

November 10, 2023

*R05-24-A-035*

U.S. Environmental Protection Agency, Region 5  
77 West Jackson Blvd. (LB-5J)  
Chicago, Illinois 60604

**RE: NARRATIVE INFORMATION SHEET FOR FY 2024 BROWNFIELD  
ASSESSMENT GRANT**

Please find below the required information for the listed grant.

1. APPLICANT IDENTIFICATION:

Port Authority of the City of Saint Paul  
400 N Wabasha Street, Suite 240  
Saint Paul, MN 55102

2. FUNDING REQUESTED:

- a. Grant Type: Community-Wide Assessment Grant
- b. Federal Funds Requested: \$500,000

3. LOCATION:

- a) City of Saint Paul
- b) Ramsey County
- c) Minnesota

4. TARGET AREA and PRIORITY SITE INFORMATIN:

- a) North End neighborhood of the City of Saint Paul
- b) Census Tracts: 304, 305, 314, 313, 308
- c) Priority Sites addresses:
  - i. **Former Kmart** 245 Maryland Ave E, Saint Paul, MN 55117
  - ii. **Insurance Auto Action** 1280 Jackson Street, Saint Paul, MN 55117
  - iii. **Action Auto Parts** 106 Arlington Ave E, Saint Paul, MN 55117

5. CONTACTS:

a. Project Director:  
Rick Howden, Project Manager  
P: (651) 204-6223, C: (507) 302-9102  
Email: [rw@spga.com](mailto:rw@spga.com)  
400 N Wabasha Street, Suite 240  
Saint Paul, MN 55102



b. Chief Executive Officer:  
Todd Hurley, President  
P: 651-204-6215  
Email: tph@sppa.com  
400 N Wabasha Street, Suite 240  
Saint Paul, MN 55102

6. POPULATION:  
City of Saint Paul population 304,442  
(North End neighborhood population: 23,752)

7. OTHER FACTORS CHECKLIST:

<b>Other Factors</b>	<b>Page #</b>
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 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).	NO
The priority site(s) is in a federally designated flood plain.	NO
The reuse of the priority site(s) proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	YES P 2&3
The reuse of the priority site(s) will incorporate energy efficiency measures.	YES P 2&3
The proposed project will improve local climate adaptation and/or mitigation capacity and resilience to protect residents and community investments.	YES P 2&3
At least 30% of the overall project budget will be spent on eligible/area-wide planning activities, as described in Section I.B., for priority sites(s) within the target area(s).	NO
The target area(s) is located with a community in which a coal-fired power plan has recently closed (2013 or later) or is closing.	NO

8. LETTER FROM STATE OR TRIBAL ENVIRONMENTAL AUTHORITY:

See Attached.

9. RELEASE COPIES OF APPLICATIONS

Not Applicable.



Please contact Rick Howden, project manager for this grant, at 651-204-6223 or [rwh@sppa.com](mailto:rwh@sppa.com) with any questions related to this application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick Howden".

Rick Howden, Project Manager

## Letter from State or Tribal Environmental Authority



520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-286-8300

800-657-3861 | Use your preferred relay service | [info.pca@state.mn.us](mailto:info.pca@state.mn.us) | Equal Opportunity Employer

**November 9, 2023**

VIA EMAIL

Rick Howden  
St. Paul Port Authority  
400 Wabasha St, Ste 240  
St. Paul, MN 55102

RE: St. Paul Port Authority EPA Brownfield Assessment Grant Application  
Letter of Support from the MPCA Brownfield Program

Dear Rick Howden:

On behalf of the Minnesota Pollution Control Agency (MPCA), we are writing to acknowledge and support the proposed assessment activities for the St. Paul Port Authority (SPPA) in fulfillment of the criteria of the United States Environmental Protection Agency (EPA) Fiscal Year 2024 Brownfield Assessment Grant guidelines.

The SPPA has informed the MPCA that they intend to perform petroleum and hazardous substances assessment activities on brownfield sites in City of St. Paul (the City) through a Community-Wide Assessment Grant. The City's North End neighborhood would be the primary target area for site assessment.

The MPCA is supportive of the SPPA's application for an EPA Brownfield Assessment Grant. Should this grant be awarded, the MPCA will partner with the SPPA to help them improve the environment and build a better future for residents in the region.

If you have any questions, please contact Shanna Schmitt at 651-757-2697 or by email at [shanna.schmitt@state.mn.us](mailto:shanna.schmitt@state.mn.us), or Stacey Hendry-Van Patten at 651-757-2425 or by email at [stacey.vanpatten@state.mn.us](mailto:stacey.vanpatten@state.mn.us).

Sincerely,

*Shanna Schmitt*

This document has been electronically signed.

Shanna Schmitt, PG, CPG  
Hydrogeologist  
Remediation Division

*Stacey Hendry-Van Patten*

This document has been electronically signed.

Stacey Hendry-VanPatten  
Supervisor  
Remediation Division

SS/SVP:svp

cc: Steven Heurung, Stoel Rives LLP (electronic)  
Jerry Minor-Gordon, US EPA (electronic)

## NARRATIVE

### FY 2024 ASSESSMENT GRANT APPLICATION

#### **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

##### **a. Target Area and Brownfields**

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

The Saint Paul Port Authority (SPPA) mission is to create quality job opportunities, expand the tax base, address environmental justice, and advance sustainable and equitable development within the geographic boundary of the City of Saint Paul. The chief means of accomplishing this goal is the redevelopment of brownfield properties into new commercial/industrial “business centers.”

The Cities of Saint Paul and Minneapolis together are referred to as the Twin Cities. Over 54% of the state’s populations calls the Twin Cities Metro Area home. Overall, Twin Cities Metro Area consistently ranks towards the top for employment and home ownership compared to its 25 metro area peers across the country, but when the data is spit out by race, huge disparities between white and people of color become apparent. About 75% of white households own their own homes, but only 23% of black households do. While only 5.7% of Twin Cities residents have incomes below the poverty rate, over 21% of residents of color in the Twin Cities have incomes below the poverty rate -- a statistic that leaves the Twin Cities with the worst disparity rate among the 25 largest metropolitan regions in the nation.

The City of Saint Paul has seen industry and commerce dating back to the mid-1800s. Saint Paul’s economy initially centered around the lumber industry and commerce transported along the Mississippi River. Railroad corridors were developed in Saint Paul in the second half of the 19th century. By the turn of the century these corridors crisscrossed the City. Industries developed along the river and railroad corridors through the 1960s. Notable among the major employers in Saint Paul were the 3M Company, with its world headquarters and all its manufacturing facilities, Whirlpool Corporation, the Hamm’s Brewery (later the Stroh’s Brewery), the Maxson Steel Company, Ford Motor Company, and facilities supporting the railroads. These major employers were at the heart of the City’s vibrant economy.

Beginning in the 1960’s with 3M’s relocation to the suburbs and continuing through the closure of the Ford Motor truck manufacturing plant in 2011, Saint Paul has seen a steady decline in major job centers, pulling local neighborhood economies into a downward spiral. Job losses due to the closing and downsizing of these major manufacturing enterprises altered the economic and cultural landscape of Saint Paul’s neighborhoods. Jobs left the core city, and residents with disposable incomes followed. As a result, commercial corridors slipped from thriving prosperity to blighted decline, leaving behind a legacy of underdeveloped or vacant brownfield sites, which has in turn depressed property values in adjacent neighborhoods.

Using census data, Crime Reports, Minnesota Department of Health data, District Community Council Neighborhood Plans and Saint Paul’s 2040 Comprehensive Plan, SPPA has identified Saint Paul’s North End neighborhood as one of the City’s neighborhoods in greatest need for assistance, based on economic indicators and racial disparities. The North End has an unemployment rate nearly three times the City-wide unemployment rate. Unemployment rate for people of color is nearly double the unemployment rate for white people in the neighborhood. Nearly one third of North End residents live below the poverty level. The census track where identified priority sites in the neighborhood are located is in the 94% for Low Income according to the CESJT. People of color make up 69% of North End residents and 81% of residents in the census track that includes our priority sites. **SPPA seeks the proposed grant to assess brownfield sites throughout the City, with special emphasis on the North End neighborhood, with the goal of assessing, remediating, and preparing properties to create developable sites for job-dense business centers.**

##### **ii. Description of the Priority Brownfield Site(s)**

Over 40 known brownfields sites, many of which have gone uninvestigated, unremediated, and underdeveloped, with varying size and varying environmental concerns plague the North End neighborhood. SPPA is aware of at least three brownfield sites in the North End neighborhood with strong redevelopment potential if the environmental barriers to redevelopment can be removed through assessment and cleanup of the properties. SPPA believes that redevelopment of the following sites would bring immediate and substantial positive social and economic benefits to the neighborhood: **1) Former Kmart.** The 12.6-acre Former Kmart shopping center site has been vacant for over three years. The property is occupied by an abandoned 126,500 sf building. The use of the property prior to a shopping center is unknown. The property is surrounded by historical and current industrial uses. **2) Insurance Auto Action.** The 21.2-acre has been used as an auto salvage business since the mid-1970s. Due to nearly 50 years of auto salvage use, the property is suspected of being impacted by petroleum products, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), and lead. **3) Action Auto Parts.** The 5-acre site has been used as an auto salvage business since 1969. Due to over 50 years of auto salvage use, the property is suspected of being impacted by petroleum products, PAHs, VOCs, and lead.

iii. Identifying Additional Sites

If SPPA becomes aware of available brownfield property, primarily within the Target Area, SPPA will apply the same screening criteria used to identify priority sites identified in this application. Consideration of the private sector's interest in the property and impacts redevelopment would have on Environmental and Economic Justice will weigh heavily in identifying additional sites.

**Revitalization of the Target Area**

i. Reuse Strategy and Alignment with Revitalization Plans

Our Brownfields Program goals are consistent with the City of Saint Paul's 2040 Comprehensive Plan, developed with considerable citizen input which identifies "Providing Land for Jobs" as one of the Land Use Strategies for achieving the Plan's primary goal of "creating a city that is economically strong, environmentally responsible, vibrant, and attractive." The Plan names SPPA as the key partner in redeveloping industrial land to "provide land for jobs." SPPA intends to analyze environmental conditions, engage in community outreach, conduct redevelopment planning, and develop cleanup plans. SPPA will remove environmental and geotechnical barriers and prepare the priority sites for redevelopment. All three properties identified by the SPPA as Priority Sites are located adjacent to the SPPA's highly successful Arlington Business Center, which is occupied by job dense light industrial users. The SPPA desires to expand the business center by adding the Priority Sites and developing the property with end users that will meet the SPPA goals of density, livable wage jobs, neighborhood workforce utilization and sustainability.

ii. Outcomes and Benefits of Reuse Strategy

The Assessment Grant funds will be available throughout the City with special emphasis on the North End neighborhood. The SPPA has identified three brownfield properties in the North End, which are targeted as Priority Sites for assessment and cleanup planning. In addition to creating new job opportunities and increasing the economic competitiveness of the Targeted Area, the SPPA redevelopment strategy includes minimum job density of 1 job per 1,000 SF and community benefits goals for businesses building within our Business Centers to commit to job creation, living wages, and local hiring (minimum 1 job/1,000 SF building with 2 for 1 credit for hires from the immediate area zip codes). This redevelopment strategy also includes incorporating sustainable design practices to maximize energy conservation opportunities. SPPA administers PACE loans statewide and ranks fourth in the country for energy investments in renewable energy and energy efficiency upgrades to properties. All buildings constructed on an SPPA site assessed with EPA funds will be required to conduct advanced energy modelling (our standard since 2003), to ensure energy efficient construction (current requirement is to build 50% more efficient than ASHRAE 90.1 energy code) and install

rooftop solar PV, with turn-key PACE financing offered by SPPA. SPPA reuse strategy includes evaluation through our Green Design Review process which focuses on climate adaptation and resilience by ensuring hardening (ex. undergrounding) of infrastructure from severe weather and maximizing energy efficiency and renewable energy generation. The proposed "outcome" of the assessment activity will be increased community vibrancy in the form of more jobs for City residents, increased tax revenue, and replacement of blight with attractive, green buildings and sustainable landscaped spaces in our new Business Centers.

**c. Strategy for Leveraging Resources**

**i. Resources Needed for Site Reuse**

The Assessment Grant funds are a single funding tool; additional sources are needed for site preparation, demolition, environmental cleanup planning, remediation, environmental liability protections, soil stabilization, site utilities, and other redevelopment activities. The following is a list of funding sources that the SPPA has used for cleanup planning, remediation, site preparation, and redevelopment of brownfields in the past and will seek to use for sites assessed with this grant:

*MN Dept of Employment and Economic Development (DEED) Contamination Cleanup Grant Program:* This program provides grants for cleanup planning and remediation of brownfield sites. The SPPA regularly applies for, obtains, and manages these grants. The SPPA is confident in our ability to obtain future grants for sites that need cleanup planning and remediation. Over \$32,000,000 has been leveraged in DEED cleanup funding since 1995, helping to cleanup and redevelop dozens of brownfield sites.

*DEED Redevelopment and Infrastructure Grants:* These grants are available to address costs of land acquisition, demolition, infrastructure improvements, soil stabilization, stormwater management, other environmental infrastructure and adaptive reuse of buildings. The SPPA has been successful in obtaining these grants when needed. In the last two decades SPPA has secured nine of these grants totaling over \$8 million.

*Metropolitan Council Tax Based Revitalization Account Funds:* This program provides grants for cleanup planning and remediation of brownfields for economic redevelopment projects that enhance the tax base while promoting job retention or job growth and/or the production of affordable housing. The SPPA has been consistently successful in winning these grants. Over \$12,500,000 has been leveraged in Metropolitan Council funds since 1996.

*Ramsey County Environmental Response Funds:* Grant funds are used for remediation in combination with the State and Metropolitan Council grants for remediation projects within Ramsey County. The SPPA has been consistently successful in securing these grants. Over \$2,800,000 has been leveraged in Ramsey County ERF funds since 2000.

*Ramsey County Critical Corridors Infrastructure Grant Program:* This new grant program funds infrastructure required for redevelopment within critical corridors in Ramsey County. The SPPA secure a \$500,000 grant in the initial funding round of this new Program in 2022.

*Tax Increment and More:* Tax Increment Financing is typically used on our larger business center sites to help offset the significant public investment required to return these properties to the tax rolls. Funding has also been secured from Capital Region Watershed District, arts organizations, environmental organizations and the philanthropic community, including the National Endowment for the Humanities, National Endowment for the Arts, and MN Legacy Funds.

The state and local brownfield Grant Programs described above all award grants on a competitive basis. SPPA would have a competitive advantage for securing these grants if Phase I and Phase II assessment activities and cleanup planning has been completed for the sites which it is preparing state and local grant applications.

**ii. Use of Existing Infrastructure**

The Target Area and all three Priority Sites are located within the Area are located within a fully developed urban neighborhood. Transit access, trunk sanitary sewer, stormwater, electric, gas and other small utilities are available to meet SPPA planned redevelopment of the properties. All the targeted properties have existing infrastructure that can accommodate the SPPA's redevelopment strategy.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **a. Community Need**

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

Brownfield sites in Saint Paul are strongly concentrated along transportation corridors where large, industrial job centers were formerly located. From approximately 1880 to the mid-1900s several major railroad line corridors and the Rice Street business corridor formed the core of job producing centers in the North End neighborhood. In the 1960s through the 1980s job losses due to the closing of job centers along these corridors altered the economic and cultural landscape of the neighborhood. The economic decline brought blighted conditions, which has in turn depressed property values, and thus property taxes have steadily decreased. Property taxes generated by the large employment centers have fallen dramatically as these properties have become underutilized. The low-income North End does not have the means to fund environmental assessment of its brownfield properties. The Saint Paul Port Authority (SPPA) mission is to assist neighborhoods in the City of Saint Paul with redeveloping brownfield properties, which the private sector is unable to see sufficient returns on investment. These projects have been under granular analysis over the past several months to prioritize those that are in the most need, the most cost-effective, the most in need of protection of human health and the environment and offer the best opportunities for reinvestment in the urban core that will change lives. Properties within the North End have risen to the top of our redevelopment plans due to the great need of this low-income neighborhood. The SPPA has identified three priority brownfield sites in the North End, which are either vacant or underutilized as auto scrape yards. Cleaning up these blighted, contaminated properties will have an immense impact on jump starting revitalization of the North End. With strong community and political support, the SPPA is targeting these properties for acquisition, assessment, cleanup, and redevelopment. An EPA Assessment Grant is essential for the SPPA to fulfill their promise to the North End to help the low-income neighborhood move back towards the economic stability it once had.

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

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

Low median income, high poverty rates, and high unemployment rates plague the North End neighborhood. 7.6% of neighborhood residents are unemployed compared 2.9% unemployment City-wide. 18% of residents live below the poverty level and only 60% of employed residents have jobs that provide livable wages (greater than \$40,000). The median household income in the neighborhood is \$46,250, compared with \$62,843 and \$68,411 nationally and statewide, respectively. People of color make up 69% of the North End residents and make up 81% of residence in the census track where the priority sites are located. The North End has a large immigrant population, with nearly 50% of immigrants identifying English as a second language.

Soil, air, and groundwater contamination from the high number of sites (compared with other areas of the City) with known environmental conditions in the North End neighborhood, along with airborne contamination coming from an interstate freeway and other major community arteries that bisect or surround the neighborhood, present health threats to sensitive populations in the North End. The health threats are exacerbated by residents with limited access to health care due to low-income and language barriers. Particularly vulnerable populations in the North End include children under the age of 17 make up 33% of the North End residents; elder account for 7% of residents; and women of childbearing age make up 24% of residents.



Contamination threats to sensitive population groups are compounded by the disproportionately high negative social issues faced by the North End. With the neighborhood's high poverty, high unemployment, low access to health care and high crime, quality of life indicators for this community makes the identified sensitive population groups more vulnerable to the adverse health effects of contamination from environmentally impacted properties in the neighborhood.

Cleaning up the approximately 40 acres of contamination from the three priority sites identified by SPPA in the Targeted Area will eliminate a substantial source of contamination threatening sensitive populations in the North End. Further, eliminating blight associated with the priority sites and stimulating economic growth at the sites and surrounding areas by redeveloping the sites will help reduce poverty, lower unemployment, and facilitate crime reduction, thereby reducing the cumulative impacts of exposure to contamination from environmentally impacted properties and related welfare impacts.

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

Sensitive populations in the North End neighborhood face elevated health consequences from exposure to high concentrations of pollution from disproportionately high numbers of contaminated property in the neighborhood by inhalation, ingestion, and dermal exposure. Decreasing exposure opportunities will decrease threats to North End residents with higher-than-normal incidents of disease and adverse health effects. The three priority sites identified by SPPA for cleanup and redevelopment in the Target Area include one vacant brownfield property with minimal access control to the public and two brownfield sites that primarily consist of open land presenting ample exposure pathways to human recipients, including dermal and inhalation pathways from contaminated dust, drinking water pathways from leached contamination to groundwater, and exposure to contaminated surface water from impacted stormwater runoff. Assessing, cleaning up and redeveloping these properties will eliminate exposure to contamination from nearly 40-acres of contaminated property.

### (3) Environmental Justice

#### (a) Identification of Environmental Justice Issues

The North End neighborhood is located entirely within disadvantaged census tracts according to CEJST. Crime, depressed quality of life, inadequate access to health care and the lack of quality paying jobs opportunities are poverty indicators that show negative impacts on the North End's health and welfare due to a disproportionately high number of environmentally impacted sites in the neighborhood. The SPPA has focused on one of the most blighted and contaminated areas in the North End neighborhood. A large area fronting approximately one-half mile of Jackson Street in St. Paul is lined with auto scrape yards and other old industrial users. This underutilized, unattractive, and likely highly contaminated property represents a health risk to area residents and an impediment to redevelopment in the neighborhood. This low-income neighborhood is the only neighborhood in the City of Saint Paul with large, open auto scrape yards. The disproportionately high number of properties with environmental issues in this neighborhood, and particularly the unique area of auto scrape yards, that have not been remediated and redeveloped due to lack of market activity in this low-income, impoverished neighborhood represents an environment justice challenge for neighborhood residents, compounding other economic burdens faced by the residents.

#### (b) Advancing Environmental Justice

The reuse of brownfield sites in the neighborhood, facilitated by assessment and environmental remediation, will reduce exposure to contamination, alleviate health impacts on populations with elevated incidents of disease and adverse health effects, reduce blight, encourage economic development, increase opportunities for livable wage jobs for neighborhood residents, and add tax base, which can be funneled back into disproportionately impacted neighborhoods.

### **b. Community Engagement**

i. Project Involvement

SPPA works closely with the neighborhood District Councils on every brownfield project. These Councils are made up of a board of area residents and business owners, and a city-supported staff person; with committees focused on land use, planning, economic development and other topical sub-groups. Regular meetings with staff, board and committee members include involving the Councils with site selection prioritization, community communications, assessment, cleanup, and redevelopment of sites. District Councils are vital to our community engagement approach.

The East Side Employment Exchange is a collaboration of 11 organizations (American Indian Family Center, East Side Financial Center, CLUES, Goodwill Easter Seals, Hmong American Partnership, Latino Economic Development Agency, Merrick, Metro State University, Urban Roots, Dayton’s Bluff Community Council, Neighborhood Development Alliance), and is single point of access to connect job-seekers, employers and service providers. While initiated on the East Side, the Exchange has expanded to serve the North End and other St. Paul neighborhoods. The Exchange will be an invaluable partner to accomplish our economic development mission in the North End.

Other governmental partners include City Department of Planning, Ramsey County, business associations, chambers of commerce, regional Metropolitan Council, Minnesota Pollution Control Agency and state and local grantors. Recognizing that all these partners are crucial, not just to creating a vision for a livable city, but also to achieving the vision, SPPA has cultivated-and obsessively tended partnerships with all these entities. Our state and local funding partners provide invaluable assistance on every brownfield project SPPA undertakes.

ii. Project Roles -- *List of Organizations/Entities/Groups & Roles*

<b>Name of Partners</b>	<b>Point of contact</b>	<b>Specific involvement in the project</b>
District 6 Planning Council – North End Neighborhood Organization (District 6)	Kerry Antrim, Executive Director, (651) 488-4485, district6ed@dist6pc.org	Facilitate Community Input to Project Plans
City of Saint Paul	Luis Pereira, Planning Director, (651) 266-6633, luis.pereira@ci.stpaul.mn.us	Cooperative Planning/Plan Consistency/Public Outreach
MN Pollution Control Agency	Shanna Schmitt, PG, CPG, 651-757-2697, shanna.schmitt@state.mn.us	Regulatory Assistance /Voluntary Investigation and Cleanup Program Oversight
MN Department of Employment and Economic Development (DEED)	Kristin Lukes, Director, Brownfields, 651-259-7451, kristin.lukes@state.mn.us	Job creation incentives and Cleanup Funding
Ramsey County	Ella Mitchel, Dir Comm & Econ Dev, ella.mitchel@co.ramsey.mn.us 651-266-9200	Planning, Program Consistency and funding assistance.
Minnesota Metropolitan Council	Marcus Martin, Livable Communities, 651-602-1059, Marcus.martin@metc.state.mn.us	Planning, Program Consistency and Funding
East Side Employment Exchange (ESEE)	Rachel Speck, Employer Liaison, 612-710-8235, rachel@xchange.mn	Connecting Businesses located on former brownfield properties with community job seekers.

Capital Region Watershed Dist.	Mark Doneux, Administrator, 651-644-8888, mark@capitolregionwd.org	Funding innovative project specific stormwater uses
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iii. Incorporating Community Input

To communicate specific progress to the North End, SPPA will convene regular neighborhood meetings to define neighborhood needs, prioritize sites for assessment, understand market demand for properties, discuss site reuse plans, and align funding resources. This includes presentations and update meetings with community groups at their board meetings, committee meetings, land use policy and planning meetings, and one-on-one and group stakeholder meetings. SPPA will include information on the Assessment Grant activity on its web site. When cleanup plans are prepared, SPPA will work with the community partners to obtain North End neighborhood input into decisions. Our objective is to ensure that the decisions we make about the redevelopment sites are informed and shaped by those who live, work, and spend time in the area, to make sure there is a sense of excitement and ownership for what is to come and to create a vibrant livable community for future generations.

Our community engagement work also includes local community and cultural group outreach, email collaboration, pop-up events, and engagement activities including interviews with community leaders and elders, surveys, focus groups, public exhibits, workshops and micro-targeted social media outreach. This will ensure community values, needs, and wants will be reflected in the cleanup and development planning. SPPA will work with community partners and other stakeholders to navigate the Community Engagement process, discuss community wants and needs, while talking through solutions that can be achieved while incorporating North End priorities into redevelopment and cleanup plans. District 6, ESEE, the City Council ward office and other stakeholders will meet regularly to discuss assessment, cleanup and redevelopment in the North End neighborhood.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

i.	<u>Project Implementation: Task 1 – Reuse Planning</u> activities performed by qualified professionals involve preliminary planning activities necessary to assess the feasibility of redeveloping properties by performing land use analysis, market study and evaluating infrastructure needs, etc. SPPA commits its own staff to oversee contracted work and complete the planning activities. <b>Task 2 – Community Engagement</b> activities include presentations and update meetings with community groups at their board meetings, committee meetings, and land use policy and planning meetings. It will also involve local community and cultural group outreach, email collaboration, pop-up events, and interviews with community leaders and elders, surveys, focus groups, public exhibits, workshops and micro-targeted social media outreach. A qualified planning firm will assist SPPA with this effort and SPPA commits its own staff and internal funds to oversee contracted work and participate in the activities as needed. <b>Task 3 – Site Assessment</b> activities include Phase I and Phase II Environmental Site Assessments (ESA). The Assessment activities will be completed by a qualified environmental professional. SPPA will oversee the work with in-kind staff time. <b>Task 4 – Cleanup Planning</b> activities include the preparation of an Analysis of Brownfield Cleanup Alternatives (ABCA), a Response Action Plan (RAP) in accordance with Minnesota Pollution Control Agency (MPCA) guidelines, and the preparation of volume and cost estimates. This work will be performed by qualified environmental professionals. SPPA will oversee the work with in-kind staff time. <b>Task 5 – Programmatic Oversight</b> includes engaging qualified professionals, meeting the requirements of the Cooperative Agreement, populating ACRES, grant payments, quarterly reports, annual DBE and FFR reports, compiling administrative records, and communication with EPA. A qualified professional will assist SPPA with these activities. SPPA commits its SPPA staff time overseeing and completing this work. SPPA staff will travel to EPA National and State Brownfield Conferences and other brownfield seminars/conferences.
ii.	<u>Anticipated Project Schedule: Task 1 – Reuse Planning</u> activities will be completed throughout the grant period as sites are considered for acquisition and redevelopment. <b>Task 2 – Community Engagement</b>

	activities will be completed prior to selecting properties for redevelopment and during assessment and reuse and cleanup planning. <b>Task 3 – Assessment</b> activities will follow immediately after each site selection, beginning in year one of the grant period and ending in year three of the grant period. <b>Task 4 – Cleanup Planning</b> activities will follow immediately after assessment activities are completed for each site, beginning in year two of the grant period and ending in year four. <b>Task 5 – Programmatic Oversight</b> activities will be completed continuously throughout the 4-year grant term in accordance with requirements of the Cooperative Agreement. Qualified professions will be engaged in the first or second quarter of the grant period prior to the start of reuse planning, site selection and assessment activities. SPPA staff will travel to the next EPA Brownfield Conference and the next State Brownfield Conference held during the term of the assessment grant.
iii.	<b>Task/Activity Lead:</b> SPPA will be the Task/Activity Lead entity for completing <b>Task 1 – Reuse Planning, Task 2 – Community Engagement, and Task 5- Programmatic Oversight</b> . A qualified environmental consultant, with specific knowledge and expertise in regulatory requirements and scientific evaluation, will be the Task/Activity Lead entity for completing <b>Task 3 – Assessment and Task 4 – Cleanup Planning</b> .
iv.	<b>Outputs:</b> <b>Task 1 – Reuse Planning:</b> One to three land use analysis, market studies and evaluation of infrastructure needs will be completed. <b>Task 2 – Community Engagement:</b> SPPA will attend community groups meetings, committee meetings, and land use policy and planning meetings regularly. Local community and cultural outreach will include interviews with at least 12 community leaders and elders, 6-10 surveys, at least 3 focus groups based upon the potential redevelopment options, at least 3-4 public exhibits, 5-10 workshops and micro-targeted social media outreach to connect with groups that reflect the community around them. <b>Task 3 – Assessment:</b> One to three Phase I and Phase II ESAs will be completed. <b>Task 4 – Cleanup Planning:</b> One to three ABCAs and RAPs will be completed. <b>Task 5 – Programmatic Oversight:</b> All ACRES Database reporting, Quarterly Reports, Annual DBE and Federal Financial Reports, grant disbursements, and administrative record will be completed during the 4-year grant period. SPPA staff will attend two National Brownfield Conference and two state Brownfield Conference.

**b. Cost Estimates -- Assessment Grant Budget Table**

Budget Category	Project Tasks					Total
	Reuse Planning	Community Engagement	Site Assessment	Cleanup Planning	Programmatic Oversight	
Personnel	\$0	\$0	\$0	\$0	\$0	\$0
Fringe Benefits	\$0	\$0	\$0	\$0	\$0	\$0
Travel	\$0	\$0	\$0	\$0	\$7,560	\$7,560
Equipment	\$0	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0	\$0
Contractual	\$90,000	\$55,000	\$257,440	\$75,000	\$15,000	\$492,440
Other	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total</b>	<b>\$90,000</b>	<b>\$55,000</b>	<b>\$257,440</b>	<b>\$75,000</b>	<b>\$22,560</b>	<b>\$500,000</b>

*Travel:* Three SPPA staff will travel to two National and State Brownfield Conferences: estimated travel expenses of \$2,520 per staff (National Conference expenses include \$375 airfare, \$225 hotel per staff, \$450 per diem, and \$100 registration per staff; registration for the State Conference is anticipated to be \$35 per staff with \$75 per diem and no airfare), totaling \$7,560.

*Contractor:* Preparation of land reuse analysis are estimated to cost \$8,335 per site; approximately \$25,000 for three priority sites. One market study for the Target Area is estimated to cost \$15,000. Infrastructure evaluation is estimated at \$16,650 per site; approximately \$50,000 for three priority sites. Based on the proposed scope and size of the Target Area and discussion with a local community engagement firm, the preliminary cost estimate for conducting community engagement is approximately \$55,000. Phase I ESA costs are estimated at \$4,000 per site; \$12,000 for three priority sites. Phase II costs are dependent on Phase I findings and size of the site. With the three priority sites totaling approximately 40 acres, one potential added site, and based on extensive experience with brownfields redevelopment, SPPA estimates the combined cost for the assessed sites at \$245,440. Based on SPPA experience, contractual work necessary to complete cleanup planning and secure MPCA approval of a cleanup plan is estimated at \$25,000 per site; \$75,000 for three priority sites. SPPA will provide 16 quarterly reports, 4 annual financial reports, and 4 annual MBE/WBE reports. SPPA will enter data into the ACRES database and communicate with EPA on an as needed basis. Based on SPPA experience managing 2 EPA assessment grants, 2 EPA cleanup grants, and one EPA RLF grant over the last 10 years, SPPA estimates contracted costs at approximately \$15,000.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

##### **4.a. Programmatic Capability (4.a.i. Organizational Capacity/4.a.ii. Organizational Structure/4.a.iii. Description of Key Staff)**

The Saint Paul Port Authority (SPPA) has the systems, processes, and procedures in place to effectively manage federal, state, and local grants and projects funded by the grants. SPPA's Project Manager oversees environmental, civil engineering, other consults during project implementation, including site investigation, cleanup, and redevelopment activities. The Project Manager is also responsible for ensuring the timely and successful expenditure of grant funds and the completion of all technical, administrative, and financial requirements of the projects and grants in accordance with the EPA grant cooperative agreement.

The Project Manager reviews vendor invoices to identify grant eligible expenses and codes the invoices according to funding sources that will be used to pay the invoices. The Finance Department enters the coded invoice information into a spreadsheet that tracks the funding sources used to pay the invoices and conducts the grant draws. Each draw request is documented with a summary table identifying the invoices and grant eligible costs, along with a copy of the invoices included in the draw. Contractor invoices are paid by electronic transfer or checks that are mailed the 4<sup>th</sup> Friday of each month. Grant eligible costs fulfilling cost share requirements, if applicable, or cost identified in the invoices as ineligible for the grants are coded and paid with SPPA Development Funds budgeted for the Project. The Finance Department maintains accounting records of funds received and invoices paid. The SPPA has developed over 20 inland Business Centers, which are occupied by approximately 550 companies and over 25,000 good paying jobs in the City of Saint Paul. Since the late 1990s SPPA has received and successfully managed multiple EPA Brownfield Grants, and state and local grants to assist with funding these projects.

Rick Howden, SPPA Project Manager, will manage the Assessment Grant and oversee the environmental assessment and subsequent cleanup and redevelopment activities for the projects funded by the Assessment Grant. Mr. Howden has over 10 years of experience in community and economic development, managed the Ramsey County brownfields grant program and is currently managing all SPPA federal, state, and local grants. SPPA Financial Operations Manager, Dana Krueger, has 25 years of experience in governmental accounting and finance, grant draws, and tracking and maintaining invoice payment and accounts receivable.

##### **4.a.iv. Acquiring Additional Resources**

SPPA uses an open and broadly advertised procurement process that is consistent with 40 CFR31.36 to select consultants. Using this process, SPPA has engaged environmental, civil engineering, and grant management consultants to assist the SPPA with cleanup planning, remediation oversight and grant management for multiple projects over nearly 3 decades of brownfield redevelopment work. SPPA plans to acquire qualified professionals for the assessment, remediation and redevelopment of future projects utilizing EPA Brownfield funding. SPPA most recently completed a procurement process in the first and second quarter of 2023 to select a pool of environmental consultants with expertise in brownfield assessment and cleanup, civil engineering firms with expertise in brownfields cleanup and redevelopment, and firms with experience with brownfields grant funding. SPPA Project Managers will have the authority to select professionals from this pool to complete the activities proposed in this grant application.

#### **4.b. Past Performance and Accomplishments**

##### **4.b.i. Currently Has or Previously Received an EPA Brownfields Grant**

SPPA has received multiple EPA Brownfield Grants since the late 1990s. Recent grants include: FY2023 Cleanup Grant for \$500,000; FY2020 Assessment Grant for \$300,000; and FY2012 RLF Grant as amended totaling \$2,050,000.

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

During the terms of the referenced FY2012 RLF grant SPPA has completed cleanup plans and implemented remediation at two sites. Over 70 acres have been cleaned up and 1,321 jobs created or retained across two Business Centers/sites. The tax base at the two sites increased by approximately \$2,670,000. During this period, SPPA has also leveraged approximately \$5,816,000 in public funds and \$101,000,000 in private investment funds. The FY2020 Assessment Grant was utilized to complete environmental investigation and cleanup and redevelopment planning of the Hillcrest Redevelopment Site. The FY2023 Cleanup Grant is being used, along with leveraged funds, to remediate the Hillcrest Site, which is anticipated to yield approximately 1000 jobs, 1000 housing units (including affordable), \$4,150,000 in property tax increase, and \$305,000,000 in private investment. All outputs and outcomes have been reported accurately and timely in ACRES since inception of the ACRES reporting system.

The SPPA sells development ready land at below market rate and records restrictive land use covenants and community benefits agreements against the titles. In return for providing a reduced price on the land, the SPPA secures benefits to City of Saint Paul neighborhoods it is targeting for assistance, including high quality aesthetic and energy efficient building design, number of Jobs the project will produce, requirements for local hiring, and required living wages. The end use at these redeveloped sites is light manufacturing, commercial, and/or office use jobs, and increased property value leading to increased property tax base.

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

The SPPA met all grant requirements of its FY2020 Assessment Grant, including closeout requirements and is meeting or exceeded all requirements and expected results of its FY2012 RLF Grant and its FY2023 Cleanup Grant. SPPA complied with quarterly and annual reporting requirements for all active grants and updates timely site profile data into the ACRES database. SPPA currently has two open EPA Grants: FY2012 RLF and FY2023 Cleanup. A \$1.2 million loan has been issued from remaining RLF funds to help clean up the Hillcrest Redevelopment Site. The approximate \$350,000 RLF balance will be loaned to assist with cleanup of brownfield properties adjacent to the new Minnesota United soccer stadium. All funds from the FY2020 Assessment Grant were drawn in 2021. The FY2023 Cleanup Grant funds will be used in 2023 for the Hillcrest Redevelopment Site.

**THRESHOLD CRITERIA  
FY2024 ASSESSMENT GRANT APPLICATION**

**Saint Paul Port Authority**

**1. Applicant Eligibility**

Documentation of Port Authority of the City of Saint Paul eligibility (Resolutions, **Statutes**, etc.) to receive a U.S EPA Cleanup Grant is provided in the following 2019 Minnesota Statutes:

**469.084 ST. PAUL.**

**Subdivision 1. Powers related to recreational facilities.**

Notwithstanding any law to the contrary, the port authority of the city of St. Paul may plan for, acquire by condemnation, purchase, or otherwise, construct, improve, operate, directly, by lease or otherwise, and maintain parks and other recreation facilities anywhere within its port district. The port authority shall establish rules on the use of the rivers, lakes, parks and recreation facilities either alone or in cooperation with the federal government or its agencies, the city of St. Paul, the state, or an agency or political subdivision of the state.

**Subd. 1a. Meetings by telephone or other electronic means.**

The port authority may conduct meetings as provided by section [13D.015](#).

**Subd. 2. No police power.**

The port authority does not have police power except as provided by subdivisions 1 to 8.

**Subd. 3. Consent for city land.**

The port authority must not take lands owned, controlled, or used by the city of St. Paul without consent of the city council.

**Subd. 4. Port jurisdiction.**

For all other recreation purposes, the port authority has jurisdiction over the use of all the navigable rivers or lakes and all the parks and recreation facilities abutting the rivers and lakes.

**Subd. 5. Expenditures; bonds.**

The port authority may spend port authority money to carry out subdivisions 1 to 8 and issue bonds for the purposes in subdivisions 1 to 8 according to either section [469.060](#) or [469.061](#).

**Subd. 6. City, county plan approval.**

The port authority, prior to taking action under subdivisions 1 to 8, shall submit for approval plans to acquire, improve, and operate parks and recreation facilities along navigable rivers and lakes within its port district to the city of St. Paul and shall submit the plans for all areas located within Ramsey County, whether located within or without the port district, to the county for approval.

**Subd. 7. Revenue bonds; sale; rate of interest.**

Notwithstanding any law to the contrary, the sale of revenue bonds issued by the port authority under section [469.061](#), shall be at public sale under section [475.60](#), or in accordance with the procedures set forth in sections [469.152](#) to [469.165](#). The bonds may be sold in the manner and for the price that the port authority determines to be for the best interest of the port authority. A sale must not be made at a price

so low as to cause the average annual rate of interest on the money received from the sale to exceed eight percent per year computed by adding the amount of the discount to the total amount of interest payable on all obligations of the series to their stated maturity dates. The bonds may be made callable. If issued as callable, the bonds may be refunded.

**Subd. 8. Relation to industrial development provisions.**

Notwithstanding any law to the contrary, the port authority of the city of St. Paul, under sections [469.048](#) to [469.068](#) and this section, may do what a redevelopment agency may do or must do under sections [469.152](#) to [469.165](#) to further any of the purposes of sections [469.048](#) to [469.068](#) and subdivisions 1 to 8. The port authority may use its powers and duties under sections [469.048](#) to [469.068](#) and subdivisions 1 to 8 to further the purposes of sections [469.152](#) to [469.165](#). The powers and duties in subdivisions 1 to 8 are in addition to the powers and duties of the port authority under sections [469.048](#) to [469.068](#), and under sections [469.152](#) to [469.165](#). The port authority may use its powers for industrial development or to establish industrial development districts. If the term "industrial" is used in relation to industrial development purposes under sections [469.048](#) to [469.068](#), the term includes "economic" and "economic development."

**Subd. 9. May join in supplying small business capital.**

Notwithstanding any contrary law, the port authority of the city of St. Paul may participate with public or private corporations or other entities, whose purpose is to provide venture capital to small businesses that have facilities located or to be located in the port district. For that purpose, the port authority may use not more than ten percent of available annual net income or \$400,000 annually, whichever is less, to acquire or invest in securities of, and enter into financing arrangements and related agreements with, the corporations or entities. The participation by the port authority must not exceed in any year 25 percent of the total amount of funds provided for venture capital purposes by all the participants. The corporation or entity shall report in writing each month to the commissioners of the port authority all investment and other action taken by it since the last report. Funds contributed to the corporation or entity must be invested pro rata with each contributor of capital taking proportional risks on each investment. As used in this subdivision, the term "small business" has the meaning given it in section [645.445, subdivision 2](#).

**Subd. 10. Recreation facilities on Mississippi River.**

The port authority of the city of Saint Paul has jurisdiction over the use of the Mississippi River for recreation purposes within its port district and may acquire and may spend port authority money for lands abutting the river within the port district to construct, operate directly, by lease or otherwise, and maintain recreation facilities. The authority shall establish rules on the use of the river and abutting lands, either individually, or in cooperation with the federal government or its agencies, the city of Saint Paul, the state, or a state agency, or political subdivision.

**Subd. 11. Revenue bonds.**

Notwithstanding any law or charter provision to the contrary, an issue of revenue bonds authorized by the port authority of the city of St. Paul shall be issued only with the consent of the St. Paul City Council in a resolution. Notwithstanding any law or charter provision to the contrary, a project to be financed by the port authority of the city of St. Paul by proceeds of revenue bonds shall be financed only with the consent of the St. Paul City Council in a resolution. An existing obligation, contract, collective bargaining or other agreement, fringe benefit plan, or covenant made or entered into by the St. Paul Port Authority is not impaired by this subdivision.



**Subd. 12. City supervision of authority employees.**

Notwithstanding any law or charter provision to the contrary, the council may, by resolution adopted by a majority of the council, place any employee of the port authority under the direction, supervision, or control of the mayor or a department of the city.

**Subd. 13. Investment in commercial paper.**

Notwithstanding section [118A.04](#) or other law, the port authority of the city of St. Paul may invest its funds in commercial paper of prime quality in the same manner as the state board of investment may invest money not currently needed.

**Subd. 4. Bond for treasurer and assistant treasurer.**

The treasurer and assistant treasurer of the port authority of the city of St. Paul shall give bond to the state in sums not to exceed \$25,000 and \$10,000 respectively. The bonds must be conditioned for the faithful discharge of their duties. The bonds must be approved as to both form and surety by the port authority and must be filed with its secretary. The amount of the bonds must be set at least annually by the port authority.

**Subd. 15. Bid law exemption.**

If the port authority receives real property through termination of a revenue agreement, as defined in section [469.153, subdivision 10](#), or as the result of refinancing and contracts with a corporation to operate the property, the corporation may sell, purchase, or rent supplies, materials, or equipment, or construct, alter, expand, repair, or maintain the real property without regard to section [471.345](#).

**History:**

*1987 91 s 85; 1991 c 98 s 1; 1996 c 399 art 2 s 12; 2000 c 286 s 1,2; 2014 c 206 s 1*

## **2. Community Involvement**

SPPA works closely with the neighborhood District Councils as a key component of community involvement on every brownfield redevelopment project it undertakes. These Councils are made up of a board of area residents, business owners, and a city-supported staff person, and include committees focused on land use, planning, economic development and other topical sub-groups. Regular meetings with staff, board and committee members include involving the Councils with brownfield site selection, community communications, and assessment, cleanup, and redevelopment planning for selected sites. District Councils are a vital component of our community engagement approach. SPPA will meet regularly with District 6 (covering the Target Area), the City Council ward office and other stakeholders to discuss assessment, cleanup and redevelopment strategies of targeted properties in the City of Saint Paul's North End neighborhood.

Other partners include local business associations, local community and cultural groups, chambers of commerce, City Departments (most notably the Department of Planning), Minnesota Pollution Control Agency, Ramsey County, regional Metropolitan Council, and state and local brownfield grantors. Recognizing that all these partners are crucial, not just to creating a vision for a livable city, but also to achieving the vision, SPPA has cultivated-and obsessively tended partnerships with all these entities. Our state and local funding partners provide invaluable assistance on every brownfield project SPPA undertakes.

To communicate specific progress on brownfield redevelopment in the Target Area, SPPA will convene quarterly neighborhood meetings to define neighborhood needs, prioritize sites for assessment, understand market demand for properties, discuss site reuse plans, and align funding resources. This includes presentations and update meetings with community groups at their board meetings, committee meetings, land use policy and planning meetings, and one-on-one and group stakeholder meetings. SPPA will include information on the Assessment Grant activity on its web site. When cleanup plans are prepared, SPPA will work with the community partners to obtain neighborhood input into decisions and incorporate North End land use preferences into redevelopment plans.

Our community engagement work will also include local community and cultural group outreach, email collaboration, pop-up events, and engagement activities including interviews with community leaders and elders, surveys, focus groups, public exhibits, workshops and micro-targeted social media outreach. This will ensure community values, needs, and wants will be reflected in the cleanup and development planning, and project implementation.

### 3. Expenditure of Existing Grant Funds

The Saint Paul Port Authority affirms that it does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

### 4. Contractors and Named Subrecipients

Not Applicable. The Port Authority of the City of Saint Paul has not procured contractors for Brownfield Assessment Grant funding. The Port Authority of the City of Saint Paul will not have subrecipients for Brownfield Assessment Grant funding.