



CITY OF CRAWFORDSVILLE

OFFICE OF MAYOR TODD D. BARTON
300 E. Pike Street
Crawfordsville, IN 47933

(765) 364-5160
crawfordsville.net

R05-24-A-016

IV.D. Narrative Information Sheet

1. Applicant Identification:

City of Crawfordsville
300 E. Pike Street
Crawfordsville, IN 47933

2. Funding Requested:

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested: \$400,000

3. Location:

- a. City of Crawfordsville
- b. Montgomery County
- c. Indiana

4. Target areas:

- Southeast Side Neighborhood (SSN) - is a mix of industrial, commercial, and residential properties in southeast Crawfordsville. The SSN is a 0.46 mi² corridor bound by Wabash Ave. to the north, Grace Ave. to the east, Elmore St. to the south, and Wallace Ave. to the west (CT #18107957100 & #18107957200). The SSN is dominated by several large brownfield sites within and around depressed neighborhoods. Despite this, the area has tremendous reuse potential, with several large vacant tracts that are targeted for affordable housing, mixed-use commercial development, and light industrial expansion.
- Priority Sites:
905 Louise Ave., Crawfordsville, Montgomery County, IN
1300 E. Elmore St., Crawfordsville, Montgomery County, IN
Chapel Ave. & Anderson St., Crawfordsville, Montgomery County, IN
1201 E. Elmore St., Crawfordsville, Montgomery County, IN
816 E. College St., Crawfordsville, Montgomery County, IN
401 S. Oak St., Crawfordsville, Montgomery County, IN

5. Contacts:

- a. Project Director:
Ms. Brandy Allen
Director of Operations & Community Development
(765) 364-5160
ballen@crawfordsville-in.gov
300 E. Pike Street
Crawfordsville, IN 47933



b. Chief Executive:
 Mayor Todd Barton
 (765) 364-5160
tbarton@crawfordsville-in.gov
 300 E. Pike Street
 Crawfordsville, IN 47933

6. Population:
 City of Crawfordsville, Montgomery County, IN – 16,279
 (2011 ACS 5-YR Estimates)

7. Other Factors:

Other Factors	Page#
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The 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).	
The priority site(s) is in a federally designated flood plain.	
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.	Page 3
30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area(s).	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	Page 5

8. Letter from the Indiana Department of Environmental Management, Indiana Brownfields Program (attached).

9. Releasing Copies of Applications: Not Applicable



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Crawfordsville, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 6, 2023

Mayor Todd D. Barton
City of Crawfordsville
300 E. Pike Street
Crawfordsville, Indiana 47933

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

Dear Mayor Barton:

This letter is provided in support of the City of Crawfordsville (Crawfordsville) 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 Crawfordsville is requesting \$400,000 for hazardous substances and/or petroleum assessment.

IDEM understands that Crawfordsville has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered through the Indiana Brownfields Program (Program) and that Crawfordsville, 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 Crawfordsville 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 Southeast Side Neighborhood (SSN) to be a focal point for environmental assessment based on need and development goals. The SSN represents a congregation of vacant or underutilized commercial and industrial sites near each other, areas in need of redevelopment, and businesses no longer in operation or are underutilized. Crawfordsville believes that the SSN represent the best opportunity for quality redevelopment, mitigation of potential health hazards, and value

added to the communities in terms of enhanced property values, commercial and residential development, and new jobs.

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

IDEM has worked with Crawfordsville on several projects. IDEM recognizes that Crawfordsville 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 Crawfordsville by providing technical and other assistance through the Program.

Based on the information submitted, IDEM considers the City of Crawfordsville 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 Crawfordsville 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)
Len Hinrichs, BCA Consultants

1. Project Area Description & Plans for Revitalization, a. Target Area & Brownfields, i. Overview of Brownfield Challenges and Description of Target Area: The City of Crawfordsville (city) is situated in west-central Indiana, approximately 45 minutes northwest of Indianapolis along I-74, US 136, and US 231. Founded in 1823, Crawfordsville (population 16,279) (2021 ACS 5-YR Estimates (2021 ACS)), was incorporated in 1834 as the Montgomery County Seat. It is home to Wabash College and our proximity to I-74, I-65, and US 136 allows quick access to Indianapolis, Chicago, Louisville, Columbus, and Cincinnati. Our city has been known as “the Athens of Indiana” since the early 1900’s for its culture, progressiveness, and abundance of nationally known writers such as Lew Wallace who wrote “Ben Hur”.

Due to its rural setting adjacent to Sugar Creek between Indianapolis and Chicago, Crawfordsville grew as a combined agricultural/industrial city with the founding of numerous manufacturing plants and industries, including agricultural products, automotive products, printing, and bookbinding. Several railroads, including the Monon and Big Four, bisected the city and industry and commerce centered along these corridors. Historic neighborhoods developed, allowing residents to live, work, and play near their homes. However, as with much of the Midwest’s “rust belt”, our manufacturing base began to decline in the 1960s and 1970s. Of the industries that survived, many chose to forego our city center for greenfields on the periphery or in the county leaving our once thriving downtown and industrial/commercial corridors in a state of decay. Company closures in the local area and reductions in force in the county (**Walmart, Fleetwood, International Paper Company, Pearson Education, Alorica, ZF Active Safety & Electronics, PPG Industries, etc.**) **have resulted in the loss over 4,500 quality jobs the past 15 years, that have especially hurt our local and commuting workforce (IN Dept. of Workforce Dev. (IN DWD)).** Many of the businesses remaining in the downtown area have reduced their operations resulting in vacant or underutilized properties, and as the city’s commerce has dwindled, much of the decline has centered along the railroad corridor, resulting in numerous abandoned and underutilized industrial buildings and vacant concrete slabs. **Historic neighborhoods in and around our downtown and southeast side rail corridor have been pulled down with this decline, leaving us burdened with more than 30 brownfields totaling more than 100 acres.**

If awarded, Crawfordsville will utilize funding from this FY24 EPA Brownfields Assessment Grant throughout the extent of our corporate limits. However, we have chosen our Southeast Side Neighborhood as our focus where EPA Brownfields Assessment Grant funding will have the greatest initial impact and move these sites towards redevelopment.

Southeast Side Neighborhood (SSN) target area is approximately 0.46 mi² in size and is bounded roughly by Wabash Ave. to the north, Grace Ave. to the east, Elmore St. to the south, and Wallace Ave. to the west, and is made up of numerous industrial and commercial properties located in low-income residential or mixed-use areas surrounding the City’s primary rail corridor. This corridor is interspersed with many historical brownfields from the former industrial and commercial development.

Residents living among brownfields in the SSN experience low income (Median Household Income (MHI) is 54% less than that of the US) and high poverty (56% higher than in the US and Indiana, especially children, with more than 40% living in poverty (200% higher than in the US and IN)) (see 2.a.ii) (2021 ACS). The financial challenges experienced by SSN residents have perpetuated a cycle of low-quality jobs; inadequate affordable housing; unhealthy nutritional options; insufficient park/recreational space; and poor community walkability, resulting in social and economic constraints that threaten their physical and financial wellbeing. We recognize the great redevelopment potential of the SSN and are making a focused effort address priority brownfields (1.a.ii) and leverage additional funding for this hardest hit part of our community where redevelopment investment has the greatest opportunity for success. We are already working hard to repurpose and reshape the businesses and commerce of the SSN including the recent repurposing of a former four-story downtown bank building into the Fusion 54 entrepreneurial hub and coworking space by leveraging \$3M in TIF funds. This confirms that Crawfordsville is striving to again be a place where people can live, work, play, and prosper. We believe that strategic investment of EPA assessment funds will revitalize the SSN, making our downtown more attractive to new businesses, developers, visitors, and residents.

1.a.ii. Description of the Priority Brownfield Site(s): Table 1 presents our priority sites that offer the greatest opportunity to trigger successful reuse/resurgence in our target area. However, numerous other brownfields are also present in the SSN. The historical/current uses, likely environmental issues, potential health effects from exposure to these sites, and planned reuses are listed below.

Table 1 – Priority Brownfield Sites and Impacts

Priority Site, Size, Proximity to Target Area Residents	Historic Use / Current Use & Condition / Planned Reuse	Suspected Contaminants*
905 Louise Ave. – 4.95 acres in SSN; adjoins residential neighborhood; 500' from daycare center	Automotive electrical manufacturer / vacant / Commercial or mixed use redevelopment	PCBs, metals, petroleum, VOCs, PAHs
1300 E. Elmore St. – 3.97 acres in SSN; adjoins residential neighborhood	Industrial site / Vacant lot adjoining railroad / Residential or mixed use redevelopment	PCBs, metals, petroleum, VOCs, PAHs
Chapel Ave. & Anderson St. – 2 acres in SSN; adjoins residential neighborhood and park	Industrial site / Vacant lot / Greenspace or mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs
1201 E. Elmore St. – 3.77 acres in SSN; adjoins residential neighborhood	Industrial site / Abandoned building / Commercial or mixed use redevelopment	PCBs, metals, petroleum, VOCs, PAHs, asbestos
816 E. College St. – 0.15 acres in SSN; adjoins residential neighborhood	Auto repair / Underutilized / Greenspace or mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs, asbestos
401 S. Oak St – 17.42 acres in SSN; 200' from low-income neighborhood	Recycling center / Active/ Commercial, greenspace, or mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs, asbestos

**According to the Agency for Toxic Substances and Disease Registry (ATSDR), the contaminants listed in Table 1 pose a real threat to human health. Health threats include damage to skin, liver, kidneys, heart, spleen; nervous, respiratory, hormonal, blood, & immune systems; may also cause neurological damage, birth defects and cancer (www.atsdr.cdc.gov).*

These sites are our highest priorities because they will meet immediate needs in the SSN, align with our revitalization plans, and redevelopment is imminent due to funding already committed (approximately **\$6.75M** from public investors). The investment to redevelop historic structures, residential/mixed-use commercial assets, and greenspace amenities on priority brownfield properties in the SSN and throughout Crawfordsville (we have an inventory of 30 brownfield properties) will serve as examples of success, triggering further investment. For example, the former Automotive Electrical Manufacturer site at 905 Louise Avenue potentially impacts the adjoining neighborhood with historical solvents or other industrial chemical releases. The city has plans to repurpose this site, removing the environmental and health threats and transforming it into a much-needed multi-tenant commercial development, bringing desperately needed high-paying employment to this part of our community (as specified in our Revitalization Plans (1.b.i.)).

1.a.iii. Identifying Additional Sites: Our focus at the outset of this grant will be the SSN. If we complete assessment of all priority sites, additional sites will be identified using the brownfield inventory and community input and will meet the demographic and environmental justice conditions used to define our disadvantaged SSN (they will be in an underserved community or a disadvantaged census tract (as defined by EJScreen and/or CEJST)).

1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans: Our 2017 Comprehensive Plan, 2018 Montgomery County Comprehensive Plan, and 2014 Bike and Pedestrian Master Plan (Revitalization Plans) specify the SSN revitalization as a key initiative and outline critical infrastructure and renovations to transform the gateway point of Crawfordsville at I-74 and US 231 and enhance our role as a regional transportation and economic hub. This mix of brownfield to commercial/residential redevelopment and increased walkability/connectivity in the SSN will allow target area residents to live, work, shop, and recreate within their neighborhoods and throughout Crawfordsville.

Crawfordsville is requesting \$400,000 in grant funding, which is essential to complete environmental assessments of target area priority brownfields. The key to revitalization of our SSN and other portions of our community is brownfields reuse, for which this EPA brownfields grant is vital. These funds will help us reach redevelopment goals outlined in our Revitalization Plans, tackling environmental challenges associated with the highest priority sites within the SSN, triggering further environmental and redevelopment funding (1.c.i). Increasing our stock of owner-occupied, moderate-income housing and mixed-use commercial/residential properties near our commercial center

will alleviate our housing shortage and aligns with our goal to increase the walkability/connection of our downtown to area neighborhoods. Revitalizing the adjoining former commercial sites, 1300 E. Elmore St. and Chapel Ave. & Anderson St., to become a potential greenspace, community facility, or mixed-use establishment, will connect our residents to nearby Nibble and Milligan parks. Other plans are underway to revitalize 1201 E. Elmore St. into a mixed-use, residential/commercial property to provide much needed housing and new commercial business. The revitalization efforts for our priority sites will create needed jobs, affordable housing, and walkable greenspace within our target area, improving our residents' quality of life and meeting the vision outlined in our Revitalization Plans. Significant resources have already been pledged for reuse of SSN properties (1.c.i). With EPA funds to cover environmental assessment and planning costs, we will realize the outcomes and benefits outlined below.

1.b.ii Outcomes & Benefits of Reuse Strategy: Assessment and reuse of priority sites such as the abandoned industrial building (1201 E. Elmore St) will remove environmental threats, eliminate blight, reduce crime, and stimulate private sector investment in surrounding properties. This in turn will be linked to successful reuse outcomes, creating equitable, affordable housing; improving the economic competitiveness of our target area; leveraging current and future investments; and creating unique, healthy, safe, and walkable neighborhoods, particularly in the SSN, where the largest number of our low-income, minority, and other sensitive populations reside, supporting environmental justice goals. Reuse of brownfields will also generate higher tax revenue for the city, and through increased investment, new jobs will be created, new residential units will be constructed, and property values will rise. **Reuse/redevelopment of all Table 1 properties will create an estimated 736 construction jobs and 455 permanent jobs and will generate more than \$2.95M in annual income tax revenue, according to projections. Additionally, since these priority sites are in a designated Tax Increment Financing (TIF) district, incremental increases in property taxes retained for redevelopment purposes by the city could generate up to \$1.7M in annual incremental tax revenue which will be reinvested in the SSN.**

During all phases of the revitalization process, we will promote/encourage the re-use of existing buildings and infrastructure, including implementing building codes that require or promote energy efficiency measures such as energy efficient lighting, low-flow showers/toilets, geothermal heating/cooling, etc. Residents will benefit from increased property values or may seek housing with energy efficiency and less maintenance costs. Addressing priority sites in the SSN will create affordable and sustainable housing, workforce development (new jobs), and remediate/reduce legacy pollution in areas with high concentrations of low-income residents. **EPA's investment in brownfields in the SSN will help meet Justice40 goals by creating energy efficient, sustainable development, conserving and preserving greenfields, reducing carbon emissions by enhancing our parks network, encouraging green transportation, and turning idled brownfields into new hubs for the growth of our economy. These accomplishments will deliver justice to disadvantaged residents (due to low-income, high minorities, distressed neighborhoods, disproportionate exposure to environmental impacts from brownfields, etc.).**

1.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse: The city has a history of leveraging investment in projects throughout the community. For example, the former 100-year old Culver Union Hospital site was recently revitalized into the \$12.1M Historic Whitlock Place, a 56-unit apartment home complex. More investment is planned, focusing on the SSN. Without EPA funding for the initial high-risk environmental assessment of these sites, brownfield redevelopment will stagnate. Crawfordsville will pursue many different funding sources from the state and federal levels, as well as the private sector to use as leveraging as outlined below.

- *Private Investment* – approximately **\$6.75M** from public investors already committed to projects
- *EPA* - Additional EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) to further the brownfield reuse goals of the city (\$500K-\$1.5M)
- *Federal Highway Administration* - Infrastructure improvements like streets & pedestrian/bicycle pathways (Est. \$5M+)
- *Indiana Economic Development Corp.* - Tax credits & other incentives to help communities create a climate where pressures from taxes, investment costs, & red tape are lower (Est. \$1M+)

- *Indiana Brownfields Program* - Low-interest/partially forgivable loans for brownfield investigation and cleanup through the EPA-funded Revolving Loan Fund (Est. \$1M)
- *Indiana Finance Authority* - SRF funding generated from an interest rate discount on wastewater improvement project loans. The savings realized through the rate reduction can be used to remediate brownfield sites (\$500K+)
- *Indiana Brownfields Program (IBP)*: Petroleum Orphan Site Initiative (POSI) funding may be used to complete the investigation of sites identified and partially assessed in this Grant and other sites in the target area (Est. \$75K)
- *Indiana Office of Community and Rural Affairs* – Main Street Revitalization Program (Est. \$500K); Blight Clearance Program for demolition of unsafe structures (\$500K)
- *Excess Liability Trust Fund* - State insurance funding for investigating and remediating eligible petroleum contaminated sites with underground storage tanks (up to \$2M)
- *Liability Insurance Funding* - Indiana courts have ruled that historical general liability policies must cover assessment and remediation costs on sites known to be contaminated. Using EPA Assessment Grant funding to demonstrate the presence of contamination will help trigger viable liability insurance policies to fund cleanup of environmental damages. The city will make efforts to apply this funding source to all eligible sites, including privately and municipally owned property (often \$1-3M/site). Insurance coupled with EPA assessment funding has been used on brownfields in many communities in Indiana, commonly leveraging hundreds of thousands, or even millions in assessment and cleanup funding.

A detailed funding plan will be developed for brownfield sites/areas as assessment projects progress, and each site will have a unique funding plan due to individual status and eligibility.

1.c.ii. Use of Existing Infrastructure: Land use goals in our Revitalization Plans emphasize the build-out of existing parcels, and rehabilitation and infill development in our city's core neighborhoods in the SSN before additional land is considered for development. All priority sites have full utilities already present including 3-Phase electricity, natural gas, city water and sewer, telephone, and fiber optic service. Redevelopment will utilize these existing services and other physical infrastructure such as roads, curb cuts, on- and off-street parking, commerce (I-74, US 231/136, SR 47/32), and Crawfordsville's greenway trail systems to attract new investment in area brownfields, reducing redevelopment costs of these sites. Traditional transportation infrastructure will be complemented by pedestrian connectivity, bicycle improvements, and universal accessibility. Our utility infrastructure is large and robust enough to handle the added capacity and need brought by the planned redevelopment in the SSN. TIF funding is also available for infrastructure improvements in the target area. Revitalization ranging from mixed use commercial/residential to light industrial existing infrastructure will allow for easy access to developers and enable residents the opportunity to work and live in the same neighborhood.

2. Community Need and Community Engagement, a. Community Need, i. The Community's Need for Funding: The City of Crawfordsville needs EPA's financial assistance because we do not have the necessary funds for environmental assessments in our general budget (\$14,835,460 FY23) to address brownfields anywhere in our community, let alone in our target area. Indicators of need in the SSN are evident in numerous key economic-demographic factors. **MHI is \$39,776 (43% and 36% less than the US & IN, respectively) and poverty is 22.5% (179% higher than the US & IN).** (see 2.a.ii) (2021 ACS). The large number of vacant buildings on SSN brownfields has resulted in an estimated twofold increase in crime within the SSN compared to other parts of Crawfordsville (according to community estimates), further limiting local government resources due to additional public safety services (police and fire calls) to brownfield sites. Crawfordsville's priority brownfield sites further add to the financial burden of target area residents by suppressing residential property values and straining municipal budgets through a reduced tax base. **In addition, the loss of over 4,500 quality jobs (Walmart, Fleetwood, International Paper Company, Pearson Education, Alorica, ZF Active Safety & Electronics, PPG Industries, etc.) in the area since 2008** (IN Dept. of Workforce Dev.), adds substantially to the economic challenges facing our city, diminishing local income and property tax revenues, and increasing poverty in our communities. With budgets barely able to provide essential services and needed infrastructure, Crawfordsville lacks the discretionary funds to complete the

assessment and planning activities that this grant will provide, including clarifying environmental issues on brownfield sites, encouraging developers to seek and invest in them, and eliminating risk to the health and wellbeing of our residents and environment. Ultimately, this EPA grant will fulfill the revitalization needs of our target area, creating unique, healthy, safe, and walkable neighborhoods.

2.a.ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations: Our community’s most sensitive populations (low-income residents and individuals living in poverty, especially children) (Table 2), live in and around our SSN brownfield sites that are often unsecured, and trespassers (including children), risk exposure to toxic chemicals, asbestos, causing soil and groundwater contamination, and unsafe structures, Contaminants such as PCBs, metals, petroleum, VOCs, PAHs, glycols, lead paint, and asbestos are potentially causing harm to our sensitive populations. Over 70% of houses in the SSN were constructed before 1980, making them much more likely to contain lead-based paint, a significant threat to young children and pregnant women. **For example, the abandoned industrial building (1201 E. Elmore St), adjoining a low-income neighborhood, is potentially impacted with petroleum, VOCs, PAHs, metals, asbestos, and other contaminants that are known to cause various cancers, heart disease, strokes, and asthma; all of which are experienced by Crawfordsville residents at higher rates than Indiana and the US (2.a.ii(2)).** The proximity of brownfields to low-income neighborhoods in our SSN drives down

Table 2	US ¹	IN ¹	SSN ¹
Median Household Income	\$69,021	\$61,944	\$39,776
Individuals Living in Poverty ²	12.6%	12.5%	22.5%
Children Living in Poverty ²	17.0%	16.8%	38.6%
¹ Stats from 2021 ACS ² Last 12 months			

housing values, suppresses commercial investment, and limits residents’ access to adequate employment, resulting in a disadvantage for SSN residents with no relief in sight.

An infusion of funding from this EPA grant will provide much needed capital for the assessment of blighted properties, clearing the way for remediation and revitalization of the SSN to include much needed affordable housing, increased greenspace, and connectivity through our growing trail system. The resulting resurgence of commerce will support new and revitalized local retail businesses which in turn will boost local employment with quality diversified jobs. Redeveloping our brownfields will increase tax revenues which will directly benefit Crawfordsville’s underserved and sensitive populations, including removal of blight, reducing exposure to toxic chemicals, lowering crime, providing safer neighborhoods, and better access to public services, ultimately improving the health of our community.

2.a.ii(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Contaminants from target area brownfields are affecting the health of our residents. Many of the priority sites are believed to be impacted by PCBs, VOCs, PAHs, petroleum, metals, asbestos, lead paint, and/or other chemicals. Studies on the health effects of exposure to these contaminants have been linked to higher incidences of cancers, kidney and liver diseases, heart disease, diabetes, respiratory diseases, and infant birth issues. As Table 3 below shows, **Montgomery County has high incidences of cancers, heart disease, child asthma, and stroke hospitalizations, all potentially linked to impacts from nearby brownfields.** Though not available at the municipal level, this data is believed to be representative of our target area due to the large number of economically vulnerable people living in them.

Table 3 – Health Indicators

Disease/Health Condition ²	Mont. Co. Rate ³	Rank ¹	Difference	IN Rate ³
Breast Cancer	135.8	10 th	18% higher	115.4
Stroke Hospitalizations	28.2	16 th	25% higher	22.6
Heart Disease Deaths	221.2	21 st	15% higher	191.9
ER Visits for Children due to Asthma	30.5	27 th	21% higher	25.2
¹ Out of 92 IN Counties ² Source: 2016-2020 IN State Dept. of Health Stats Explorer ³ Incidence per 100K Residents				

There are 511 Crawfordsville properties with environmental records on IDEM’s Virtual File Cabinet (VFC), including a coal fired power plant less than 1 mile from the SSN that closed in 2016. The cumulative effects of these sites contribute to the adverse health conditions impacting our residents.

Removal of sources of environmental contaminants present at brownfields in our target

area will reduce exposure to our underserved populations, and in turn, reduce disproportionate incidences of disease and poor health outcomes these residents experience.

2.a.ii(3) Environmental Justice (a) Identification of Environmental Justice Issues: The public health impact from SSN brownfields and industrial operations, and their proximity to our underserved populations, including low-income and minority residents, has disproportionately exposed them to environmental pollutants, resulting in an inability to maintain their health and wellbeing. EPA’s EJScreen tool indicates that SSN residents are in the 97th percentile for Lack of Indoor Plumbing; 81st percentile for Low income; 80th percentile for Heart Disease; 77th percentile for Asthma; and 73rd percentile for Lead Paint when compared to the US and IN. The Climate and Economic Justice Screening Tool (CEJST) identifies the SSN as Disadvantaged for Housing (lack of indoor plumbing and low income). Three of the SSN priority brownfields sites in 1.a.ii are located within a disadvantaged CEJST census tract.

2.a.ii(3)(b) Advancing Environmental Justice: Brownfield assessment, cleanup, and reuse strategies will improve the welfare of our sensitive populations in the SSN by eliminating the health risks they pose, and this EPA grant will play a crucial role, reducing threats by funding environmental investigation work needed to trigger stalled cleanup and redevelopment on priority sites. New jobs in our target area will create gainful employment for residents, reducing poverty, minimizing displacement, and improving the state of our housing by redeveloping some sites as low-income residential. For example, repurposing the vacant industrial lot (1300 E. Elmore St.) and adjoining parcel (Chapel Ave. & Anderson St.) will provide needed mixed-use commercial/residential development and provide greenspace as a gateway park in the community. Grant funds will assess lead-based paint, spurring other federal programs (e.g. CDBG) to help fund lead-based paint abatement and other residential improvements. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of the neighborhood, incentivizing investment in other area properties. New tax revenue will be generated and reinvested in the community. **Health indicators such as deaths from heart disease, breast cancer rates, childhood asthma, and stroke hospitalizations (2.a.ii(2)) will no longer be influenced by environmental impacts caused by SSN brownfields. This will be accomplished in areas where low income and minority populations are concentrated, supporting environmental justice for all Crawfordsville residents.**

2.b. Community Engagement, i. Project Involvement & ii. Project Roles: Several community organizations have pledged supporting roles for our brownfields program and grant (Table 4). This diverse assemblage of community groups is well suited to engage the community at a grassroots level. They have regional influence and local ties, maximizing the benefits they bring to the project.

Table 4 – Project Partners and Roles

Partner Name	Point of Contact	Description and Project Roles
Montgomery County Economic Development Authority	Tom Klein, Interim Director 765-362-6514 tom.klein@montgomerycounty.in.gov	Local economic dev. & workforce dev. organization – site selection & prioritization; connect workers to job opportunities created by environmental redevelopment and end use of brownfields; disseminate information about the grant
Friends of Sugar Creek	Cindy Woodall, Executive Director 765-364-0050 canoe@friendsofsugarcreek.org	Local environmental advocacy group - provide meeting facilities, educate the public of benefits of brownfields reuse for Sugar Creek watershed, dissemination of information
Crawfordsville Main Street, Inc.	Sue Lucas, Director 765-376-6831 sue@crawfordsvillemainstreet.com	Grassroots economic dev. organization in target area - provide public feedback, disseminate grant information; assist with site selection & prioritization
Wabash College	James Amidon, Chief of Staff 765-361-6364 amidoni@wabash.edu	Local college - provide meeting facilities, expertise to educate the public on brownfields & benefits of redevelopment, dissemination of information
Montgomery County Visitors & Convention Bureau	Heather Shirk, Executive Director 765-362-5200 request@visitmoco.com	Tourism promotional organization - provide meeting facilities, expertise to educate the public on brownfields & benefits of redevelopment, dissemination of information
Montgomery Government Leadership Academy	Jeremy Lemus, Executive Director 765-367-4125 ExecutiveDirector@54leadership.com	Leadership mentoring organization - provide project planning, funding, community project liaison, provide meeting space

2.b.iii. Incorporating Community Input: Crawfordsville has a culture of community involvement that we will maintain throughout this grant. **A total of 8-12 public meetings will be held during the 4-year grant period** to maintain stakeholder engagement and continue to gather input on site selection, prioritization, assessment needs, cleanup decisions, mitigation measures from the cleanup and redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. In the event social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA's Office of Land and Emergency Management *Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). The community will be updated on progress throughout the grant and will have the opportunity to share input through comment opportunities on city and community partner websites. For residents with limited internet or cellular network access, paper surveys will be available at local businesses, enabling community input without access to digital resources. The city has multi-lingual personnel available to advertise meetings, interpret presentations, or translate documents in Spanish or other languages as needed. We have already begun engaging SSN residents, business owners, not for profits, churches, and other community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and a schedule for future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted through the City's Planning & Building Department, Plan Commission, and Redevelopment Commission to bring awareness of the redevelopment opportunities priority sites offer. When developers are identified, they will be invited to attend public meetings to describe their plans for reuse. As a project progresses, we will involve target area stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on reuse. As stakeholder input is received, we will evaluate it against our development goals and available resources, adopting input that feasibly meets these criteria.

3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities & Outputs: The city will begin activities immediately upon award confirmation, working to prepare a Work Plan approved by EPA's PO. No subawards or participant support costs are planned. After the Cooperative Agreement period begins, Crawfordsville and its QEP will complete the following tasks:

Task /Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization

i. Project Implementation: City staff will travel to regional and national brownfields conferences/meetings, participate in calls, meetings, and correspondence between the city, QEP, EPA, etc. to manage the grant's Cooperative Agreement. We will complete Quarterly, DBE, Annual reports, and ACRES database entries. We will carefully track contractor costs, comparing to budget, expenditures, and project progress, to ensure that grant funds will be utilized within the prescribed 4-year project period. The city, with QEP support, will update its existing brownfield inventory to use as a tool to help accomplish reuse goals. Inventoried sites are prioritized based on the following criteria, in no order: 1) reuse potential, 2) potential for environmental or human health impact and environmental justice, and 3) community input. Additional sites will be identified by the city, community leaders, redevelopment investors, and through community outreach. Priority will be granted to sites within areas identified as disadvantaged by the CEJST and to sites near residential areas that pose health risks to an underserved community. Priority will also be considered for sites that have a higher chance of redevelopment and a greater economic impact potential within our target area.

ii. Schedule: QEP selected through a competitive bidding process (compliant with federal procurement regulations - 2 CFR 200.317 - 200.326) before Cooperative Agreement period begins; correspondence

will occur at least monthly (more frequently as required) throughout the grant period; update and prioritize brownfield inventory the first two quarters, then as necessary for the remainder of the grant period; ACRES updates will be conducted at least quarterly throughout the grant period

iii. Task/activity Leads: Crawfordsville & QEP

iv. Output(s): Travel - city staff to regional/national brownfields conferences/meetings; prioritized inventory; project performance reports: 16 Quarterly Reports, ACRES entries, 4 MBE/WBE reports, 4 annual reports, etc.; calls, 8-12 public meetings to update communities on the brownfield program, and correspondence between the city, QEP, EPA, etc. to manage the grant's Cooperative Agreement.

Task/Activity 2: Environmental Investigation

i. Project Implementation: Prior to applying for site eligibility, an access agreement will be prepared and executed for each site being considered. Eligibility determinations will be completed under this task and the QEP will complete Phase I ESAs activities on sites selected by the city. All Phase I ESAs will be conducted by/in accordance with the applicable ASTM standard (E1527-21) and the All Appropriate Inquiry (AAI) rule. Areas of focus will include those already determined in the inventories as priority sites listed in Table 1. The QEP will prepare a Quality Assurance Project Plan (QAPP) as well as Sampling & Analysis Plans/Health & Safety Plans (SAPs/HASPs) for EPA approval. Once approved, the QEP, directed by the city, will complete Phase II ESAs based on environmental conditions identified in the Phase I ESAs.

ii. Schedule: Obtain site access, request eligibility determinations & finalize site access to initial sites for investigation-early 2nd Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 15th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted-45 days before end of grant period.

iii. Task/activity Lead(s): Crawfordsville & QEP

iv. Outputs: 11 Phase I ESAs; QAPP, SAPs/HASPs, estimated 8-10 Phase II ESAs.

Task/Activity 3: Clean-up & Reuse Planning:

i. Project Implementation: The QEP, directed by the city, will prepare site specific clean-up plans/documents including: Analysis of Brownfield Cleanup Alternatives, remediation plans, site closure letter requests, and clean-up/reuse funding development (l.c.i).

ii. Schedule: Prepared after Phase I and II ESAs are complete, contamination is present, and if cleanup is necessary. Task 3 activities will continue throughout the grant period.

iii. Task/activity Lead(s): Crawfordsville & QEP

iv. Output(s): 5-10 cleanup planning documents

Task/Activity 4: Community Outreach & Involvement:

i. Project Implementation: 8-12 public meetings will be held at various venues throughout Crawfordsville during the grant period to update ESA progress and seek public input/involvement. Print and mail material for project/site information and marketing documents will also be funded under this task. The city will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program, and will attend/participate in outreach events. Social media outlets and online media will be developed/maintained, and outreach efforts will inform the public on the progress of brownfield investigation/cleanup planning and provide marketing resources for future development. Additional sites can be identified during public community outreach meetings. These meetings will be focused on public engagement including what sites the community views as a priority for redevelopment. Priority will be granted to sites identified by underserved communities, especially when those sites are within areas identified as disadvantaged by the CEJST.

ii. Schedule: 2-3 public meetings per year; the 1st planned for the 2nd Quarter of the grant period.

iii. Task/activity Lead(s): Crawfordsville & QEP

iv. Output(s): 8-12 public meetings to update communities on the brownfield assessment progress and seek public input and involvement; supplies: printed flyers, advertising, postage, etc.

We will work diligently to ensure startup activities are completed per the schedule above. The city will allocate all grant funds to project properties before the final quarter of the grant period to

assure that grant task activities are completed before the end of the 4-year Cooperative Agreement contract. Because there is an extremely high demand for assessments and site access has already been obtained for some of the highest priority sites in 1.a.ii, it is likely that funds will be spent prior to the end date. We are proactively communicating with representatives of privately-owned brownfields to gain access and resolve issues in anticipation of this grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and reuse, and creates a positive dialog between property owners, local government, and impacted citizens.

3.b. Cost Estimates: The costs outlined in Table 5 were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1. The city will allocate \$334,300 (84% of total grant funds) to Phase I and II ESAs.

Table 5 Budget	Budget Categories ¹	1. Program Mgmt, Training Support, Inv / Prioritization	2.Phase I / II ESAs	3. Clean-up / Reuse Planning	4. Community Outreach & Involvement	Budget Category Total
	Travel	\$3,000				\$3,000
	Supplies				\$400	\$400
	Contractual ²	\$19,550	\$334,300	\$30,000	\$12,750	\$396,600
TOTAL BUDGET		\$22,550	\$334,300	\$30,000	\$13,150	\$400,000

¹Table 5 only includes budget categories with costs. ²In accordance with Federal, State, and local procurement regulations.

Grant tasks will be completed at the anticipated costs per unit with the following anticipated outputs/outcomes:

1. Program Management & Training Support, Inventory/Prioritization: \$22,550 – **Travel:** Attend National Brownfield Conf.: airfare x 2 @ \$1,000, 2 rooms, 3 nights lodging @ \$1,400, meals @ \$450, ground transportation @ \$150 = \$3,000, **Contractual:** total \$19,550, includes approximately 110 hrs. \$85/hr. = \$9,350 for inventory, & approximately 120 hours \$85/hr. = \$10,200 for program mgmt.

2. Env. Investigation: \$334,300 – **Contractual:** 11 Phase I ESAs at an average cost of \$3,800 each = \$41,800, & 8-10 Phase II ESAs at an estimated cost of \$30,000-\$45,000 (depending on site complexity/environmental conditions) = \$292,500 (@ \$32,500 average cost). Though our budget will support 11 Phase I’s and 8-10 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in 1.a.ii.

3. Clean-up & Re-use Planning: \$30,000 – **Contractual:** 5-10 ABCAs/Clean-up plans or Re-use plans expected to cost \$3,000-\$6,000 each = \$30,000.

4. Community Outreach & Involvement: \$13,150 – **Supplies:** printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = \$400, **Contractual:** approx. 150 hours at an estimated \$85/hr. = \$12,750.

3.c. Plan to Measure & Evaluate Environmental Progress & Results: We will track, measure, and evaluate progress through meeting minutes, Quarterly and Annual Financial Reports, quarterly review/analysis of grant performance, ACRES entries, and completion of Work Plan tasks. If planned outputs/outcomes are not achieved or milestones/project schedule outlined in 3.a are not being met, we will create a corrective action plan to identify deficiencies and make appropriate adjustments to achieve anticipated outputs on schedule. The Assessment Grant will also have the following measurable outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels cleaned up/redeveloped, acreage made ready for greenspace/recreation, and leveraged monies. These and other statistics will be included in Quarterly Reports and ACRES submittals as data becomes available, which will allow the EPA to better evaluate and highlight the grant program success. At the close of the grant, city staff will provide a final report to the EPA and our residents summarizing project outputs and outcomes. After evaluation of sites is done, it is in the city’s best interest that redevelopment happens, and as such, close monitoring of subsequent actions will be done diligently. Outputs and outcomes following the close of the grant will be uploaded to EPA’s ACRES page for continued monitoring of the program’s success.

4. Programmatic Capability & Past Performance, a. Programmatic Capability i. Organizational Capacity, ii. Organizational Structure & iii Description of Key Staff: The City's Office of the Mayor will manage this grant. The Office of the Mayor has previously managed many other economic development resources (including a previous EPA Brownfields Assessment Grant - FY2020) valued at well over \$30M over the past 10 years. We have the technical, financial, and administrative ability in place to implement this grant project successfully. Ms. Brandy Allen, Director of Operations, will serve as the City's Grant Manager. Ms. Allen has over 15 years of experience in project development/management. Ms. Allen has been integral to the progress made to redevelop brownfields in Crawfordsville. Ms. Allen will be assisted by Mayor Todd Barton. Mayor Barton has been the leader of Crawfordsville's redevelopment efforts for the past 10 years. Both Allen and Barton will aggressively use their previous brownfield redevelopment, project management experience, and connections to seek redevelopment opportunities for those sites without secured redevelopment contracts. Ms. Terri Gadd, Crawfordsville Clerk-Treasurer, will serve as the Grant Financial Manager, responsible for accounting and financial reporting. She has been an Accredited Clerk-Treasurer for the City since 2008 and provided these services on other grant and loan programs benefitting the City, including their 2015 Stellar Grant and their 2020 EPA Assessment Grant. In the unlikely event that a member of the team leaves their job prior to the completion of grant tasks, the depth of the city's team will allow for a seamless transition to other experienced members.

4.a.iv. Acquiring Additional Resources: The city and our QEP will make every effort to contract with disadvantaged business enterprises (women and/or minority owned) and consultants/contractors who employ disadvantaged people, when possible, and we will require our QEP to make every effort to do the same. City staff have a history of working cooperatively with state and federal environmental agency personnel and engaging qualified environmental consultants. Through a competitive bidding and procurement process, the city will select a QEP with experience administering EPA Brownfields Grants and working with IDEM/IBP. The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed 4-year project period. This team will be supported by other city departments including planning, finance, utilities, legal, and the Office of the Mayor. We will work with the Small Business Administration (SBA) to identify small businesses in the area with strong labor practices who have been vetted by the SBA as qualified to perform remediation activities and other contracted services. We will invite vetted contractors through the competitive bidding process noted above. We will also work with MCEDA (2.b.ii.) to link our community members to job opportunities related to the investigation, remediation, and reuse of brownfields.

4.b. Past Performance & Accomplishments, i. Currently Has or Previously Received an EPA Brownfields Grant, (1) Accomplishments: Crawfordsville previously received an FY20 EPA Community Wide Brownfields Assessment Grant (**BF00E02879 - 10/01/2020-09/30/2023 for \$300K**). Skillful execution of the Work Plan resulted in expending 100% of grant funds by the end date, resulting in inventorying and prioritizing over 30 properties and the completion of 7 Phase I and 8 Phase II ESAs. At the time of this submission, all outputs and outcomes related to the grants (completed brownfield inventory, community engagement, 7 Phase I ESAs, QAPP, 8 Phase II ESAs, remedial planning, reporting and ACRES entries) have been met and are accurately reflected in the ACRES system. To date, over \$650K has been leveraged from work performed during the FY20 grant with much more leveraging imminent.

4.b.i(2) Compliance with Grant Requirements: All Work Plan goals, outputs, and outcomes of the previous EPA Brownfields Grant were achieved, and all reports including Quarterly Reports, Annual Reports, MBE/WBE Utilization Reports, ACRES submissions, etc. were completed in a timely manner, and no corrective measures were needed. The city was fully compliant with the terms and conditions of their previous Cooperative Agreement. As with our previous grant, Crawfordsville has a clear plan to aggressively address targeted brownfields in the community, and firm leveraging commitments to redevelop sites into viable assets. Due to budget constraints, lower tax revenues, and pressures to complete projects necessary to maintain our infrastructure, EPA grant funding is the only way we will successfully redevelop brownfields.

III.B. Threshold Criteria for Assessment Grants

III.B.1 Applicant Eligibility

The City of Crawfordsville meets the definition of a Local Government under 2 CFR 200.64 and is a political subdivision of the State of Indiana. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.B.2 Community Involvement

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, and our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions, and solutions. 8 - 12 outreach events (2-3 per yr.) will be held throughout the grant period to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, mitigation measures from cleanup/redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost, or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA's Office of Land and Emergency Management *Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

III.B.3 Expenditure of Assessment Grant Funds

This criterion is not applicable as the City of Crawfordsville is not a current EPA Brownfields Assessment Grant recipient.

III.B.4 Named Contractors and Subrecipients

The City of Crawfordsville has not procured/named any contractors or subrecipients.