



COMMUNITY DEVELOPMENT REDEVELOPMENT

Thomas C. Henry, Mayor

City of Fort Wayne
Community Development
200 East Berry Street, Suite 320
Fort Wayne, IN 46802

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EPA BROWNFIELD CLEANUP GRANT NARRATIVE INFORMATION SHEET

1. Applicant Identification	Fort Wayne Redevelopment Authority Citizens Square, 200 East Berry Street - Suite 320 Fort Wayne, Indiana 46802	
2. Funding Requested	a. Grant Type Single Site Cleanup b. Federal Funds Requested \$2,000,000	
3. Location	Fort Wayne, Allen County, Indiana	
4. Property Information	Former OmniSource South Property (AKA North River Development South) Southern 8-Acres 1610 North Calhoun Street Fort Wayne, Allen County, Indiana 46808	
5. Contacts	a. Project Director	b. Chief Executive
Name and Title	Jonathan Leist Deputy Director of Redevelopment	John Powell President
Address	Citizens Square 200 East Berry Street - Suite 320 Fort Wayne, Indiana 46802	Citizens Square, 200 East Berry Street - Suite 320 Fort Wayne, Indiana 46802
Phone Number	(260) 427-1323	(260) 423-1430
Email Address	Jonathan.Leist@cityoffortwayne.org	jpowell@skbw.com
6. Population	267,927 (City of Fort Wayne; 2022 ¹)	

¹ <https://www.census.gov/quickfacts/fact/table/fortwaynecityindiana/PST045222>



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	Other Factors	Page No.
7. Other Factors	Community population is 10,000 or less.	N/A
	The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	N/A
	The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
	Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	N/A
	The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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).	Pages 1 and 3
	The proposed site(s) is in a federally designated flood plain.	Pages 1 and 3
	The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
	The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Page 4
	The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Pages 3 and 4
	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.	N/A
	8. Releasing Copies of Applications	No confidential, privileged, or sensitive information is being claimed for redaction as part of this application.

N/A = Not Applicable



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1 PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a Target Area and Brownfields. 1.a.i Overview of Brownfield Challenges and Description of Target

Area: Fort Wayne, located in northeast Indiana, is the 2nd largest city in the state with a population of 265,000 and it is the economic engine for 2.6 million people who live within a 75-mile radius. Supporting trade and transportation, the city’s origin and history are built upon the confluence of its iconic three rivers: the St. Marys, St. Joseph, and Maumee. By the mid-19th century, a canal and railroads provided transportation for people and freight, making the city, particularly on the periphery of downtown, a center for regional industry and heavy manufacturing. By 1980, the manufacturing foundation had significantly deteriorated, resulting in the exodus of tens of thousands of jobs and the abandonment of numerous large industrial properties. Approximately 80 acres of legacy industrial sites, situated along the St. Marys River on the northern edge of downtown, had become underutilized or vacant. Many of these properties have fallen into a state of blight and environmental degradation, posing serious health risks to nearby residents. Over the decades, the persistent challenges of remediating these sites have given rise to environmental justice (“EJ”) concerns, on the economically disadvantaged populations residing in these areas.

An underserved and disadvantaged¹ Target Area (“TA”)², bounded to the south by the St. Marys River and consisting predominantly of residential and commercial uses, contains the city’s most extensive brownfield, a 29-acre tract referred to as “North River”. As described in Section 2, persistent poverty, disproportionate health impacts, and EJ concerns plague the TA. This underscores the pressing need for targeted interventions and revitalization efforts to address the economic disparities and environmental challenges it faces. Demographic data for the Bloomingdale Neighborhood, a significant part of the TA, reveals a growing diversity among its residents, alongside a decline in income and property values. While the increased diversity can infuse the TA with vibrancy and enthusiasm, it's concerning to observe its connection to deteriorating quality-of-life indicators. These trends are noteworthy when juxtaposed with the overall city metrics, especially in light of the TA's proximity to downtown, which has seen remarkable growth over the past 15 years

1.a.ii Description of the Proposed Brownfield Site: Following a long history of heavy industrial use, North River has remained vacant since 2006 and stands as a testament to the abandonment of industrial and commercial activity in the area. North River is situated north of the St. Marys River, adjacent to downtown, within the Bloomingdale Neighborhood. It is surrounded by assets including the diverse Wells Street corridor, Science Central (an interactive STEM museum), and the downtown Riverfront, which is a linear park extending along the central riverfront. North River also adjoins the St. Vincent Villas Local Historic District to the north. The county’s 110-mile trail system converges on the south side of North River.

The subject site (“Site”), which this EPA grant will address, encompasses approximately 8-acres of North River. The Site sits just north of Riverfront’s first private development (\$6 million restaurant) north of the river and 4th Street, an east-west gateway through the TA, making it a linchpin property for additional northern redevelopment. The Site, located in a reduced-risk federally designated flood plain, separated from the Saint Marys River by a levee and public thoroughfare, is bounded by vacated 6th Street to the north; Clinton Street, which serves as the main northern gateway into downtown, to the east; 4th Street to the south; and, North Calhoun Street to east.

From the late 1870s through the 1940s, the Site was occupied by a portion of a local rail yard, with shops and roundhouses. A turntable is still present beneath the surface near the northeast corner of the Site. A junk yard was present in the southeast corner of the Site at the turn of the 20th century, which was replaced by a freight station that operated through the 1960s. Scrap iron metal processing and recycling occurred between the mid- 1950’s and 1990’s, the Site has been vacant since 2006, and all above-ground structures were razed by 2012. In 2017, the City’s Department of Redevelopment (“City”) purchased the property, recognizing its immense potential to extend the economic revitalization of downtown to north of the river, creating opportunities for the underserved TA. In 2022, the property ownership was transferred to the Fort Wayne Redevelopment Authority (“Authority”).

¹ <https://screeningtool.geoplatform.gov/>

² Surrounding census tracts 18003000500 (Tract 5), 18003000600 (Tract 6), and 18003000701 (Tract 7.01).

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Environmental assessments of North River were completed between 1994 and 2021. A Hazardous Substances Site Assessment (ASTM E1903-19 equivalent Phase II) completed in 2021 with FY2019 Brownfields Assessment Grant funds (CA# BF00E02708) confirmed surface and subsurface soil consisting primarily of contaminated fill material overlies most of North River and varies in depth and composition (average 1 to 4 feet with 9 feet max depth below grade). The results of the 2021 assessment and data collected during previous investigations dating back to 1994 were used to develop a Soil Management Plan. The surface fill/soil contamination at the Site primarily consists of metals including arsenic, lead, and mercury, with isolated areas of PCB, VOC, and PAH contamination at concentrations exceeding the state's residential, commercial, and excavation worker direct contact published levels. Investigations confirm the soil contamination is widespread and varies in depth across the Site but impacted soils do not appear to extend significantly beneath the fill into the native soil.

1.b Revitalization of the Target Area. 1.b.i Reuse Strategy and Alignment with Revitalization Plans:

The Authority's reuse strategy for the Site is a reflection of the City's goals for the revitalization of the entire TA, which include: (i) addressing EJ concerns stemming from the 29-acre North River brownfield property, (ii) promoting inclusive economic growth through the redevelopment of North River as a mixed-use district, (iii) leveraging downtown's resurgence to facilitate sustainable growth in the TA, and (iv) enhancing multi-modal connectivity between the Bloomingdale and Spy Run neighborhoods, the Wells Street business corridor, and the major amenities and services located downtown.

The plan for North River and the surrounding area has been developed through extensive community engagement. This collaborative effort began in 2015 and culminated in 2021 with the adoption of the Riverfront Development Implementation Framework (the "Riverfront Plan")³. It represents a shared vision among residents, local government, businesses, and community partners, aiming to revitalize the central riverfront through the creation of public spaces, seamlessly integrated with private development through a public investment exceeding \$100 million. This multi-phase initiative seeks to expand downtown's reach by redeveloping former industrial sites into a vibrant mixed-use district, increasing density, offering diverse housing and employment opportunities, and connecting existing assets to each other and the riverfront. A primary objective is to extend downtown's revitalization into the socioeconomically distressed neighborhoods north of the river, where average household income is less than 50% of the county average and the poverty level is more than twice the county level. The TA, which includes North River, falls within the planning area described in the Riverfront Plan.

North River's full redevelopment focuses on establishing a \$300 million mixed-use district and regional destination centered around health, wellness, higher education, sports facilities and mixed-income housing. Planned components include key projects such as a fieldhouse, hotel, event center, and an extension of the City trail system to connect the TA and Site to regional and local trails. It will also include a variety of medium to high-density mixed-income housing options accessible to local residents as well as commercial spaces, such as restaurants, activities, retail, and offices, all designed to create a pedestrian-friendly and universally accessible environment that harmonizes with the existing urban fabric.

The redevelopment strategy for the Site is the \$100 million first phase of North River's overall strategy. It will include a key project anchored by one of the largest regional employers, plus retail and community space and multi-family housing opportunities. It also includes the construction of new streets, sidewalks, and trails, aimed at re-establishing the street grid and facilitating strong multi-modal connections between the Site, adjacent neighborhoods, Science Central, the Wells Street Commercial Corridor, the Riverfront, nearby parks, and the array of jobs and services available downtown, including workforce development and continuing education centers. Additionally, the Site will feature an extension of the City's "Urban Trail", designed to connect key destinations for bikers and pedestrians, within and around downtown, with each other, and with the surrounding neighborhoods, encouraging walkability and economic development. The Site will also serve as a segment of the 81-mile Poke-Bache Trail, part of the regional United Trails Project. By connecting the Urban Trail, Poke-Bache Trail, and the City's 110-mile trail system, the Site becomes the central hub within the regional trail network.

³ https://www.fwcommunitydevelopment.org/images/reports_studies/riverfront_plan_reduced.pdf

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As part of the larger redevelopment plan, 4th Street, located south of the Site, will be redeveloped as an active commercial corridor connecting the Site to the Wells St. Commercial Corridor, thus strengthening existing businesses by drawing additional customers to the area. New sidewalks, lighting and signage, along with, targeted grants for existing TA residences and businesses, are planned along with the Site reuse to stabilize and support the area.

Furthermore, Site reuse plans are aligned with key recommendations in the City's Climate Action and Adaptation Plan ("CAAP")⁴. This holistic plan addresses sustainability and environmental resiliency through policies, design, infrastructure, and goals. Initiatives such as the addition of electric vehicle ("EV") charging stations, minimizing impermeable surfaces, and prioritizing native or regionally adapted plants are part of the development. Green stormwater management facilities, including enhanced riparian buffers, rain gardens, and runoff capture, are integral components, especially for the Site, which is in a reduced-risk federally designated flood plain, separated from the Saint Marys River by a levee and public thoroughfare.

1.b.ii Outcomes and Benefits of Reuse Strategy: Cleanup of the Site will remove hazardous substances in the surface and subsurface soil that are currently open to the environment and adjacent to residences, businesses and riverfront public space. The cost and risk to develop on the contaminated Site is an immense hurdle for stakeholders and has perpetuated chronic disinvestment, leaving North River vacant.

Currently, the City and Authority are working with several developers interested in developing the Site, upon completion of cleanup activities, with a \$100 million investment. An anchor project led by a top employer in the region; new retail and commercial spaces; entry level hospitality jobs, programming aimed to support, educate and train entrepreneurs - will support inclusive job opportunities within the TA. New and existing local destinations like Science Central, restaurants, and tourism can flourish, creating more revenue for the area. The Site's reuse will also catalyze the continued expansion of North River's development bringing in another \$200 million investment and removing 100,000 more tons of contaminated fill/soil.

Increasing the supply of attainable housing is critical to meeting the demand in the localized housing market, as identified in a 2021 housing study by Zimmerman-Volk. This effort also helps homeowners gain equity and secure loans for necessary repairs and helps the TA's large percentage of renters by stabilizing housing prices and preventing rapid displacement. Existing homeowners throughout the TA will also benefit from the targeted City offered grants to affordably update and maintain their homes.

The development of office space and other commercial uses at North River will help to leverage downtown's growth into the TA. Fort Wayne's downtown office and retail market has rebounded from the challenges posed by the pandemic and is now experiencing historically low vacancy rates (under 10%). The shortage of existing Class A space, especially contiguous floor plates of at least 50,000 square feet, has hindered the region's business attraction efforts. Conversations with brokers and developers have revealed that commercial development in this area is extremely desirable. New lighting, sidewalks and signage will be added to the TA to promote walkability and connectivity supporting the Site and TA businesses. To ensure that economic development benefits extend beyond North River, the City has included surrounding commercial areas into local economic development target areas to allow businesses to take advantage of incentives such as tax abatement, façade grants, and favorable financing terms.

One of the key benefits of the Site reuse includes the construction of new sidewalks, trails, and greenways as the apex of the regional trail network, connecting the City's trail system, Urban Trail, and Poke-Bache Trail, and meaningfully moving the needle on the TA's economic and health outcomes. The installation of nearly a mile of new sidewalks, and ¼-mile of new trail constructed in a dense urban area, will improve connectivity of the TA to the existing trail network and public parks (Lawton Park, Headwaters Park, and Riverfront). Multi-modal connectivity promotes safe travel and makes it easier for people to access their workplaces, schools, and amenities. This is of particular importance in the TA, where many negative health indicators could be improved by making the environment more conducive to mental well-being and physical activity. They will also connect

⁴ <https://sustainingfortwayne.org/climate-action-and-adaptation-plan/>

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currently isolated businesses to the Site and draw people from downtown into the TA, further contributing to the vibrancy and viability.

Each development will be directed to follow the sustainability and environmental resiliency recommendations outlined in the Riverfront Plan and City’s CAAP. EV chargers will be installed in and along the Site, concrete pavement minimized, native plants and trees incorporated into landscaping and green spaces, and stormwater runoff will be captured in bioswales constructed as part of the Urban Trail. Each building will be encouraged to incorporate energy efficient buildings measures, while City funds will be used to support infrastructure such as green roofs, rain gardens and additional bioswales within the developments. The Authority will continue to work with developers to ensure that goals in the CAAP are addressed.

1.c Strategy for Leveraging Resources. 1.c.i Resources Needed for Site Characterization: The Site has been sufficiently characterized by the City and is ready for remediation. Additional characterization is not anticipated; however, if incidental investigative data is needed; these costs can be funded by the minimum \$200,000 annual County Economic Development Income Tax (“CEDIT”) allotment for brownfield assessment.

1.c.ii Resources Needed for Site Remediation: The Site’s remediation (~\$3.7 million) is critical to support the reuse strategy and to encourage private development, by reducing investment risk. The \$2 million EPA Cleanup Grant will be used to leverage local public funds necessary to complete the remediation. The City has approximately \$1.7 million in available funds that will be necessary to fully clean up and restore the Site for development. They have also committed to funding any contingencies during remediation.

1.c.iii Resources Needed for Site Reuse: The Authority, working with the City, have a strong track record of effectively utilizing a variety of funding sources at local, state, and federal levels to support a wide range of projects. In the downtown area of Fort Wayne alone, partnerships between the public and private sectors have attracted over \$1.1 billion in private investment since 2004.

The requested \$2 million cleanup grant will serve as a catalyst, enabling the mobilization of hundreds of millions of dollars in private investments. In 2022, North River was incorporated into a TIF district. The City intends to pledge 100% of the district’s tax increment towards North River. These funds and Local Income Tax Revenue, which has a specific allocation for development in the Riverfront district, are already secured and will be used to fund the infrastructure. The Authority and City plan to contribute financially through methods like real estate donations, construction and relocation of vital public infrastructure, additional environmental remediation and extending the Urban Trail, in total valued at over \$9 million. The City will provide funding to support green infrastructure such as green roofs, rain gardens and bio retention swales to developers.

The private investments, partnered with local, state and federal incentives and public funding will provide the additional resources needed for redevelopment of the Site. The Authority is committed to working with each developer to ensure applicable incentives, grants and credits will be in place. If additional local subsidy is needed, they will identify the most appropriate funding sources for the respective project.

1.c.iv Use of Existing Infrastructure: The Site is situated in an already fully developed part of the city. It benefits from existing nearby infrastructure, including sanitary sewer, water, natural gas, electric, fiber optic cables, and paved streets, with the capacity to accommodate the proposed development. It is conveniently located adjacent to Clinton Street and one block from Spy Run Avenue, which collectively function as -one-way principal arterials running north and south through the city. Public transit directly serves the Site, and it's strategically positioned at the intersection of the City's trail system.

While the existing surrounding infrastructure supports the project, integrating the Site into the surrounding area will require the extension of public infrastructure, potentially including the creation of two new public rights-of-way running east to west across the Site. Redevelopment will involve the addition of new sewers, water connections, and surface parking, as well as the construction of new sidewalks, trails, and streetscapes to connect the Site directly to the trail system and the Riverfront. Both public and private funding will be utilized to install the new infrastructure improvements.

2 COMMUNITY NEED AND COMMUNITY ENGAGEMENT 2.a Community Need. 2.a.i The Community’s Need for Funding: Maintaining the City’s existing infrastructure system reduces its ability to invest funds into sites with challenges such as hazardous soils. Private sector entities are also typically hesitant to

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undertake remediation, especially in areas that have experienced decades of disinvestment and where household incomes are low. Other public funding sources are needed to support the development itself. Therefore, the EPA Grant is a critical piece of funding that will unlock myriad other sources of funding for this low-income TA.

Two of the three Census Tracts (Tracts 5 and 6) which comprise the TA are designated by the U.S. Department of HUD⁵ as “Qualified Census Tracts”, where at least 50% of households have an income which is 60% or less of the county median income. The average per capita income of the TA is about ¾ of the county and state level, the poverty rate is nearly double, and childhood poverty is nearly 150% of county and state rates. The TA has experienced chronic poverty, with rates doubling those in the county⁶ since at least 2012.

Demographic/Data¹	TA^A	Fort Wayne	Allen County	Indiana
Median household income	\$37,727	\$48,023	\$53,402	\$54,325
% Housing ≤1979	94.2%	65.0%	57.1%	56.0%
Per Capita Income	\$23,853	\$29,268	\$32,079	\$32,537
Adults >25 w/ no diploma	18.3%	11.6%	9.9%	9.8%
Persons with a disability	19.1%	13.9%	12.4%	13.6%
Minorities ²	25.9%	30.3%	24.1%	18.8%
Receiving Public Assistance	17.2%	11.8%	9.4%	9.0%
Poverty Rate	27.1%	14.3%	11.6%	12.3%
Childhood Poverty Rate (<18)	33.7%	23.9%	18.2%	16.8%
Children (<18)	26.5%	24.6%	25.8%	23.6%
Children (<5)	6.6%	7.0%	6.9%	6.2%
Women 15-44	42.8%	40.6%	39.4%	38.6%

^ACombined/weighted data for CTs 5, 6, and 7.01; ¹ACS 2021 5-Year Estimates; ²Total population % “non-white”

2.a.ii Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations:

Impoverished and sensitive populations typically bear the disproportionate impact of brownfields, representing an ongoing EJ concern. As indicated in **Table 1**, the TA is no exception. The proportion of people without a high school diploma (or equivalent), disabled, and/or impoverished residents in need of public assistance in the TA exceed city, county, and state levels, implying limited opportunities to improve their economic status through higher paying jobs. The percentage of women of child-bearing age within the TA is higher than within the city, county, and state,

contributing to ⅓ of children in the TA that qualify as impoverished, as opposed to less than ¼ of those in the city. In addition to the contaminated Site, 94% of homes in the TA were constructed prior to 1979, raising a concern of an unjust elevated risk of exposure to environmental hazards such as lead paint and asbestos. Redeveloping the Site will lead to a broader range of newer housing options within the neighborhood, with greater direct walkable access to downtown and employment centers. The North River reuse strategy also calls for lead abatement grants to further mitigate lead exposure for families living in older homes.

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

According to the Robert Wood Johnson Foundation’s Life Expectancy data tool, the average life span for residents living in the TA is 73 years, which is three years below the county and state average⁷. According to the Centers for Disease Control and Prevention (“CDC”) PLACES interactive map⁸, the incidence of chronic obstructive pulmonary disease (“COPD”), asthma, diabetes, obesity, heart disease, and depression in the TA are all higher than the rest of Allen County. Higher rates of these chronic diseases, some associated with metals toxicity, may contribute to the decreased life span.

Health Measure	TA Average	County Rate
COPD	10.1	7.6
Asthma (Adults)	12.5	11.1
Diabetes	13.0	12.2
Obesity	42.7	38.3
Heart Disease	6.7	6.4
Depression	26.9	22.6
Combined data for CTs 5, 6, and 7.01 (2021)		

Cleaning up the Site will alleviate potential health risks associated with exposure to the Site contaminants, especially those affecting sensitive populations. Planned use, featuring greenways and trails, promotes a healthy lifestyle by providing safer travel options between downtown and the TA, leading to reduced risk of chronic

⁵ https://www.huduser.gov/portal/sadda/sadda_qct.html

⁶ US Census ACS 2012-2021 5-year estimates.

⁷ <https://www.rwjf.org/en/insights/our-research/interactives/whereliveaffects/showlongyoulive.html>

⁸ <https://www.cdc.gov/places/>

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diseases and enhancing mental well-being, thereby directly addressing the disparate rates of obesity and depression within the TA.

(3) Environmental Justice: (3)(a) Identification of Environmental Justice Issues: The EPA’s EJ Indexes⁹ were calculated for the Site comparing the TA to rates in Indiana and the US. The index shows TA residents are disproportionately exposed to contaminants. Specifically, 11 of 13 standard EJ variables exceed the 80th percentile within the state. According to the CDC Agency for Toxic Substances and Disease Registry (“ATSDR”) database¹⁰, the Overall Social Vulnerability Index (“SVI”) for the TA is 0.78 (on a 0 to 1 scale) compared to the state, exceeding the overall county rate (0.73).

(3)(b) Advancing Environmental Justice: The Site is a large brownfield property near a significant number of residences, further exacerbating the risk and afflictions experienced by sensitive populations, particularly from dust and stormwater runoff potentially carrying Site contaminants onto nearby offsite properties. The reuse plan aims to rectify the historical injustices by addressing both the health and economic disinvestment and the key points of the plan's integration with environmental justice include:

Health and Safety: Cleaning up the Site will alleviate health risks for the nearby sensitive population by expeditiously removing the Site contaminants. The multi-modal pathways and trails will minimize the risk of accidents and establish a sense of safety to encourage walking and biking.

Economic Revitalization: The reuse plan will be a \$100 million investment into the TA and rectify historical disinvestment by creating new job opportunities and contributing to economic growth within the TA. The reuse strategy will create both temporary and permanent jobs. New wayfinding and improved connectivity throughout the Site and TA will direct the influx of new consumers, from tourists to residents, to new and existing businesses creating more stability and increasing revenue.

Education and Workforce: The reuse strategy includes strengthening workforce opportunities for low-income residents and communities of color. From entry level retail and hospitality jobs to the creation of office space, the Site reuse will offer inclusive job opportunities. Additionally, the Authority is committed to working with the TA and Fort Wayne Black Chamber of Commerce to ensure that all residents benefit from the job creation. The Site will also host the City’s Build Institute Entrepreneur Education Program, a 9-week business class aimed to educate, train and support entrepreneurs.

Community Spaces and Connectivity: The redevelopment plan aims to create community spaces and improve connectivity from the TA to major work and learning centers, the riverfront, public art, and greenways. This enhances the quality of life and access to essential services, addressing EJ concerns by bridging historical disparities. Placemaking and art within the TA and Site will reflect their vision.

Supporting Mental Health and Well-being: The plan recognizes that improved walkability, access to trails, and parks are essential for supporting mental and physical health. By enhancing access to these amenities, the plan fosters a healthier living environment for residents.

Infrastructure and Safety: Neighborhood-serving public infrastructure improvements, such as streetscapes, lighting, signage, and sidewalks, will address both real and perceived safety concerns. This increases the overall safety of the area by reducing crime and encourages reinvestment in existing homes and businesses.

Housing Support and Lead Mitigation: The plan emphasizes the creation of mixed-income housing to provide updated and efficient housing opportunities within the TA. The addition of new housing will not only meet critical

Environmental Justice Indexes		
EJ Variable	State %ile	USA %ile
Particulate Matter 2.5	82	80
Ozone	77	70
Diesel Particulate Matter	86	81
Air Toxics Cancer Risk*	81	65
Air Toxics Respiratory HI	86	63
Toxic Releases to Air	91	89
Traffic Proximity	87	78
Lead Paint	90	86
Superfund Proximity	83	82
RMP Facility Proximity	91	87
Hazardous Waste Proximity	86	79
Underground Storage Tanks	88	83
Wastewater Discharge	74	66

⁹ <https://ejscreen.epa.gov/mapper/> (EJ Index for Air Toxic Cancer Risk Percentiles based on 2022 data, as this metric was unavailable for State percentile.)

¹⁰ <https://www.atsdr.cdc.gov/placeandhealth/svi/>

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housing needs but also help TA homeowners gain equity and stabilize housing prices to prevent rapid displacement. Additionally, City-offered grants and 0% interest loan programs will be targeted within the TA to support low-income homeowners in making necessary repairs to maintain their homes with less economic burden. The plan also seeks HUD financed lead abatement grants to further mitigate lead exposure.

Business Development: The south end of the Site, 4th St., will be reestablished as a main commercial corridor to connect the Wells Street Corridor and existing businesses within the TA to both the Site and the main downtown gateway of Clinton Street. The City's commitment to working with existing businesses on façade grants that offer 50/50 reimbursements to improve their buildings contributes to the overall economic viability of the TA. This support encourages business growth and economic development.

2.b Community Engagement. 2.b.i/ii Project Involvement and Roles: Redevelopment of the Riverfront area, North River, and the Site, have community support, as documented by plans and strategies created through broad public input and collaboration with stakeholders. The organizations in the table below have been integral to shaping the North River vision and will continue to be engaged as plans take shape.

Organization Name, Contact, and Specific Involvement in Project or Assistance Provided
Bloomingtondale Neighborhood Association (Chris Walker, Vice President; [REDACTED]): The adjoining neighborhood association and partner endorses the cleanup and redevelopment of the Site with great support for improved walkability, a strengthened street grid, scaled Site design, and influx of new housing and businesses.
Wells Corridor Business Association (Judi Wire, President; 260-426-7859): This nearby business association is a partner who provides input on connectivity and infrastructure to ensure that the new developments and supporting investments within the TA enhance and support existing businesses. They have endorsed cleanup and redevelopment.
Science Central (Martin Fisher, Director; mfisher@sciencecentral.org): This eastern adjacent STEM museum will provide input on connectivity and tourism and provide rooms for future public meetings associated with this grant.
Greater Fort Wayne, Inc. (John Urbahns, President/CEO; 260-420-6945): Allen County's Local Economic Development Organization will provide input on supporting the economic needs of the community and will facilitate connections with economic partners and end-use partners involved with redevelopment of the Site.
City of Fort Wayne, Department of Redevelopment (Jonathan Leist, Deputy Director; Jonathan Leist@cityoffortwayne.org): This department will provide financial and technical support for the reuse.
City of Fort Wayne, Neighborhood Planning and Activation Workgroup, (Dan Baisden, Administrator; 260-427-5694): This team will gather neighborhood input to develop an action plan that will further inform the reuse strategy.
City of Fort Wayne, Greenways and Trails (Dawn Ritchie, Manager; Dawn.Ritchie@cityoffortwayne.org): This Department will give input on how to best connect the TA, Site and regional trail system.

2.b.iii Incorporating Community Input: The input and support of the broader community and the TA was crucial for both the development of the Riverfront Plan, which has been guiding the City's approach to the Site and TA thus far and is equally important for the success of the Site's remediation and redevelopment going forward. These inputs are crucial to ensure that the project's outcomes benefit the historically underserved TA.

To ensure these plans cater to the TA residents, the City's Neighborhood Planning and Activation Workgroup ("Workgroup") initiated the Northwest Neighborhoods Plan in September 2023. This group is engaging with the neighborhoods through various strategies such as surveys, public meetings, design charrettes, and gamification to better understand the area's strengths, assets, concerns, and needs. Initial feedback has highlighted concerns about walkability, noise pollution, housing quality, lighting, and reduced social capital. On the positive side, the TA's proximity to downtown, parks, and affordable housing is seen as a significant strength. The feedback will be gathered into a Neighborhood Action Plan and used to further inform the reuse strategy. Additionally, the neighborhood will have a say in public art and placemaking that reflects its culture; and, local businesses are collaborating with the City's Planning Department to update design standards, impacting the Site's final design.

These community engagement plans also build upon previous brownfields engagement efforts. There is currently a Community Relations Plan ("CRP") in-place from the City's previous RLF Subgrant under the Indiana Brownfields Program ("IBP") that will be updated. The CRP established an Information Repository and outlined previous and future methods of community input, including posting legal notices, holding public meetings, engaging local leaders to inform the community, and providing contact information for questions and comments. The Authority will update the repository with grant, remediation and redevelopment information.

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Beyond the CRP and Workgroup Team efforts, the City, in partnership with the Authority, is taking a comprehensive approach to engagement. This includes stakeholder meetings, widely distributed newsletter and social media updates, site signage with contact information, multi-lingual supplementary materials, and information posted on the City’s website.

The Authority held a pre-application public meeting on October 20, 2023, at the Site-adjacent Science Central to discuss the proposed timeline, scope of remediation and the reuse plan. Eighteen people attended and were provided with contact information and instructions for submitting public comments. Key stakeholders were contacted directly, including the President of the Bloomingdale Neighborhood and the Wells Street Business Association, to discuss the EPA grant, remediation, and redevelopment plan. A minimum of three public meetings on the cleanup (before, during, and after), ensuring ongoing public awareness and support throughout the project's lifecycle are planned. Virtual meetings and handouts will be offered to accommodate residents with disabilities and transportation limitations.

As work progresses, the Authority will continue to meet with nearby business owners and residents to mitigate potential disruptions to their day-to-day operations. The substantial work on the Site is expected to have a significant economic impact, with remediation and Site work being publicly bid.

3 TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a Proposed Cleanup Plan. It is estimated approximately 48,000 tons of impacted surface and near surface soils will be excavated and disposed offsite at an approved landfill. The soil may need to be conditioned in-situ to make it characteristically non-hazardous. These activities will expeditiously address the environmental concerns with respect to the hazardous substance soil contamination. Excavation will eliminate soil contamination unsuitable for the planned uses, alleviating long-term concerns regarding direct contact by Site occupants and nearby residents; and, was identified as the preferred cleanup alternative to incentivize a wide array of redevelopment opportunities for the Site when compared to inaction or engineered controls.

3.b Description of Tasks/Activities and Outputs. 3.b.i/ii/iii/iv Project Implementation, Anticipated Project Schedule, Task/Activity Lead, and Outputs: The scope of work has been organized into three major tasks, for which the specific activities, deliverables, and roles are summarized below.

Task 1 – Programmatic Outreach and Management
<u>i. Task/Activity Description:</u> This task will include brownfield training for staff, management of all programmatic tasks (progress and financial) associated with this cleanup project, including public outreach (meetings (minimum 3), signage (3), media), issuing and evaluating RFQs from potentially qualified contractors, procuring a QEP, quarterly reporting to the EPA, updating the site status in ACRES, final grant closeout documentation, and updating/finalizing the ABCA and CRP. The City contributes its own resources in support of the Authority, and as such salary for administration of the grant is not billed to the EPA.
<u>ii. Anticipated Schedule:</u> RFQ issued once Cooperative Agreement is finalized. QEP selected beginning of Qtr 1. ABCA/CRP finalized in Qtr 1; quarterly and annual reporting throughout grant period; ACRES update when cleanup is initiated and completed & redevelopment is initiated; closeout reporting at completion of cleanup. Two public meetings in Year 1, upon grant award and prior to initiating cleanup, and one public meeting following cleanup completion and prior to initiating redevelopment.
<u>iii. Task/Activity Lead:</u> This task will be led by the Authority, with support from the QEP.
<u>iv. Outputs:</u> Attendance of 1 national conference by Authority support staff, finalized ABCA and CRP, quarterly progress reports, annual financial reports, 3 public meetings with notes/presentation materials developed, outreach media and/or website(s), ACRES reporting, and grant closeout report.
Task 2 - QAPP/Reporting
<u>i. Task/Activity Description:</u> This task includes all anticipated subcontractor costs associated with preparing, submitting, and obtaining regulatory approval of the site-specific QAPP, QAPP Updates, HASP, RWP, and RWP Completion Report (“RCR”).
<u>ii. Anticipated Schedule:</u> The QAPP, HASP, and RWP will be developed by the QEP with a completion date 2nd Qtr Year 1 and approval date 3rd Qtr Year 1. A QAPP Update will be provided annually, as necessary. The RCR will be completed by the QEP upon successful cleanup of the Site and likely issued in 2nd Qtr Year 2.

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iii. <u>Task/Activity Lead:</u> This task will be led by the QEP, with oversight by the Authority.
iv. <u>Outputs:</u> 1) QAPP x 1; 2) HASP x 1; 3) RWP x 1; 4) RCR x 1; and, 5) Annual QAPP Updates as needed
Task 3 - Soil Excavation and Disposal
i. <u>Task/Activity Description:</u> This task includes the QEP and their subcontractor’s costs associated with landfill waste characterization, confirmation sampling/analysis, and construction costs associated with overseeing excavation, loading, transporting, and disposing of the contaminated soil and procuring clean backfill.
ii. <u>Anticipated Schedule:</u> This task will be initiated within 3 months of approval of the QAPP and RWP. This implementation task is expected to take approximately 12-18 months to achieve, depending on subcontractor availability and accounting for any unforeseen complications (i.e. weather, special waste disposal considerations, etc.). Start date by 4th Qtr Year 1, completion by end of 1st Qtr Year 3.
iii. <u>Task/Activity Lead:</u> This task will be led by the QEP, with oversight by the Authority.
iv. <u>Outputs:</u> Contractor bids, photographs, laboratory analytical reports, disposal manifests, backfill receipts

3.c Cost Estimates

Budget Categories		Project Tasks (\$)			
		Task 1	Task 2	Task 3	Total
Direct Costs	Personnel	--	--	--	--
	Fringe Benefits	--	--	--	--
	Travel	\$1,101	--	--	\$1,101
	Equipment	--	--	--	--
	Supplies	\$200	--	--	\$200
	Contractual	\$4,995	\$19,000	--	\$23,995
	Construction	--	--	\$1,974,704	\$1,974,704
	Other (include subawards, specify type)	--	--	--	--
Total Direct Cost Budget (No indirect costs requested)		\$6,296	\$19,000	\$1,974,704	\$2,000,000

Only direct costs are proposed for the grant funds. **Task 1 (\$6,296):** The Authority costs for supplies (paper/fliers/postage, etc.) total \$200, and the costs for one Authority support personnel to travel to and attend one national conference totals \$1,101 (lodging (\$480), per diem (\$204), travel/airfare (\$192), and registration fee (\$225)). Contractual costs for QEP to support during public meetings (1.5 hr./mtg. x 3 mtgs. x \$130/hr. = \$585), quarterly reporting (6 hr./rpt. x 6 rpts. x \$105/hr. = \$3,780) to the EPA and updating/finalizing the CRP and ABCA (6 hrs x \$105/hr.= \$630) are included in this task. **Task 2 (\$19,000):** The contractual cost estimates for Task 2 are broken out as follows: QAPP/QAPP Updates and data evaluation - \$5,000; HASP - \$2,000; RWP \$4,000; and RCR - \$8,000. **Task 3 (\$1,974,704):** The construction cost estimates for Task 3 (totaling \$3,649,352), include all subcontracted costs associated with excavating/mixing/loading/transporting and disposing contaminated soil at an approved landfill (~48,000 tons @ ~\$43/ton ≈ \$2,064,000); backfilling/compacting clean fill (~\$1,285,200); waste characterization and compliance soil sampling activities (~\$203,372); and, oversight (~\$96,780). The City will cover a portion (~\$1,674,648) of the estimated combined cleanup costs and additional excess costs beyond the requested grant once Federal funds are expended.

3.d Plan to Measure and Evaluate Environmental Progress and Results. The following information summarizes the plan and mechanism to track, measure and evaluate progress of this cleanup project.

Expected Output(s): Successful cleanup of the Site- Intermediate steps towards this output will be tracked in a spreadsheet and will include: (i) solicitation and selection of a qualified contractor; (ii) development, regulatory approval, and successful implementation of the RWP; (iii) successful and timely notification of the status of the cleanup project pursuant to the CRP; (iv) notification of the project status to the EPA through quarterly reporting and updating ACRES, along with any other deliverables outlined in the task schedule above, as appropriate; and (v) volume of contaminated soil removed.

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Expected Outcome(s): Successful Redevelopment of the Site, Job Creation, & Improved TA Metrics.

Outcomes will be tracked in a spreadsheet and based upon the following documentation: (i) land area ready for reuse (ii) completion of infrastructure, trail and building construction; (iii) job creation- both temporary and permanent; (iv) funds leveraged through the economic reuse of the Site; (v) level of additional investment into the TA catalyzed by the successful cleanup/redevelopment of the Site; (vi) mixed-income housing units and (vii) monitoring of TA census/demographic data outlined in **Table 1** and the EJ Indices above.

4 PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a Programmatic Capability. 4.a.i/ii Organizational Structure and Description of Key Staff: The Authority and supporting City of Fort Wayne Redevelopment staff have extensive expertise in remediating and redeveloping brownfields sites, as well as managing federal grants. Key project team members include Redevelopment Authority President, John Powell, Deputy Director of City Redevelopment Jonathan Leist, and Director of Finance Gail Bradley. Mr. Powell (Juris Doctor from Indiana University) has been on the Authority Board of Directors since 2016 and has served as President since 2019. During his tenure he has overseen the financing and development of several redevelopment projects, including a \$285 million brownfield mixed-use project called Electric Works. Mr. Leist, (Master's in Public Administration, Indiana State University) has 20 years of experience in state and local government management including city planning, brownfields redevelopment, federal grants, hazardous materials management, and municipal financial management. Ms. Bradley (BS, Accounting, University of Evansville) has 15 years of experience with the City's Accounting and Finance systems. She will be responsible for establishing and managing the program's financial accounts, payment requests and transfers. As needed, the City Controller's Office will provide financial management support. This experienced project team will be able to quickly and effectively complete all administrative and financial requirements for the grant to ensure the project is successfully completed within the 4-year period. Additional team members, if necessary, would be appointed from City staff involved in the Site planning.

4.a.iii Acquiring Additional Resources: The Authority will contract with a QEP selected in compliance with state/federal procurement requirements, which includes guidance to attract MWBE's, when possible, and which has been used for multiple state and federal grants. Within one month of securing the grant, the Authority will issue an RFQ, and will direct and oversee the procurement and select a QEP within 3 months of the award. The selected consultant will be experienced with the EPA and IBP, including their programmatic requirements, have the capacity to complete the project on time, and have a successful track record with EPA Brownfields projects. The Authority is committed to prioritizing MWBEs in its procurement processes and includes requirements in its economic development agreements for private-sector firms to hire local enterprises and MWBEs.

4.b Past Performance and Accomplishments. 4.b.i Currently Has or Previously Received an EPA Brownfields Grant: Although the Authority has not been a past applicant, the City department supporting the Authority has extensive experience managing EPA grants. **(1) Accomplishments: BF00E00396** (9/10-8/13): \$200,000 Cleanup. Former Hubcap Express site now Headwaters Park (\$15.8M leveraged); **BF00E00883** (9/1/11-8/14): \$400,000 Petroleum/Hazardous Substance CWA Grant. Public Involvement, 9 Phase I ESAs, 10 Phase II ESAs, and 4 Cleanup Plans entered into ACRES. Former Canton Laundry now a local boutique (\$43,000 leveraged), Former Coca Cola now a Housing project, Recycle Logic rebuilt as a self-storage facility. Many redevelopment projects are currently occurring and should be complete by 2022; **BF00E02708** (10/19-9/22): \$455,625 Petroleum/Hazardous Substance CWA Grant. 15 Phase I ESAs, 13 Phase II ESAs, and 2 Cleanup Plans entered into ACRES. RFP for 2 Riverfront sites (Norfolk Southern and the Former K-9 Training Center) have been distributed. **(2) Compliance with Grant Requirements:** The City developed Work Plans and QAPPs, provided QAPP Updates, quarterly reports, annual financial reports, and ACRES updates, and negotiated CAs with the EPA, complied with the Work Plans and their associated schedules, terms, and conditions. All grant funds were expended within their project periods.

TRESHOLD CRITERIA FOR EPA BROWNFIELD CLEANUP GRANT

1. Applicant Eligibility

The Fort Wayne Redevelopment Authority (“Authority”) is an eligible “General Purpose Unit of Local Government” as *local government* is defined by 2 CFR § 200.1. The Authority operates as a separate corporate body and instrumentality to the City of Fort Wayne (“City”), as allowed under Indiana Code (IC 36-7-14.5) to facilitate the completion of local public improvements. Although separate, they are supported by staff from the City of Fort Wayne, Department of Redevelopment.

2. Previously Awarded Cleanup Grants

The Authority affirms that the proposed Site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The Authority affirms that it does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

Fort Wayne Redevelopment Authority is the current owner of the Site and acquired the Site on November 14, 2022 via corporate warranty deed. The Authority will retain ownership of the Site throughout the period in which grant funds are dispersed.

5. Basic Site Information

Site Name: Former OmniSource South Property (AKA North River Development South)

Site Address: 1610 North Calhoun Street, Fort Wayne, Indiana 46808

The Site for which cleanup grants fund are being requested is the southern 8-acre portion of a 24.86-acre parcel (Parcel ID 02-07-35-457-003.000.074) of land. The Site and remaining portion of the 24.86-acre parcel is part of a larger 29--acre tract known as “Former OmniSource Property” or “North River Development”. The Site is bound by the north side of vacated 6th Street to the north; North Calhoun Street to the west; North Clinton Street to the east; and 4th Street to the south.

6. Status and History of Contamination at the Site

The 8-acre Site is contaminated by hazardous substances, primarily associated with historical rail use and repair, and/or scrap metal processing operations at the Site, which was developed in the late 1870s for use as a rail repair yard. Historical review indicates up to thirteen (13) sets of rail tracks, a turn table and partial roundhouse, yard houses, a freight station, a scrap metal warehouse, automotive repair, metal processing buildings, and piles of scrap/debris were once present on the Site. The Site has been vacant since 2006, and all above-ground structures were removed by 2012. The varied nature and areas of historical rail use and scrap metal storage/processing operations for over a century appear to be the primary cause of contamination at the Site.

TRESHOLD CRITERIA FOR EPA BROWNFIELD CLEANUP GRANT

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The soil and groundwater at the Site have been characterized during numerous investigations completed between 1994 and 2021. Surface soil consisting primarily of fill material overlies the Site and most of North River. The fill material varies in depth and composition (average 1 to 4 feet with 9 feet max depth below grade), containing widespread contamination including arsenic, lead, and mercury, with isolated areas of PCB, VOC, and PAH contamination at concentrations exceeding the state's residential, commercial, and excavation worker direct contact published levels

Groundwater impacts beneath the Site appear to be limited but groundwater samples collected from one (1) location in 2020 on the north-central portion of the Site contained vinyl chloride (VC) exceeding its R2 Groundwater Published Level (GWPL). Based upon the limited extent and magnitude of groundwater contamination, active cleanup of the groundwater is not required since potential exposure pathways can be eliminated via institutional and/or engineering controls.

7. Brownfield Site Definition

The Authority affirms the Site subject to this application is a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Applications

A comprehensive Hazardous Substances Site Assessment (ASTM E1903-19 equivalent Phase II), dated December 10, 2021 and submitted to the EPA, was completed by IWM Consulting Group, LLC at the Site in June and July 2021 under the oversight of the Indiana Brownfields Program (IBP) and the IDEM Office of Land Quality (OLQ) Risk Section utilizing Assessment Grant funds (EPA Cooperative Agreement #BF-00E02708-0). The assessment included the advancement of 151 soil borings and collection of 229 soil samples on the North River property (which includes the Site). The investigation determined that the contamination is widespread, varies in depth, and is generally limited to the fill material overlying the native soil. The 2021 assessment activities and other historical investigations dating back to 1994 have sufficiently characterized the Site and allowed for creation of a Soil Management Plan and draft Analysis of Brownfield Cleanup Alternatives (ABCA) document. The surficial fill coverage on the Site is so discontinuously, but extensively, contaminated above commercial levels, that most, if not all, must be removed prior to redevelopment.

9. Site Characterization

The Site is eligible to be enrolled and is currently enrolled in the Indiana Brownfield Program and an *IDEM Acknowledgement Letter* from the IDEM OLQ dated November 13, 2023 (attached) affirms that the Site has been sufficiently characterized to allow for the remediation work to start at the Site.

TRESHOLD CRITERIA FOR EPA BROWNFIELD CLEANUP GRANT

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the Site.

11. Sites Requiring a Property-Specific Determination

The Site does not require a Property-Specific Determination according to Section 1.5 of the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k). Specifically, the Site does not meet any of the following criteria:

- properties subject to planned or ongoing removal actions under CERCLA;
- properties with facilities that have been issued or entered into a unilateral administrative order, a court order, an administrative order on consent, or judicial consent decree or to which a permit has been issued by the United States or an authorized state under the Resource Conservation and Recovery Act (RCRA), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SDWA);
- properties with facilities subject to RCRA corrective action (§ 3004(u) or § 3008(h)) to which a corrective action permit or order has been issued or modified to require the implementation of corrective measures;
- properties that are land disposal units that have submitted a RCRA closure notification or that are subject to closure requirements specified in a closure plan or permit;
- properties where there has been a release of polychlorinated biphenyls (PCBs) and all, or part, of the property is subject to TSCA remediation; and
- properties that include facilities receiving monies for cleanup from the Leaking Underground Storage Tank (LUST) Trust Fund.

Further, the Former OmniSource Property/North River Development Site was determined to qualify as a Brownfields by the IBP as indicated in the attached *IDEM Acknowledgement Letter*.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

The Site is primarily contaminated with hazardous substances.

12.a. Property Ownership Eligibility - Hazardous Substance Sites

12.a.i. Exemptions to CERCLA Liability

12.a.i.1. Indian Tribes

Not applicable.

12.a.i.2. Alaska Native Village Corporations and Alaska Native Regional Corporations

Not applicable.

TRESHOLD CRITERIA FOR EPA BROWNFIELD CLEANUP GRANT

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12.a.i.3. Property Acquired Under Certain Circumstances by Units of State and Local Government

Not applicable.

12.a.ii. Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability

12.a.ii.1. Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

Not applicable.

12.a.iii. Landowner Protections from CERCLA Liability

12.a.iii.1. Bona Fide Prospective Purchaser Liability Protection

12.a.iii.1.a. Information on the Property Acquisition

The Site was acquired by the Fort Wayne Redevelopment Authority via corporate warranty deed via transfer from the City of Fort Wayne, Department of Redevelopment (another governmental unit) on November 14, 2022. The Authority has fee simple ownership of the Site and there were no, and are no, familial, contractual, corporate, or financial relationships or affiliations with the prior owner. The Authority is a separate corporate body from the City of Fort Wayne, Department of Redevelopment, but is supported by City of Fort Wayne, Department of Redevelopment staff.

12.a.iii.1.b. Pre-Purchase Inquiry

An ASTM E1527-13/E1527-21 compliant Phase I Environmental Site Assessment (ESA), dated November 9, 2022, of the Former OmniSource Property/Proposed North River Development (including the Site) was completed by IWM Consulting Group, LLC for the Fort Wayne Redevelopment Authority. Specifically, the Phase I ESA was completed by Kurt Byanski and Ashley Pepple, Environmental Professionals as defined in 40 CFR § 312.10, with over 40 -years of combined experience in environmental consulting. The Site was purchased within 180-days of completing all components of All Appropriate Inquiries (AAI) compliant Phase I ESA.

12.a.iii.1.c. Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the Site occurred before the Authority acquired the Site and the Authority did not cause or contribute to any release of hazardous substances at the Site. The Authority has not, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

12.a.iii.1.d. Post-Acquisition Uses

The Authority acquired the Site in 2022 for the specific purpose of facilitating the completion of local public improvements for future redevelopment. The Site was vacant and unoccupied upon acquisition

TRESHOLD CRITERIA FOR EPA BROWNFIELD CLEANUP GRANT

and has remained that way since the Site was acquired. The Site has not been utilized for any reason, other than some portions being used as a surface parking lot, since it was acquired in 2022.

12.a.iii.1.e. Continuing Obligations

Prior to the Authority acquiring the Site in 2022, as part of the City's efforts to expand on its efforts to prevent or limit exposure to previously released hazardous substances at the Site, the City took several steps prior to, and subsequent to, acquiring the Site. All structures were removed from the Site prior to the City's acquisition of the Site, and no known off-site impacts have occurred since the City acquired the Site in 2017. In fact, the City took great lengths to assess the Site, and partially remediated the Site under supervision of the IBP and the IDEM.

Reasonable steps completed by the City included further characterization of hazardous substance contamination on the Site, removal by excavation the most contaminated soils of the full North River Development Site (29 acres in size) utilizing RLF-subgrant funding, and installation of fencing to limit access to the Site. Furthermore, a Soil Management Plan was developed dictating handling and disposal of Site soils as a requirement by the Indiana Department of Environmental Management (IDEM). Although the City made significant progress with respect to characterizing and remediating the Site, additional cleanup activities are still warranted.

The Authority has continued to limit access to the Site and is actively seeking supplemental funding to complete the necessary remediation activities. As such, the Authority is applying to the EPA for this Brownfields Cleanup Grant to address the contaminants remaining on the southern portion of North River which pose potential threats to human health and the environment and to further prepare the Site for reuse.

The Authority commits to:

- i. complying with any land-use restrictions and not impeding the effectiveness or integrity of any institutional controls;
- ii. assisting and cooperating with those performing the cleanup and providing access to the property;
- iii. complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- iv. providing all legally required notices.

12.b. Property Ownership Eligibility - Petroleum Sites

Not applicable; co-mingled hazardous substance and limited petroleum contamination may be present in isolated locations at the Site, but the predominant contamination is from hazardous substances.

13. Cleanup Authority and Oversight Structure

13.a. Cleanup Oversight

The Fort Wayne Redevelopment Authority's supporting staff from the City of Fort Wayne, Department of Redevelopment have historically worked with representatives from the Indiana Finance Authority (IFA), IBP and the IDEM OLQ Risk Section regarding this Site and the Authority will continue to work

TRESHOLD CRITERIA FOR EPA BROWNFIELD CLEANUP GRANT

under their oversight during the cleanup phase of this project. The IBP is very familiar with this Site since the City has previously corresponded with them regarding the contamination present at this Site and discussed potential cleanup alternatives. The IBP and OLQ Risk Section have been integral to providing regulatory and technical oversight, especially during the comprehensive 2021 Hazardous Site Substances Assessment activities and development of the Soil Management Plan. The IBP will continue to be intimately involved in the Site cleanup activities. All of the future reports and work plans will be submitted to the IBP for their review and the work plans will satisfy the cleanup requirements outlined by the IBP.

The Authority will also contract with a qualified environmental contractor which employs a licensed professional geologist, licensed professional engineer, or another similar type of qualified professional. The selected contractor will be experienced with respect to remediating these types of properties, understand the requirements of the IBP, and be familiar with the U.S. EPA Grant program. The selected contractor will be responsible for developing and implementing the appropriate remedial work plan.

The City's Department of Redevelopment Deputy Director, Mr. Jonathan Leist, as support staff for the Authority, will also provide oversight with respect to ensuring that all of the tasks are completed on time and submitted to the appropriate agency. The City Brownfields Coordinator, Ms. Lindsey Maksim, will be the primary technical contact for the selected environmental contractor and assist in overseeing expenditures associated with the project. Ms. Maksim will also assist in tracking the progress of the project, submit the quarterly updates to the EPA, and work with the other City staff to ensure the competitive procurement process satisfies the 40 CFR requirements.

13.b. Access to Adjacent Properties

In this instance, contamination appears to be defined within the current Site boundaries and an off-site access agreement is not expected to be required for the cleanup project. The Site is bound by the north and west by the remaining portion of the North River Development site; to the east by Clinton Street and land owned by the City of Fort Wayne Board of Park Commissioners; and to the south by 4th Street followed by a portion of the North River Development site that was recently transferred for redevelopment as a brewery and restaurant and land owned by the Fort Wayne Board of Park Commissioners currently under development as Riverfront Phase II.

The City has extensive experience in gaining Right of Entry agreements from property owners for environmental investigation and can act on behalf of the Authority. The City already has a standard Right of Entry request form that it has successfully employed with its EPA-funded Phase I ESA and Phase II ESA projects. If needed, the City would employ the same techniques of advising adjacent property owners of the benefits of assisting the City with remediation of environmental contamination, describing the process to be undertaken, and demonstrating the benefits to the property owner. The Brownfields Coordinator is also skilled at obtaining right of way encroachment licenses and permits for investigation on public right of ways in the event that private property owners are not forthcoming with access. Lastly, if necessary, the IBP and the Allen County Department of Health can assist the Authority in gaining access to sites for the protection of human health and environment.

14. Community Notification

14.a. Draft Analysis of Brownfields Cleanup Alternatives (ABCA)

The draft EPA application and ABCA, along with the proposed redevelopment and cleanup activities, were discussed at the pre-application public meeting held on October 30, 2023.

The draft ABCA summarizes information about the Site and contamination issues, cleanup standards, and applicable laws; the cleanup alternatives considered, including the effectiveness, ability of the applicant to implement, resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness; and the proposed cleanup.

14.b. Community Notification Ad

The Authority published a Public Meeting Notification advertisement in the regional newspaper, the Journal Gazette, on October 27, 2023, and on the City of Fort Wayne's website. In addition to the public announcements, key neighborhood stakeholders were directly contacted to discuss the grant, remediation plan and public meeting. The newspaper advertisement indicated that a copy of the draft application and ABCA would be available for review during the public meeting; the date, time, and location of the public meeting; where the documents were located for public review; and how to comment on the draft application. The community notification information, including the newspaper advertisement, the website notice, and a copy of the draft ABCA are included as an Attachment to this Proposal.

14.c. Public Meeting

The public meeting was held on October 30, 2023 at 2:00 p.m. at Science Central, located at 1950 North Clinton Street, adjacent to the east of the North River Development site, across North Clinton Street. Eighteen people attended, where the timeline and scope of remediation, alternatives, and the reuse plan were discussed. Attendees were provided with contact information and instructions for submitting public comments. The Authority contacted key stakeholders directly, including the President of the Bloomingdale Neighborhood and the Wells Street Business Association, to discuss the EPA grant, remediation, and redevelopment plan. Copies of the *2024 EPA Brownfields Cleanup Grant Public Meeting* sign-in sheets are included as an attachment.

14.d. Submission of Community Notification Documents

Copies of the draft ABCA, and the newspaper ad soliciting public comments on the application (including its accompanying affidavit by the publisher) that occurred on October 27, 2023, at least 14 calendar days before this application was submitted to EPA, is attached. The subsequent meeting is discussed above.

15. Contractors and Named Subrecipients

Not applicable.

THRESHOLD CRITERIA FOR EPA BROWNFIELD CLEANUP GRANT ATTACHMENTS

Letter from State Environmental Authority



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

November 13, 2023

Mr. John Powell, President
Fort Wayne Redevelopment Authority
c/o City Administrator
200 East Berry Street, Suite 320
Fort Wayne, Indiana 46802

Re: IDEM Acknowledgement Letter
U.S. EPA Brownfields Cleanup Grant Proposal
Fort Wayne Redevelopment Authority
Former OmniSource South Property
1610 North Calhoun Street
Allen County, Indiana
Brownfield #4180207

Dear Mr. Powell:

This letter is provided in support of the Fort Wayne Redevelopment Authority proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Cleanup Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that the Fort Wayne Redevelopment Authority is requesting \$2,000,000 for a cleanup grant for 8 acres of the former OmniSource South property (Site) located at 1610 North Calhoun Street which the Fort Wayne Redevelopment Authority has owned since 2022.

IDEM understands that the Fort Wayne Redevelopment Authority has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered through the Indiana Brownfields Program and that the Fort Wayne Redevelopment Authority, based on the information it has provided with its request, believes it has the capability to perform the proposed grant-funded activities.

The Cleanup Grant is essential to ignite development at this Site and would be used to address contamination on an approximately 8-acre portion of the Site, which will be the first phase of a multi-phase redevelopment effort. This approximately 8-acre portion, located south of 6th Street and east of North Calhoun Street, is at the southern end of the Site and provides the best opportunity for a significant redevelopment project capable of catalyzing additional growth and addressing our goals for the Site and the community.

With several agreements underway supporting the commercial and recreational use of the southeastern portion of the Site, the target area to be remediated with this grant will have some multi-family housing, commercial/office/retail space, inclusive

employment opportunities and community/recreational space. It will also connect to the City and Regional Trail System.

Grant funds will be used to cleanup, by excavation and off-site disposal, heavy metals (primarily lead, arsenic, and mercury) and PCB contaminated soil identified during previous environmental assessments at the Site. In addition, funds will be used to conduct community outreach and satisfy programmatic requirements. The City of Fort Wayne (City) received a U.S. EPA Community-Wide Assessment Grant in 2019, a portion of which was utilized to characterize fill material and native soils at the Site. The Site appears sufficiently characterized for remediation to begin.

The Fort Wayne Redevelopment Authority has identified the work necessary to remove, and identify any additional, environmental barriers to the redevelopment of this brownfield Site. IDEM has worked with the Fort Wayne Redevelopment Authority on several projects and staff are committed to supporting this project by providing technical assistance and coordination through the Indiana Brownfields Program.

Based on the information submitted, IDEM considers the Fort Wayne Redevelopment Authority an excellent candidate to receive U.S. EPA grant funding to clean up the former OmniSource property. IDEM looks forward to continuing its partnership with the Fort Wayne Redevelopment Authority on brownfield redevelopment projects. For further assistance, please contact John Morris of the Indiana Brownfields Program directly at (317) 234-0235 and at jmorris@ifa.in.gov.

Sincerely,

Andrea Roberston Habeck
Technical Staff Coordinator
Indiana Brownfields Program

ARH/JTM

cc: Ms. Lindsay Maksim, City of Fort Wayne
Ms. Ashley Pepple, IWM Consulting Group