stimulate the availability of the IDNR funds by being a portion of the required local match. In addition to these funds that the City is eligible to secure, the City has three revolving loan programs that provide low-interest loans to businesses that wish to expand or relocate in Kokomo. The programs will provide up to \$300,000 per loan for site acquisition, property improvements, plant construction, and equipment purchase/lease.

1.c.ii. Use of Existing Infrastructure: The two target areas have been developed and contain the required public infrastructure (water, sewer, electricity, etc.) to support most types of redevelopments. Each of the priority sites have a long history of commercial and industrial use, so the existing infrastructure (including roads and, in some locations, rails for access and transportation) extends to these sites and will support the

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revitalization plans discussed in **Section 1.b.i**. By dedicating funds to these areas, the City will be able to maximize and facilitate the use of this existing infrastructure. The most likely infrastructure improvement need will be high-speed fiber/other telecommunication technologies, which may be supported by City loan funds available for technology, manufacturing, and industrial companies investing in the City.

2. Community Need and Community Engagement

2.a. Community Need

2.a.i. Community's Need for Funding: Kokomo stands at the cusp of a transformative period, fueled by the burgeoning development of EV battery plants and EV support industry. Despite this promising trajectory, the City is grappling with a pressing issue: the imperative redevelopment of prevalent brownfield sites. These blighted areas currently cast a shadow over the community's progress, hindering the much-needed expansion of housing options for the influx of younger laborers and foreign workers. In response to this critical demand, the City commissioned a comprehensive housing feasibility study, which unequivocally underscored the necessity for over 400 multifamily units and approximately 340 new single-family homes in the upcoming years³. This acute need has materialized as a direct consequence of the rapid growth in the EV sector within the region. The surge in investments has heralded the creation of more than 3,200 employment opportunities, beckoning an influx of international workers seeking feasible housing options in proximity to their workplaces. Failure to provide accessible housing within City limits could potentially precipitate a detrimental loss of local income taxes and curtail investments in the area's economic growth. However, the median household income of Kokomo residents is only \$51,450 (greater than 21% less than national value)⁴ and a poverty rate of 14.5% (compared to the national rate of 12.6%)⁴, incoming funds to the City to spur this necessary development are limited. Now, more than ever, the community of Kokomo is rallying for the necessary funding to revitalize these brownfield sites and pave the way for an inclusive, sustainable future, where economic prosperity is not a dream but a tangible reality for all its residents.

2.a.ii. Threats to Sensitive Populations

Persistent burdens from the brownfields weigh heavily on disadvantaged communities, presenting an enduring environmental justice issue. These sites, situated close to sensitive populations (especially those in the target areas), have been integral to the City's industrial history for over a century, with ties to steel plants, manufacturing facilities, and automotive industry operations. Through grant-funded site assessments, the threats to the health of these communities will be identified and subsequently mitigated through tailored cleanup plans. This process will not only improve residents' well-being but also reduce blight, shifting perceptions and drawing both residents and businesses back to these areas, catalyzing further reinvestment and redevelopment for overall community betterment.

(1) Health and Welfare of Sensitive Populations

The sensitive populations in the target areas include minorities, children, and women of child-bearing age. In the target areas, the percentage of minorities ranges from 28% to 65%⁵ with high numbers of children (30% to 38% below the age of 18)⁵ and women of child-bearing age (24.4% to 35.7% between the ages of 20 and 54)⁶. The largest health and welfare concerns are the persistent disinvestment in neighborhoods and commercial districts within the target areas, coupled with uncontrolled exposures to contaminated soil and groundwater, as well as the presence of buildings containing hazardous materials. Brownfields in the targeted areas lie near residential areas, heavily trafficked trails and parks, and churches, significantly impacting the vulnerable populations residing within these zones. Despite these conditions, residents have largely stayed in these target areas because they are generally those minority and/or impoverished groups that cannot afford to leave. Through use of grant funds, the City intends to spur investment in these areas while also reducing community exposure to contamination and hazardous materials.

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

The target areas contain brownfields that are likely negatively impacting residents, including sensitive populations with the inability to leave the areas, by potentially exposing them to numerous contaminants via

³ Kokomo Housing Analysis, 2023

⁴U.S. Census Bureau 2021, American Community Survey 1-Year Estimates

⁵ U.S. EPA, EJSscreen 2023

⁶ U.S. Census Bureau 2021

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direct contact, ingestion, airborne particulate inhalation, and vapor intrusion pathways. The types of contaminants likely to be present on the priority sites are known to cause cancer and respiratory problems. These cumulative exposures have likely contributed to elevated total cancer, respiratory disease, and lung cancer rates in Howard County (see table below) when compared to Indiana and the U.S., these impacts are worse for sensitive populations (e.g., African American cancer incidence rates are 2% less than Caucasian, but their cancer mortality rates are 11% greater than Caucasian⁷).

Health Complication Category	U.S.	Indiana	Howard County
Cancer Death Rate*	128.7 ⁸	142.2 ¹⁰	156.9 ¹⁰
Chronic Lower Respiratory Disease Death Rate*	49.2 ⁹	55.17 ¹¹	55.41 ¹¹
Lung Cancer Incidence Rate*	60.2 ¹⁰	71.9 ¹²	77.6 ¹²

*Age-adjusted rates per 100,000

Grant-funded assessments will identify and characterize specific health threats from brownfields affecting residents. Implementation of remediation measures and engineering controls during or prior to redevelopment will curtail these exposures. This approach will minimize spread of contaminated soil and groundwater, while eliminating hazardous building materials will ensure safer residential and commercial use, thereby reducing environmental risks and potential health issues in the target areas.

(3) Environmental Justice

a. Identification of Environmental Justice Issues: Poverty rates in Kokomo (14.5%) exceed those of the U.S. and Indiana (12.6% and 12.5%, respectively)¹¹, and median household and per capita incomes in Kokomo (\$51,450 and \$29,046) are approximately 22-25% lower than the U.S. (\$69,021 and \$37,638)¹³. These numbers get worse in the two target areas with poverty rates ranging from 17.4% to 42.4%¹⁰, and 22.2% to 36.2% of the population receiving public assistance¹³. Median home values in these target areas are 22% to 33% of the U.S. median value of \$244,900¹³. These target areas are also home to high minority neighborhoods. As this evidence would suggest, **each of the identified target areas (Downtown/Riverfront and Warren’s Auto) and all priority sites are confirmed to be located within disadvantaged census tracts¹²**. As the quantity of jobs in Kokomo have decreased, the departure of more affluent residents has led to the concentration of minority populations residing in impoverished neighborhoods within the targeted areas where the majority of the City’s brownfields are situated. The Downtown/Riverfront target area also falls almost entirely within the 100-year floodplain. These communities bear a disproportionate burden of the environmental and economic repercussions stemming from the transformation of industrial and commercial operations into brownfields. These areas have historically been neglected or overlooked, with recent efforts and funds are only just beginning to be directed towards the revitalization of these struggling neighborhoods. Below are just a sample of the environmental justice issues identified within the target areas¹³.

Target Area	Environmental Indicators*			Health Disparities Indicators*		Socioeconomic Indicators*	
	Superfund proximity	UST proximity	Lead paint	Low life expectancy	Asthma	<High School	Unemployment rate
Downtown/Riverfront	97-98	90-96	77-85	91-96	89-94	81-87	83-91
Warren’s Auto	98-99	90-96	82-85	91-97	89-92	78-87	76-91

*Compared to the U.S. An indicator of 95 means that only 5% of the U.S. block groups have a higher or worse value.

⁷ Indiana Cancer Facts and Figures 2021

⁸ CDC, State Cancer Profiles, 2016-2020

⁹ Indiana Mortality Report, 2017

¹⁰ Indiana Indicators, 2012-2016

¹¹ U.S. Census Bureau 2021, American Community Survey 1-Year Estimates

¹² Climate and Economic Justice Screening Tool 2023

¹³U.S. EPA, EJScreen, 2023

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b. Advancing Environmental Justice: The City has committed to forming an Environmental Justice Committee to provide regular community input on proposed assessment sites and redevelopment plans, ensuring environmental justice is a consideration at the onset of each project. The City will leverage recommended community stakeholders, neighborhood representatives, and community partners identified in the table below to form the Environmental Justice Committee. By leveraging grant-funded assessments and subsequent redevelopment initiatives, community-prioritized and targeted interventions can be introduced to foster environmental justice within these marginalized communities. The identification, removal, and effective management of contamination in the target areas will serve as a foundational step in promoting a healthier living environment. The focused redevelopment of currently blighted and vacant properties will minimize displacement of current residents and businesses. The creation of new job opportunities within walkable distances will play a pivotal role in boosting household incomes and reducing the community's reliance on fossil fuel-based energy. Furthermore, the resulting expansion of tax bases will allow the City to better provide essential services to residents, thereby contributing to the promotion of environmental equity and socioeconomic stability within the affected population.

2.b. Community Engagement

2.b.i. Project Involvement and 2.b.ii Project Roles: The grant project is set to involve a robust coalition of community partners, each playing a pivotal role in partnering with the City. These collaborators will have representation on an advisory group that will contribute their expertise and guidance throughout the process, aiding in critical decisions, and offering technical support for the selection, cleanup, and revitalization of the brownfield sites.

Partner Name	Point of Contact	Role in Project
Greater Kokomo Economic Development Alliance	Lori Dukes, President/CEO 765-457-2000 ldukes@greaterkokomo.com	Provide brownfields redevelopment planning help and assist with acquiring additional funds to support remediation and redevelopment of priority sites.
Kokomo-Howard County Chamber of Commerce	Courtney Butler, Manager 765-457-5301 cbutler@greaterkokomo.com	Identify/select sites needing assessment and cleanup, support redevelopment planning following assessment of priority sites, and inform business and developers of the availability of grant funds.
City of Kokomo Environmental Justice Committee	Steve Geiselman, Facilitator/Liaison 765-456-7389 sgeiselman@CityofKokomo.org	Identify/select sites needing assessment and cleanup, collect and disseminate feedback regarding assessment and future reuse plans, and inform community members of the grant progress.
Kokomo Downtown Association	Susan Alexander, Manager of Creative Placemaking & Downtown Initiatives 765-319-0019 salexander@greaterkokomo.com	Identify/help select sites needing assessment and cleanup in the Downtown District target area. Provide technical assistance for redevelopment planning to ensure Former Substation priority site plans enhance the downtown district.
Wildcat Guardians	Mark Laughner, President 765-427-3587 wildcatguardians@yahoo.com	Identify/select additional sites along Wildcat Creek. Provide support for integrating ecological components in the redevelopment of the Former Substation priority site and other sites along Wildcat Creek.
Purdue University Kokomo	Jeff Griffin, Director 765-455-9268 griffin0@purdue.edu	On-the-ground community involvement activities, such as distributing information on 1200 S. Home/1200 S. Union priority sites selected for assessment, cleanup activities, and redevelopment plans.

2.b.iii. Incorporating Community Input: Upon selection, the City will disseminate information via press releases, local newspapers, and digital platforms. Radio ads will target a wider audience, while notices at libraries, community centers, and churches will enhance accessibility. Key community organizations will also be involved in outreach efforts. Spanish versions and translators will be available for inclusive engagement. The City will prioritize employing multiple methods for information sharing and engagement to involve a more diverse community. A public kick-off meeting will initiate the brownfield project, incorporating public input. Updates on selected sites will be regularly communicated. Stakeholder meetings, including the Environmental Justice Committee, will ensure ongoing feedback. Public meetings in accessible locations with remote attendance options will facilitate community engagement. Regular updates will be provided at

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Kokomo Redevelopment Commission meetings. Project materials will be archived online and at Kokomo City Hall for community access.

3. Task Descriptions, Cost Estimates, and Measuring Progress

3.a. Description of Tasks and Activities: The City intends to utilize the grant to evaluate priority sites in the target areas and other identified high-risk sites, facilitating their cleanup and redevelopment. To execute this plan, the City has outlined five key tasks for the grant project. Tasks 1-3 will manage overall grant operations, while Tasks 4 and 5 will directly focus on the priority and additional identified sites. In-kind City staff time will be contributed for Tasks 1-4 and for travel not accounted for in 3.b.

<p>Task 1 – Programmatic</p> <p><u>i. Project Implementation</u></p> <ul style="list-style-type: none"> • The Work Plan will be prepared. • The Cooperative Agreement (CA) will be executed. • A qualified environmental consultant will be retained in compliance with applicable federal procurement regulations. • Formation of the Environmental Justice Committee • A project “kick-off” meeting will be hosted by the City and consultant. • City will complete all required quarterly reports; the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) will be updated; and final project closeout documentation will be submitted. • Staff will attend brownfields training programs.
<p><u>ii. Anticipated Project Schedule</u></p> <ul style="list-style-type: none"> • The Work Plan will be prepared within one month of receiving notification of the grant award. • The CA will be executed within three months of award. • An environmental consultant will be retained within three months of award. • Quarterly reports will be submitted within 30 days of the end of the quarterly reporting period and ACRES will be updated as Priority and non-Priority Sites are assessed. ACRES will subsequently be updated with cleanup and/or redevelopment information during and/or after the performance period. Final project closeout documentation will be submitted as required once the performance period ends. • A “kick-off” meeting will be held within 2 months of receiving notification of the award.
<p><u>iii. Task/Activity Lead</u></p> <p>The City will lead the day-to-day coordination of grant activities, performance reporting, and ongoing training of staff.</p>
<p><u>iv. Outputs</u></p> <p>Satisfaction of administrative requirements of the grant including the Work Plan, CA, quarterly reports (16); ACRES updates; staff training; public meetings and development of outreach materials; final project closeout documentation.</p>
<p>Task 2 – Community Outreach</p> <p><u>i. Project Implementation</u></p> <ul style="list-style-type: none"> • Community outreach and education at public meetings. • Quarterly meetings (or as needed) of the Environmental Justice Committee. • Correspondence with community stakeholders about assessments will be ongoing. • Assistance will be requested from the County health department as appropriate throughout the performance period to understand and prioritize health risks at brownfield sites identified for assessment.
<p><u>ii. Anticipated Project Schedule</u></p> <ul style="list-style-type: none"> • An initial public information and input meeting within two months of notification of award. • Community outreach activities will continue throughout the performance period.
<p><u>iii. Task/Activity Lead</u></p> <p>The City will coordinate/conduct community meetings and community outreach activities in conjunction with the environmental consultant. Frequency of the meetings will be determined based on community engagement.</p>
<p><u>iv. Outputs</u></p> <p>Facebook and website posts, fact sheets, meeting minutes and, more generally, effective communication to the public and stakeholders regarding the objectives and progress of the project.</p>

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<p>Task 3 – Site Inventory</p> <p><u>i. Project Implementation</u></p> <ul style="list-style-type: none"> • A selection system for assessments will be developed to identify and prioritize sites in addition to the priority sites based on: 1) sites where evident threat to public welfare or the environment exists; 2) sites with real development/job creation potential; and 3) sites identified and prioritized by the community. • Non-priority sites will be added to the inventory. • In-kind staff time and travel will be contributed for amounts over those accounted for in 3.b. <p><u>ii. Anticipated Project Schedule</u></p> <ul style="list-style-type: none"> • The prioritization system will be developed within three months of grant award. • Non-priority sites will be added to the inventory throughout the 4-year performance period. <p><u>iii. Task/Activity Lead</u></p> <p>The City will be the lead and work with the environmental consultant to update and maintain an inventory of brownfield sites.</p> <p><u>iv. Outputs</u></p> <p>A more complete and comprehensive inventory of Brownfield sites in the City.</p>
<p>Task 4 – Site Assessment</p> <p><u>i. Project Implementation</u></p> <ul style="list-style-type: none"> • The selected environmental consultant will prepare a Quality Assurance Project Plan (QAPP) and submit to EPA. • Priority sites and additional sites identified during the grant period will be evaluated through performance of Phase I and/or Phase II ESAs, conducted in accordance with All Appropriate Inquiry (ASTM Standard E1527-21). Hazardous Materials Assessments will also be conducted. Health & Safety Plans (HASPs) will be prepared prior to each assessment. • Assessments on both priority and other sites following securing site access will continue. • City and environmental consultant will meet to ensure required site access has been secured, individual assessments are progressing, and the overall project schedule is met. <p><u>ii. Anticipated Project Schedule</u></p> <ul style="list-style-type: none"> • Phase I and/or Phase II assessments will continue throughout the performance period. • Phase II assessments will begin after submission/approval of the QAPP; within three months of environmental consultant selection and grant start date. • Assessments on both priority and other sites following securing site access will continue throughout the performance period. • City and environmental consultant will meet monthly, or as needed, to ensure required site access have been secured, individual projects are progressing, and the overall project schedule is met. <p><u>iii. Task/Activity Lead</u></p> <p>The environmental consultant will lead this task.</p> <p><u>iv. Outputs</u></p> <p>QAPP, 16 site eligibility determinations, 16 health-and-safety plans (HASPs), 16 Phase I ESA reports, 11 site-specific sampling and analysis plans (SAPs), 11 Phase II ESA reports, 5 hazardous materials assessment reports.</p>
<p>Task 5 – Cleanup Planning</p> <p><u>i. Project Implementation</u></p> <ul style="list-style-type: none"> • Cleanup/redevelopment planning as required for sites where redevelopment is imminent. Assessment of brownfields cleanup/redevelopment alternatives, evaluation of needed institutional and engineering controls, and preparation of cleanup and reuse plans. <p><u>ii. Anticipated Project Schedule</u></p> <p>Cleanup planning will be conducted at Priority Sites and other sites following completion of the associated assessment activities and will continue throughout the performance period.</p> <p><u>iii. Task/Activity Lead</u></p> <p>The environmental consultant will lead this task.</p>

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4. a. Programmatic Capability:

4.a.i. Organizational Capacity, 4.a.ii Structure, and 4.a.iii Key Staff: The City has experience managing grants and will employ the same project team during the entire 4-year grant period. The project team includes the City's Director of Development (**Ms. Jennifer Jordan**), Development Specialist (**Mr. Steve Geiselman**), and an **environmental consultant** (see 4.a.ii). The team will be led by **Mr. Geiselman**, who has 9 years of redevelopment, brownfield, and municipal financial management experience. He will be responsible for all grant operations and management of the environmental consultant. He currently manages the U.S. EPA grants and has guided their timely and effective use and will ensure that this grant is successful. He will be responsible for establishing and managing the program's financial accounts and payment requests and transfers. **Ms. Jordan** will serve as assistant Project Manager. She has over 18 years of redevelopment, brownfield, and municipal financial management experience, including managing the City's previous U.S. EPA Brownfields Assessment Grants. As needed, the City's Controller's Office will also provide financial management support. This experienced project team will be able to quickly and effectively complete all administrative and financial requirements for the grant to ensure the project is successfully completed within the 4-year period.

4.a.iv. Acquiring Additional Resources: The City will retain an environmental consultant to assist with Grant activities and conduct environmental assessments. The City has a procurement process in place and has procured contractors for state and federal grant projects, including assessment grants. The process complies with federal procurement regulations (40 CFR §31.36) and includes guidance to attract and utilize minority- and women-owned businesses, as possible. Within one month of securing the grant Cooperative Agreement, the City will prepare the project Request for Qualifications and will direct and oversee the procurement process and will select a consultant within three months of award. The selected consultant will have managed U.S. EPA Assessment Grant projects and be familiar with programmatic requirements.

4.b. Past Performance and Accomplishments

4.b.i. The City was the lead agency for a Coalition that was awarded a U.S. EPA Assessment Grant for Hazardous Substances (\$400,000) and Petroleum (\$200,000) in FY2012, a U.S. EPA Assessment Grant for Hazardous Substances (\$450,000) and Petroleum (\$50,000) in FY2015, and a U.S. EPA Assessment Grant for Hazardous Substances (\$250,000) and Petroleum (\$50,000) in FY2019. The City was also awarded a U.S. EPA RLF Grant for Hazardous Substances (\$700,000) in FY2014.

(1) Accomplishments: At this time, 47 sites (46 within the City) have been assessed using the assessment grants resulting in the following outputs: 58 Phase I ESAs/Phase I ESA Updates, 39 Phase II ESAs, and 8 requests for comfort letters have been prepared for the IBP. RLF grant funds have been used to prepare RLF-required documents and loan documents for three sites and supported the successful cleanup and redevelopment of one site (directly east-adjacent to the Substation priority site). Using these grants, the City has supported the following outcomes: assessment of ~370 acres of brownfields, redevelopment (or announced plans for redevelopment) with nearly \$6.5 billion in leveraged funding, creation of 948 permanent jobs and 1,112 temporary construction jobs.

(2) Compliance with Grant Requirements: The City has successfully developed Work Plans and successfully negotiated Cooperative Agreements (CAs) with the U.S. EPA. The City complied with the Work Plans and their associated schedules, terms, and conditions. The City submitted and received approval for project Quality Assurance Project Plans (QAPPs) and associated updates, complied with quarterly reporting and annual financial status reporting requirements, and submitted to the U.S. EPA, via the ACRES database, the site information and assessment data for each grant. The FY2012 Assessment Grant funds were expended within the three-year grant period (\$502.91 remained). Approximately \$39,000 (primarily petroleum dollars) remained in the FY2015 Assessment Grant at the end of the grant period. Remaining funds from the two open grants are on track to be expended by the end of September 2024 (both were granted extensions ultimately associated with COVID-related impacts). Approximately \$423,498 remains in the FY2014 RLF grant (combined grant funds and grant program income/interest); a \$250,000 loan has been made to a developer with on-going repayments, and the City hopes to provide the remaining RLF dollars to a yet-to-be-determined housing-related project sometime in 2024. Approximately \$78,000 (hazardous and petroleum combined) remains in the FY2019 Assessment Grant. These remaining funds will be used for continued assessment and cleanup planning at identified sites in early 2024.

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CITY OF KOKOMO
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THRESHOLD CRITERIA

1. **Applicant Eligibility:** The City of Kokomo is a General Purpose Unit of Local Government in the State of Indiana.

2. **Community Involvement:** The main stakeholders in this grant project will be Kokomo citizens and employees, employer companies, business organizations, lenders, and developers. Upon selection, the City will disseminate information via press releases, local newspapers, and digital platforms. Radio ads will target a wider audience, while notices at libraries, community centers, and churches will enhance accessibility. Key community organizations will also be involved in outreach efforts (see table below). Spanish versions and translators will be available for inclusive engagement. The City will prioritize employing multiple methods for information sharing and engagement to involve a more diverse community, including formation of an Environmental Justice Committee to provide regular community input on proposed assessment sites and redevelopment plans. A public kick-off meeting will initiate the brownfield project, incorporating public input. Updates on selected sites will be regularly communicated. Stakeholder meetings, including the Environmental Justice Committee, will ensure ongoing feedback. Public meetings in accessible locations will facilitate community engagement. Regular updates will be provided at Kokomo Redevelopment Commission meetings. Project materials will be archived online and at Kokomo City Hall for community access.

The grant project is set to involve a robust coalition of community partners, each playing a pivotal role in partnering with the City. These collaborators will have representation through various advisory groups that will contribute their expertise and guidance throughout the process, aiding in critical decisions, and offering technical support for the selection, cleanup, and revitalization of the brownfield sites.

Partner Name	Point of Contact	Role in Project
Greater Kokomo Economic Development Alliance	Lori Dukes, President/CEO 765-457-2000 ldukes@greaterkokomo.com	Provide brownfields redevelopment planning help and assist with acquiring additional funds to support remediation and redevelopment of priority sites.
Kokomo-Howard County Chamber of Commerce	Courtney Butler, Manager 765-457-5301 cbutler@greaterkokomo.com	Identify/select sites needing assessment and cleanup, support redevelopment planning following assessment of priority sites, and inform business and developers of the availability of grant funds.
City of Kokomo Environmental Justice Committee	Steve Geiselman, Facilitator/Liaison 765-456-7389 sgeiselman@CityofKokomo.org	Identify/select sites needing assessment and cleanup, collect and disseminate feedback regarding assessment and future reuse plans, and inform community members of the grant progress.

Kokomo Downtown Association	Susan Alexander, Manager of Creative Placemaking & Downtown Initiatives 765-319-0019 salexander@greaterkokomo.com	Identify/help select sites needing assessment and cleanup in the Downtown District target area. Provide technical assistance for redevelopment planning to ensure plans enhance the downtown district.
Wildcat Guardians	Mark Laughner, President 765-427-3587 wildcatguardians@yahoo.com	Identify/select additional sites along Wildcat Creek. Provide support for integrating ecological components in the redevelopment along Wildcat Creek.
Purdue University Kokomo	Jeff Griffin, Director 765-455-9268 griffin0@purdue.edu	On-the-ground community involvement activities, such as distributing information on priority sites selected for assessment, cleanup activities, and redevelopment plans.

3. **Expenditure of Assessment Grant Funds:** The City was awarded a FY2019 U.S. EPA Assessment Grant for Hazardous Substances (\$250,000) and Petroleum (\$50,000). The City had expended \$221,986.48 (~74%) of this active grant by September 29, 2023. Documentation of this grant drawdown is attached.