



## Cuyahoga County Land Reutilization Corp.

812 Huron Road E, Suite 800 Cleveland, Ohio 44115

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### FY 2024 Application for U.S. Environmental Protection Agency Brownfield Assessment Coalition Grants

#### NARRATIVE INFORMATION SHEET

The Cuyahoga County Land Reutilization Corporation (CCLRC), and its Coalition members, First Suburbs Consortium Development Council (FSCDC), Site Readiness for Good Jobs Fund (SRFGJF), and Manufacturing Works (MW), are pleased to submit this application for FY 2024 Brownfield Assessment Coalition Grant funding.

#### **IV.D.1. Applicant Identification:**

Cuyahoga County Land Reutilization Corporation (Lead Entity)

812 Huron Road E. Suite 800. Cleveland, Ohio 44115

#### **IV.D.2. Funding requested:**

IV.D.2.a. Assessment Grant Type: Assessment Coalition

IV.D.2.b. Amount of Federal Funds Requested: \$1,500,000

#### **IV.D.3. Location**

The geographic boundary for this application is Cuyahoga County, Ohio, which is comprised of 57 municipalities and 2 townships.

#### **IV.D.4. Coalition Members' Target Areas and Priority Site Information**

Coalition Member	Target Areas and Census Tract(s)	Priority Site
CCLRC (Lead Entity)	East Cleveland Target Area, East Cleveland (Target Area 1) Census Tracts: 390351517, 390351993, 390351515	1705 Noble Road, East Cleveland
SRFGJF (Non-Lead Entity)	Near Eastside Area, Cleveland (Target Area 2) Census Tract(s): 39035113101	2175 Ashland Road, Cleveland
FSCDC (Non-Lead Entity)	Euclid Industrial Southwest Corridor, Euclid (Target Area 3) Census Tract(s): 39035152502	1111-1113 E. 200 <sup>th</sup> Street, Euclid
MW (Non-Lead Entity)	Union Miles Neighborhood, Cleveland (Target Area 4) Census Tract(s): 39035127501	A 2-block square bound by Cleveland's Prince Ave. to the north, Loren Ave. to the south, E. 91st St. to the west, and E. 93rd St. to the east.

**IV.D.5. Contacts**

**IV.D.5.a. Project Director:** Kimberly Steigerwald, Acquisition Manager, Cuyahoga County Land Reutilization Corporation, 812 Huron Road E, Suite 800, Cleveland, Ohio 44115. (216) 298-8802. ksteigerwald@cuyahogalandbank.org.

**IV.D.5.b. Chief Executive/Highest Ranking Elected Official:** Gus Frangos, President and General Counsel, Cuyahoga County Land Reutilization Corporation, 812 Huron Road E, Suite 800, Cleveland, Ohio 44115. (216) 298-8853. gfrangos@cuyahogalandbank.org.

**IV.D.6. Population:** Cuyahoga County – 1,264,817 (2020 census).

**IV.D.7. Other Factors**

<b>Information on the Other Factors</b>	<b>Narrative 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).	2 & 3
The priority site(s) is in a federally designated flood plain.	No, but see page 3 re flooding
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4
The reuse of the priority site(s) will incorporate energy efficiency measures.	4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	12
The target area(s) is located within a community which a coal-fired power plant has recently closed (2013 or later) or is closing.	No

**IV.D.8. Letter from the State or Tribal Environmental Authority**

Please find attached a letter dated November 1, 2023, from Ohio Department of Commerce, Division of State Fire Marshal, acknowledging our intent to apply for FY24 grant funds and conduct assessment activities. (Exhibit A.)

Please find attached a letter dated November 6, 2023, from Ohio Environmental Protection Agency, acknowledging our intent to apply for FY24 grant funds and conduct assessment activities. (Exhibit A.)

**IV.D.9. Releasing Copies of Applications**

In concert with EPA's commitment to conducting business in an open and transparent manner, copies of this application can be made publicly available on EPA's website for a period of time after the selected applications are announced.

## NARRATIVE

### **IV.E.1. Project Area Description and Plans for Revitalization**

#### **IV.E.1.a. Coalition Members, Target Areas and Brownfields**

**IV.E.1.a.i. Coalition Members: First Suburbs Consortium Development Council (FSCDC)** is a tax exempt, non-profit corporation in the State of Ohio. **Site Readiness for Good Jobs Fund (SRFGJF)** is a newly formed non-profit corporation in the State of Ohio. Its application for tax exempt status under Section 501(c)3 of the Internal Revenue Code is in progress and will be filed in November, 2023. **Manufacturing Works (MW)** is a tax-exempt nonprofit corporation in the State of Ohio. As non-profit corporations, all the Coalition non-lead members are small organizations with limited budgets servicing wide areas of the community and don't have the either the financial or staff capacity to manage and or execute a large Brownfield grant. FSCDC and SRFGJF each have only one employee.

**IV.E.1.a.ii. Overview of Brownfield Challenges and Description of Target Areas:** The Coalition seeks US EPA funding for the assessment of Brownfield properties within the geographic boundary of Cuyahoga County, Ohio.

Cuyahoga County is home to the City of Cleveland, 58 other municipalities, and 2 townships. Like other industrial cities in the rust belt, the City of Cleveland and the County as a whole experienced huge losses of manufacturing businesses and the jobs they provided. As a result of these losses, the County is home to a staggering number of former industrial site that are now Brownfields, including an estimated 10,000 - 25,000 sites just within the City of Cleveland<sup>1</sup>. It has been documented that these sites contribute to public health problems and criminal activity, impede revitalization, and slow the County's path towards economic resurgence. These impacts are disproportionately felt by the County's high minority population (as high as 98% in the Coalition's Target Areas<sup>2</sup>). Such a disparity seems to be a perpetuation of environmental injustice that peaked in the 1960s when race riots plagued the City of Cleveland. In fact, in 1967 at a church in the heart of Cleveland's now Brownfield plagued Opportunity Corridor, Martin Luther King, Jr. spoke of injustice to local black neighborhoods, saying "the total community...has constantly ignored their cries for justice and opportunity...their joblessness, poor housing and economic exploitation<sup>3</sup>." Tragically, his words still ring true today.

Despite these hurdles, local efforts to increase the number of manufacturing jobs have been aided by resources provided by the Bipartisan Infrastructure Deal and the American Rescue Plan. These resources and others are being harnessed to drive a new economy around renewable energy and sustainability that the County's manufacturing workforce is well suited to support.

With its history of manufacturing, already established infrastructure, underutilized skilled workforce, and a growing network of expansion-minded business, the receipt of a coalition Brownfield assessment grant will present the Coalition with an opportunity to stop the cycle of loss and injustice in Cuyahoga County. In recent years, after being called the "ground zero" of the foreclosure crisis<sup>4</sup>, the remediation and redevelopment of Brownfield sites within Cuyahoga County took a back seat to stabilizing the residential property values (which were particularly devastated in each of the Coalition's Target Areas). The Coalition's renewed focus on industrial

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<sup>1</sup> Kramer, Charles & Dsouza, Craig & Schramm, Michael & Griffen, Maureen & Teron, Lemir. (2014). Brownfields: From Redevelopment to Revitalization. 10.13140/RG.2.1.5006.0565. Accessed at [www.researchgate.net](http://www.researchgate.net) 10/20/23

<sup>2</sup> US EPA EJScreen Tool

<sup>3</sup> <https://clevelandmagazine.com/in-the-cle/the-read/articles/kings-speech>

<sup>4</sup> <https://beltmag.com/learning-from-slavic-village-a-report-from-ground-zero-of-the-foreclosure-crisis/>

redevelopment in Cuyahoga County will take advantage of the grant availability to convert the legacy of our manufacturing heritage into a new, sustainable, renewable manufacturing economy.

Four Target Areas have been selected for this grant. CCLRC has adopted the **East Cleveland Target Area (Target Area 1)**, in the city of East Cleveland. The area runs along Euclid Avenue, from Lakeview Avenue (the western city limit) to Belvoir Boulevard/Ivanhoe Road. This corridor is particularly challenged, ranking above the 90<sup>th</sup> percentile for multiple disparity measures including low income, unemployment, and life expectancy<sup>5</sup>. It was also the focus of a successful US EPA Assessment Grant application in 2022 by the Ohio Environmental Protection Agency (OEPA) and this application will supplement any properties that were unable to be reviewed by the OEPA.

The **Near Eastside Area (Target Area 2)**, prioritized by SRFGJF, lies between the East/West boundaries from Cleveland's East 55<sup>th</sup> St. to East 105<sup>th</sup> St., and between the North/South boundaries of Cedar Ave. and Bessemer Ave. The census tracts in this Corridor rank among the most economically disadvantaged in the US, where poverty rates reach as high as 86%, and the median household income as low as \$4,000<sup>6</sup>.

For **Target Area 3**, FSCDC has identified an area within the City of Euclid called the **Euclid Industrial Southwest Corridor**. This location is defined by East/West boundaries of E. 222<sup>nd</sup> St. and Chardon Rd., and St. Clair Ave. and Tungsten Rd. to the North and South. This area is home to numerous Brownfields with former uses including stamping, monorail manufacturing, underground storage tank usage, and post-industrial plastics recycling.

**Target Area 4**, selected by MW, is a neighborhood known as **Union Miles**, in the city of Cleveland. It is bound by Puritan and Beachwood Avenues to the south, Kinsman Rd. to the north, E. 131st St. to the east, and the Norfolk Southern rail tracks to the west. According to EPA's EJScreen tool, this community ranks in the 93rd percentile for Demographic Index, making it one of the most environmentally unjust locations in the nation.

**IV.E.I.a.iii. Description of the Priority Brownfield Sites:** Due to the County's long history as a hub for industry and manufacturing, the potential for Brownfield reclamation here is nearly unlimited. Based on a review of studies and information from local officials and U.S. EPA, the following statistics are available to represent the Brownfields in our Target Areas:

- 40,000 acres (14%) of Cuyahoga County has been categorized industrial at some point<sup>7</sup>;
- An estimated 4,623 acres of Brownfields exist in Cuyahoga County<sup>7</sup>;
- Cleveland is home to an estimated 10,000 – 25,000 Brownfield sites<sup>8</sup>;

For CCLRC's **Target Area 1** priority site, the Coalition is focusing on 1705 Noble Rd., East Cleveland. This 9.89-acre site, located in census tract 39035151100, has a long history of industrial use from at least 1913 to 2017. Its most recent use was an infamous construction and demolition debris recycling facility named Arco Recycling, Inc. After numerous complaints by the local residents, the facility was found to be an illegal dump and ordered closed by the Ohio EPA. In 2017, a large fire burned at the Site for over a week. Although the piles of illegal debris were removed by Ohio EPA, a Phase I and limited Phase II that were completed in 2020 by the CCLRC identified seven recognized environmental conditions (RECs) needing additional

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<sup>5</sup> US EPA EJScreen Tool

<sup>6</sup> American Community Survey. (2023). US. Census Bureau.

<sup>7</sup> Cuyahoga County Planning Commission

<sup>8</sup> Ibid. (Ref. 1)

assessment. A culverted section of Nine Mile Creek runs adjacent to this site. The site is located within Northeast Ohio Regional Sewer District's "Nine Mile Creek Sub-watershed – Problem Area 3". According to the District, this problem area was identified primarily because of impassible flooding caused by contributing streams beginning at a 25-year storm event.

In **Target Area 2** (SRFGJF) near the corner of Ashland Rd. and Cedar Ave., within Cleveland's "Poets" neighborhood and census tract 39035113101 lies a 42-acre priority site at 2175 Ashland Road, known locally as "**The Ruins.**" Still standing in this site are a Westinghouse and Ohio Railway building that date from the early 1900s, and an area of illicit dumping several stories high. Prior investigations have identified asbestos in the buildings and soil/groundwater contamination. Those buildings are surrounded by roughly 20 acres of former residential land now controlled by CCLRC. The community in this census tract is 93% minority, has a low-income rate of 76%, and a median household income of \$16,000<sup>9</sup>. This site is of the scale to attract industrial reuse.

FSCDC's priority site in **Target Area 3** is a building located at 1111 – 1113 E. 200<sup>th</sup> Street, Euclid. This site is surrounded by census tract 39035152502 and was originally a stamping company in the late 1920s, with continuous manufacturing uses since then. Initial investigations are needed to determine environmental conditions so that the site can be repurposed.

**Target Area 4** is home to MW's priority site, which is a 2-block square bound by Cleveland's Prince Ave. to the north, Loren Ave. to the south, E. 91st St. to the west, and E. 93rd St. to the east. Located within census tract 39035127501, this site is partially owned by a MW partner company who looks to expand to the adjoining properties, creating a valuable opportunity for local job creation. Initial investigations are needed to determine environmental conditions so that the site can be repurposed.

**IV.E.1.a.iv. Identifying Additional Sites:** The Coalition has already established a robust list of priority sites that would undoubtedly extend beyond the award of this grant. The SRFGJF has identified, vetted and prioritized 27 sites, totaling nearly 1000 acres to revitalize Cleveland. Additionally, the FSCDC works directly with Mayors in 20 member communities who can bring new development opportunities forward and MW has relationships with nearly 300 member companies who are in regular contact about planned growth and interest in Brownfield sites.

When assessing new priority sites, the Coalition will utilize resources such as the Where Matters, or ESG<sup>^</sup>P tool<sup>10</sup> that was developed by the SRFGJF, which scores sites based on access to talent, racial equity, and commuter emissions. Sites achieving a score of >80 through this tool are preferred. Additional criteria that will be considered include: (1) total number of available acres, either zoned industrial or where rezoning is appropriate/possible;; (2) Site is – our could be – easily accessible by public transit; (3) Relevance to projects already underway and resources already dedicated; (4) Potential for public health and economic benefit; (5) Additional preference given to blighted areas that have negative impact on neighborhood stability;; and, (6) Strong grass-roots support.

#### **IV.E.1.b. Revitalization of the Target Areas**

##### **IV.E.1.b.i. Reuse Strategy and Alignment with Revitalization Plans**

The SRFGJF has prepared an analysis of needs in the City of Cleveland, concluding with a goal of redeveloping 1,000 acres for industrial use, which aligns closely with the MW goals of expanding existing manufacturing opportunities for its members. The FSCDC is in close

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<sup>9</sup> US EPA EIScreen Tool

<sup>10</sup> <https://wherematters.teamneo.org/>

communication with the Mayors of its member communities and has a stated goal for redeveloping brownfields in its communities.

<b>Target Area 1: 1705 Noble Road, East Cleveland.</b> CCLRC owned vacant lot on the corner of two main arteries with public transportation. Remediate leveraging private/public funds. Market to industrial uses for new job creation. Eliminate a public nuisance site.
<b>Target Area 2: 2176 Ashland Road, Cleveland.</b> State forfeited property located on industrial corridor. Consolidate with adjacent vacant parcels to create a 42-acre development site. Market to industrial/manufacturing uses for new job creation.
<b>Target Area 3: 1111-1113 E. 200<sup>th</sup> St, Euclid.</b> 100,000 sq. ft, vacant two-story building. Market to industrial/manufacturing uses for new job creation.
<b>Target Area 4: A 2-block square bound by Prince Ave. to the north, Loren Ave. to the south, E. 91st St. to the west, and E. 93rd St. to the east, in Cleveland.</b> Brownfield inventory area. Consolidate with adjacent parcels to create development site for expansion of existing business.

**IV.E.1.b.ii. Outcomes and Benefits of Reuse Strategy:** The redevelopment of the priority sites (totaling 30 acres) in the four target areas is expected to generate 15 jobs per acre of land according to SRFGJF staff, resulting in potentially 450 new jobs. The redevelopment of the areas will also generate significant real estate tax revenue for the County and local governments. The redevelopment of brownfields in the urban core will minimize the outward sprawl of development, thereby positively effecting climate change and improving resilience. Redeveloping the industrial sites targeted in this application with sustainable operations will result in new, manufacturing uses that improve air and water quality and lead to utilizing renewable energy, also building resilience into the community. Because the target areas are all in fully developed areas of the County, they are in locations that are not susceptible to adverse climate conditions that could affect their reuse. Redevelopment of the urban core will also limit vehicle miles travelled for commuting, lowering greenhouse gas emissions. The City of Cleveland has a commitment to power itself with 100% clean and renewable energy sources by 2050<sup>11</sup>, paired with a County commitment to continue developing Brownfields for clean energy generation<sup>12</sup>. The Coalition will leverage its alignment with the City and County climate initiatives to implement clean energy and brightfield programming throughout the Target Areas.

**IV.E.1.c. Strategy for Leveraging Resources**

**IV.E.1.c.i. Resources Needed for Site Reuse:** CCLRC has used previous grants and other resources to complete Brownfield redevelopment projects with much success. Coalitions members will leverage EPA funding with grants, loans and other local incentives including: **Assessment & Cleanup:** The Coalition will utilize the City of Cleveland’s FY 23 US EPA Brownfield Assessment Grant and OEPA’s Targeted Brownfield Assistance (TBA) Program for assessments. We will utilize the Ohio Department of Development’s Brownfield Cleanup Program, as well as Northeast Ohio Areawide Coordinating Agency’s (NOACA) FY 23 US EPA Revolving Loan Fund. **Redevelopment:** The City of Cleveland has allocated \$50 million in funding solely for the use of redeveloping Brownfield sites including planning, infrastructure and site assembly.

**IV.E.1.c.ii. Use of Existing Infrastructure:** With its robust infrastructure, the area has a well-established, easy to utilize network of existing infrastructure. Given that each of this Coalition’s

<sup>11</sup> Cleveland Climate Action Plan (CAP)

<sup>12</sup> [Cuyahoga County Climate Change Action Plan](#)

target areas are urban, no addition of infrastructure is needed. The Coalition has committed to exclusively utilizing existing infrastructure, and because the Priority sites are in underutilized areas, there is sufficient capacity to handle the planned redevelopment activities. Facilitated through this grant, several recent infrastructure projects will be leveraged by redevelopment, including work done by the Northeast Ohio Regional Sewer District to develop green infrastructure and minimize combined sewer overflows; City of Cleveland efforts to replace lead water lines; and CCLRC's work to revitalize the City of East Cleveland through its Circle East District project that strikes a balance between economic growth, environmental care, and social well-being<sup>13</sup>.

Each Coalition member is connected to robust roadways, footpaths, waste management, sewage and stormwater systems, potable water supply, electricity, and communication networks; and are complemented by nearby police, EMS, and fire stations, health clinics, and libraries.

#### **IV.E.2. Community Need and Community Engagement**

##### **IV.E.2.a. Community Need**

**IV.E.2.a.i. The Community's Need for Funding:** Since 1990, Cuyahoga County has seen nearly 90,000<sup>14</sup> of its manufacturing jobs erased, and its population has declined by nearly 30% since 1970<sup>15</sup>. With a 16.2% poverty rate (nearly 1.5 times the national measure), above average unemployment rates<sup>16</sup>, and a 90th percentile ranking for crime safety<sup>17</sup>, the communities of Cuyahoga County are challenging enough to discourage almost all outside investment, and too impoverished to fund Brownfield reclamation on their own. In parts of the County, namely surrounding some of our Target Areas, these figures are drastically more formidable. Cleveland's Opportunity Corridor (OC) –a linkage of five contiguous census tracts that are among the poorest urban tracts in the US, and the target of a 2013 Brownfield Area Wide Plan– hosts only 4,500 total jobs, two thirds of which are below living wage, to offer to the area's 6,500 prime age working population<sup>18</sup>. The stagnant job market in these areas further contributes to the community's inability to self-fund Brownfield projects and highlights the need for an infusion of jobs both from Brownfield reclamation work, and the influx of business to follow.

These factors contribute to low property prices in the County that one would expect to attract businesses and investors, however the widely known likelihood of parcel contamination means that investors are aware that additional costs will be incurred to acquire real estate and clean it up in our Target Areas. This condition forces development to outer greenfield sites, which are seen as more feasible because they don't have the costs and delays associated with Brownfield sites. Outside funding provided by this grant is needed to level the playing field by offsetting costs to conduct due diligence to prepare sites for development so that the community is ready for new business and the infusion of new jobs for Cuyahoga County residents who badly need them.

##### **IV.E.2.a.ii. Threats to Sensitive Populations:**

**IV.E.2.a.ii.1 Health or Welfare of Sensitive Populations:** The Target Areas identified by the Coalition have a significant presence of particularly vulnerable residents. **Table 1** identifies that

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<sup>13</sup> <https://circleeastdistrict.org/>

<sup>14</sup> <https://www.policymattersohio.org/research-policy/fair-economy/work-wages/state-of-working-ohio/manufacturing-a-high-wage-ohio-deindustrialization-and-recovery> 1/23/19

<sup>15</sup> <https://fred.stlouisfed.org/series/OHCUYA5POP>

<sup>16</sup> <https://fred.stlouisfed.org/series/OHCUYA5URN>

<sup>17</sup> <https://crimegrade.org/safest-places-in-cuyahoga-county-oh/>

<sup>18</sup> Opportunity Corridor, City of Cleveland, and US. (2023). Lightcast.



the Target Areas have very high minority populations that are generally double the remainder of Cuyahoga County and 4 times more than the rest of the State. Additionally, those populations largely live in poverty, with rates as high as 86% and unemployment as high as 20% in some Target Areas. With a large population of children and high crime rates, the Target Areas have suffered from inequity and remain exceptionally challenged and threatened on multiple levels. The Coalition's efforts are aimed at revitalizing these areas, which will in turn serve as a magnet for businesses, resulting in increased employment opportunities and enhanced economic well-being. Uniquely, the SFRGJF's Community Investment Trust will provide for local land equity participation in their Target Area which will directly improve health and welfare measures and enhance the living standards and quality of life for vulnerable communities in Cuyahoga County.

<b>TABLE 1: Threats to Sensitive Populations<sup>19</sup></b>	Target Area 1	Target Area 2	Target Area 3	Target Area 4	Cuyahoga County	State of Ohio	United States
Low Income	<b>70%</b>	<b>67%</b>	<b>35%</b>	<b>54%</b>	34%	13%	12%
Minority	<b>94%</b>	<b>96%</b>	<b>69%</b>	<b>98%</b>	42%	21%	38%
Unemployment	<b>20%</b>	<b>20%</b>	<b>13%</b>	<b>20%</b>	8%	3%	4%
< HS Education	<b>17%</b>	<b>18%</b>	11%	15%	9%	9%	11%
Under Age 5	<b>11%</b>	<b>9%</b>	2%	5%	6%	6%	6%
Crime (percentile) <sup>20</sup>	<b>94<sup>th</sup></b>	<b>75<sup>th</sup></b>	70 <sup>th</sup>	<b>94<sup>th</sup></b>	<b>90<sup>th</sup></b>	20 <sup>th</sup>	N/A

**Bold/Shaded** indicates >75<sup>th</sup> percentile in USA

**IV.E.2.a.ii.2 Greater Than Normal Incidence of Disease and Adverse Health Conditions:**

The information in Table 2 below displays clearly measurable disparities experienced by the Coalition's stakeholder communities in these areas, with inequity measures ranking above the 75<sup>th</sup> percentile nearly across the board, when compared with US averages. Additionally, the 2019 Cuyahoga County Health Assessment Report has identified infant mortality as a top-priority health issue. Infant and neonatal mortality rates in Cuyahoga County (8.1 and 6.0, respectively) are higher than the rates for the state of Ohio (7.2 and 5.0, respectively), and they are far from meeting the National Institute of Health's Healthy People 2020 Goals (6.0 and 4.1, respectively). Furthermore, due to poor air quality 15.7% of children in Cuyahoga County have been diagnosed with asthma, with even higher rates (19.3%) among those residing in or near the City of Cleveland<sup>21</sup>. A 2017 study found that 13% of all Cleveland children are exposed to dangerous levels of lead (four times the national average). Taking action to eliminate contaminants from the area and mitigate their migration will lead to a decrease in exposure to hazardous substances for the target areas' residents and workers, including women of childbearing age, ultimately addressing the issue of infant mortality. Safety risks from exposure to contaminants (such as lead in dust, asbestos and lead paint from abandoned buildings, migrating chemical vapors) will also be diminished through the recovery of the area's numerous Brownfield sites.

<b>TABLE 2: Disease and Adverse Health Conditions<sup>22</sup></b>	Target Area 1	Target Area 2	Target Area 3	Target Area 4	Cuyahoga County
Diabetes (percentile)	<b>99<sup>th</sup></b>	<b>99<sup>th</sup></b>	<b>85<sup>th</sup></b>	<b>98<sup>th</sup></b>	Unavailable
Asthma (percentile)	<b>99<sup>th</sup></b>	<b>99<sup>th</sup></b>	<b>96<sup>th</sup></b>	<b>99<sup>th</sup></b>	73 <sup>rd</sup>
Heart Disease (percentile)	<b>98<sup>th</sup></b>	<b>98<sup>th</sup></b>	<b>86<sup>th</sup></b>	<b>95<sup>th</sup></b>	74 <sup>th</sup>
Life Expectancy (years)	<b>66</b>	<b>69</b>	<b>75</b>	<b>66</b>	78

<sup>19</sup> US EPA EJScreen Tool

<sup>20</sup> <https://crimegrade.org/safest-places-in-cleveland-oh/>

<sup>21</sup> CCLRC's FY23 Brownfield Cleanup Grant Application

<sup>22</sup> Council on Environmental Quality CEJST Tool

Lead Paint (percentile)	88 <sup>th</sup>	77 <sup>th</sup>	94 <sup>th</sup>	93 <sup>rd</sup>	78 <sup>th</sup>
Hazardous Waste Proximity (percentile)	94 <sup>th</sup>	97 <sup>th</sup>	86 <sup>th</sup>	90 <sup>th</sup>	78 <sup>th</sup>
Underground Storage Tanks/Releases (percentile)	96 <sup>th</sup>	93 <sup>rd</sup>	71 <sup>st</sup>	81 <sup>st</sup>	76 <sup>th</sup>
<b>Bold/Shaded</b> indicates >75 <sup>th</sup> percentile in USA					

**IV.E.2.a.ii.3. Environmental Justice**

**2.a.ii.(3)(a) Identification of Environmental Justice Issues:** *All of this Coalition’s Target Areas fall into communities identified firmly as disadvantaged under the CEJST and EJScreen tools. The Target Areas generally score above the 75<sup>th</sup> percentile nationally for a variety of environmental injustice measures, with many scoring much higher. Additional measures in Cleveland show further disparities among the city’s communities, including black infant mortality rates soaring to 15.2 deaths per thousand live births, compared with 2.6 for white babies. These disparities tragically continue throughout those infants’ lives, as Cleveland’s black adults will live an average 6 years less than white residents<sup>23</sup>. The same uneven distribution of health issues is seen in the City’s lead poisoning problem, for which it has been named the “worst in the country,” with poisoning rates reaching as high as 25% in children of predominately black neighborhoods<sup>24</sup>.*

With the prevalence of Brownfield sites throughout each of the Coalition’s Target Areas and Cuyahoga County as a whole, it is not difficult to draw connections between exposure to neighboring industrial site dilapidation and abnormal health indicators like asthma, lead poisoning, and low life expectancy. Like the Brownfield sites themselves, these communities have been abandoned and they are now suffering at disproportionate rates because of consistent failure to equally represent them.

**2.a.ii.(3)(b) Advancing Environmental Justice:** With this grant, the Coalition will work towards the remediation of sites long linked to health burdens, and the injection of new economic life into communities historically trapped under financial duress. Like during the original industrial revolution, we want our industries in this new sustainable economic revolution to be near our workers. The Coalition’s work will minimize the displacement of residents surrounding Target Area Brownfield sites MW in particular will play an important role here, as the organization works directly with businesses in the Cuyahoga County area and helps ensure local residents are hired for new workforces. Furthermore, in the case of SRFGJF sites, community members will be directly participating in Brownfield property equity growth through its Community Investment Trust. The Coalition will also partner with local Community Development Corporations in the Target Areas, who are “boots on the ground” in neighborhoods and can help foster direct connections to those who have historically experienced environmental injustice.

**IV.E.2.b. Community Engagement:**

**IV.E.2.b.i. Project Involvement & IV.E.2.b. ii. Project Roles**

CCLRC will work closely with the Coalition members, FSCDC, SRFGJF, and MW to connect stakeholders throughout all four target areas.

<sup>23</sup> <https://beltmag.com/cleveland-environmental-justice-hotspots-map/>

<sup>24</sup> <https://www.cleveland.com/metro/2019/01/after-decades-of-promises-cleveland-children-still-poisoned-by-lead.html>

Name of organization /entity /group	Point of contact (name, & email)	Specific involvement in the program or assistance provided
CCLRC	Kim Steigerwald, Acquisition Manager <a href="mailto:ksteigerwald@cuyahogalandbank.org">ksteigerwald@cuyahogalandbank.org</a>	Project Manager. Will coordinate grant activities and help with site selection.
FSCDC	Jennifer Kuzma, Executive Director <a href="mailto:jkuzma@bedfordoh.gov">jkuzma@bedfordoh.gov</a>	Will engage suburban stakeholders, help with site selection.
SRFGJF	Brad Whitehead, Managing Director <a href="mailto:brad@whiteheadadvisory.org">brad@whiteheadadvisory.org</a>	Will engage Cleveland real estate stakeholders, assemble parcels, help with site selection.
MW	Millie Caraballo, VP, Industrial Development <a href="mailto:mcaraballo@mfgworkscl.org">mcaraballo@mfgworkscl.org</a>	Will engage existing and new manufacturing and industrial companies, help with site selection.

**IV.E.2.b.iii. Incorporating Community Input:** Combined, this coalition has eighty years of experience in directing community-centered programming, all of which has featured robust public input. These grassroots partnerships have proven key to the success CCLRC has had on many Brownfield projects funded by the US EPA. From the beginning of this project, the Coalition has worked directly with community partners to identify priority projects that tie into work already envisioned with citizen input. The Coalition will meet bi-monthly to garner community input in each of the Target Areas.

The focus on **Target Area 1** is a strategic one, as it allows the Coalition to build upon relationships and communication channels already established by CCLRC in previous East Cleveland (EC) Brownfield projects and its current Circle East District project. The Coalition will take advantage of the City’s regular community meetings which are historically met with exceptional community engagement. Updates and project information will also be conveyed through EC’s outreach channels in this Target Area.

Both located within the City of Cleveland, **Target Areas 2 and 4** will utilize the strong partnerships between SRFGJF, MW, and the City to disseminate project information and solicit community input through meetings with current and future MW members. CCLRC will engage Union Miles Community Development Corporation (CDC) as a key partner for **Target Area 4**. The CDC will provide an important boots-on-the-ground connection to the local population.

For projects in **Target Area 3**, located in Euclid, FSCDC will work with the City of Euclid staff to update the surrounding neighborhood regarding its efforts to investigate the Brownfield parcels. The City of Euclid uses social media, email, and its website to communicate effectively with its constituents.

**IV.E.3. Task Descriptions, Cost Estimates, and Measuring Progress**

**IV.E.3.a. Description of Tasks/Activities and Outputs:**

<b>Task/Activity: Grant Administration</b>
<p><b>i. Project Implementation:</b> This task will include the oversight and supervision of the grant program for the Coalition. Activities include the management of the Cooperative Agreement, procuring the Qualified Environmental Professional (QEP), conducting regular meetings with the QEP and US EPA, reporting, output tracking, Assessment Cleanup Redevelopment</p>

Exchange System (ACRES) database entries, approval of invoices, eligibility determinations, review of completed reports review of Disadvantage Business Enterprise (DBE) reporting, financial reporting, quarterly program reports to US EPA, a final comprehensive report, and attending EPA Brownfields conferences and related workshops.
<b>ii. Anticipated Project Schedule:</b> This activity will be initiated at project inception. QEP selection will occur within three (3) months of securing the Cooperative Agreement. Other activities will occur concurrently throughout the grant period.
<b>iii. Task/Activity Lead:</b> CCLRC Acquisitions Manager and QEP.
<b>iv. Output:</b> Outputs for this Task will include documentation of QEP selection, completion of bi-monthly meetings with US EPA representatives, quarterly meeting notes from presentations to Coalition partners, documentation of Outputs, financial tracking summary prepared for each US EPA meeting, eligibility determinations, percent of contract allocated to DBEs, ACRES reporting, and a final report.
<b>Task/Activity: Brownfield Inventory</b>
<b>i. Project Implementation:</b> A Brownfield Inventory will be prepared in at least one (1) of each of the Coalition's Target Areas, not to exceed a total of four (4).
<b>ii. Anticipated Project Schedule:</b> The Brownfield Inventory for the selected Target Area will be completed within one year of QEP selection. Additional Inventories, if determined needed by the Brownfield Advisory Committee, will be conducted as needed.
<b>iii. Task/Activity Lead:</b> CCLRC Acquisitions Manager and QEP.
<b>iv. Output:</b> Output for this task will be a comprehensive Brownfield Inventory for the selected Target Area produced using the Brownfield Inventory Tool (BiT) or similar resource.
<b>Task/Activity: Community Engagement</b>
<b>i. Project Implementation:</b> This task will include the engagement of new partners and convening bi-monthly Coalition meetings to review actions and progress. It will include at least four (4) community meetings - four (4) associated with Area Wide Plans (one in each of the target areas), and one (1) public meeting in each Target Area (4 total). To communicate progress, a bilingual communication plan will be created to reach non-English speaking community members. The Coalition will also partner with representatives from Target Area municipalities to tailor meetings at times and in locations convenient to residents and business owners in the concerned neighborhoods. Communication of the program may include website postings and the creation of fact sheets and will include presentations at council and town hall meetings.
<b>ii. Anticipated Project Schedule:</b> This Task will be initiated within three (3) months of completion of Consultant selection and continue throughout the grant period.
<b>iii. Task/Activity Lead:</b> CCLRC Acquisitions Manager, SRFGJF Managing Director, FSCDC Director, MW Vice President of Industrial Development and QEP.
<b>iv. Output:</b> Outputs for this task will include a list of members, documentation from bimonthly Coalition meetings and at least four (4) community meetings, four (4) public meetings, and a bilingual communication plan.
<b>Task/Activity: Re-Use/Area-Wide Planning</b>
<b>i. Project Implementation:</b> Brownfield re-use/area-wide planning will be conducted in three (3) of the Target Areas. Community input will be garnered through public meetings specific to each Target Area.
<b>ii. Anticipated Project Schedule:</b> The planning projects will be prioritized and scheduled over the course of the grant period. The first will be initiated within the first year of the grant

and completed by the end of the first grant year, with others to follow. At least one (1) public meeting will be conducted as part of each planning process.
<b>iii. Task/Activity Lead:</b> CCLRC Acquisitions Manager, SRFGJF Managing Director, FSCDC Director, MW Vice President of Industrial Development and CIRI, and QEP.
<b>iv. Output:</b> Outputs will be the three (3) Re-use/Area Wide Plans and documentation of at least three (3) public meetings specific to the planning process.
<b>Task/Activity: Environmental Assessments</b>
<b>i. Project Implementation:</b> The Coalition will conduct Phase I and II Environmental Site Assessments (ESAs) and Hazardous Materials surveys. All work will be conducted under the QEP's approved Quality Assurance Project Plan (QAPP) and site-specific Sampling and Analysis Plans (SAPs) where applicable, and consistent with All Appropriate Inquiry (AAI) and with the Ohio Voluntary Action Program (VAP) or other applicable statutes (e.g., Ohio Department of Health [ODH] asbestos, lead-based paint, etc.).
<b>ii. Anticipated Project Schedule:</b> Assessments will be initiated throughout the grant based on Coalition member recommendations, site eligibility, and priorities developed by the Coalition during the Inventory and Brownfield Planning tasks.
<b>iii. Task/Activity Lead:</b> CCLRC Acquisitions Manager, SRFGJF Managing Director, FSCDC Director, MW Vice President of Industrial Development and CIRI, and QEP.
<b>iv. Output:</b> Outputs will include the approved QAPP, at least 25 Phase I ESAs, at least 12 Phase II ESAs (including the SAPs), eight (8) hazardous material surveys, and eligibility determinations for each site that is considered.
<b>Task/Activity: Cleanup Planning</b>
<b>i. Project Implementation:</b> The Coalition will conduct cleanup planning on at least one (1) site, likely starting with the Former Arco Recycling Priority Site and The Ruins Priority Site which may also include the development of an Analysis of Brownfield Cleanup Alternatives (ABCA). The cleanup plan(s) will be consistent with the CDPHE requirements and submitted for regulatory approval.
<b>ii. Anticipated Project Schedule:</b> A cleanup plan for at least one (1) eligible Priority Site will be prepared by the end of the first year after QEP selection to allow for sufficient time for environmental assessments. Other clean-up plans will be prepared as needed throughout the grant period.
<b>iii. Task/Activity Lead:</b> CCLRC Acquisitions Manager, SRFGJF Managing Director, FSCDC Director, MW Vice President of Industrial Development and CIRI, and QEP.
<b>iv. Output:</b> Outputs will consist of at least one (1) approved cleanup plan.

**IV.E.3.b. Cost Estimates**

**Task 1 – Grant Administration: \$75,000:** Contractual- \$75,000: The Coalition will rely on the QEP for eligible programmatic tasks and will be providing grant administration in-kind.

**Task 2 – Brownfield Inventory: \$60,000:** Contractual - \$60,000: The QEP is anticipated to prepare one (1) Brownfield Inventory for each of the four (4) Target Areas. It is estimated that \$15,000 will be needed for each Inventory, for a total of \$60,000.

**Task 3 – Community Engagement: \$25,000:** Contractual - \$25,000: The Coalition will rely on the QEP to lead this Task, with in-kind support from each Coalition member. It is anticipated that the QEP will lead a minimum of four (4) stakeholder group meetings at \$2,000/each and a minimum of four (4) public meetings at \$ 3,000/each. One bilingual communication plan will be prepared at a cost of \$5,000.

**Task 4 – Re-Use/Area-Wide Planning: \$420,000:** Contractual - \$420,000: The QEP will lead this Task completing at least one (1) Re-Use Plan for the City of Cleveland, one (1) for City of East Cleveland, and one (1) for Cleveland’s First Ring Suburbs. It is estimated that \$140,000 will be allocated to each plan.

**Task 5 – Environmental Assessment: \$775,000:** Contractual - \$775,000: The QEP will lead this task. It is anticipated that \$775,000 will be allocated to this task accounting for up to 25 Phase I ESAs at an average cost of \$5,000/each, one (1) QAPP at a cost of \$10,000, 12 Phase II ESAs (including the SAPs) at an average cost of \$40,000/each and eight (8) hazardous materials surveys at an average cost of \$20,000/each.

**Task 6 – Cleanup Planning: \$145,000:** Contractual - \$145,000: The QEP will lead this Task conducting cleanup planning on at least one (1) site per Target Area for an average cost of \$36,250.

Budget Categories		Grant Administration	Brownfield Inventory	Community Engagement	Re-Use / Area Wide Planning	Environmental Assessment	Cleanup Planning	Total
Direct Costs	Personnel	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fringe Benefits	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Travel	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Equipment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Supplies	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Contractual	\$75,000	\$60,000	\$25,000	\$450,000	\$775,000	\$115,000	\$1,500,000
	Construction	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Other	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Direct Costs		\$ 75,000	\$ 60,000	\$ 25,000	\$ 450,000	\$ 775,000	\$ 115,000	\$1,500,000
Indirect Costs		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Budget		\$ 75,000	\$ 60,000	\$ 25,000	\$ 450,000	\$ 775,000	\$ 115,000	\$1,500,000

**IV.E.3.c. Plan to Measure and Evaluate Environmental Progress and Results:** The QEP will be required to establish and maintain a comprehensive project schedule that outlines key milestones, budget allocations, and deliverables. Monthly updates will be generated to track ongoing project processes, which the Coalition will transmit to the EPA through the ACRES database. In cases where predetermined measures or timeline milestones are not met, the Coalition will convene meetings involving the EPA, Coalition partners, and the QEP to assess challenges, identify solutions, and devise steps for recovering lost time or making necessary adjustments to align the project with expectations.

ESAs will be prioritized early in the project’s execution to assess the availability of extra capacity for additional sites within the Target Areas and other communities encompassed in this project’s geographic houndary of Cuyahoga County. The defined project outputs will be consistently monitored and recorded in the ACRES system on a monthly basis.

The Coalition will also monitor project progress through documentation provided by all contractors and consultants and will provide this information to the EPA through regularly scheduled quarterly meetings with the EPA Project Officer, quarterly reports, annual reports, and regular correspondence.

**IV.E.4 Programmatic Capability and Past Performance**

**IV.E.4.a. Programmatic Capability**

**IV.E.4.a.i. Organizational Capacity:** CCLRC will lead the Coalition, with the non-lead entities of the First Suburbs Development Council, Site Ready for Good Jobs Fund and Manufacturing Works. CCLRC has staff capacity and significant experience administering USEPA Brownfield Grants. It will administer this grant on behalf of the Coalition.

**IV.E.4.a.ii. Organizational Structure:** The Coalition members will collaborate to repurpose Brownfield sites in the City of Cleveland and its adjacent first ring suburbs. It will meet bi-monthly to assess eligible sites and planning activities.

**IV.E.4.a.iii. Description of Key Staff:** CCLRC staff has extensive experience managing Brownfield grant projects. **Kimberly Steigerwald, Acquisition Manager, CCLRC:** With 33 years of community development experience, Kim has successfully managed both USEPA Brownfield Cleanup Grants and USEPA Assessments Grants for the City of Cleveland Heights and the Cuyahoga Land Bank. She will oversee the management of this grant. **Douglas Sawyer, Assistant General Counsel, CCLRC:** manages the day-to-day legal affairs of the Land Bank and provides legal counsel to Land Bank management and staff. He graduated with dual degrees from Cleveland State University by simultaneously earning a Master of Arts in Environmental Studies at the Maxine Levin College of Urban Affairs and a law degree at Cleveland-Marshall College of Law

Additionally, each non-lead entity's director will work closely with CCLRC to ensure that the EPA funding will further the Coalition's goals.

**IV.E.4.a. iv. Acquiring Additional Resources.** The Coalition members each bring substantial resources including technical and support staff. Staff time from all of the members is in-kind. CCLRC's procurement procedures align with federal, state and local requirements.

**IV.E.4.b. Past Performance and Accomplishments**

**IV.E.4.b.i. Currently Has or Previously Received an EPA Brownfields Grant & IV.E.4.b.i.1 Accomplishments:** Since 2010, CCLRC has successfully secured and managed multiple USEPA Brownfield Grants.

- **FY2011 -USEPA Brownfield Assessment Grant Award.** BF-00E00415. Total \$400,000. **Accomplishments:** 14 Phase Is, 8 Phase IIs, 4 Asbestos Surveys, 1 Lead Based Paint Survey, 1 Risk Assessment.
- **FY 2016-USEPA Brownfield Assessment Grant Award.** BF-00E02022. Total \$400,000. **Accomplishments:** Completed 16 Phase Is, 14 Phase IIs, 5 Asbestos Surveys, 1 Risk Assessment, 1 Risk Mitigation Plan, 1 Ground Penetrating Radar Survey.
- **FY2020-USEPA Brownfield Assessment Grant Award.** BF 00E02732. Total \$300,000. **Accomplishments:** Completed 15 Phase Is, 9 Phase IIs, 5 Asbestos Surveys, 1 Lead Based Paint Survey, 2 Neighborhood Brownfield Inventories, 1 Landfill Management Plan.
- **FY 2023-USEPA Brownfield Cleanup Grant Award.** BF 00E03571. Total \$500,000. Underway.

- **Accomplishments:** Recently hired QEP for management of remediation contractors.

**IV.E.4. b.i.2. Compliance with Grant Requirements.** For all four grants, CCLRC maintained compliance with the terms and conditions, including timely and acceptable submission of quarterly reports, grant deliverables and ACRES reporting.

## THRESHOLD CRITERIA

**III.B.1. Applicant Eligibility:** The Cuyahoga County Land Reutilization Corporation (CCLRC) is a community improvement corporation organized and existing under Chapter 1724 of the Ohio Revised Code. Under Ohio law, it is an instrumentality and agency of Cuyahoga County, Ohio. Correspondence with EPA Region 5 confirming its eligibility as a lead entity can be found in Exhibit B.

**III.B.2. Number and Eligibility of Non-lead Coalition Members:** There are three Non-lead Coalition Members. Eligibility documentation can be found in Exhibit B.

**First Suburbs Development Council (FSCDC)** is a tax exempt, non-profit corporation created in the State of Ohio.

**Site Readiness For Good Jobs Fund (SRFGJF)** was formed as a tax exempt, non-profit corporation created in the State of Ohio in August, 2023. Its application for 501(c)3 status will be filed in November, 2023.

**Manufacturing Works (MW)** is a tax-exempt nonprofit corporation created in the State of Ohio.

### **III.B.3. Target Areas**

<b>Coalition Member</b>	<b>Target Areas</b>	<b>Priority Site</b>
CCLRC (Lead Entity)	East Cleveland Target Area, East Cleveland (Target Area 1)	1705 Noble Road, East Cleveland
SRFGJF (Non-Lead Entity)	Near Eastside Area, Cleveland (Target Area 2)	2175 Ashland Road, Cleveland
FSCDC (Non-Lead Entity)	Euclid Industrial Southwest Corridor, Euclid (Target Area 3)	1111-1113 E. 200 <sup>th</sup> Street, Euclid
MW (Non-Lead Entity)	Union Miles Neighborhood, Cleveland	A 2-block square bound by Prince Ave. to the north, Loren Ave. to the south, E. 91st St. to the west, and E. 93rd St. to the east, Cleveland.

**III.B.4. Existing Brownfields Grants to Non-lead Members:** None of the three Non-lead members have previously applied for or obtained USEPA Brownfield Grants.

**III.B.5. Coalition Agreement:** Signed letters of intent from the three Non-lead members can be found in Exhibit C



**III.B.6. Community Involvement:** CCLRC began engaging with Brownfield projects shortly after the housing crisis in 2009, receiving their first US EPA Community-wide Brownfield grant in FY 2010, and has held community involvement as a core tenet of its operations since day one. Indeed, CCLRC considers these efforts to be a key component of the organization's success in previous Brownfield projects. Because of its existing community engagement process centered around its role in the housing crisis, CCLRC acquires abundant citizen input and formal approval from municipalities and/or community-based development organizations during all their work. When working on Brownfields, CCLRC works hard to ensure that citizens are well-notified and have the opportunity to provide meaningful comments throughout each stage of the process. Public comments received from outreach activities are shared and discussed between the CCLRC, the municipality(ies) and any interest group(s) involved, so that appropriate changes can be considered before proceeding with any project. These efforts are informed by CCLRC's Communication Plan, which includes consistent social media presence on Facebook and X (formerly known as Twitter), bi-monthly newsletters, quarterly open Board meetings, and dedicated public informational meetings.

Due to the scale of this proposal and its potential to impact such a large swath of Cuyahoga County residents, we will also take advantage of the additional community outreach networks brought to the table by each of the coalition's members. Using both approaches, that of our own systems developed through multiple Community-wide Assessment and Cleanup grants and relying on the well-established community engagement resources of our Coalition members, we will be sure to reach underserved communities and broadly engage our community members.

MW, with its commitment to promoting economic growth and fostering a skilled workforce, collaborates with local communities in the Greater Cleveland area to bridge the gap between the manufacturing industry and public. MW will provide a direct connection to bring industry and worker voices to the table in Brownfield assessment conversations and has a long history of effective outreach including webinars, plant tours, trainings, lunch and learns, peer group organization, and more. They are well known in the manufacturing industry as a trusted advisor, and work with their members to ensure both industry and the workforce are strongly represented.

As a City of Cleveland program, SRFGJF will provide the Cleveland-specific outreach opportunities necessary to capture input of stakeholders in the heart of Cuyahoga County. SRFGJF is intimately attuned to the needs of its constituents and has already leveraged preexisting City of Cleveland resources to determine Brownfield priorities and objectives. Additionally, SRFGJF has established the Community Investment Trust, which provides equity returns to local neighborhoods on all SRFGJF projects. Local residents which have long felt the health and economic impacts of neighboring Brownfield sites, will now actively participate in the land value appreciation that comes from their recovery. Thus, there will be a direct line between the work of this coalition and the community's financial benefit. The communication plan, to facilitate the equity return, will similarly be used to gain important input on Brownfield site priorities and to serve as a channel to access information in a transparent manner.

FSCDC represents the residents and stakeholders of the first ring (A.K.A. inner ring) suburbs in the Greater Cleveland area. They organize community events, town hall meetings, and workshops to facilitate dialogue, address concerns, and create a sense of unity among community members. Additionally, the consortium utilizes their website as an informative hub, offering resources, news, and updates to keep the public well-informed. FSCDC is a hub between 20 communities in Cuyahoga County and works directly with Mayors and staff within these

municipalities to ensure site-specific information and involvement is a priority. FSCDC will be crucial to ensuring Cuyahoga County voices, beyond urban Cleveland, are represented in Brownfield assessments. FSCDC will use their direct line of communication with the inner-ring Mayors to gain input on Brownfield priorities and return information to the communities they serve.

In order to achieve its community outreach objectives, the Coalition members are committed to meeting on a bi-monthly basis in order to inform the public of project statuses and acquire open input for project direction. It will pool resources and adopt best practices established by preexisting stakeholder groups including the First Suburbs Development Council and the SRFGJF Operations Committee, featuring site criteria that include direct neighborhood engagement, a developed community benefits agreement, and prioritizing needs based on financial, racial, health, and inequity measures<sup>25</sup>. This already includes the following organizations from SRFGJF's advisory committee: City of Cleveland, JobsOhio, Team Northeast Ohio (NEO), Cuyahoga County Planning Commission, the Fund for Our Economic Future, Greater Cleveland Partnership. FSCDC will link in representatives from their 20 FSCDC member communities within Cuyahoga County, and MW will bring to the table representatives from manufacturing groups and community development organizations, particularly with a minority focus.

Lastly, this coalition commits to engaging with as much of this project's affected populations as possible. Given that 12% of Cuyahoga County residents speak a language other than English at home<sup>26</sup>, the coalition will seek translation and hearing assisted services whenever needed for in-person meetings and will provide translated public project materials upon request.

### **III.B.7. Expenditure of Existing Grant Funds**

**FY2011-USEPA Brownfield Assessment Grant Award.** BF-00E00415. Award Amount: \$400,000. Expended all funds. Closed.

**FY 2016-USEPA Brownfield Assessment Grant Award.** BF-00E02022. Award Amount: \$400,000. Expended all funds. Closed.

**FY2020-USEPA Brownfield Assessment Grant Award.** BF 00E02732. Award Amount: \$300,000. Expended \$285,106.72. Closed.

**FY 2023-USEPA Brownfield Cleanup Grant Award.** BF 00E03571. Award Amount: \$500,000. No funds expended at this time. Underway.

**III.B.8. Contractors and Named Subrecipients:** Not Applicable. The Coalition has not procured any contractors or subrecipients for this application.

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<sup>25</sup> May 2023 SRFGJF Presentation to City of Cleveland

<sup>26</sup> <https://www.census.gov/quickfacts/fact/table/cuyahogacountyohio,US/PST045222>

**EXHIBIT A**

**IV.D.8 LETTERS FROM STATE AUTHORITY**



Department  
of Commerce

Division of State Fire Marshal

Sheryl Masfield, Director

Mike DeWine, Governor  
Jon Husted, U. Governor



November 1, 2023

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

**RE: Cuyahoga County Land Reutilization Corporation's Brownfield Coalition Assessment Grant Proposal**

Dear Mr. Jurevis:

This letter acknowledges that the Cuyahoga County Land Reutilization Corporation notified the Office of the Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR) of its plans to use the \$1,500,000 grant proposal for a brownfield coalition assessment for petroleum and hazardous waste. The coalition consists of the Cuyahoga County Land Reutilization Corporation, First Suburbs Development Council, Site Readiness for Good Jobs Fund and Manufacturing Works. The targeted areas are located within Cleveland, East Cleveland, and Euclid. These areas have high unemployment and poverty rates, historic manufacturing and industrial brownfields, and vacant properties. Goals of the grant include assessment of four targeted areas, developing reuse plans promoting economic growth, and revitalizing neighborhoods.

I am pleased to offer BUSTR's support for the Cuyahoga County Land Reutilization Corporation's Brownfield Coalition Assessment Grant proposal. We look forward to working with the Cuyahoga County Land Reutilization Corporation, First Suburbs Development Council, Site Readiness for Good Jobs Fund and Manufacturing Works and the U.S.EPA on this project.

Sincerely,

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

xc: Site File  
Kim Steigerwald, Cuyahoga County Land Reutilization Corporation



November 6, 2023

U.S. Environmental Protection Agency, Region 5

ATTN: Ashley Green

77 West Jackson Boulevard

Mail Code SB-5J

Chicago, IL 60604-3507

**RE: Cuyahoga County Land Reutilization Corporation Assessment Coalition Grant Proposal**

Dear Mr. Ashley Green:

I am pleased to offer Ohio EPA's support for the Cuyahoga County Land Reutilization Corporation (CCLRC) Assessment Coalition Grant Proposal. The coalition consists of CCLRC as the lead applicant, and three non-profit organizations: the First Suburbs Development Council, the Site Readiness for Good Jobs Fund, Manufacturing Works. Collectively the CCLRC Coalition is applying for an Assessment Coalition grant totaling \$1,500,000. Ohio EPA hopes to provide support to the CCLRC Coalition 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 CCLRC is requesting under their Assessment Coalition Grant Proposal will be used in the focused area of the City of East Cleveland, along Euclid Avenue. This focus area includes parcels owned by General Electric and CCLRC. The priority site has a long history of industrial use from at least 1913 to 2017 including Arco Recycling. The former Arco facility received numerous notices of violation and was found to be illegally operating as a solid waste facility for construction and demolition debris. In 2017, a large fire burned at the Site for over a week. Following a largescale cleanup involving the removal of all material, the site has been vacant since 2017. A Phase I and limited Phase II were completed in 2020 with seven recognized environmental conditions (RECs) and identified areas in connection with the site. CCLRC acquired 1705 Noble Road in 2022 with the focus to re-assess the site, remediate if necessary and redevelop. A portion of the reuse/planning grant will be used for eligible reuse/planning activities.

The First Suburbs Development Council's area of focus is a 130,000 sq. ft. vacant industrial building that was built in 1932. It is a priority redevelopment site for the City of Euclid, a charter member of the FSDC. A Phase I, asbestos survey and II are required to determine the extent of contamination from prior industrial uses.

The Site Readiness for Good Jobs Fund target area includes a 42-acre priority site. Still standing in this site are a Westinghouse and Ohio Railway building that date from the early 1900s, and an area of illicit dumping several stories high. Those buildings are surrounded by roughly 20 acres of former residential land now controlled by the City of Cleveland. With access to a major thoroughfare (East 55th Street) and rebirth occurring in surrounding former industrial sites, this location is one of the few sites already assembled in Cleveland of the scale to attract industrial reuse. A portion of the reuse/planning grant will be used on this site to determine highest and best use after remediation.

Manufacturing Works' area of focus is Cleveland's "Forgotten Triangle" (Central, Kinsman and Buckeye/Woodhill Neighborhoods). They would like to do a brownfield inventory in a key corner of the target area, the Beaver Avenue Triangle at the intersection of Woodland and Kinsman Avenues, followed up with Phase I and II ESAs.

We look forward to working with the Cuyahoga County Land Reutilization Corporation Coalition 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: Kim Steigerwald, Acquisition Manager, Cuyahoga County Land Bank

Natalie Oryshkewych, Ohio EPA, DERR/NEDO