



R05-24-A-037

TRUSTEES

Roland Winburn  
Georgeann Godsey  
Danielle Bradley

ADMINISTRATOR

Kristofer N. McClintick

Montgomery County

FISCAL OFFICER

Craig A. Jones

5945 N. Dixie Dr. • Dayton, Ohio 45414-4015  
937-890-5611 • 937-454-4831 Fax  
www.harrisontownship.org

1. Applicant Identification

Harrison Township  
5945 North Dixie Drive  
Dayton, Ohio 45414

2. Funding Requested

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

3. Location

a) Harrison Township b) Montgomery County c) Ohio

4. Target Area and Priority Site Information

Target Area:

- Wagner Ford/I-75 Interchange area: Census Tract 39113080600
- Forest Park Plaza area: Census Tract 39113080400

Priority Sites:

- Former Auto Service Facility: 3620 N. Dixie Drive, Dayton, Ohio 45414
- Former Forest Park Plaza Site: 4200 Forest Park Drive, Dayton, Ohio 45414

5. Contacts

a. Project Director

Emily Crow, AICP, Development Director  
(937) 576-0264  
ECrow@harrisontownship.org  
5495 North Dixie Drive  
Dayton, Ohio 45414

b. Chief Executive/Highest Ranking Elected Official

Kris McClintick, Administrator  
(937) 890-5611  
KMcClintick@harrisontownship.org  
5495 North Dixie Drive  
Dayton, Ohio 45414

6. Population

Harrison Township, Montgomery County, Ohio: 21,841  
(US Census: 2017–2021 American Community Survey)



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7. Other Factors

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
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).	NA
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
At least 30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area.	NA
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

8. Letter from the State or Tribal Environmental Authority  
 See attached.

9. Releasing Copies of Applications  
 Not Applicable.



October 24, 2023

U.S. Environmental Protection Agency, Region 5

ATTN: Ashley Green

77 West Jackson Boulevard

Mail Code SB-5J

Chicago, IL 60604-3507

**RE: Harrison Township Community Wide Assessment Grant Proposal**

Dear Ashley Green:

I am pleased to offer Ohio EPA's support for Harrison Township's (Township) Community Wide Assessment Grant Proposal. The Township is applying for a Community Wide Assessment Grant with funding totaling \$500,000. We have worked with the Township in the past and hope to provide support under the Assessment, Cleanup and Revolving Loan Fund Grant program established by the Small Business Liability Relief and Brownfield Revitalization Act (P.L. 107-118).

The funding the Township is requesting under their Community Wide Assessment Grant Proposal will be used to develop inventories, prioritize sites, conduct community outreach activities, perform Phase I and Phase II site assessments, and prepare cleanup and reuse plans. The Township will focus on two target areas, the former Forest Park Plaza site, and the Wagner Ford/ I-75 Interchange. If awarded, this grant would be used to assist the redevelopment of the mostly vacant former Forest Park area and the tornado-ravaged area at N. Dixie Highway and Wagner Ford Road. These areas are economically depressed and the vacant land is a visual blight. The target areas are large, highly accessible sites with regional importance. Redevelopment of these target areas is expected to be a catalyst for reinvestment in the surrounding neighborhoods. The assessments that will be conducted on these properties will assist in transforming these health and environmental hazards into productive reuse. There is current interest in redevelopment of these target areas, but the known or perceived environmental conditions are an obstacle.

We look forward to working with Harrison Township and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2295 or via e-mail at

[Lisa.Shook@epa.ohio.gov](mailto:Lisa.Shook@epa.ohio.gov).

Sincerely,

*Lisa Shook*

Lisa Shook, Manager

Ohio Environmental Protection Agency

Voluntary Action Program

cc: Emily Crow, Development Director, Harrison Township

Randall Kirkland, Ohio EPA, DERR/SWDO



Department  
of Commerce

Division of State Fire Marshal

Sheryl Maxfield, Director

Mike DeWine, Governor  
Jon Husted, Lt. Governor



October 2, 2023

John Jurevis  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Mail Code SE-7J  
Chicago, IL 60604-3507

**RE: Harrison Township Community-Wide Brownfield Assessment Grant Proposal**

Dear Mr. Jurevis:

This letter acknowledges that Harrison Township notified the Office of the Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR) of its plans to use the \$500,000 grant proposal for a community-wide brownfield assessment for petroleum and hazardous waste sites. The targeted areas for this grant are the former Forest Park Plaza, a former shopping mall and surrounding commercial areas, and the Wagner Ford/I-75 Interchange, which was heavily damaged by a tornado in 2019. Numerous properties have been identified and need assessment and remediation to promote redevelopment of blighted or abandoned buildings, former gas stations, dry cleaners, and commercial buildings. Goals of the grant include assessment of vacant and demolished buildings, areas of illegal dumping, protection of the 5-year infiltration zone for the City of Dayton's wellfield, and the revitalization of depressed residential areas.

I am pleased to offer BUSTR's support for Harrison Township's Community-Wide Brownfield Assessment Grant proposal. We look forward to working with Harrison Township and the U.S.EPA on this project.

Sincerely,

Christine G. Pyscher, P.G.  
Environmental Specialist – BUSTR  
Division of State Fire Marshal  
Ohio Department of Commerce

xc: Site File  
Emily Crow, Harrison Township



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

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

**Target Area:** Harrison Township consists of 6.3 square miles, a population of over 20,000, and more than 800 business establishments. A declining population, lack of community planning, and devastation caused by tornadoes in 2019 have resulted in economic decline with many abandoned or underutilized areas and a continued decline in property values, the basis of the Township's income. Property taxes do not provide funding for redevelopment, causing a continued spiral and ongoing brownfield challenges. To change course, the Township has prepared strategic plans and added administrative controls to revitalize the community.

**The geographic boundary of this grant application is the unincorporated boundary of Harrison Township with target areas that include the Wagner Ford/I-75 Interchange area and the Forest Park Plaza area. The Wagner Ford/I-75 Interchange target area, is located in Census Tract (CT) 39113080600 (Justice40 Disadvantaged Community). Target Area 1, the Wagner Ford/I-75 Interchange, is located on valuable but underused property along Interstate 75 at the Wagner Ford/Neff Road exit in the southeast portion of the Township. It comprises 34 acres previously developed as a mixed commercial/retail area that included a large hotel and several smaller motels, an auto service shop, restaurants, retail stores, and several gentlemen's clubs and adult entertainment. The area was devastated by a 2019 tornado, with debris still scattered across the area to this day, resulting in a decline of the surrounding neighborhood and inviting crime and illegal dumping (brownfield challenge). The Forest Park Plaza target area, (CT 39113080400 Opportunity Zone and Justice40 Disadvantaged Community) is on the west side of the Stillwater River and includes the remaining pads and pavement from a former commercial/retail mall, mini golf course, and automotive sales and service. Target Area 2, the Forest Park Plaza area, comprises 54 acres previously developed as a shopping center, including several abandoned apartment structures, a bank, a drug store, and a post office. Only the drugstore remains occupied. The post office building still exists but is vacant along with the abandoned remains of a mini golf course. The majority of the area is vacant of permanent structures, but the slabs and utilities from the demolished buildings remain in decaying and hazardous conditions (brownfield challenge). The target area adjoins the Girl Scouts of Buckeye Trails facility; the Charity Adams Ealey Academy, a school for girls; and the Horizon Science Academy–Dayton High School. Several churches are less than a mile away. This EPA Brownfield funding is needed to further revitalization throughout the Township and improve the quality of life for the sensitive populations.**

**ii. Description of the Priority Brownfield Site(s): Throughout the target area's combined 88 acres, 10 potential brownfield sites are anticipated, consisting of gas stations, auto repair shops, vacant buildings, hotels, motels, and drug stores that need assessment to remove the environmental stigma and allow for redevelopment. The first priority site, located in the Wagner Ford/I-75 Interchange target area, is the former Traffic Circle Tire Center at 3620 N. Dixie Drive. Historically, this site (0.66 acres) was an auto service and filling station as well as a dry cleaner. The structure was demolished by a 2019 tornado. The damaged structure was removed, but the owner left piles of tires and uses the site to store vehicles. The convenience of the adjacent highway makes its potential for redevelopment great, but it also makes the property a prime target for unauthorized dumping, especially since the property is unsecured. This unauthorized dumping leads to a host of additional environmental concerns. The site is listed in the historical auto service, historical dry cleaner, leaking underground storage tank (LUST), archive underground storage tank (UST), and Resource Conservation and Recovery Act (RCRA) regulatory databases. Common contaminants of concern associated with the past uses of the site**



and adjoining properties include **petroleum hydrocarbons, dry-cleaning solvents, metals, and herbicides/pesticides.**

The **second priority site** is the **Former Forest Park Plaza**, located at 4200 Forest Park Drive. The Plaza (32.6 acres) was improperly demolished by the management company in 2013, leaving it **unsecured** with pads and **utilities exposed**. The abandoned mini golf course on the property is overgrown and harbors numerous **dumped tires and other debris**. The site is listed on the Ohio EPA database as a brownfield and is found in the LUST and archive UST databases. These sites pose a significant health risk to those living or working in the community. **Common contaminants associated with past uses of the site and adjoining properties include petroleum hydrocarbons, dry-cleaning solvents, metals, and herbicides/pesticides.** The Township is in site access discussions with the property owner for assessment for both priority sites.

iii. Identifying Additional Sites: The Township will focus on identifying sites for assessment throughout the target area's census tracts, which are defined by **Climate Economic Justice Screening Tool (CEJST) as Justice40 disadvantaged communities**. During this grant project, a more in-depth, grant-funded site inventory and evaluation ranking criteria process (Budget Task 2) will be established, and the Township will work diligently with target-area residents to identify and prioritize sites within the underserved community. Those properties will be researched further by Township staff using the property appraiser's website. The evaluation criteria used to determine which sites are added to the inventory will be based on community need, project partner and resident input, and CEJST and US Census data to ensure underserved communities are benefiting from the project. In the event all target-area sites have been addressed with grant funding, **the Township will work with project partners and residents throughout the geographic boundary of the township limits to identify abandoned and underused properties.** Once identified, the Township will apply the already established evaluation ranking criteria (based on need of the underserved) to determine the order sites will be addressed.

b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans  
Harrison Township has established clear goals for revitalization in its May **2021 Harrison Township Strategic Plan**. Objectives include strengthening business districts through investment leading to job retention and creation, community involvement, and financing. The current Comprehensive Plan, adopted March 9, 2023, provides specific strategies for areas designated as "growth management," "protect and enhance," "stabilize," or "redevelop." The target areas are designated as "redevelop" and are specifically addressed with the intent to target infrastructure improvements, increase housing options, use local incentives to promote reinvestment, identify qualified and interested developers, develop marketing materials, and provide economic development assistance. The Plan's goals are to encourage residential, commercial, and light industrial development to increase land values, increase the tax base, generate new jobs for residents, and provide adequate facilities and services to protect public health and welfare.

The vision for reuse in the two target areas are for a **mixed-use, commuter-oriented development with hotel, restaurant, residential, and service uses**. The **Traffic Circle Tire Center** priority site will feature a redevelopment into **commercial, retail, hotel, and entertainment**. Redevelopment of the **Former Forest Park Plaza** priority site is planned with a **mix of moderate income and market-rate housing, office, health care, and retail** uses. These reuse plans tie back into the goals for the Plan by increasing land values via the new development, creating affordable housing, increasing the tax base by adding new businesses, generating new local jobs for all education and experience ranges, providing new facilities and services to protect the health and welfare for this underserved community.



Current efforts are underway to establish specialized **Community Reinvestment Areas (CRAs)** to incentivize reinvestment and improvements. Redevelopment of the target areas will bring employment opportunities, businesses, and housing and increase the Township's revenue by increasing property values and providing funding for additional improvements. The redevelopment of these priority sites for moderate to higher-intensity housing will support business growth in the region by supplying much-needed workforce housing.

ii. Outcomes and Benefits of Reuse Strategy: The Township's historical prosperity was based on the thriving businesses and residential areas supporting the needs of the Dayton Metropolitan area. As addressed in the Township's Strategic Plan, the **target areas** are in **strategic locations** at a **highway interchange** and a significant **commuter corridor**, are **underused**, and are located in **impoverished, economically distressed** areas with **substantial environmental concerns**. The redevelopment of the **Wagner Ford** target area priority site to its previously vibrant state with **commercial, retail, hotel, and entertainment** establishments would capture commuter and tourist revenue (economic benefit). Redevelopment of the **Forest Park Plaza** target area priority site with a **mix of moderate income and market-rate housing**, office, health care, and retail uses would spur the development of housing and redevelopment of distressed properties throughout the target areas. The redevelopment and revitalization of these areas will generate **job opportunities, increase the tax base, bring revenue** from populations living outside the Township (economic benefit), and provide access to affordable housing, food, and retail services (noneconomic benefit) to residents and transient populations.

The Township will educate the community and developers on available state incentives for **energy-efficient buildings and renewable energy sources** and will ensure redevelopment uses several energy-efficient sources and renewable energy as part of its redevelopment strategy, such as energy-efficient lighting, windows, and insulation. The Township will encourage developers to maximize green space within the planned redevelopment areas to promote community health and wellness within the target areas. By exploring climate adaptation and mitigation capacity in each redevelopment throughout the target areas, and promoting sustainability and renewable energy options, the Township will create a better resilience to protect not only the community but the future of their investments.

c. **Strategy for Leveraging Resources** i. Resources Needed for Site Reuse: Harrison Township has a **Tax Increment Financing District (TIF)** in place on the **Forest Park Plaza** target area. It is within a designated **Opportunity Zone**, and the Township Board has approved the establishment of a specialized **Community Reinvestment Area (CRA)** to incentivize reinvestment and improvements. The TIF allows the use of funds for infrastructure improvements only, **therefore funding cannot be used for remediation of identified brownfield sites**. The TIF agreement expires in 2032, and improvements must occur to generate revenue. The Township has an established **Enterprise Zone** on the **Wagner Ford/I-75 Interchange** target area and placed a year-long moratorium on the site in 2021 to better control redevelopment and poise the site for reinvestment. The Township is working with the Montgomery County Landbank to prepare a market analysis, redevelopment plan, and strategy for this area. A draft was completed in the summer of 2023. These target areas are also included in the market analysis and fiscal impact assessment done by the **Miami Valley Regional Planning Commission** using Economic Development Association funds. Additionally, the Township will assist businesses in pursuing a JobsOhio Economic Development Grant available for companies to start, relocate, or expand in the state. If an eligible site is identified, the Township may apply for a grant through Ohio's





Abandoned Gas Station Cleanup Program. The Township will apply for an Ohio Department of Development Brownfield Remediation Grant if the program obtains additional funding.

ii. Use of Existing Infrastructure: Basic infrastructure, such as sewer, water, electricity, and roads, is in place in both target areas and priority sites. In the event additional infrastructure improvements are needed, the Township will pursue grant funding to address any infrastructure updates necessary for the redevelopment of sites throughout the target areas.

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

a. **Community Need** i. The Community's Need for Funding: Harrison Township has had a **decline in population**, especially in CT 39113080400 (**Forest Park Plaza** target area), with an 11% decrease from 2010 to 2020 and the **departure of industry**.<sup>1</sup> Within the target area, the **population is only 4,752**.<sup>1</sup> Although the population has been on the decline, the Township's poverty, unemployment, and poor health rates have all increased. The target areas' **per capita income of \$22,912** and **median household income of \$43,254** are much lower than the national values (\$37,638/\$69,021).<sup>1</sup> Poverty runs rampant within the target area: **19% of all families** (9% US), **37% of female head of household** (25% US), **18% of all people** (13% US), and **28% of all people under the age of 18** (17% US) are living below the poverty level.<sup>1</sup> In addition, the average unemployment rate of 7% is higher than the national rate (6%), with CT 39113080600 **unemployment rate at 12%**.<sup>1</sup> With its **declining tax base**, the Township's budget that depends on property taxes to provide basic services like police, fire, road maintenance, and trash collection (80% of the Township's budget) continues to decline, **leaving no funds for assessment and remediation of brownfield sites**.<sup>2</sup> The already **impoverished community** cannot afford tax increases. Brownfield Grant funding for redevelopment and revitalization will generate earning potential and grow the Township's labor force.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: The Township's sensitive populations include the **impoverished, elderly, and minorities**. Within the target area, **19% of all families live below the poverty level** (US 9%), **34% are Black or African American** (US 13%), and **23% are elderly** (US 20%).<sup>1</sup> The Township's **underserved** population is much more vulnerable to negative health effects from contaminants associated with brownfield properties and other contaminated properties in the community. Faced with few good options, the residents in the Township's communities have no choice but to turn to public assistance. Over 17% of households in the two CTs had Food Stamp/SNAP benefits relative to 13% in the state and 11% nationwide.<sup>1</sup> Countless studies have shown that African Americans are generally more impoverished, have less access to healthy food and health care, are more likely to be victims of crime, have lower life expectancies, and are less employed than other racial groups. The education level in the target-area CTs is below the state and national rates: over 10% of residents who attended high school **lack a diploma**, compared to 6% statewide and 6% nationally, and only 10% hold a bachelor's degree or higher, compared to 30% statewide and 34% nationally.<sup>1</sup> Low education levels can equate to higher crime rates. The Township has an **extraordinarily high rate of violent crime** (962.1 per 100,000 compared to 293.2 for Ohio and 379.4 for the US).<sup>3</sup>

Providing **affordable housing** is necessary for this underserved community to thrive. Within the **target areas**, the average **cost of housing relative to income** is in the **86<sup>th</sup> percentile**.<sup>4</sup> The average monthly rent in the target area is \$863 (US \$1,163), with the average median home value at \$55,100 (US \$244,900).<sup>1</sup> Even with the low cost of monthly rent and low home values, residents

<sup>1</sup> US Census: 2017–2021 American Community Survey

<sup>2</sup> 2021 Harrison Township Annual Report, <https://www.harrisontownship.org/DocumentCenter/View/436/Harrison-Township-Annual-Report-2021->

<sup>3</sup> Bestplaces, [https://www.bestplaces.net/crime/city/ohio/harrison\\_township\\_\(montgomery\\_enty\)](https://www.bestplaces.net/crime/city/ohio/harrison_township_(montgomery_enty))

<sup>4</sup> Climate and Environmental Justice Screening Tool, [www.screeningtool.geoplatform.gov](http://www.screeningtool.geoplatform.gov)



are suffering as a significant portion of their annual income goes to cover housing. To make matters worse, existing target-area housing is aged and falling apart, with **96% of all homes being constructed prior to 1979** (53% US) and **77% constructed prior to 1969** (38% US), creating an environmental concern of **asbestos and lead**.<sup>5</sup> The Environmental Justice (EJ) Screen Report **Lead Paint Indicator** shows the target area (average) index is in the **69<sup>th</sup> percentile** relative to the US.

Limited access to fresh food and health care is a paramount concern in the target areas for sensitive populations and leads to fewer options for a healthy lifestyle. Montgomery County statistics (CT data unavailable) indicate **food insecurity** overall is 17% and 22% for children compared to 13% and 17% for children in the US.<sup>6</sup> The **Wagner Ford target area** is also classified as a **food desert**.

The Township believes that identifying contaminants, allowing for assessment, and promoting redevelopment along its major thoroughfares will generate economic benefits of job opportunities and increase its tax base. Desired development at the **Wagner Ford/I-15 Interchange** would capture tourist and commuter revenue, and a retail/office/residential development in the **Forest Park Plaza** area, including market-rate and moderate-income housing, will spur redevelopment of distressed properties to the west and south. Connectivity will increase throughout the target areas, reducing health and welfare threats by providing increased access to fresh food, health care, affordable housing, and job opportunities to help sensitive populations transition out of the cycle of poverty.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: **Lead paint** exposure, commonly associated with aging structures found in the target areas, poses increased risk factors to sensitive populations, particularly the target areas' high minority populations and those living in poverty. Past uses of the priority sites and surrounding properties in the target areas include auto service, dry cleaners, and hazardous waste generators. **Toxic chemicals** associated with these operations **include volatile organic compounds (VOCs) such as chlorinated compounds from fuels, lubricants, degreasing solvents, and dry-cleaning solvents**. These contaminants have been documented to cause a multitude of negative health effects. The target areas (averaged) are in the **69<sup>th</sup> percentile for lead-based paint** in the US.<sup>7</sup> The target areas also are in high percentiles (averaged) for **asthma (92<sup>nd</sup> percentile)**, heart disease (84<sup>th</sup> percentile), and low life expectancy (97<sup>th</sup> percentile).<sup>8</sup>

Montgomery County health statistics (CT data unavailable) indicate a higher incidence of **asthma** among adults and children (adults 17%/children 15%) than state (adults 14%/children 11%) and national (adults 14%/children 12%) averages.<sup>6</sup> **Cancer** rates also are high, with a rate of 175.9 per 100,000 compared to the state and national rates of 172.2 and 154.1 per 100,000, respectively.<sup>6</sup> The county has an **infant mortality** rate of 7.8 deaths per 1,000 live births, compared to the state value of 7.2 and the national average of 5.8, and indicates a large disparity between infant mortality rate for Black (16.9) and white (4.2) populations.<sup>6</sup> County statistics indicate 10% of live births are classified as low weight (15% for births to Black women), compared to 9% in Ohio and 8% in the US (14% / 14% for births to Black women in Ohio and the US, respectively).<sup>9</sup>

Various contaminants likely present at the target-area properties can lead to a host of short-term and chronic health concerns. These health concerns include tremors, headaches, infertility, anxiety, depression, central nervous system depression, vision impairment, neurologic disorders, various

<sup>5</sup> US Census: 2017-2021 American Community Survey

<sup>6</sup> Community Health Assessment 2019, Montgomery County, Ohio, [www.phdmc.org](http://www.phdmc.org)

<sup>7</sup> EJ Screen Report

<sup>8</sup> Climate and Environmental Justice Screening Tool, [www.screeningtool.geoplatform.gov](http://www.screeningtool.geoplatform.gov)

<sup>9</sup> March of Dimes Peristats, [www.marchofdimes.org/peristats/](http://www.marchofdimes.org/peristats/)



forms of cancer, and numerous ailments of the genetic, immune, and endocrine systems. The target areas' already sensitive population with a high poverty level would be more significantly impacted than the general population. By identification and assessment of brownfield sites throughout the target areas, redevelopment will facilitate the removal of harmful contaminants causing serious health issues for sensitive populations.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: The two **CEJST Justice40 Disadvantaged Communities** are victims of continued disinvestment, resulting in vacant properties throughout the **distressed neighborhoods** that generate ripple effects of negative consequences such as **decreased taxable revenue, decreased property values**, and reduced ability to market properties for redevelopment. The **target areas** have a **high poverty rate**, 48% higher than the national average (19% versus 13%), and **higher unemployment** (7%) than the national average (5%).<sup>10</sup> The target areas' **cost of housing relative to income** is in the **86<sup>th</sup> percentile**.<sup>11</sup> Over 10% of residents who attended high school **lack a diploma**, compared to 6% statewide and 6% nationally, and less than 9% hold a bachelor's degree or higher, compared to 30% statewide and 34% nationally.<sup>10</sup> In addition, the target areas have **disproportionate environmental stressors**, including air toxics **cancer risk** in the 63<sup>rd</sup> percentile, and a **Superfund proximity** in the 97<sup>th</sup> percentile.<sup>12</sup>

The residents living in and around the **target areas** are underserved and have borne the brunt of the negative impacts. Negative environmental consequences and years of disinvestment have severely limited the sensitive populations' potential for economic growth as illustrated by high poverty, substandard housing, and low high school and higher education completion rates. Lack of education severely limits one's ability to advocate for their social, economic, and welfare needs, typically leading to an intergenerational, community-based poverty trap.

(b) Advancing Environmental Justice: Brownfield Assessment funds would make a significant impact on the Township's ability to promote redevelopment and improvement of these areas included in the goals of its 2021 Strategic Plan. Target area development would create much-needed jobs for residents, improve the overall perception of the communities, and spur additional development. Thriving businesses and housing will replace blighted brownfields, ushering in employment opportunities and a brighter, more prosperous future for the community and promoting environmental justice within and surrounding the target areas. The priority sites and surrounding sites in the target areas are mostly vacant. Development **will not displace residents or businesses** but rather will provide a more vibrant environment that will reduce crime/illicit activities and improve business. The Township will work with businesses and property owners to coordinate mutually beneficial conditions.

**b. Community Engagement** i. Project Involvement & ii. Project Roles:

Name of Org.	Point of Contact	Specific involvement in the project or assistance provided
WYSO Yellow Springs, Ohio	Alejandro Figueroa (937) 917-5943 <a href="mailto:afigueroa@wyso.org">afigueroa@wyso.org</a>	WYSO is a local public radio station. They will assist with <b>outreach</b> through public service announcements.
Shiloh Church	Pastor Jay McMillen (937) 277-8953 <a href="mailto:jmcmillen@shiloh.org">jmcmillen@shiloh.org</a>	The church is located one mile north of the Forest Park Plaza target area. The church will assist with community outreach and provide input regarding <b>future reuse and redevelopment plans</b> .
Northridge Community	Tina Fiore <a href="mailto:momfiore@woh.rr.com">momfiore@woh.rr.com</a>	The Wagner Ford target area is located in the Northridge community. The community will provide <b>outreach</b> and input regarding <b>site prioritization and site inventory</b> .

<sup>10</sup> US Census: 2017–2021 American Community Survey

<sup>11</sup> Climate and Environmental Justice Screening Tool, [www.screeningtool.geoplatform.gov](http://www.screeningtool.geoplatform.gov)

<sup>12</sup> EPA EJ Screen Report



**Harrison Township, Montgomery County, Ohio  
FY2024 US EPA Brownfields Assessment Grant**

iii. Incorporating Community Input: The Township announced its intent to apply for this Brownfields Community-wide Assessment Grant in the summer of 2022 and again in January 2023 at Board of Trustees meetings. The Board of Trustees believes community involvement requires fostering collaborative interaction with its underserved residents most affected by the project and local organizations/entities/groups by keeping the community informed and collecting community input. Businesses and residents in the target areas will be informed and will know that they are a valued component of the Township’s Brownfield Program. Residents will provide vital input and feedback at the neighborhood level. A Community Involvement Plan (CIP) will be created to outline planned community engagement activities, a project schedule, the project background, and key players. Through meeting minutes and specific input activities, the Township will record community member input and suggestions on the project. The Township will evaluate the information and prioritize the projects to best address community concerns with consideration given to projects providing the most benefit to the target areas’ sensitive populations. Community outreach will encourage target-area residents to suggest additional potential brownfield sites that may be added to the site inventory based on community needs and the overall Brownfield Program goals. The Township will contact residents or groups to discuss their suggestions in more detail.

To be effective in community outreach, the Township will work with its project partners (identified above) in disseminating project information throughout the community for the four-year project period. The Township holds public engagement events three times per year. A discussion of brownfield initiatives and grant progress will be included as part of the events. In addition, the Township will use a dedicated brownfields page on its website [www.harrisantownship.org](http://www.harrisantownship.org) to disseminate Brownfield Program information and will engage residents through its various social media pages (Nextdoor, Facebook, Instagram, and LinkedIn), which have a growing audience. This will ensure the widest reach of information throughout the community. Announcements will be disseminated by email via Constant Contact®, by printed newsletter, and in the local newspapers: *Daily Court Reporter* and *Dayton Daily News*. Harrison Township also produces its own YouTube video channel content. Project updates and information will be discussed during monthly Trustee meetings and other community education meetings. Harrison Township will work to provide virtual attendance meeting options for the convenience of those unable to attend in person. Contact information for the Brownfield Project Team will be posted on the web page and all promotional materials. If necessary due to weather, road closures, or other factors that may deter attendance, the Township will engage the public via meetings in alternate formats of either virtual or mixed virtual/live events.

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

**Description of Tasks/Activities and Outputs:**

<b>Task 1: Outreach</b>	
i.	<i>Project Implementation</i> : The Township’s Brownfield (BF) Project Director will develop a Community Involvement Plan (CIP), outreach materials, BF Project website, and social media posts with the assistance of the environmental contractor (EC). Township staff will lead community meetings to keep the public informed about project plans and updates. Supplies budgeted for the printing of outreach brochures/handouts and office supplies.
	<i>Anticipated Project Schedule</i> : CIP created within three months of award. Community Meetings held 1 <sup>st</sup> , 4 <sup>th</sup> , 6 <sup>th</sup> , 8 <sup>th</sup> , 10 <sup>th</sup> , 12 <sup>th</sup> , and 14 <sup>th</sup> quarters. Website and outreach materials created in the 1 <sup>st</sup> quarter and posted quarterly.
ii.	<i>Task/Activity Lead</i> : Ms. Emily Crow, Harrison Township Development Director, Brownfield Project Director.
iii.	<i>Outputs</i> : CIP, Brownfield Website, 7 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA required Quarterly Reports.
<b>Task 2: Site Inventory</b>	



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i.	<i>Project Implementation:</i> The Township’s BF Project Director will work with target-area residents during community meetings to create a thorough site inventory for assessment. Abandoned and underused properties identified by the residents of the target areas will be researched further by Township staff using the County GIS website. Once a list is compiled, the EC will work with the Township staff to create an evaluation ranking tool to determine the order, with the help of residents, in which the sites will be addressed.
ii.	<i>Anticipated Project Schedule:</i> Community meeting in 1 <sup>st</sup> quarter will continue the preliminary inventory process that began with this application. Evaluation ranking process begins 3 <sup>rd</sup> quarter and continues throughout grant.
iii.	<i>Task/Activity Lead:</i> Ms. Emily Crow, Harrison Township Development Director, Brownfield Project Director.
iv.	<i>Outputs:</i> Evaluation Ranking Tool, Site Inventory List.
<b>Task 3: Assessment</b>	
i.	<i>Project Implementation:</i> The EC will prepare a Generic Quality Assurance Project Plan (QAPP) for EPA approval. The Township will obtain site access agreements and property eligibility determinations prior to conducting Environmental Site Assessment (ESA) activities at sites selected and ranked through the Site Inventory Task, starting first with the two priority sites listed in this application. Assessments will consist of ASTM-AAI compliant Phase Is and Phase IIs. Specific sampling and analysis plans will be prepared for EPA approval prior to implementation of the Phase IIs.
ii.	<i>Anticipated Project Schedule:</i> Assessment activities begin 2 <sup>nd</sup> quarter and continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects of the project with oversight from Ms. Emily Crow, Harrison Township Development Director, Brownfield Project Director.
iv.	<i>Outputs:</i> 18 Phase I ESAs; 1 Generic QAPP; 10 Phase II ESAs, including site-specific sampling and analysis plans. Site Access Agreements and Property Eligibility Determinations as required.
<b>Task 4: Remediation/Reuse Planning</b>	
i.	<i>Project Implementation:</i> For projects identified for cleanup, the EC will prepare the Analysis for Brownfields Cleanup Alternatives (ABCA) and/or Cleanup Plans. Cleanup planning will include evaluating cleanup alternatives, calculating cleanup costs, and determining site-appropriate remediation/reuse planning to reduce health/environmental risks. The EC will assist the Township in hosting charrettes/visioning sessions for key properties. A planner will prepare Site Reuse Assessments, a BF Revitalization Plan, and a Market Study.
ii.	<i>Anticipated Project Schedule:</i> Plans & Charrettes to begin in the 6 <sup>th</sup> quarter and continue throughout the grant.
iii.	<i>Task/Activity Lead:</i> The consultant will implement the technical aspects of the project with oversight from Ms. Emily Crow, Harrison Township Development Director, Brownfield Project Director.
iv.	<i>Outputs:</i> 4 ABCAs, 2 Vision Sessions/Charrettes, 2 Site Reuse Assessments, 1 BF Rev Plan, 1 Market Study.
<b>Task 5: Programmatic Support</b>	
i.	<i>Project Implementation:</i> Harrison Township will procure an EC to assist with the Brownfield Grant Project. The Brownfield Project Director will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The EC will assist the Township in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant. The Township staff travel budget allows for two staff to attend two national/regional/grantee brownfield training conferences/workshops.
ii.	<i>Anticipated Project Schedule:</i> ACRES Reporting will begin in the 1 <sup>st</sup> quarter, and Quarterly Reporting will begin in the 2 <sup>nd</sup> quarter and continue throughout the grant project. Annual Reporting and Forms will be created in the 5 <sup>th</sup> , 9 <sup>th</sup> , and 13 <sup>th</sup> quarters and during final closeout.
iii.	<i>Task/Activity Lead:</i> Ms. Emily Crow, Harrison Township Development Director, Brownfield Project Director.
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Annual Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend two conferences.

**b. Cost Estimates:** Below are the anticipated cost estimates for this project *based on past Brownfield Projects as determined by local market standards with contractual hourly rates based on skills needed for specific tasks.* The budget for this project includes travel, supplies, and contractual costs. **Sixty percent (60%) of the budget will be spent on site-specific work through the Assessment Task. Task 1 Outreach:** Contractual: Community Involvement Plan at \$4,000



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(40hrs x \$100); Brownfield Website, Outreach Brochure/Handouts, Social Media Posts at \$3,000 (24hrs x \$125); Community Education Meetings at \$7,000 (7 x \$1,000/meeting). **Supplies:** Outreach Supplies at \$1,000 (software, printouts). **Task 2 Site Inventory:** Contractual: Brownfield Site Inventory and Evaluation Ranking Tool Creation at \$10,000 (80hrs x \$125). **Task 3 Assessment:** Contractual: 18 Phase I ESAs at \$3,500 for a total of \$63,000; 1 Generic QAPP at \$5,000; 10 Phase II ESAs including site-specific sampling and analysis plans at \$23,000 for a total of \$230,000. **Task 4 Remediation/Reuse Planning:** Contractual: 4 ABCAs at \$26,000 (4 x \$6,500); 2 Vision Sessions/Charrettes at \$6,000 (\$3,000/meeting); 2 Site Reuse Assessments at \$40,000 (Planner: 40hrs x \$150; Market Analyst: 248hrs x \$125; Contractor: 24hrs x \$125); 1 Brownfield Revitalization Plan at \$50,000 (Planner: 175hrs x \$150; Market Analyst: 90hrs x \$125; Environmental Contractor: 100hrs x \$125); Market Study at \$20,000 (Planner: 20hrs x \$150; Market Analyst: 124hrs x \$125; Environmental Contractor: 12hrs x \$125). **Task 5 Programmatic Support:** Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period at \$24,000 (192hrs x \$125). Travel: Two staff to attend two conferences at \$11,000 (4 registrations at \$500, 4 RT flights at \$750, 4 persons for 3 nights in hotel at \$350/night, incidentals and per diem for 4 persons for 3 days at \$150).

Category	Tasks					Totals
	<i>Outreach</i>	<i>Site Inventory</i>	<i>Assessment</i>	<i>Remediation/Reuse Planning</i>	<i>Programmatic Support</i>	
Travel					\$11,000	\$11,000
Supplies	\$1,000					\$1,000
Contractual	\$14,000	\$10,000	\$298,000	\$142,000	\$24,000	\$488,000
<b>Total Budget</b>	<b>\$15,000</b>	<b>\$10,000</b>	<b>\$298,000</b>	<b>\$142,000</b>	<b>\$35,000</b>	<b>\$500,000</b>

**c. Plan to Measure and Evaluate Environmental Progress and Results:** To ensure this EPA Brownfield Project is on schedule, the Township Brownfields Team, which will include the consultant, will meet quarterly to track all **outputs identified in 3.a.** using an Excel spreadsheet and will report all progress in fulfilling the scope of work, goals, and objectives to the EPA via quarterly reports. In addition, project expenditures and activities will be compared to the project schedule to ensure the grant project will be completed within the four-year time frame. Site-specific information will be entered and tracked in the ACRES database. The outputs that will be tracked include the number of neighborhood meetings, public meetings, meetings with community groups and community partners, environmental assessments, ABCAs, and cleanup redevelopment plans. The outcomes that will be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not being completed efficiently, the Township will implement countermeasures to address this problem. The Township will make monthly calls to its EPA Project Officer and, if needed, create a Corrective Action Plan.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

a. **Programmatic Capability** i. Organizational Capacity, ii. Organizational Structure, & iii.

Description of Key Staff: Harrison Township's management of the grant will be by a team experienced in successfully managing federal- and state-funded grants. The team identified below, and their supporting staff provide more than adequate staff to successfully implement the Brownfields Assessment Grant. Ms. Emily Crow, AICP, Development Director, will serve as the **Brownfield Project Director**. Ms. Crow joined Harrison Township in 2021, prior to which she was a planning consultant for many years. She has experience managing and creating regional



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comprehensive and growth management plans, design standards and guidelines, land use plans, urban renewal studies and plans, GIS-based development capacity models and graphics, and demographic/economic analysis. Ms. Crow is responsible for supporting existing business/industry, recruiting new business/industry, conducting market research, and serving as a liaison between business/industry and local/state/federal regulatory agencies. She will be responsible for the timely and successful expenditure of funds and the completion of administrative and financial requirements of the project. Kris McClintick, AICP, Township Administrator, will serve as the **Brownfield Project Manager** and ensure internal resources are available to support the grant. Mr. McClintick oversees the day-to-day administration of township services and implements the policies enacted by the Township Trustees. With three years as Assistant Director of Community and Economic Development and eight years as Director of Community and Economic Development, he has an intimate interest in the development of brownfield sites. Mr. McClintick will provide support for community and economic development projects, including conducting research, budget tracking, community outreach, local business outreach, and marketing, and will assist Mr. Craig Jones, the Township's Fiscal Officer, who will serve as the **Brownfield Finance Director**. Appointed to the position in 2021, Mr. Jones has served in public service positions for over 35 years. As Finance Director, he plans, organizes, and directs the activities of the Township, including accounting, grant administration, collections, internal audit, risk management, and purchasing. He oversees the preparation of the annual financial statements and monitors budget expenditures. Mr. Jones will be responsible for managing the finances and drawdowns through ASAP.gov. A qualified EC will assist with the technical portions of the project.

iv. Acquiring Additional Resources: Using local contracting requirements and procurement process, the Township will procure a qualified environmental contractor to assist with technical and reporting portions of the Brownfield Community-wide Assessment, in addition to any other contractors needed to complete the project. The Township will ensure compliance with the EPA's "Professional Service" procurement process. The Township has measures in place for proper solicitation of bids and qualifications for services that are monitored by its legal counsel. Requests for qualifications and requests for bids are posted on the Township's website. Qualifications and proposals are evaluated as appropriate by the Township Trustees. The Township strongly encourages strong labor practices, and local hiring/procurement and considers such practices in the award of contracts. The Township currently works closely with a contractor that intentionally strives to hire formerly incarcerated, local individuals.

b. **Past Performance and Accomplishments** ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (1) Purpose and Accomplishments: The Township has experience with obtaining and implementing state and federal grants. In 2020, the Township was awarded a \$1.5M Federal Emergency Management Agency (FEMA) grant for the removal of debris and property cleanup related to the 2019 tornadoes. The Township used a grant from the Ohio Public Works to resurface 4.2 miles of road in 2023 using \$274,900 in grant funds and \$304,100 in local match. Both grants were completed with no issues and met all deadlines and requirements with all funds expended.

(2) Compliance with Grant Requirements The Township has a history of full compliance with all grant work plans, schedules, terms and conditions, and timely reporting as required by the awarding agencies. The Township is actively managing six grants and monitoring progress to ensure compliance with schedules, financial, and reporting requirements. Ms. Crow is skilled in project management and is personally monitoring all grant activities to ensure compliance with all financial reporting requirements.



Harrison Township, Montgomery County, Ohio  
FY2024 US EPA Brownfields Assessment Threshold Criteria

## Threshold Criteria

### 1. Applicant Eligibility

- a. Harrison Township, Montgomery County, Ohio, is eligible to apply for the EPA Brownfields Community-wide Assessment Grant as a local government defined in 2 CFR § 200.64.
- b. The Township is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

### 2. Community Involvement

The Township announced its intent to apply for a Brownfields Community-wide Assessment Grant at its Board of Trustees meeting in the summer of 2022 and again in January 2023. The Board of Trustees believes community involvement requires fostering collaborative interaction with its underserved residents most affected by the project and local organizations/entities/groups by keeping the community informed and collecting community input. Businesses and residents in the target areas will be informed and will know that they are a valued component of the Township's Brownfield Program. The local community will provide vital input and feedback at the neighborhood level. A Community Involvement Plan (CIP) will be created to outline planned community engagement activities, a project schedule, the project background, and key players. Through meeting minutes, the Township will record community members' input and suggestions on the program and use of funds. The Township will evaluate the information during quarterly Brownfield Team meetings and prioritize addressing community input with the most benefit to the target areas' sensitive populations living in underserved communities. All resident and project partner input will be responded to via posts on the brownfield webpage within two weeks of receipt. When necessary, the Township will contact residents individually to discuss their suggestions in more detail. Community outreach will allow target-area residents to suggest additional potential brownfield sites for assessment. These sites will be added to the site inventory as appropriate, and the Township's Brownfield Program Team and project partners will prioritize the sites based on community needs and the overall Brownfield Program goals.

Effective community outreach requires communication with residents about the Brownfield Program through multiple forms of media. The Township will use a dedicated brownfields page on its website and various social media pages, which have a growing audience, to disseminate Brownfield Program information. This will ensure the widest reach of information throughout the community. The Township will post information on its website [www.harrisontownship.org](http://www.harrisontownship.org) and take advantage of its presence on social media, including Nextdoor, Facebook, Instagram, and LinkedIn. Announcements will be disseminated by email via Constant Contact®, by a triennial (three times per year) printed newsletter, and in the local newspapers *Daily Court Reporter* and *Dayton Daily News*. Harrison Township also produces its own YouTube video channel content. Project updates and information will be discussed during monthly Trustee meetings and other community education meetings. Harrison Township will work to provide virtual attendance at the meetings for the convenience of those unable to attend in person. Contact information for the Brownfield Project Team will be posted on the web page and all promotional materials. If necessary due to extenuating circumstances such as weather, road closures, or other factors that may deter attendance, the Township will engage the public via meetings in alternate formats of either virtual or mixed virtual/live events.





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**3. Expenditure of Existing Grant Funds**

Harrison Township, Ohio, does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

**4. Contractors and Named Subrecipients**

Not Applicable.