

November 9, 2023

EPA Region 6
Attn: Paul Johnson
1201 Elm Street
Dallas, TX 75270-2162

RO6-24-A-009

Dear Mr. Johnson:

Oklahoma City's proposal for a Brownfields Assessment Grant is enclosed. This proposal requests \$500,000 for assessments.

1. **Applicant Identification:**

City of Oklahoma City
420 West Main, 9th Floor
Oklahoma City, OK 73102

2. **Funding Requested:**

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

3. **Location:** This proposal would serve the City of Oklahoma City, Oklahoma County, Oklahoma

4. **Target Area and Priority Site Information:** Not Applicable

The target area for this proposal is the Oklahoma City **Neighborhood Revitalization Strategy Area (NRSA)**. The NRSA is a designated area in our central city core approved by the U.S. Department of Housing and Urban Development (HUD) as a distressed area worthy of special focus for reinvestment of human and economic capital and creating opportunities to empower low-income residents. Census Tract 1004, 1005, 1010, 1011, 1012, 1013, 1014, 1015, 1019, 1024, 1025, 1032, 1033, 1039, 1041, 1042, 1043, 1044, 1046, 1047, 1048, 1049, 1053, 1056, 1070.01, 1070.02, 1073.05, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 9800.05, 9800.06, 9800.07, 9800.08, 9800.09.

Address of the priority site(s)

1. NE 8th & Lincoln: This 3.8-acre site located at 616 NE 8th Street, Oklahoma City, OK 73104
2. NE 7th & Laird: This 1.7-acre site located at 808 NE 7th Street, Oklahoma City, OK 73104
3. NE 23rd & Martin Luther King: This 11.4-acre site located at 201 NE 23rd Street, Oklahoma City, OK 73111
4. C2S Salvage Yard: This 1.5-acre salvage yard located at 1300 S Robinson, Oklahoma City, OK 731105
5. SW 14th & Harvey: This .43-acre site located at 1509 S. Harvey, Oklahoma City, OK 731109



The City of
OKLAHOMA CITY
 PLANNING DEPARTMENT

5. Contact

- a. Project Director:
 Amanda Alewine
 420 West Main Street, 9th Floor
 Oklahoma City, OK 73102
 E-mail: amanda.alewine@okc.gov
 Phone: 405-297-1766;
- b. Chief Executive Officer:
 David Holt, Mayor
 200 North Walker Avenue
 Oklahoma City, OK 73102
 E-mail: mayor@okc.gov
 Phone: 405-297-2424;

6. Population - Oklahoma City: 694,800 (2022)

7. Other Factor Checklist –

Factor	Page #
Community population is 10,000 or less.	
The applicant is, or will assist a federally designated Indian tribe or United States territory.	
The priority site(s) is impacted by mine-scarred land	
The priority area is adjacent to a body of water	
The priority site is in a federally designated flood plain	3
The reuse of the priority site will facilitate renewable energy from wind, solar or geothermal/	
The reuse of the priority site will incorporate energy efficiency measures	
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	9
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.	

8. State Letter: See Attachment

9. Releasing Copies of Applications – No portion of this application is confidential

Sincerely,

Amanda Alewine
 Planning Department
 City of Oklahoma City

October 31, 2023

Ms. Amanda Alewine
Oklahoma City Planning Department
420 West Main Street, Suite 900
Oklahoma City, Oklahoma 73102

Re: State of Oklahoma Acknowledgement Letter – City of Oklahoma City Community-Wide Assessment Grant Application, Fiscal Year 2024

Dear Ms. Alewine:

The Oklahoma Department of Environmental Quality (DEQ) acknowledges and supports the City of Oklahoma City's (City) application for a United States Environmental Protection Agency's Community-Wide Assessment Grant for Fiscal Year 2024.

It is DEQ's understanding that the Community-Wide Assessment Grant will assist the City in conducting assessment activities within the Neighborhood Revitalization Strategy Area (NRSA). The NRSA includes: the South of 8th Street (SO8th) Plan Area, the Core to Shore (C2S) Plan Area and the 23rd and Martin Luther King (23rd and MLK) Corridor. DEQ has successfully collaborated with the City on several projects resulting in positive impacts on the community.

DEQ encourages the voluntary cleanup and reuse of contaminated properties and DEQ is dedicated to providing the City with technical assistance, as needed. If you have any questions, please contact Kasie Stambaugh at (405) 702-5164 or kasie.stambaugh@deq.ok.gov.

Sincerely,



Kelly Dixon
Division Director
Land Protection Division
Oklahoma Department of Environmental Quality

The Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION (40 Points)

1. a. Target Area and Brownfields (20 points)

1. a.i. Overview of Brownfields Challenges and Descriptions of Target Area (5 points)

Description of Target Area: The target area (TA) for this proposal is the Oklahoma City (the City or OKC) **Neighborhood Revitalization Strategy Area (NRSA)**. The NRSA TA includes the following 40 Census Tracts: 1004, 1005, 1010–1015, 1019, 1024, 1025, 1032, 1033, 1039, 1041–1044, 1046–1049 1053, 1056, 1070.01, 1070.02, 1073.05, 1093–1100, 9800.05, 9800.06, 9800.07, 9800.08, 9800.09. **The NRSA** is a designated area approved by the United States Department of Housing and Urban Development (HUD) as a distressed area worthy of special focus for reinvesting in human and economic capital to create opportunities that empower low-income residents. NRSA boundaries were established in 2002 through an intensive resident participation process. Within the wider NRSA TA, the City has engaged the community in numerous Plan Areas for revitalization, specifically the South of 8th Street (SO8th) Plan Area, the Core to Shore (C2S) Plan Area, and the 23rd and Martin Luther King (23rd and MLK) Corridor, all of which include high priority sites for brownfields assessment and redevelopment.

Challenges of Target Area: The NRSA's industrial history of oil and gas production, as well as chemical storage, illicit dumping, and salvage operations, has often been a stark contrast to its low-income and minority residential neighborhoods. The NRSA lies within the old OKC oilfield, and, according to the Oklahoma Corporation Commission (OCC), 155 wells are located within the NRSA that could still pose hazards. Contaminants found in NSRA soils include petroleum hydrocarbons, metals, acid sludges, semivolatile compounds, and animal carcass pits. These releases have rendered the groundwater **unusable**.

Vacancy, blight, environmental challenges, and economic disadvantage in the NRSA neighborhoods were exacerbated by the historic location of two major highways: Interstates 40 (I-40) and 235 (I-235). In 1964, I-40 was built as an elevated interstate through the NRSA's center, bisecting OKC north to south. The neighborhoods south of I-40, cut off from downtown, began to decay and were deemed blighted in 2010. In 1989, I-235 opened and divided the NRSA east to west, heavily **impacting** the historically Black part of the city. While these neighborhoods continued to decline, industrial uses (such as automotive facilities, salvage yards, large production facilities, and dry cleaners) invaded the area, creating an undesirable mix of low-income residential spaces next to industrial land uses.

The NRSA faces poverty, housing, employment, and infrastructure challenges, and its average household income is only 51.7% of the national median. Of the NRSA's more than 18,000 acres of land, more than 76% of the area consists of disadvantaged communities, according to the Climate and Economic Justice Screening Tool (CEJST). The area is continually faced with obstacles related to environmental justice (EJ) and disinvestment in the community.

How This Grant Will Help: This funding will identify contaminated sites and fund community involvement through site reuse and cleanup planning to convert brownfield sites into productive assets. Assessment dollars will support *inclusive development* in the NRSA, connecting existing community planning efforts to implementation and reuse of key properties in disadvantaged and underserved areas.

1.a.ii. Description of the Priority Brownfields Sites (10 points)

The following priority sites were identified within the NRSA TA due to their importance in revitalization Plan Areas, community input, and the potential for contamination to diminish redevelopment efforts.

SO8th Plan Area Priority Sites (Identified as disadvantaged by CJEST)

1. SO8th Plan Area—NE 8th & Lincoln: This 3.8-acre site is comprised of 3 parcels. It has an active oil well and a saltwater pipeline on-site. This key entry point to the SO8th planning area is challenging. The site is owned by OCURA who is currently investigating redevelopment options.

2. SO8th Plan Area—NE 7th & Laird: This 1.7-acre site is comprised of 12 parcels. A 2009 limited subsurface investigation identified a release of fuel product and solvents. An updated assessment will be needed prior to redevelopment. This site would be ideal for mixed use redevelopment.

23rd and MLK Corridor Priority Sites (Identified as disadvantaged by CJEST)

3. NE Corner of NE 23rd & Martin Luther King: a 11.4-acre site in the NEOKC Community across the street from the future Clara Luper Civil Rights Center. It was acquired on February 2, 2023, by OCURA. Multiple Recognized Environmental Conditions' were identified and must be investigated further. Funds will be used to engage the community in site reuse and planning and additional site assessments.

Core to Shore Plan Area Priority Sites (Identified as disadvantaged by CJEST)

4. C2S Salvage Yard: This 1.5-acre salvage yard caught fire in 2022. The owners have listed the site for sale. The Brownfields Program has spoken with the realtor to assist potential purchasers with site assessments to redevelop this key site that is across from Scissortail Park. The C2S Plan calls for Live/work and rental units.

5. C2S SW 14th & Harvey: This .43-acre site planned for mixed use is west of Scissortail Park. The Phase I Environmental Site Assessment (ESA) identified underground storage tanks and called for a Phase II ESA.

1.a.iii. Identifying Additional Sites (5 points)

Additional sites for eligible activities within the NRSA will be identified through input from the Citizens Committee for Community Development meetings and area plan community outreach, as well as by partnering with OCURA as they identify community needs, work with the development community, and request development proposals for publicly owned sites. The Brownfields Program will prioritize sites based on alignment with community plans, the redevelopment potential of the site, and the redevelopment's benefit to disadvantaged and underserved communities (identified as disadvantaged census tracts in the CEJST and the Environmental Justice Screening Tool (EJScreen).

1.b. Revitalization of the Target Area (10 points)**1.b.i. Reuse Strategy and Alignment with Revitalization Plans (5 points)**

OKC's Brownfields Program is in the Planning Department, and projects fall within wider community planning efforts. Community stakeholders have been actively involved in these efforts since the 1990's, which includes the following:

23rd and MLK Corridor: The **NE Corner of NE 23rd & Martin Luther King** site is in the heart of the redevelopment efforts in this corridor. The Stronger Neighborhoods initiative (SNI) identified the Martin Luther King neighborhood just west of this site as one of three SNI neighborhoods. SNI staff work alongside neighborhood residents, local stakeholders, community partners, and various city departments to implement revitalization strategies specific to each neighborhood. Brownfields staff attends planning meetings and will build off the momentum of this neighborhood to redevelop this site.

SO8th Area Plan: The SO8th Area Plan focuses on redeveloping the NEOKC area south of 8th Street. This area was once a vibrant cultural hub, centered around the deeply connected roots of Black educators and activists, which now needs revitalization. OCURA collaborated with Open Design Collective, business owners, and residents to create a vision for the area—a first step in the process of redeveloping a neighborhood and relationship-building. OCURA owns multiple parcels in this area that are identified for future requests for proposals (RFPs) including the **NE 8th & Lincoln** and the **NE 7th & Laird** sites. Over the next 5 years, the

Brownfields Program will support this community plan by providing assessments and reuse planning to developers responding to these RFPs. The RFPs will focus on community needs such as increased mixed use, expanding housing supply and commercial space identified through this plan.

Core to Shore (C2S) Plan (2008): The C2S Plan included a citizen’s steering committee that met monthly, and the public process included targeted task forces, workshops, and multiple public meetings. The plan calls for major civic improvements and private mixed-use development, linking the traditional City center to the Oklahoma River, redeveloping the C2S riverfront. Assessment activities are critical to support safe redevelopment, as prior studies in the area documented contamination resulting from historical uses. Over 29% of the C2S is a federally designated floodplain, which requires sustainable flood mitigation. New development is expected to occur proximate to the Oklahoma River. Key sites identified in this area include **C2S Salvage Yard** and the **C2S SW 14th & Harvey**.

2010–2020 *planokc* (OKC’s comprehensive plan adopted July 2015): Public engagement included 80+ public meetings, 20,000+ participants, 23 school districts, 8 component stakeholder groups, city staff working groups, a Healthy Communities Oversight Group, focus groups, and a Citizens’ Advisory Team to maximize community involvement. The plan is a shared vision for the future of the City and is a policy document used by City leaders, developers, business owners, and residents to make decisions about future growth, development, policy, and capital improvements. The City adopted *planokc* in 2015, and *planokc* added “**preserveokc**,” the first Citywide historic preservation plan, and “**adaptokc**,” its first sustainability plan, in 2020. **Adaptokc** aims to accomplish the following:

- Reduce electricity costs with increased efficiency and renewable energy use.
- Mitigate heat through development requirements and more natural urban environments.
- Reduce emissions that threaten health and economy.
- Protect and conserve water resources.
- Enhance the equitable approach to disaster recovery and response.
- Strengthen infrastructure against extreme weather and increasing costs.

Northeast Renaissance Redevelopment Project Plan (2015): This plan was developed to reduce and eliminate blight conditions, reverse economic stagnation, create new employment opportunities and growth, create new businesses, and stimulate the rehabilitation and preservation of historically or architecturally significant structures with an established historic value along NE 23rd, NE 36th, and NE 16th. The **NE Corner of NE 23rd & Martin Luther King** site falls within this plan area.

The redevelopment strategy in the NRSA involves infill in NEOKC along with connecting the core of downtown OKC to the shore of the Oklahoma River. Urban design and planning efforts are community-led to address historical inequities. The priority projects identified in this proposal, along with other sites in the NRSA, are consistent with local plans and will advance infill development.

1.b.ii. Outcomes and Benefits of Reuse Strategy (5 points)

The TA is in an urban community and supports existing revitalization plans and the United States Environmental Protection Agency’s (EPA’s) Strategic Plan Goal 6, safeguard and revitalize the NRSA community, Objective 6.1, clean up and restore land for productive uses.

Redeveloping vacant sites increases density, results in increased property tax revenue (over 57% of which goes to public schools), provides jobs, and reduces crime. Redevelopment will support projects that incorporate green infrastructure and low impact developments to manage stormwater, reduce urban heat island effects, and reduce the risk of flooding. Community engagement will be assisted by the Office of Sustainability, providing community education on climate adaptation strategies to enhance local resilience.

SO8th Plan Area: Staff identified the **NE 8th & Lincoln** and the **NE 7th & Laird** sites for infill and will support the SO8th Plan in a coordinated strategy for cleanup and remediation of environmental challenges. The SO8th Plan calls for multiple parks and greenways that these sites will support. Reuse planning will incorporate energy efficiency measures.

NE 23rd & MLK Street Corridor: The **NE Corner of NE 23rd & Martin Luther King** site is in the heart of this corridor. The Brownfields Program has been working with sites in this area that are connected with infrastructure, economic, social, and environmental conditions with significant success and plans to continue an area-wide approach with this funding to restore economic vitality. The Office of Sustainability will participate with the **adaptokc** plan to improve climate adaptation/mitigation capacity and resilience.

C2S Riverfront Redevelopment: The Brownfields Program intends to assist private developments including the **C2S Salvage Yard** and the **C2S SW 14th & Harvey** in the previously heavy industrial area around the 70-acre Scissortail Park, completed September 23rd, 2022, that connects the core of downtown to the shore of the Oklahoma River. The park and riverfront provide those who live nearby opportunities for walking/biking/running trails and outdoor recreation to promote a healthy lifestyle. Developing mixed-income housing will be key in revitalizing this area. Benefits will include an increased number of blended affordable and market-rate housing units around the Oklahoma River, Downtown Public Park, and streetcar route that opened in 2018. Supporting projects around transit options, residents will have options to reduce car trips, **which supports energy efficiency, improves air quality, and lowers household expenses.**

These projects and area plans are designed to improve quality of life for OKC's residents, repair historic injustices that occurred due to highway construction, and act as economic drivers. They encourage a healthy lifestyle and reduce the cost of transportation by promoting reduced reliance on vehicles. Options for healthier lifestyles is important, as residents suffer from high rates of obesity (over 39.4% of Oklahoma adults and 18.7% of 10-to-17-year-olds were obese in 2022 (ref. *The State of Obesity*). Alternate transportation modes benefit public health in improving air quality by reducing ground-level ozone-forming emissions.

1.c. Strategy for Leveraging Resources (10 points)

1.c.i. Resources Needed for Site Reuse (5 points)

These assessment funds will determine the nature and extent of existing contamination on TA sites and enable cleanup and reuse planning. Staff project \$500,000 will cover the ESA costs; if assessment costs exceed \$500,000, staff will contact EPA for a targeted brownfields assessment.

This funding will stimulate the \$3.7M open 2022 Brownfields RLF for cleanup costs. Staff will continue to work with the City's CDBG, HOME funding to leverage funds in efforts to increase the inventory and diversity of affordable housing. All priority sites identified are located in **Tax Increment Finance districts (TIFs)**. TIFs allow cities to use a portion of property taxes generated within the district to invest in the district's infrastructure, providing an incentive for private investment. The City has a variety of public funding resources in combination with private equity, conventional financing, tax credits, and other instruments potentially available to leverage assessment grant funding and facilitate reuse of Brownfields sites in the NRSA. Specifically, the following leveraged resources may support City brownfields projects:

- New Market Tax Credits
- Community Development Block Grants
- Private Foundation Grants (Reynolds Foundation, Magic Johnson Foundation)
- Section 108, Small Business, and Economic Development Administration Loans
- Fixing America's Surface Transportation Act funds and Department of Transportation grants
- Capital Improvement Program/General Obligation (GO) bond financing for public improvements projects, which support private development
- Property Assessed Clean Energy financing

1.c.ii. Use of Existing Infrastructure (5 points)

The work under this grant will facilitate the use of existing infrastructure. The aging, but sufficient, infrastructure exists, including utilities, historic buildings, and streets. The City is experienced with leveraging TIF programs, GO Bonds, and dedicated sales tax to fund infrastructure improvements for streets, drainage, and park/recreational green space improvements to support redevelopment. Multiple bike trails and sidewalks funded through the City’s MAPS 4 penny sales tax are planned for the TA. Several multimodal enhancement projects (Legacy Trail, 4th Street and 8th Street in the SO8th Plan Area) and park improvements (Washington Park in 23rd and MLK Corridor) along with street enhancements on NE 23rd are planned for future funding initiatives. The City is dedicated to promoting sustainable redevelopment and infill. The reuse of existing infrastructure along existing trails and transportation corridors, is an incentive to attract development.

2.a. Community Need (25 points)

2.a.i. The Community’s Need for Funding (5 points)

CJEST identified 76.32% of the NRSA as disadvantaged. The NRSA’s sustained poverty and historic disinvestment for decades has resulted in long-term vacancies and blight. This lack of investment creates an inability to draw on other initial sources of funds to carry out environmental assessment and is compounded by the low income of the residents. NRSA residents have a median income of \$36,045.48, just above half of the national income average (US Census). **The NRSA sustains a poverty level of 27.2%, 2.5 times more than the national average (US Census).** While planning initiatives and other City programs continue to try to bridge the gap for NRSA communities, this grant will provide an important catalyst to implementation and redevelopment for brownfields properties, as well as assessing and remediating sites before redevelopment.

2.a.ii. Threats to Sensitive Populations (20 points)

(1) Health and Welfare of Sensitive Populations (5 points)

The NRSA includes sensitive populations of children, pregnant women, minority and low-income communities. The Supplemental Demographic Index, from the EJScreen, combines the demographics of the area for Low Income, Unemployment, Limited English Proficiency, Less than High School Education & Low Life Expectancy. **All of the identified priority site areas are at or above the 70 percentile for representation of sensitive populations** (Supplemental Demographic Index) according to EJScreen (see table).

EJScreen. Supplemental Demographic Index for Priority Sites	
NE Corner NE 23rd & Martin Luther King	70%
NE 8th & Lincoln & NE 7th & Laird	83%
C2S Salvage Yard & C2S SW 14th & Harvey	82%

Brownfields sites left abandoned present a physical danger and social cost to the community. EJScreen ranks the NRSA nationally in the 93rd percentile for particulate matter 2.5, 75th in ozone, and 95th in diesel particulate matter. Residents also live in close proximity to hazardous waste facilities.

This grant will facilitate assessments to identify contamination and create remediation plans to spur revitalization, as well as engage the community to gain insights on health concerns and desired outcomes from reuse of sites and reduce health threats to the community.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 points)

The NRSA has a disparate number of incidences of disease and adverse health conditions compared to the City and the US overall, as shown in the chart below. These sensitive populations face health and wellness issues that are exacerbated by the prevalence of brownfields sites.

Priority Sites	Asthma	Diabetes	Heart Disease	Low Income
NE Corner NE 23rd & Martin Luther King	95 th	96 th	92 nd	70 th
NE 8th & Lincoln & NE 7th & Laird	90 th	93 rd	74 th	78 th
C2S Salvage Yard & C2S SW 14th & Harvey	86 th	97 th	95 th	97 th

People in the NRSA are among the most vulnerable for exposure to environmental risk indicators affecting EJ populations The SO8th Plan Area, in Census Tract 1097 in NEOKC, ranks in the 93rd percentile for people with diabetes and the 78th percentile for low-income households. The C2S Plan Area, in Census Tract 9800.09, ranks in the 99th percentile for low-income households, 96th percentile for people suffering from asthma, the 98th percentile for people with diabetes, and 99th in percentile for people with heart disease. Overall, all but three of the NRSA census tracts score higher than 0.75 for Environmental Justice Index Rank (EJI), with most scoring above 0.80 EJI Rank (EJI Explorer Tool from the Center for Disease Control and Agency for Toxic Substances and Disease Registry). This indicates that most of census tracts in the nation experience less severe cumulative impacts on health and well-being than the NRSA census tracts. **This grant will facilitate the identification of existing contamination and create cleanup plans that will reduce exposure which are threats to the identified vulnerable population.**

(3) Environmental Justice (10 points)

(3)(a) Identification of Environmental Justice Issues (5 points)

All the identified priority sites are located in the NRSA and are located in disadvantaged Census tracts according to CJEST data. The construction of I-235 and I-40 are key events that impacted and displaced EJ communities and continue to affect the NRSA TA. In addition, decades of redlining, disinvestment, and neglect in northeast Oklahoma City (23rd and MLK, SO8th Plan Area) has created disproportionate environmental and economic challenges for residents in this portion of the NRSA TA. Prior to the community's recent efforts (2017) to revitalize, no new development had occurred in this part of the TA in the previous 30 years (Eastpoint ULI Global Awards for Excellence Summary, 2021). Local residents have recent memories of urban renewal practices that displaced minority populations from longtime neighborhoods in downtown Oklahoma City and into closer proximity of hazardous facilities and oil fields.

These areas have persistent challenges with aging housing stock (lead-based paint), poor health outcomes (heart disease, diabetes and asthma), high energy costs, poverty (above the 90th percentile), and unemployment (above the 90th percentile) that disproportionately impact low income and minority populations (CEJST). The EJScreen shows that 67% of NRSA population consists of people of color.

(3)(b) Advancing Environmental Justice (5 points)

This grant will support the *implementation* of planning initiatives (SO8th, C2S, and 23rd and MLK) that have been developed with NRSA residents that plan for safe, equitable, and inclusive redevelopment. These plans advance strong neighborhood initiatives; a greater connectivity to jobs, education, and services; and engagement among neighborhood groups and partners in underserved communities. The Brownfields Program will work with community partners, like the Placekeepers Program, to increase minority-led development and homeownership at levels that offset the displacement that has historically been caused by gentrification. Assessment and cleanup at NRSA brownfields sites will not only reduce environmental harms, but also help replace them with infill development that is community serving-housing, greenspace, and business.

2.b.i. Project Involvement (5 points) & 2.b.ii. Project Roles (5 points)

Key community partners with the Brownfields Program’s redevelopment efforts are listed below:

Organization	Description/Role
Alliance for Economic Development of Oklahoma City <u>Point of Contact</u> Daisy Munoz daisy.munoz@theallianceokc.org (405) 474-4418	This local non-profit economic development agency is focused on working with the private sector on financing redevelopment projects. The Alliance will assist in identifying sites needing assessments for redevelopment and will integrate the Brownfields Program with development deals and public meetings in the NRSA. OCURA is managed by The Alliance.
Placekeepers (PK) Community Based Organization <u>Point of Contact</u> DeAndre Martin (405)637-8816 Neokc.org/placekeepers	PK is a real estate and business development program that empowers and equips residents and stakeholders of NEOKC. PK helps to overcome generations of EJ issues by engaging residents as real estate developers, business owners, and job creators through training and mentoring. PK works to increase Black-led development and homeownership at levels that offset gentrification. PK will be engaged in brownfields redevelopment opportunities in NEOKC (23rd and MLK and SO8th).
Community Action Agency of Oklahoma City and Oklahoma/Canadian Counties, Inc. <u>Point of Contact</u> Bonnie Schwartz Bschwartz@caaofokc.org (405) 232-0199 x 3205	Community Action Agency (CAA) is a grass roots agency that promotes self-sufficiency of socially, economically, and culturally disadvantaged residents. CAA addresses substance abuse, home repair, child-care, economic development, and home ownership. CAA will partner through education and direct assistance by identifying businesses seeking to acquire property in the NRSA and connecting them with the Brownfields staff. Small business loans are available through CAA to qualifying owner-operated businesses that locate on Brownfields sites.

2.b.iii. Incorporating Community Input (5 points)

City staff are available in person or via phone, online meeting and email (as alternatives to in-person meetings), to share information. The City will communicate project progress and prioritize engaging the community, sharing information, soliciting input and encourage stakeholder participation by the NRSA community. Staff participates in the **Citizens Committee for Community Development** meetings that provide project progress and solicit citizen input on the Community Development Programs the City manages affecting low and moderate income residents. Representatives from all eight wards of OKC attend this meeting. Additional efforts include participating in the following:

- Meetings with landowners and project partners
- City Council meetings
- Partner agency board meetings
- Neighborhood meetings
- Placekeepers conference
- SNI meetings

Staff distributes information by several means, including timely entering assessment results into EPA’s ACRES database. The information is then publicly available on EPA’s Cleanups in My Communities website. Project information is shared on the City’s website. Staff utilize the phone and online meeting that offer.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS (45 Points)

3.a. Description of Tasks/Activities and Outputs (25 points)

3.a.i. Project Implementation (10 points)

Task 1—Programmatic Support: City staff are now engaged in community outreach and negotiation of site access agreements and can initiate project activities upon issuance of a Cooperative Agreement.

Task 2—Phase I & II Environmental Site Assessments: Activities are anticipated at priority sites as well as other locations within the NRSA. After sites are selected and prioritized, staff will verify site eligibility. Phase I ESAs will be completed in conformance with EPA’s All Appropriate Inquiry regulation and current ASTM International standards. Based on the Phase I results, the City will select sites for Phase II ESAs. Site reports and progress will be tracked and recorded in the ACRES database. The cost assumes about 26 Phase I ESAs will be complete along with 5 Phase II ESAs. The City follows competitive procurement procedures adopted by City Council to hire environmental consultants to perform assessment work.

Task 3—Cleanup/Reuse Planning: Brownfields staff will participate in planning efforts for NRSA areas. Once assessments are complete, staff and the consultant will develop a use-based cleanup plan for an estimated three sites. Preparation of cleanup plans will be consistent with submittal requirements of the Oklahoma Department of Environmental Quality and/or OCC.

Task 4—Community Involvement: The City will include interested community residents, businesses, property owners, and stakeholders through all phases of project planning and implementation. Staff will track and measure site progress through the redevelopment process. Public communication will be accomplished with help from our community partners and through existing meetings and media.

3.a.ii. Anticipated Project Schedule (5 points)

Task 1—Programmatic Support: Cooperative Agreements negotiated August 2024 to October 2024. Contractors are selected and, if not satisfactory, we will advertise RFPs for environmental consulting and select a contractor in September 2024 to October 2024. Complete Generic Quality Assurance Project Plan for EPA approval November 2024.

Task 2—Phase I & II Environmental Site Assessments: Obtain Access Agreements Nov 2024—**Ongoing**. Verify site eligibility Dec 2024—**Ongoing**. Conduct Phase I ESAs Jan 2025—**Ongoing**. Conduct Phase II ESAs Feb 2025—**Ongoing**.

Task 3—Cleanup/Reuse Planning: Prepare focused, use-based cleanup plans October 2024—**Ongoing**.

Task 4—Community Involvement: Participate in community outreach forums October 2024—**Ongoing**.

3.a.iii. Task/Activity Lead (5 points)

City's staff along with selected consultants will lead on **Task 1–4, Programmatic Support, Phase I & II Environmental Site Assessments, Cleanup/Reuse Planning and Community Involvement.**

3.a.iv. Outputs (5 points)

Task 1—Programmatic Support: 16 Quarterly Reports

Task 2—Phase I & II Environmental Site Assessments: 26 Phase I ESAs and 5 Phase II ESAs

Task 3—Cleanup/Reuse Planning: 3 site cleanup plans

Task 4—Community Involvement: 26 sites added to BF inventory and 20 Community Meetings are planned.

All activities will be complete and cleanup plans in place by August 2028. The outputs will be documented in quarterly reports and all sites will be entered into ACRES and to capture the outcomes in **3.c.**

3.b. Cost Estimates (15 points)

Task 1—Programmatic Support (\$32,500): Staff time for programmatic support is estimated at 519 hours at \$37/hr. plus 25% fringe to be paid from the assessment grant; additional salary costs will be covered from the City’s General Fund. A portion of the funds will be used to offset costs for travel and education/training for staff to attend the National Brownfields Conference or other brownfields venues. \$1,600 is estimated for

supplies over 4 years for computer-related hardware, paper, ink, pens, and other miscellaneous office supplies. Staff has budgeted \$500 in the Other category for Covid protective efforts, filings fees, public notices, etc.

Task 2—Phase I & II Environmental Site Assessments (\$287,176): This budget estimates an average per site cost of \$3,000 - \$4,000 for the 26 Phase I ESAs and \$30k–\$40k for five Phase II ESAs.

Task 3—Cleanup/Reuse Planning (\$150,000): An estimated 30% of the budget including 2 staff for 400 hours at \$27-54/hr. plus 25% fringe to be paid from the assessment grant; additional salary costs will be covered from the City’s General Fund. Selected consultants’ expense is estimated at 500 hours at \$150/hr.

Task 4—Community Involvement (\$30,324): Staff for 518 hours at \$37/hr. plus 25% fringe is estimated to be paid from the assessment grant; additional salary costs will be covered from the City’s General Fund. The selected consultants’ expense is estimated at 35-40 hours at \$150/hr. Other \$500 is for Covid protective efforts.

	Budget Categories	Project Task 1	Project Task 2	Project Task 3	Project Task 4	Total
		Programmatic Support	Site Assessments	Cleanup/Reuse Planning	Community Involvement	
Direct Cost	Personnel	\$19,200		\$56,250	\$19,200	\$94,650
	Fringe	\$4,800	-	\$18,750	\$4,800	\$28,350
	Travel	\$6,400	-		-	\$6,400
	Supplies	\$1,600	-		-	\$1,600
	Equipment					
	Contractual	-	\$287,176	\$75,000	\$5,824	\$368,000
	Other	\$500			\$500	\$1,000
	Total Budget	\$32,500	\$287,176	\$150,000	\$30,324	\$500,000

3.c. Plan to Measure and Evaluate Environmental Progress and Results (5 points)

An EPA-approved work plan will guide project results. The City will evaluate progress based on milestones identified in the work plan to keep tasks on track for completion. The City will document Phase I and II ESAs, and cleanup plans funded by the grant and the number of sites that are successfully redeveloped. All outputs and outcomes will also be tracked in EPA’s ACRES system with quarterly reporting to EPA. We will also document community engagement events, planning, stakeholder meetings, jobs created, acres of greenspace created, improved outcomes for disadvantaged portions of our community, and the reuse of sites and structures. At the conclusion of the four-year grant period, a report summarizing the projects will be transmitted to EPA. In addition, the City also tracks assessment information in a City brownfields database and GIS.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (35 Points)

4.a. Programmatic Capability (20 points)

4.a.i. Organizational Capacity (5 points)

The City’s Brownfields Program has a Program Manager, Coordinator, Planner, and a Quality Assurance Manager dedicated to the Brownfields Program. The Planning Department has staff that manage approximately 66 federal grant awards. The City has successfully managed all EPA brownfields agreements since 1998.

4.a.ii. Organizational Structure (5 points)

The City’s Brownfields Program has been staffed and established since 2006 and brownfields staff are part of the Housing & Community Development Division of the Planning Department. Staff and personnel in the City Engineer’s office work closely with the brownfields staff and are responsible for the Quality Management Plan and quality assurance and quality control reviews. Brownfields Program staff also routinely interface with the Oklahoma regulators at the Oklahoma Department of Environmental Quality and the Oklahoma Corporation Commission brownfields staff.

4.a.iii. Description of Key Staff (5 points)

Chris Varga, Division Manager, has overseen the OKC Brownfields Program for 14 years. Mr. Varga has over 26 years of experience in managing assessment and remedial plans. Amanda Alewine, Brownfields Senior Planner has worked in Brownfields redevelopment for the past 14 years, in business/real estate development for over 20 years and is a certified Economic Development Finance Professional. Municipal legal counselors are engaged with this project, with municipal accountants responsible for all financial reporting.

4.a.iv. Acquiring Additional Resources (5 points)

The City contracts assessment activities to environmental firms with appropriate credentials, qualifications and expertise to do all required assessment and cleanup planning work. Firms are selected in compliance with the Competitive Procurement Standards in 40 CFR Part 31.36. The selected firms have local offices and include project team members/specialists from local minority-, native- and woman-owned firms.

4.b. Past Performance and Accomplishments (15 points)

4.b.i. Currently Has or Previously Received and EPA Brownfields Grant (15 points)

(1) Accomplishments (5 points) – This chart highlights the most recently closed and the two open EPA grants.

The City has received 5 RLF grants, 11 assessment grants, and 3 site-specific cleanup grants since 1998. **Over 379 parcels have been assessed through the City’s Brownfields Program, with 10 projects cleaned up utilizing RLF funds and many others remediated with private funds.** All redevelopment work is

OUTPUTS & OUTCOMES	2021 Assessment BF-01F99401 10/1/21 – 04/26/23	2018 RLF - BF- 01F48201 10/1/18-9/30/24	2022 RLF - 4B 02F21301-0 10/1/22 – 9/30/27
Quarterly Reports	6	16	4
Sites added to BF Inv.	38	6	0
Phase I Site Assessment	33	0	0
Phase II Site Assessment	10	0	0
ACM/LBP Surveys	2	0	0
Site Cleanup Plans	2	16	0
Community Meetings	2	7	3
Jobs Created	Not Yet Determined	445	Not Yet Determined
Funding Leveraged	Not Yet Determined	\$307,200,000	Not Yet Determined
Ready for Reuse	27 Sites	5	Not Yet Determined

tracked throughout site redevelopment, entered in ACRES quarterly and added to the City’s Brownfields GIS. With projects ranging from multi-family residential, non-profit buildings, public parks, and schools, **the City expects EPA’s grant dollars to have leveraged over \$2 billion in development by the end of 2023.**

(2) Compliance with Grant Requirements (10 points)

The City has **complied with all brownfields grant requirements, including work plans, schedules, and terms and conditions for all closed and open grants.** The City has never received an adverse audit finding on an EPA grant. We have complied with all quarterly reporting, MBE-WBE reporting, financial status reporting and other reporting required by EPA cooperative agreements. Detailed information in each quarterly report conveys the goals, milestones and other notable accomplishments with applicable dates. **The City routinely enters assessments and project successes information in ACRES.**

The City had one site-specific cleanup grant with a cleanup completed under budget. All other funds allocated to us were spent within the specified grant time. **The City has two open RLF grants from EPA. They are as follows:**

- 1. 2018 RLF BF-01F48201** grant period 10/1/18 – 9/30/24. all funds are committed.
- 2. 2022 RLF 4B-02F21301** grant period 10/1/22 – 9/30/27.

Threshold Criteria Responses attachment

1. **Statement of applicant eligibility**

The City of Oklahoma City is a City

2. **Documentation of applicant eligibility if other than a city,**

Not Applicable

3. **A statement of the applicant's 501(c)(4) tax-exempt status**

Not Applicable

4. **Description of Community involvement**

Staff participate in and seek input from the Citizens Committee for Community Development meetings and area plan community outreach, as well as by partnering with OCURA as they identify community needs, work with the development community, and request development proposals for publicly owned sites.

Project specific community involvement includes community residents, businesses, property owners, and stakeholders through all phases of project planning and implementation. This will be accomplished with help from outside consultants, our community partners, through meetings, email, website and social media.

5. **Documentation of the available balance on each open Assessment Grant**

The City of Oklahoma City does not have an open Assessment Grant or Multipurpose Grant

6. **Discussion on contractors and named subrecipients**

The City of Oklahoma City has not identified a subrecipient.

The City of Oklahoma City currently has contracts with three environmental firms that support our Brownfields Revolving Loan Fund and assessment programs. These contractor(s) were selected in compliance with the fair and open Federal procurement requirements in 2 CFR Part 200 and 2 CFR Part 1500.

A Notice to Architects, Engineers, and Planners titled MC-0732, Environmental Services necessary to support Brownfields redevelopment projects was sent out in February and March 2023. This was that are mailed to all firms on file with the City of Oklahoma City. It was also advertised in The Journal Record on February 21, 2023; The Black Chronicle on March 2, 2023; and in The Daily Oklahoman on March 1, 2023. Letters of Interest were due March 14, 2023. The City received 12 responses. and narrowed those down to six companies to interview. Three companies were selected, and contracts were executed.

7. **A copy of the solicitation documents and the signed executed contract are attached**

- Solicitation Document
- MC-0732-Ac_OklahomaEnvironmentalServices
- MC-0732-Bc_Geosyntec
- MC-0732-Cc_Terracon