UPTOWN CONSORTIUM, INC.

1. Applicant Identification

Uptown Consortium, Inc. 3440 Burnett Avenue #130 Cincinnati, Ohio 45229

R05-24-M-005

2. Funding Requested

- a. Grant Type: Multipurpose
- b. Federal Funds Requested: \$1,000,000

3. Location

a) City of Cincinnati b) Hamilton County c) Ohio

4. Target Area and Priority Site Information

Target Area: Uptown Innovation Corridor Census Tract 39061027000 Priority Assessment Site:

515 Martin Luther King Drive, Cincinnati, Ohio 45206

Priority Cleanup Site:

3123/3125 Van Buren Avenue, Cincinnati, Ohio 45229

5. Contacts

a. Project Director

Beth A. Robinson, President & CEO (513) 861-8726 brobinson@uptownconsortium.org 3440 Burnett Avenue #130 Cincinnati, Ohio 45229

b. Chief Executive/Highest Ranking Elected Official

Beth A. Robinson, President & CEO (513) 861-8726 brobinson@uptownconsortium.org 3440 Burnett Avenue #130 Cincinnati, Ohio 45229

6. Population

City of Cincinnati, Ohio: 308,664

(US Census: 2017–2021 American Community Survey)

UPTOWN CONSORTIUM, INC.

7. Other Factors

Other Factors	Page #			
Community population is 10,000 or less.				
The applicant is, or will assist, a federally recognized Indian Tribe or United				
States Territory.				
The priority brownfield site(s) is impacted by mine-scarred land.	NA			
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be	NA			
contiguous or partially contiguous with a body of water but for a street, road or other public thoroughfare separating them.)				
The priority site(s) is in a federally designated flood plain.	NA			
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.	3–4			
At least 20% of the overall project budget will be spent on eligible site reuse/area-wide planning activities, as described in Section I.B., for priority brownfield site(s) within the target area.	NA			
The target area is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA			

8. <u>Letter from the State or Tribal Environmental Authority</u> See attached.

9. Releasing Copies of Applications Not Applicable.

Mike DeWine, Governor Jon Husted, Lt. Governor Anne M. Vogel, Director

October 24, 2023 U.S. Environmental Protection Agency, Region 5 ATTN: Ashley Green 77 West Jackson Boulevard Mail Code SB-5J Chicago, IL 60604-3507

RE: Uptown Consortium Multi-Purpose Grant Proposal

Dear Ashley Green:

I am pleased to offer Ohio EPA's support for the Uptown Consortium Multi-Purpose Grant Proposal. The Uptown Consortium is applying for a multi-purpose grant with funding totaling \$1,000,000. We hope to provide support under the Assessment, Cleanup and Revolving Loan Fund Grant program established by the Small Business Liability Relief and Brownfield Revitalization Act (P.L. 107-118).

Uptown Consortium will focus on two target sites within the target area of the Innovation Corridor in the Avondale neighborhood of Cincinnati, the northeast quad (for remediation) and the southwest quad (for assessment). The funding the Uptown Consortium is requesting under their Multi-Purpose Grant Proposal will be used primarily to remediate a proposed greenway in the northeast quad of the Innovation Corridor. Additional funds will be used to assess other sites, focusing on a proposed development in the southwest quad, develop inventories, prioritize sites, conduct community outreach activities, perform Phase I site assessments, and prepare cleanup and reuse plans.

If awarded, this grant would enable remediation for development of a greenway as part of a much larger development and assessment of other sites within the area targeted for development The planned development will include bicycle infrastructure with connection to a large bicycle network through the Wasson Way Trail. The design will provide cyclists with access to cafes at the greenway as well as other facilities. Landscaping will include pollinator resources & overwintering habitat, and winter food sources for resident and migratory species, incorporating native species. The popup event, plaza, flexible spaces, and water feature will draw the public to the area and serve as a focal point for the community. Rainwater will be captured and used for irrigation. The water feature will pre-treat stormwater prior to discharge. Smart lighting with LED efficiency will be used and incorporate solar power with photo controls and various sensors. Sensors will be connected to

50 W. Town Street Suite 700 Columbus, Ohio 43215 U.S.A. 614 | 644 3020 epa.ohio.gov a data management system to track air quality 7 speed, temperature, noise & gunshot detection, people counting, and be able to extend or strengthen public Wi-Fi. Solar panels are planned to be used for building facades and canopies over recreational swings and parking areas. The development plans include solar-powered Wi-Fi shaded benches and power pods for charging electronic devices, and E-bike and E-scooter stations.

Overall, the \$2.5B development of the four quads covers 65 acres, with 2 million square feet of mixed-use development (research, office, clinical, residential, hotel and retail), and the potential to create and retain 7,500 jobs. It is estimated that the planned development on the target assessment and remediation sites will retain or create 4,483 jobs.

We look forward to working with the Uptown Consortium 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 <u>Lisa.Shook@epa.ohio.gov</u>.

Sincerely,

Lisa Shook

Lisa Shook, Manager

Ohio Environmental Protection Agency

Voluntary Action Program

cc:Franz Stanbury, Project Director, Uptown Consortium, Inc.

Randall Kirkland, Ohio EPA, DERR/SWDO



Mike DeWine, Governor Jon Husted, Lt. Governor Division of State Fire Marshal Sheryl Maxfield, Director



October 23, 2023

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

RE: Uptown Consortium Multi-Purpose Brownfield Grant Proposal

Dear Mr. Jurevis:

This letter acknowledges that the Uptown Consortium notified the Office of the Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR) of its plans to use the \$1,000,000 grant proposal for assessment and remediation for petroleum and hazardous waste sites. The targeted areas for this grant are located within the Innovation District of the Avondale neighborhood in Cincinnati, Ohio. Assessment activities are proposed in the southwest quadrant and cleanup activities focused on the northeast quadrant of the district. Numerous properties have been identified and need assessment and remediation to promote redevelopment of blighted or abandoned buildings, former gas stations, dry cleaners, and commercial buildings. Goals of the grant include the remediation of a proposed greenway and multifunctional park and public space to elevate the area as a focal point for the community.

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

Sincerely,

Christine G. Pyscher, P.G.

 $Environmental\ Specialist-BUSTR$

Division of State Fire Marshal

Ohio Department of Commerce

xc: Site File

Franz Stanbury, Uptown Consortium



FY24 Brownfields Multipurpose Grant
Narrative



1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields i. Overview of Brownfield Challenges and Description of Target Area: The target area for this grant will be the Avondale neighborhood of Cincinnati, Ohio (City). The neighborhood is one of seven that make up the "Uptown" area. Avondale was settled in the 1800s predominantly by English and German settlers and began as a rural village filled with large estates of Cincinnati's wealthy citizens. It was first referred to as Avondale in 1853 and was incorporated in 1864. In late 1896, it was annexed by the City. Avondale consists of 1,383 acres located on either side (east and west) of Reading Road, a major local artery, with its southern boundary two miles north of downtown Cincinnati. Martin Luther King Drive crosses Avondale near the southern end. It is bound on the east by Interstate 71 (I-71). From the 1920s until the 1940s, it was a closed, less affluent neighborhood. In the 1940s, it saw an influx of Black population resulting from the migration of displaced residents of the West End neighborhood. The area saw rising crime and deteriorating housing resulting from absentee landlords. Avondale was the scene of significant race riots in 1967 and 1968, after which the business district was abandoned and left in disrepair. Avondale is a predominantly Black/African American (91%)¹ low-income (37% below poverty level)¹ neighborhood with a high crime rate (170% of the national average with violent crime 220% of the national average).²

The geographic boundary for this project is the Uptown Consortium, Inc., (UCI) jurisdiction comprised of the neighborhoods of Avondale; Clifton. Clifton Heights, University Heights, Fairview; Corryville; and Mt. Auburn. These include the Short Vine, Calhoun/McMillan, Ludlow, Mt. Auburn, and Avondale business districts. The target area is the Avondale Neighborhood: Innovation District located in Census Tract (CT) 39061027000, a Justice40 Disadvantage Community.

UCI is a nonprofit community development corporation dedicated to Uptown. It brings together local and regional leaders and works tirelessly on extensive planning and community engagement. Together, UCI and these regional/local leaders have established a vision for Uptown and executed a shared mission for vibrant spaces, connected corridors, varied housing options, and hosting the future of research and innovation. UCI serves a crucial role in establishing site control and advancing infrastructure that has allowed Uptown to progress and become a magnet for highgrowth firms, technology, and creative start-ups. UCI has initiated and advanced development in the target area with a strategic plan for transforming the area designated the **Innovation District**. The Innovation District has four quadrants, with development planned by UCI in the northeast and southwest quads. The Innovation District has been blighted with vacant lots, vacant residential and commercial properties, and historical use as automotive repair, dry cleaning, and other services typically associated with environmental impacts. The vacant properties have led to dumping, and limited preliminary assessments have confirmed environmental impacts. These issues and a lack of funds to assess and clean up the sites have stalled development, and the majority of the area remains vacant. These issues can and must be addressed for redevelopment to continue. A Multipurpose Grant can provide a means to properly address environmental issues so that the sites can be put to productive use. The planned redevelopment of the Innovation District includes research centers in cooperation with the National Institute for Occupational Safety and Health (NIOSH), the University of Cincinnati, and various medical enterprises as well as office, clinical, residential, and retail developments. It is estimated to create approximately 7,500 jobs. The use of grant funds to further assess and remediate these properties will facilitate the development; vastly

¹ US Census:2017–2021 American Community Survey

² Areavibes, https://www.areavibes.com/cincinnati-oh/avondale/crime/



improve the local demographics, employment, and access to services; and improve the physical and social environment. It will invigorate the neighborhood with new business development in the surrounding area, creating a ripple effect, generating more jobs, creating a safer neighborhood, and increasing the tax revenue.

ii. Description of the Priority Brownfield Site(s): The assessment priority site, consisting of approximately 3.2 acres is 515 Martin Luther King Drive located in the southwest quad of the Innovation District. In the 1950s, the site was developed with various commercial facilities, including a gas holder for town gas, warehouses, a filling station with known releases, a nursing home, and other health-care-related facilities. The seven former structures located on parcels currently owned by UCI were demolished in 2022. Currently, the site is a fenced, vacant lot. Adjoining property housed automotive/truck repair, dry cleaners, filling stations, auto repair facilities, auto dealers, and retail shops. Based on a recent Phase I Environmental Site Assessment (ESA), there are 12 solid waste landfill sites, 13 underground storage tank (UST) sites, and 39 leaking UST sites within ½ mile, and 15 historic auto facilities and eight dry cleaners within ½ mile. Contaminants of concern associated with these operations are lubricants, degreasing solvents, and dry-cleaning solvents.

The cleanup priority site, referred to as the Innovation Greenway is located in the northeast quad of the Innovation District. Comprised of 12 parcels, the site was historically developed with residential properties as early as 1904. Portions were developed for commercial uses between 1904 and 1922. Documented commercial uses include automotive repair shops and towing services through 2017. The 16 structures located on these parcels were demolished between 2013 and 2017. The parcels currently are grass-covered vacant lots. Analysis of the debris indicated several samples contained asbestos. The convenience of the location makes its potential for redevelopment great, but it also makes the site a prime target for unauthorized dumping, especially since the parcels are unsecured. This unauthorized dumping gives an opportunity for a host of additional environmental concerns. Adjoining property uses include dry cleaners, filling stations, auto repair facilities, auto dealers, a car wash, a radiator repair shop, a mortuary school, and retail shops. Based on a recent Phase I ESA, there are a large quantity generator; 13 UST, 32 leaking UST, and 11 archive UST sites; nine solid waste landfill sites; and one USEPA Brownfield site within ½ mile and at least three former dry cleaners within 1/8 mile. The contaminants of concern associated with these operations are fuels and lubricants (petroleum hydrocarbons and metals), degreasing solvents (volatile organic compounds), and dry-cleaning solvents (chlorinated volatile organic compounds).

The presence of these contaminants at both priority sites poses a significant health risk to those living or working in the community. Both sites are of concern due to their proximity to residents via the following: two churches within 200 ft., a school and a daycare within 1,000 ft., an addiction center and a health complex within 600 ft., and five additional medical facilities including a psychiatric institute and children's hospital within 1,800 ft.

iii. <u>Identifying Additional Sites</u>: UCI will focus on identifying sites for assessment throughout the target area's census tract, which is defined by the Climate Economic Justice Screening Tool (CEJST) as a Justice40 disadvantaged community. During this grant project, a more in-depth, grant-funded site inventory and evaluation ranking criteria process (Budget Task 2) will be established, and UCI will work diligently with the organizations listed in 2.b. as well as businesses and residents of the target area to identify and prioritize sites within the underserved community. Those properties will be researched further by UCI staff using the property appraiser's website. The evaluation criteria used to determine which sites are added to the inventory will be based on



community need, project partner and resident input, and CEJST and US Census data to ensure the underserved community is benefiting from the project. In the event all target-area sites have been addressed with grant funding, UCI will work with project partners and residents throughout their jurisdiction/geographic boundary to identify abandoned and underused properties. Once identified, UCI will apply the already established evaluation ranking criteria (based on the needs of the underserved) to determine the order sites will be addressed.

b. Revitalization of the Target Area i. Overall Plan for Revitalization: The priority sites are located in Avondale, a historic Black neighborhood and one of the most economically disadvantaged neighborhoods in Cincinnati. Many of UCI's activities are focused on programs and initiatives to improve the Avondale neighborhood. The priority sites are some of the most polluted sites in the area and have experienced a long period of environmental degradation and neglect. Working with the leaders of the City and Avondale, UCI is working to make transformative changes to improve all of Uptown. The Avondale Development Corporation together with the City and other partners launched a Quality of Life (QOL) movement to look at community needs and opportunities. The QOL Plan was developed by working groups led by residents and key community stakeholders, including representatives from schools, churches, community institutions, local development companies, law enforcement, and the local government. These groups were able to incorporate the Avondale Vision Plan, and it was approved by the Avondale Community Council in November 2019 and the City in January 2020. This was the first comprehensive community plan approved by both the Avondale Community Council and the City Council of Cincinnati. The OOL Plan provides the framework for a long-awaited revitalization anchored by the growth of the Uptown Innovation District at a new \$110 million interchange at I-71 and Martin Luther King Drive. However, the past uses of the properties in the quadrants pose potential impediments to redevelopment.

The assessment and cleanup priority sites are part of the larger, planned, multiyear development area called the Innovation District. This District is divided into four quadrants at the major intersection of Martin Luther King Drive and Reading Road in Avondale. The Northeast Quad, centered by a linear park called the Innovation Greenway (the priority cleanup site), is planned for a mixed-use development incorporating hotels, residential, office, research, and retail. The assessment priority site, formerly occupied by a gas holder and a filling station, is in the Southwest Quad. The Southwest Quad is planned for a mixed-use development focusing on biological research and development with supporting retail and residential components. The Northwest Quad will be the site of a new NIOSH research campus that will employ approximately 600 people. A portion of the Southeast Quadrant has been developed with research space in coordination with the University of Cincinnati.

ii. Outcomes and Benefits of Overall Plan for Revitalization: The target area is in a strategic location at a highway interchange and a significant commuter corridor. However, they are underused and located in an impoverished, economically distressed area with substantial environmental concerns. The plans for the development of the northeast and southwest quadrants of the Innovation District include green space (including the Innovation Greenway cleanup site), office, research, commercial, retail, hotel, and entertainment. These establishments would significantly enhance residents' quality of life (noneconomic benefit). The redevelopment and revitalization of the target areas will capture commuter revenue, generate job opportunities, increase its tax base, and bring revenue from populations living outside the community (economic benefit).



Specific plans for the priority cleanup site (Innovation Greenway) will be primarily green space. The development will include features related to climate change: Landscaping will include pollinator resources, overwintering habitat, and winter food sources for resident and migratory species, incorporating native species and reducing heat island effects. Green stormwater **infrastructure** will capture precipitation for irrigation and pretreat stormwater prior to discharge. Clean energy and efficiency will be incorporated to reduce energy burden, with smart lighting with LED efficiency incorporating solar power with photo controls and various sensors. Sensors will be connected to a data management system to track air quality, wind speed, temperature, noise and gunshot detection, people counting, and be able to extend or strengthen public Wi-Fi. Solar panels are planned for building facades and canopies over recreational swings and parking areas to provide shade coverage as well as generate power. The development plans include solarpowered Wi-Fi shaded benches and power pods for charging electronic devices, and E-bike and E-scooter stations. The plans include clean transportation bicycle infrastructure with connection to a larger bicycle network. The design will provide cyclists with access to cafes at the greenway as well as other facilities, reducing traffic. The pop-up event, plaza, flexible spaces, and water feature will draw the public to the area and serve as a focal point for the community.

Overall, the \$2.5 billion development of the **four quads** covers 65 acres, with 2 million square feet of mixed-use development (research, office, clinical, residential, hotel, and retail), and will create and retain 7,500 jobs. It is estimated that the planned development of the assessment and cleanup priority sites will create 4,483 jobs.

- c. Strategy for Leveraging Resources i. Resources Needed for Site Reuse: UCI depends on grants and donations to accomplish its work and it does not have the funds to complete the project on its own. A US EPA Multipurpose Grant would enable the project to go forward. UCI will work with the developer, the City of Cincinnati, and Hamilton County to identify and seek additional sources of funds for the development, including TIF financing for the parking structure and various grants for sustainable development. Funding could also be obtained using The Port of Greater Cincinnati Development Authority's US EPA-funded Brownfields Revolving Loan Fund; Ohio Department of Development (ODoD) grants for asbestos abatement, building demolition, site assessment, and cleanup; and JobsOhio funding. UCI has undertaken the initial stages of the redevelopment using their own funds, including \$151,205 for the demolition of structures and tank removal at the former filling station within the southwest quadrant area as well as \$390,000 for demolition and \$32,000 for environmental assessment in the northeast quadrant.
- ii. <u>Use of Existing Infrastructure</u>: All utilities, including water, gas, electric power, sewer, and fiber optics are available at the priority sites. Upgrades to the utilities and the roads are planned in conjunction with the NIOSH campus development on adjoining land. However, once development begins, utilities may be modified or upgraded depending on final development requirements.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. The Community's Need for Funding: The priority sites are located in CT 39061027000. The target area is home to a small (CT: 3,517) and impoverished population with a low per capita income of \$20,662 (US \$37,638) and a low median household income of \$29,042 (US \$69,021).³ The family poverty level is 3.5 times the national average (32% /US 8.9%) placing it in the 99th percentile of communities with income less than twice the poverty level.⁴ The CT has higher unemployment (6.5%) than the national average (5.5%).³ As a nonprofit organization, UCI is funded by donations and grants. UCI does not have the capability to collect

³ US Census 2017–2021 American Community Survey

⁴ EJ Screen Report



funds through taxes or other means and relies on outside sources for funding. The **small population** of the target area cannot support such a development without significant grant funding. Without grant funds, UCI could not continue with the assessment and remediation necessary to secure contracts with developers and continue the target-area revitalization efforts.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: Avondale has significant sensitive populations including those impoverished, elderly, and minority. Within the target area, 37% of all families are below the poverty level (US 13%), with unemployment at 6.5% (US 5.5%). The community is predominantly (91%) Black/African American (US 13%), and 22% are elderly (US 19.7%). The CT's underserved population is much more vulnerable to negative health effects from contaminants associated with brownfield properties and other contaminated properties in the community. Faced with few good options, the residents in Avondale have no choice but to turn to public assistance, with 27% of households in the target area using food stamps/SNAP (US 11%). Countless studies have shown that Black/African Americans are generally more impoverished, have less access to healthy food and health care, are more likely to be victims of crime, have lower life expectancies, and are less employed than other racial groups. The education level in the target area is below the state and national rates: 19% of residents who attended high school lack a diploma, compared to 6% in the US.⁵ Low education levels can equate to higher crime rates. Avondale has an extraordinarily high rate of overall and violent **crime** with rates of 6,378 and 1,254 per 100,000, respectively (2,159 and 309 for Ohio, 2,346 and 388 for the US).⁶

UCI's development plans include the construction of affordable multitenant housing, a requirement UCI imposes on developers. Providing **affordable housing** is necessary for this underserved community to thrive. Although the average monthly rent in the target area is \$543 (US: \$1,163), residents are suffering as a significant portion of their annual income goes to cover housing.⁵ Within the CT the average **cost of housing relative to income is in the 96th percentile.**⁷ To make matters worse, existing target-area housing is aged and falling apart, with 89% of all homes being constructed prior to 1979 (52% in US) and 83% constructed prior to 1969 (37% in US), creating an environmental concern of asbestos and lead.⁵ The Environmental Justice (EJ) Screen Report **Lead Paint Indicator** shows the target area (average) index is in the **69th percentile** relative to the US. The target area is in the 95th percentile for having a hazardous waste site within five kilometers and a leaking underground storage tank (UST) site within 1,500 feet.⁸ The planned development, which can be made possible only through grant funding, will provide good-paying jobs. These jobs will be expected to decrease poverty levels, crime, and the relative cost of housing and other expenses.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Lead paint exposure, commonly associated with aging structures found in the target areas, poses increased risk factors to sensitive populations, particularly the target areas' high minority populations and those living in poverty. Past uses of the target properties and surrounding properties in the target areas include auto service, dry cleaners, and hazardous waste generators. **Toxic chemicals** associated with these operations include volatile organic compounds (VOCs) such as chlorinated compounds from fuels, lubricants, degreasing solvents, and dry-cleaning solvents. These contaminants have been documented to cause a multitude of negative health effects. The target area is in the **69**th **percentile for lead-based paint** in the US.⁸ Avondale's percentiles are high for **asthma (98**th **percentile)**, heart disease (95th percentile), and **low life expectancy** (99th

⁵ US Census 2017–2021 American Community Survey

⁶ https://www.areavibes.com/cincinnati-oh/avondale/crime5

⁷ CEJST



percentile). The predominantly Black population is exceptionally at risk. Emergency room visits for **asthma** are over four times higher for Black persons than white persons in Ohio (197.6/10,000 vs. 43.7/10,000; CT data not available). Even though Black children make up 18% of the Ohio population, they make up 49% of **emergency room visits** for asthma. Infant mortality rates in Cincinnati (CT data not available) are 2.5 times higher for the Black population (15.6/1,000) than white (6.1/1,000). In addition, life expectancy in Avondale is 68 years. Life expectancy for Black men and women in Cincinnati (CT data not available) is shorter (63.8 and 72.4 yrs., respectively) compared to Ohio (69.8 / 76.5) and the US (71.8 / 78). Cancer rates in Hamilton County (CT data not available) are higher than for Ohio and the US (479.7, 468.0, and 435.8 per 100,000, respectively). Similarly, cancer mortality rates for Hamilton County, Ohio (CT data not available), and the US are 169.5, 162.8, and 146.0 per 100,000, respectively. Also, cancer mortality for the Black population in Ohio is 6% higher than for white (172.3/100,000 vs. 162.8/100,000).

Various contaminants present at the target area's properties can lead to a host of short-term and chronic health concerns. These health concerns include tremors, headaches, infertility, anxiety, depression, central nervous system depression, vision impairment, neurologic disorders, various forms of cancer, and numerous aliments of genetic, immune, and endocrine systems. The target area's already sensitive population with a high poverty level would be more significantly impacted than the general population. Identifying, assessing and remediating brownfield sites throughout the target area for redevelopment will facilitate the removal of harmful contaminants causing serious health issues for sensitive populations.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: Target-area residents are victims of continued disinvestment, resulting in vacant properties throughout the **distressed neighborhoods** and generating a ripple effect of negative consequences such as **decreased taxable revenue**, **decreased property values**, and reduced ability to market properties for redevelopment. The CT has a **high poverty rate** 3.5 times higher than the national average (31.7% / 8.9%) and **higher unemployment** (6.5%) than the national average (5.5%). Within the CT, 37% **of all families live below the poverty level** (US 13%), 91% are **Black/African American** (US 13%), and **22%** are **elderly** (US 19.7%). Also, 19% of residents who attended high school **lack a diploma**, compared to 6% in the US. 12

From the 1920s until the 1940s, Avondale was a closed, less affluent neighborhood. In the 1940s, as the West End neighborhood developed, its Black population was forced out and, because of the laws at the time, they could move only to neighborhoods with existing Black populations. As a result of this discrimination, Avondale saw an influx of the displaced Black population. The residents living in and around the target sites are underserved and have borne the brunt of the negative social and environmental impacts. Negative environmental consequences and years of disinvestment have severely limited the sensitive populations' potential for economic growth as illustrated by high poverty, substandard housing, and low high school and higher education completion rates. Lack of education severely limits one's ability to advocate for social, economic, and welfare needs, typically leading to an intergenerational poverty trap community members are unable to escape. The Environmental Justice (EJ) Screen Report Lead Paint Indicator shows the target area (average) index is in the 69th percentile relative to the US. The CT is in the 95th

⁸ EJ Screen Report

⁹ Burden of Asthma in Ohio 2019, Ohio Department of Health

¹⁰ City of Cincinnati Community Health Assessment, December 21, 2017

¹¹ Ohio Annual Cancer Report 2022, Ohio Department of Health, March 2022

¹² US Census 2017–2021 American Community Survey



percentile for having a hazardous waste site within five kilometers and a leaking UST site within 1,500 feet. ¹³ Multipurpose Grant funds would make a significant impact on the community by allowing UCI to promote redevelopment and improvement in accordance with the Avondale Quality of Life Plan. Redevelopment of sites within the Innovation District and other sites in the target area would create much-needed jobs and improve the overall perception of the community, spurring further development. Thriving businesses, housing, green space, and community gathering space will replace blighted brownfields, ushering in employment opportunities and a brighter, more prosperous future for the community, promoting environmental justice throughout the target area.

- (b) Advancing Environmental Justice: The development plans fully promote the controlled, planned, and equitable growth plan laid out in the Avondale Quality of Life Plan. Grant funds would make a significant impact on UCI's ability to promote redevelopment and improve the areas included in the goals of the Quality of Life Plan. The priority site development will create much-needed jobs for local residents, improve the overall perception of the communities, and spur additional development. Thriving businesses, affordable housing, and green space will replace blighted brownfields, ushering in employment opportunities and a brighter, more prosperous future for the community and promote environmental justice within and surrounding the target areas. Development will not displace residents or businesses, but rather will provide a more vibrant environment that will reduce crime/illicit activities and improve business. UCI will work with businesses and property owners to coordinate mutually beneficial conditions regarding relocating if necessary in the future.
- b. Community Engagement i. Prior/Ongoing Community Involvement: Since planning began for the innovation district, UCI and its development partners have engaged residents to present development plans, connect with developers and provide feedback. UCI also created several committees that include neighborhood leaders, representatives from the Uptown anchor institutions, and other partners to help guide planning and development efforts. The community lacks access to quality green space and has shared a desire and excitement for the greenway. UCI has an annual contract with the Avondale Development Corporation (ADC) for community engagement. UCI engages with ADC leadership during monthly meetings and shares information in ADC's monthly newsletter to over 1,000 residents. ADC works with UCI to engage the Avondale Community Council (ACC) and has presented to the Board and General Body on an ongoing basis. In addition, UCI has held four open houses/virtual meetings on the greenway specifically.

<u>ii Project Involvement & iii. Project Roles</u>: The following partners will assist in the process of site selection and prioritization, cleanup, and future redevelopment plans of the propriety sites and surrounding target areas.

Name of Org. & POC	Organization Role	Specific involvement in the project or assistance provided	
Avondale Development Corporation (ADC): Russell Hairston rhairston@growavondale.or g 513-861-2232 ext. 100	ADC directs Avondale revitalization by developing housing, real estate, and economic initiatives while working collaboratively with residents/partners to address priorities that promote the well-being of residents as recommended in the Quality-of-Life Plan. It also posts updates on its Facebook and Twitter pages to keep the Avondale community informed.	Site inventory, community engagement, planning and marketing of open houses and/or targeted engagement sessions (with churches, resident block groups, etc.); inclusion of an "Uptown Update" in their monthly newsletters	

¹³ EJ Screen Report



Avondale Community Council (ACC): Tony Moore, President avondalecommunitycouncil. com 513-281-5999	The council represents and promotes the community of Avondale, providing the leadership, direction, and support	Community relations: discussions and presentations to the Community Council Board and General Body
Avondale Business Association (ABA): William Witten 513-646-8944	ABA works to promote interests of the business community and facilitate meetings, programs, and information to work on initiatives, discuss issues that promote economic growth, and improve conditions under which merchants and professionals conduct their business	Outreach & Business Placement: small business support, including technical assistance coaching, to retain and grow a robust pipeline of minority- and womenowned enterprises, by offering one-on-support, strategic planning, marketing and access to capital
Short Vine Association (SVA): Patrice Eby Burke, President 513-861-9394 myshortvine.net	SVA serves to preserve, improve and develop the "Short Vine Business District" as a safe and attractive area for all who visit, live, or work in the area. The "Short Vine Business District" is on the south side of Martin Luther King Dr. just west of the southwest quadrant of the Innovation District.	Short Vine Association partners with UCI on community relations and support for small business activities

iv. Incorporating Community Input: UCI has a long track record of working with community organizations to revitalize Uptown. UCI develops and implements robust community engagement and relations efforts through various committees and frequent interactions with residents, neighborhood councils, business owners, anchor institutions, developers, and community leaders to gain insight into the area's needs. UCI believes community involvement requires fostering collaborative interaction with its residents and local organizations/entities/groups by keeping the community informed and collecting community input. Businesses and residents in the target area will be informed and will know they are a valued component of UCI's Brownfield Program. Residents will provide vital input and feedback at the neighborhood level, and as input is received, UCI will review and respond individually within one week of receipt. A Community Involvement Plan (CIP) will be created with the purpose of outlining planned community engagement activities, the project schedule, project background, and key players. Through meeting minutes and specific input activities, UCI will record community member input and suggestions on the projects. UCI will evaluate the information and prioritize grant-funded projects to best address community concerns with consideration to the projects providing the most benefit to the target area's sensitive populations. Community outreach will encourage residents in the target area to suggest additional potential brownfield sites that may be added to the site inventory based on community need and the overall Brownfield Program goals. If appropriate, UCI will contact specific residents or groups to discuss their suggestions in more detail. Specifically for this project, UCI collaborates with the Avondale Community Council and Avondale Development Corporation to engage residents. UCI will work with the entities identified above to disseminate information throughout the community for the duration of the project. Information will be posted on the UCI webpage www.cincinnatiuptown.com and engage through various social media pages. The UCI website, Facebook, websites of the partners listed above, and the regional newspaper will also be used for frequent updates and reporting on the status of the grant activities. This will ensure a wide distribution of information through the community. Project updates and information will be discussed during community meetings held with ADC, ACC, ABA, and SVA. Announcements regarding the meetings will be posted on the website. Contact information for the Brownfield Project Team will be posted on the web page and on all promotional materials.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS



Description of Tasks/Activities and Outputs:

Task 1: Outreach

- i. *Project Implementation:* UCI's Brownfield Project Director will develop a Community Involvement Plan (CIP), outreach materials, brownfield project website, and social media posts with the assistance of the environmental contractor (EC). UCI staff will lead the community meetings to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, and software to manage the grant.
- ii. *Anticipated Project Schedule:* CIP created 1st quarter. Community Meetings held 1st & 3rd quarter of Y1–4 and the 1st quarter of Y5. Website/Outreach Materials created in 1st quarter and posted throughout the grant.
- iii. | Task/Activity Lead: UCI: Beth A. Robinson, President & CEO, Brownfield Project Director
- iv. *Outputs:* CIP, Brownfield Website, 9 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA-required Quarterly Reports.

Task 2: Site Inventory

- i. *Project Implementation:* UCI's Brownfields Project Manager will work with target-area residents during community meetings to create a thorough site inventory for assessment. Abandoned and underused properties identified by the residents will be researched further by UCI staff using the Hamilton County Auditor and Cincinnati Area Geographic Information System (CAGIS) websites. Once a list is compiled, the EC will work with UCI staff to create an evaluation ranking tool to determine, with the help of residents, the order in which the sites will be addressed.
- ii. *Anticipated Project Schedule:* Community meeting held in 1st quarter will continue the preliminary inventory process that began with this application. Evaluation ranking process begins 2nd quarter.
- iii. | Task/Activity Lead: Franz Stansbury, Director, Real Estate, Brownfield Project Manager
- iv. | Outputs: Evaluation Ranking Tool, Site Inventory List

Task 3: Assessment

- i. *Project Implementation:* The EC will conduct Environmental Site Assessment (ESA) activities at sites selected and ranked through the Site Inventory Task, starting first with the two priority sites listed in this application. ASTM-AAI compliant Phase Is; Generic Quality Assurance Project Plan (QAPP); Phase IIs which will include the SS-QAPP. Prior to assessment, site access agreements and property eligibility determinations approval will be obtained.
- ii. Anticipated Project Schedule: Assessment activities begin 2nd quarter and continue throughout the grant.
- iii. *Task/Activity Lead:* The EC will implement the technical aspects of the project with oversight from UCI: Franz Stansbury, Director, Real Estate, Brownfield Project Manager
- iv. Outputs: 8 Phase I ESAs, 1 Generic QAPP, 4 Phase II ESAs including SS-QAPP, Site Access Agreements and Property Eligibility Determinations.

Task 4: Remediation/Reuse Planning

- i. *Project Implementation:* For projects identified for cleanup, the EC will prepare the Analysis for Brownfields Cleanup Alternatives (ABCA) and/or Cleanup Plans to remediate the site to Ohio EPA Voluntary Action Program standards specific to the applicable potential exposures. Cleanup planning will include evaluating cleanup alternatives, calculating cleanup costs and determining site-appropriate remediation/reuse planning to reduce health/environmental risks. The EC will assist UCI in hosting charrettes/visioning sessions to be held for key properties.
- ii. Anticipated Project Schedule: Plans & Charrettes begin 6th quarter and continue throughout the grant project.
- iii. *Task/Activity Lead:* The EC will implement the technical aspects of the project with oversight from UCI: Franz Stansbury, Director, Real Estate, Brownfield Project Manager
- iv. | Outputs: 3 ABCAs, 2 Vision Sessions/Charrettes

Task 5: Cleanup

i. *Project Implementation:* UCI's Brownfields Project Manager will oversee the environmental consultant as they manage the proposed site cleanup activities including contractor mobilization, cleanup implementation, contractor oversight, confirmation sampling, and cleanup reporting.



- ii. Anticipated Project Schedule: Remediation to begin 3rd quarter of 2025 and be complete by the end of 2025. Assessment and remediation of additional sites to be complete 2nd quarter 2029.
- iii. *Task/Activity Lead:* The EC will handle the technical aspects of the project with oversight from UCI: Franz Stansbury, Director, Real Estate, Brownfield Project Manager
- iv. | Outputs: 1 site ready for reuse, 8 remediation jobs created (annualized), 1 cleanup reports

Task 6: Programmatic Support

- i. *Project Implementation:* UCI will procure an EC to assist with the project. UCI's Brownfields Project Director and Manager oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule and terms and conditions. The EC will assist UCI in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the five-year term of the grant. UCI staff travel budget allows for one staff to attend three national/regional/grantee brownfield training conferences/workshops.
- ii. Anticipated Project Schedule: ACRES Reporting begins in the 1st quarter, and Quarterly Reporting begins in the 2nd quarter and continues throughout the grant project. Annual Reporting and Forms created in the 5th, 9th, 19th, and 16th quarters, and during final closeout.
- iii. *Task/Activity Lead:* UCI: Beth A. Robinson, President & CEO, Brownfield Project Manager/Director and Franz Stansbury, Director, Real Estate, Brownfield Project Manager
- iv. *Outputs:* ACRES Database Reporting, 5 Annual Financial Reports, 20 Quarterly Reports, 5 MBE/WBE Forms, Programmatic Support for the five-year grant period. One staff to attend three conferences.

b. Cost Estimates: Below are the anticipated cost estimates for this project based on past Brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks. The budget for this project includes travel, supplies, and contractual costs only. Ninety-nine percent (99%) of the budget will be spent on site-specific work through the Assessment and Cleanup Task, with 78% spent on remediation of the priority site. Task 1 Outreach: Contractual: Community Involvement Plan \$3,000 (24 hrs x \$125); Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$3,000 (24 hrs x \$125); 9 Community Education Meetings \$10,800 (10 hrs x \$120; \$1,200/meeting). Supplies: Outreach Supplies (software, printouts, etc.) \$1,700. Task 2 Site Inventory: Contractual: \$10,000 (80 hrs x \$125). Task 3 Assessment: Contractual: 8 Phase I ESAs \$3,500 each for a total of \$28,000; 1 Generic QAPP \$5,500; 4 Phase II ESAs including SS-QAPP at \$25,000 each for a total of \$100,000. Task 4 Remediation/Reuse Planning: Contractual: 3 ABCAs \$5,500 for a total of \$16,500; 2 Vision Sessions/Charrettes \$5,000 (\$2,500/meeting). Task 5 Cleanup Construction: Excavation/transport/disposal of estimated 5,000 tons of impacted soil \$700,000 (Excavation \$15/ton; Transportation & Disposal \$80/ton; Backfill \$45/ton); Contractual: Professional Oversight \$58,500; Confirmation Sampling Analyses \$18,000; Remediation Report \$8,000.

Task 6 Programmatic Support: Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the five-year grant period \$26,000 (200 hrs x \$130). <u>Travel</u>: One staff to attend three conferences \$6,000 (3 flights at \$800, 9 nights (hotel) at \$300 each, 9 per diem/incidentals at \$100).

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Category	Tasks					Totals	
	Outreach	Site Inventory	Assessment	Planning	Cleanup	Programmatic Support	1 Otals
Travel						\$6,000	\$6,000
Supplies	\$1,700						\$1,700
Contractual	\$16,800	\$10,000	\$133,500	\$21,500	\$84,500	\$26,000	\$292,300
Construction					\$700,000		\$700,000
Total Budget	\$18,500	\$10,000	\$133,500	\$21,500	\$784,500	\$32,000	\$1,000,000



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

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Capacity, ii. Organizational Structure, & iii. Description of Key Staff: Uptown Consortium, Inc.'s (UCI's) management of the grant will be by a team experienced in successfully managing federal- and state-funded grants. The team identified below and their supporting staff are more than adequate to successfully implement the Brownfields Multipurpose Grant. UCI is a 501(c)(3) organization with a board of directors including representatives from Cincinnati Children's Hospital Medical Center, the Cincinnati Zoo and Botanical Garden, the University of Cincinnati, and UC Health. Beth A. Robinson, President & CEO, will serve as the **Brownfield Project Director**. Ms. Robinson leads UCI's efforts, including financing, real estate development, and advocacy. She has more than 20 years of experience in community and economic development, specializing in neighborhood revitalization, development financing, and business attraction/retention. Beth is a Certified Economic Developer (CEcD) and a Certified Economic Development Finance Professional. Since joining UCI in 2009, Beth has leveraged the anchor institutions' assets and ecosystem to invest more than \$250 million in Uptown real estate and economic development projects including over \$2 billion in investment. During Beth's tenure, local media have called the changes in Uptown a "renaissance," and UCI received an Excellence in Economic Development Award from the International Economic Development Council. Mr. Franz Stansbury, Director of Real Estate Development, has been with UCI since 2006 and will serve as the Brownfield Project Manager. As an experienced professional with 45 years in real estate development, construction, development management, operations, urban planning, and design, he has proven abilities in the development and management of both large and small projects. Mr. Stansbury oversees the management and financial conditions of UCI's real estate. He facilitates implementation of all real estate development projects and investments with special projects, interaction with community development corporations, and developers. He has an intimate interest in the development of brownfield sites. Mr. Stansbury will provide support for community and economic development projects, including conducting research, budget tracking, community outreach, local business outreach, and marketing and will assist Ms. Robinson with all elements of Brownfields Grant implementation to ensure the successful execution of the Brownfields Grant. Mr. Rick Lopez, UCI's Director of Finance and Accounting since 2020, will serve as the Brownfield Finance Director. Mr. Lopez has over 25 years of in-depth experience in higher education, commercial real estate, construction, hospitality, and nonprofit organizations with extensive knowledge of debt and public bonding, compliance, fund accounting, and grants administration. Rick has been a



compliance auditor for nonprofit organizations and government- and state-funded higher education organizations. As Director of Finance and Accounting, he oversees accounting, grant administration, collections, internal audit, risk management, and purchasing as well as the preparation of the annual financial statements and budget expenditures. Mr. Lopez will be responsible for managing the finances and drawdowns through ASAP.gov for this EPA Grant project. A qualified environmental contractor will assist with the technical portions of the project iv. Acquiring Additional Resources Using local contracting requirements and procurement process, UCI will procure a qualified environmental contractor to assist with technical and reporting portions of the Multipurpose Grant, in addition to any other contractors needed to complete the project. UCI will ensure compliance with the EPA's "Professional Service" procurement process. UCI has specific goals for inclusion of Minority Business Enterprise (MBE) and Women Business Enterprise (WBE) in agreements with project sponsors and employs a handson, supportive approach to ensure goals are reached. Those goals include MBE participation >25%, WBE participation >6%, investment by minority and women investor groups >10%, and workforce diversity goals of 12% for minority men and 6% for minority women. Whereas traditional inclusion efforts focus on construction opportunities that are short-term in nature, UCI focuses on finding MBE and WBE opportunities throughout the development process—preconstruction, construction, and post-construction to provide long-term opportunities. All developers who work with UCI sign Community Benefits Agreements (CBAs) with goals for MBE, WBE and Uptown resident inclusion. UCI engages WEB Ventures to identify and grow support for the effort by connecting companies with opportunities and leveraging workforce development programs to prepare Uptown residents for employment within Uptown. UCI uses a structured robust vetting process for obtaining contract services from established companies recommended by their members and partners and WEB.

- b. Past Performance and Accomplishments ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (1) Purpose and Accomplishments: UCI has received and managed \$195M in grants (2011, 2015, 2021 and 2022) from the Community Development Financial Institutions Fund (federal) for Federal New Markets Tax Credits (NMTCs) used to incentivize investment in low-income Uptown communities. The incentives were used for 16 projects throughout Uptown generating 600+ housing units, 2,800+ jobs and to service to 150,000+ patients annually. The funds redeveloped vacant and underutilized property with the development of a 41,000 SF emergency department expansion, 180,000 SF research institution, a mixed-use town center with housing and 75,000 SF of commercial space, a 114,000 SF neurological institute, specialized services in two other healthcare institutions offering care to Uptown's low-income communities, a 73,000 SF grocery store, a community hub offering social services, business district revitalization, a 132-room hotel, new housing options anchored with new storefronts offering goods and services, a 1.56 MW solar canopy, anchor office buildings bringing new jobs, and 16 single -family townhomes. All grants were successfully implemented fully in full compliance with requirements, all deadlines were met, and all goals were accomplished.
- (2) <u>Compliance with Grant Requirements</u> UCI has a history of full compliance with all grant work plans, schedules, terms and conditions, and timely reporting as required by the awarding agencies. Uptown is actively managing multiple grants and monitoring progress to ensure compliance with schedules, financial, and reporting requirements. Mr. Stansbury is skilled in project management and is personally monitoring all grant activities to ensure compliance with all financial reporting requirements.



FY24 Brownfields Multipurpose Grant Threshold Criteria

UCI UPTOWN CONSORTIUM, INC.

Uptown Consortium, Inc., OH FY2024 US EPA Brownfields Multipurpose Threshold Criteria

Threshold Criteria

1. Applicant Eligibility

- a. Uptown Consortium, Inc. (UCI) is a tax-exempt, nonprofit 501(c)(3) organization incorporated in the state of Ohio (Employer Identification Number 20-0688727). A copy of the articles of incorporation is provided as an attachment.
- b. UCI is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Community Involvement

Since planning began for the Innovation District, UCI and its development partners regularly host open house events for residents to learn about development plans, connect with developers, and provide feedback. UCI also created several committees that include neighborhood leaders, representatives from the Uptown anchor institutions, and other partners to help guide planning and development efforts. UCI has been engaging the community via public education, outreach, and distributing educational materials as well as involvement in reuse plans for over a decade. UCI will continue to hold public meetings to educate and acquire community feedback from the citizens and businesses. UCI plans to conduct regular community meetings within the target-area community. Community meetings will educate residents, project partners, local organizations, and the underserved sensitive populations of the target area about the priority site and brownfield activities in the target area. As UCI receives comments, concerns, or additional sites from targetarea residents, the Brownfield Program Team will review all information gathered at these public meetings and respond to individuals within two weeks of receipt. UCI will continue to provide regular updates regarding the process of assessment, cleanup, and redevelopment of the site(s) at various meetings with Avondale Development Corporation (ADC), Avondale Community Council (ACC), Avondale Business Association (ABA), and Short Vine Association (SVA). Important information will be included in the ADC monthly newsletter "Uptown Update." Social media, the UCI website, and the regional newspaper will also be used for frequent updates and reporting on the status of the Brownfields Program's progress. A Community Involvement Plan will be developed for this Multipurpose Grant. If extenuating circumstances dictate, the meetings may be held remotely and broadcast, with community input being gathered via email or phone.

3. Target Area

Target Area: Uptown Innovation Corridor Census Tract 39061027000

4. Affirmation of Brownfield Site Ownership

UCI owns the priority site for remediation as well as other parcels in the target area (sole owner) and affirms that the priority site meets the CERCLA § 101(39) definition of a brownfield.

UCI affirms that the priority site and other sites owned by UCI in the target are:

- 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.



Uptown Consortium, Inc., OH FY2024 US EPA Brownfields Multipurpose Threshold Criteria

5. Use of Grant Funds

The Multipurpose Grant will be used to conduct community outreach, brownfields inventory and prioritization, environmental assessments (Phase I & II ESA), remediation/reuse planning, priority site cleanup, and programmatic support.

It is anticipated the following will be completed during this grant project:

- Four (4) Phase II Property Assessments (P2PAs) following the Ohio EPA's Voluntary Action Program (VAP) standards pages 9, 10
- One (1) priority site cleanup page 10
- UCI has redevelopment plans for the revitalization of the target area, which includes a feasible reuse strategy for both priority sites. page 3

6. Expenditure of Existing Grant Funds

UCI affirms that it does not have an open EPA Brownfields Multipurpose Grant or Assessment Grant.

7. Contractors and Named Subrecipients

Not Applicable.