

THE CITY OF



FREEPORT

200 West Second St • Freeport, TX 77541

979.233.3526 • Fax 979.233.8867

Brooks Bass
Mayor

Tim Kelty
City Manager

1. Applicant Identification

City of Freeport
200 West Second Street
Freeport, Texas 77541

2. Funding Requested

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

3. Location

a) City of Freeport b) Brazoria County c) Texas

4. Target Area and Priority Site Information

- Target Area: City Limits located in Census Tracts **48039664300 and 48039664400**
- Priority Sites
 - i. Walker Royall Site – 100 East Brazos Boulevard, Freeport, TX 77541
 - ii. Abandoned Rail Site – 28°56'47.47"N / 95°20'49.93"W, Freeport, TX 77541

5. Contacts

a. Project Director

Mr. Tim Kelty, City Manager
979-233-3526
tkelty@freeport.tx.us
200 West Second Street
Freeport, Texas 77541

b. Chief Executive/Highest Ranking Elected Official

Mr. Brooks Bass, Mayor
979-233-3526
bbass@freeport.tx.us
200 West Second Street
Freeport, Texas 77541

6. Population

City of Freeport, Texas – 10,864 (US Census: 2017–2021 American Community Survey)





Brooks Bass
Mayor

Tim Kelty
City Manager

7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	2
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
At least 30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area.	8, 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.	NA

8. Letter from the State or Tribal Environmental Authority

See attached.

9. Releasing Copies of Applications

Not Applicable.



Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Kelly Keel, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 12, 2023

Mr. Tim Kelty
City of Freeport
200 West 2nd Street
Freeport, Texas 77541

Sent via Email

Re: City of Freeport Proposal for a U.S. Environmental Protection Agency FY24 Brownfields
Community-Wide Assessment Grant

Dear Mr. Kelty:

The Texas Commission on Environmental Quality (TCEQ) is pleased to offer this letter of support for the City of Freeport's proposal for the U.S. Environmental Protection Agency FY24 Brownfields Community-Wide Assessment Grant. TCEQ believes the work completed under the grant will significantly impact the enhancement of this community and supports the grant proposal. You may contact me at 512-239-2252 or Kristian.livingston@tceq.texas.gov if you have any questions or if you would like additional information.

Sincerely,

A handwritten signature in cursive script that reads "Kristy Livingston".

Kristy Mauricio Livingston
Team Leader
Remediation Division

KML/dl



Freeport, TX
FY24 Brownfields Assessment Grant
Narrative



1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields i. Overview of Brownfield Challenges and Description of Target Area: The City of Freeport (City) was founded by the Freeport Sulphur Company in 1912 when banker Eric Pierson Swenson and a group of investors started mining the Bryan Mound salt dome. In 1929, the Brazos River was diverted south of town to reduce flooding, transforming the old riverbed into a protected harbor leading to the Gulf of Mexico and encouraging economic growth. Dow Chemical Company purchased 800 acres of land bordering the harbor in 1940, and within 20 years, it grew to 3,000 acres and numerous plants. Dow and other refineries and manufacturing operations remain the foundation of the City's economy.

The City has been a community with an economy driven by heavy industrial businesses since its founding, causing significant brownfield challenges. The community is both dependent on the wealth of refineries and manufacturing businesses that provide economic stability but also challenged by the pollution those businesses create. Redeveloping the City's potential brownfields in downtown Freeport will bring new life to the City's center and draw new residents after significant population loss throughout the 2010s.

The City is approximately 17 square miles with a population that is down 16% from 2010, causing schools and businesses to shutter over the past decade. However, due to the recent expansion of Port Freeport, population loss is slowing and could even reverse with timely, strategic investments in the community. The City sees this grant as the first step toward creating a vibrant town center, which will create job opportunities, incubate small businesses, promote tourism, increase foot traffic for existing businesses, and create a cultural heart of the City that would promote community cohesion and civic engagement.

The **geographic boundary and target area** for this application is the **city limits**, which includes Census Tract (CT) 48039664300 and CT 48039664400 (**Justice40 Disadvantaged Communities**). The target area is home to a large minority sensitive population with **83% people of color**¹ who are living with economic and environmental justice difficulties such as high unemployment, high poverty, blighted and distressed neighborhoods, and a lack of affordable housing. The target area is in the **93rd percentile in low income, 85th percentile in unemployment, and 84th percentile in poverty**.² The City recognizes the need for an environmental assessment to move forward with the redevelopment concepts found in the **Freeport Strategic Community Plan**. The City believes that a collaborative planning effort with project partner organizations, supported by EPA Brownfields Assessment Grant funding, will allow for additional inventory and refined prioritization, assessment, and cleanup planning to push redevelopment of blighted and abandoned brownfields, bringing prosperity back to the community.

ii. Description of the Priority Brownfield Site(s): With **over a dozen** abandoned businesses and properties falling into various states of disrepair over the last several decades, the City has identified properties that present a potential hazard to residents, including former industrial buildings, warehouses, and restaurants. Potential environmental concerns in the target area are **petroleum hydrocarbons, chlorinated volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons, metals, lead-based paint (LBP), and asbestos**. The City will work with target area residents to identify additional sites through a grant-funded site inventory followed by the creation of an evaluation ranking tool that will prioritize the identified brownfield sites based on need and current redevelopment plans.

¹ EPA EJ Screen Report – Freeport, TX

² CEJST Screening Tool



Priority site 1, referred to as the **Walker Royall site**, is located at 100 E. Brazos Boulevard. The **Walker Royall site** is a **5.66-acre** tract, adjacent to City Hall and the Brazos River. The site is **walkable to Freeport's historic downtown**, which holds a few small boutiques and eateries, as well as the Freeport Historical Museum and Visitor Center. The site is currently a vacant, unfenced grassy field with no improvements. It has been abandoned since the early 2000s. From the 1960s to the early 2000s, it was the site of a medical equipment manufacturing business. Manufacturing sites of this nature are potentially contaminated with **petroleum and chlorinated VOCs, hydrocarbons, or metals**. Before being used for manufacturing, from 1912 to 1956, the site was home to the Tarpon Inn, an upscale hotel that served as a prominent community meeting space. Potential chemicals of concern from the hotel include **petroleum hydrocarbons (diesel)** from an emergency generator, **dry cleaning solvents (chlorinated VOCs)**, and **heating oil tanks, in addition to asbestos and lead from demolished building materials that could have been left at the site**. The City is working to get access to the site for assessment.

Priority site 2, the **Abandoned Rail Site**, is an **11-acre** tract adjacent (south) to the historic downtown area and three blocks south of the **Walker Royall site**. Together, the two priority sites **bookend the historic downtown area**. The site currently contains **abandoned railroad tracks, a former building slab, and abandoned trailers**. The site has been abandoned since 2002 and is unsecured, creating a safety problem for residents as it is close to churches, schools, and parks. The City is currently in negotiations with Union Pacific to take control of the property. Potential contaminants of concern include **petroleum hydrocarbons, chlorinated VOCs, polycyclic aromatic hydrocarbons, and metals**.

iii. Identifying Additional Sites: The City will work to determine additional eligible sites within the **two Justice40 Disadvantaged CTs** that make up the target area/city limits. The City has already identified **over a dozen** potential hazardous sites. A more in-depth, grant-funded site inventory and evaluation ranking criteria process (Budget Task 2) will be established as the City works with target area residents and partners to identify and prioritize sites within the **underserved** community. Due to its history as a primarily industry-focused community, there are many underused and abandoned buildings within the City that have the potential to experience brownfields-related challenges in redevelopment and safe reuse. Those properties will be researched further by City staff using the Brazoria County's GIS 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 the Climate and Economic Justice Screening Tool (CEJST) and US Census data to ensure **underserved** communities benefit from the project. Since the geographic boundary and target area are one and the same as the city limits, the site inventory will include the addition of sites from the entire city.

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

The City brought together local and regional partners and stakeholders to create a plan for Freeport. **Freeport's Strategic Community Plan** is intended to guide future development, redevelopment, and community enhancement efforts over the next 20 years through 2040. The Plan includes goals for **downtown revitalization** and increased foot traffic. The City was approved by the Texas Historical Commission to be part of the Texas Main Street Program in October 2021. The Main Street Program aims to bring economic vitality and preservation to important historic resources in Texas. The Program highlights the importance of identifying new opportunities to create economically vibrant town centers. The City has already taken steps toward breathing new life into downtown through new events, celebrations, and market days to draw visitors to the area; however, redevelopment of downtown-adjacent properties would greatly contribute to the City's goals.



The projected reuse strategy for the **Walker Royall** site is a **hotel and convention center with green space**. The hotel and convention center would be the cornerstone for the revitalization of the downtown waterfront area, attracting new businesses and highlighting the City's most notable natural asset, the Brazos River. The projected reuse of the **Abandoned Rail** site is **mixed-use development**, bringing both **businesses and affordable housing** within a block of downtown Freeport. The reuse strategies for **both priority sites** align with **Freeport's Strategic Community Plan** and will begin to address the environmental and economic needs of this **disadvantaged, underserved** community.

ii. Outcomes and Benefits of Reuse Strategy: The desired redevelopment at the **Walker Royall** priority site into a **hotel and convention center and green space** will provide a great economic benefit while also highlighting the property's importance to **Freeport's history** (noneconomic benefit). The site was previously a hotel for more than 40 years and was the preeminent place in the City for entertainment and social gatherings, serving as the cultural heart of the entire area. With the help of EPA Brownfields Assessment Grant funding, it could once again become a prominent community gathering space, **drawing visitors** (economic benefit) to the downtown Freeport area, **reinvigorating local businesses** (economic benefit), **creating employment opportunities** (economic benefit), **increasing property values** (economic benefit), improving the **walkability of the community** (noneconomic benefit), and reinvesting a sense of **community pride** (noneconomic benefit) back into this **disadvantaged and underserved** community.

The **Abandoned Rail Site** priority site will create **new business opportunities** (economic benefit) while **increasing local employment** (economic benefit) and **creating new affordable housing opportunities** (noneconomic benefit). All of these new redevelopments within the City's **target area** tie directly into **Freeport's Strategic Community Plan** and will provide life-changing trends for an improved quality of life for Freeport's **underserved** community for generations to come.

The City will work with developers so that the planned redevelopment will also improve **climate adaptation/mitigation capacity and resilience**. Improving **green space** and connecting and **improving city walkability** will **reduce pollutants** and improve the quality of life for all residents. By working to ensure developers are using **energy-efficient measures** in their redevelopment designs, **promoting sustainability**, and encouraging use of **renewable energy** through use of **solar lighting or wind energy**, the City will build a resilient community that will continue to grow for many years to come.

c. **Strategy for Leveraging Resources** i. Resources Needed for Site Reuse: The City, as a local unit of government, is eligible to apply for county, state, and federal grant funding. The City is making every effort to secure additional funding to further its Brownfield Program redevelopment goals. Community Development Block Grant (CDBG) funds are available for the removal of blight, demolition, infrastructure, and affordable housing redevelopment. Freeport's Economic Development Corporation allows a portion of sales tax for redevelopment funding within city limits and includes removal of blight, demolition, infrastructure, and redevelopment. Funding is currently based on a project-by-project basis, and no funding limits are specified. Freeport's Tax Increment Reinvestment Zone Funding can be used for infrastructure and redevelopment incentives, and projects can range up to \$200,000. Texas Commission on Environmental Quality also issues a Brownfields Site Assessment Program that assists in funding any additional assessments that may be needed. Once sites are assessed, the City will apply for EPA Brownfield Cleanup funding.



ii. Use of Existing Infrastructure: The City issued a \$7.5 million bond for street infrastructure improvements in 2020, which was used to rehabilitate over four miles of existing asphalt streets and new concrete streets. The City recently received CDBG funds to upgrade the sewer and water treatment infrastructure. The CDBG project is expected to be completed by mid-year 2024. The City's plans for target area redevelopment include the use of existing infrastructure, including water, sewer, electricity, gas, and transportation. Therefore, infrastructure within the target area and at the two priority sites is sufficient for immediate redevelopment. In the event additional infrastructure improvements are needed, the City will look to state and federal funding.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. **Community Need** i. The Community's Need for Funding: Revitalizing Freeport's historic downtown area is the first step in forging a new future for a community that has been caught in a downward spiral of population and tax revenue loss. Freeport is a small, low-income community with a **population of 10,864**.³ The target area is comprised of two CTs that have been identified as **disadvantaged CTs** by CEJST. Residents suffer from a **low per capita income of \$20,805** (US \$37,638) and **low median family income of \$50,000** (US \$85,028).³ In addition, the target areas' **poverty rate is 21%** (US 9%).³ Furthermore, these Justice40 CTs are in the **93rd percentile for low income** and in the **85th percentile for unemployment**.⁴

Unfortunately, with the City budget allocated for salaries and services such as solid waste, police, and fire, coupled with the **high unemployment rate** and **extreme low-income status** of the target area and City residents, the City lacks the funding for assessments that would allow for the redevelopment of this **underserved** community. With no additional funding for assessments, these underserved residents will continue to endure the negative health effects and blight currently controlling this **disadvantaged** target area. Therefore, Brownfield Assessment Grant funding would give the City the ability to provide resources, identify environmental hazards, and generate revitalization to create opportunities and a brighter future for this established **underserved** community.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: Target area **sensitive populations** are those **living below poverty, minorities, and the youth and elderly populations**. The target area population is **over 63% Hispanic** (US 18%) and **17% African American** (US 13%).³ Combined with an **elderly and youth** (under 18) population **exceeding 45%**,³ the vulnerability of the target-area population shows. An elevated number of residents in this area depend on **government food assistance (17%)**, which is greatly elevated over the US average (11%).³ When you combine these statistics with over **20% of all families living below the poverty level** (US 12%) and **22% of all families with children under 18 living below the poverty level** (US 17%),³ the two CTs in this **disadvantaged** target area show the importance of redevelopment for the future of this **underserved** community.

The target area also suffers from several **wellness issues** such as access to **affordable housing and new local job opportunities**. Within the target area, the average **monthly rent is \$958** (US \$1,163), and the average median value of a home is \$90,800 (US \$244,900).³ Even with the low cost of monthly rent and low home values, the community is suffering as a significant portion of their annual income goes to cover housing costs (in the **63rd percentile of low-income households spending more than 30% of their income on housing**).⁴ Rental vacancy rates at 11% (US 6%) and homeowner vacancy rates at 4% (US 1%) show the dire need for more affordable housing within the underserved area.³ To make matters worse, the target area ranks in the **82nd percentile**

³ US Census: 2017–2021 ACS

⁴ Climate and Economic Justice Screening Tool



for potential of LBP.⁵ With the redevelopment of both priority sites, these **underserved** residents will have new opportunities to obtain **better paying jobs** with the addition of a conference center, hotel, and mixed-use sites. They will also have access to new **affordable housing** developments that will solve these welfare issues for this **disadvantaged area**, which is crucial for this **underserved** community to prosper.

The target area has an **unemployment rate in the 85th percentile**, with an average of **29% of residents who are 25 years or older and have less than a high school diploma**.⁶ The addition of a hotel and restaurant will allow more of the underserved residents to have an opportunity to access higher paying jobs that are not dependent on a degree. The revitalization of Freeport's downtown target area will create jobs, grow small businesses, increase the opportunity for affordable housing, and protect property values, all while cleaning up the blight and abandoned areas and contributing to the City's overall strategy to increase the quality of life for all residents.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Freeport is a community rich in manufacturing and refining businesses that, though critical to the economic well-being of the community, has created an increase in adverse health conditions. Brownfield sites and the potential for contaminants on those sites are causes for concern, especially when potential contaminants at the priority sites are **petroleum hydrocarbons, chlorinated VOCs, metals, LBP, and asbestos** that can affect the residents' health.

Sensitive populations face a higher risk of disease and health conditions such as **cancer and asthma**. The **EJ Screen Report for asthma risk** places the target area in the **68th percentile** for the state. The percent of adults with asthma is 9%, which is higher than the state average of 7%.⁷ The target area buildings are of the greatest concern because of the age and the potential for **LBP and asbestos-containing materials (ACM)**. The target area ranks in the **82nd percentile for potential of LBP**.⁸ LBP and ACM are linked to severe health and developmental issues in infants and children, and exposure can result in cancer and asthma issues. The age-adjusted cancer risk in Brazoria County was higher than the state average, with 422 cases per 100,000 (Texas 412).⁹ When combining all the risk factors for the target area **sensitive** populations, the most concerning is a **70th percentile** ranking for **low-life expectancy**.⁶ The risk for disease and health conditions within the target population continues to increase as the **proximity to risk management plan facilities is in the 99th percentile** and the **proximity to hazardous waste facilities averages is in the 84th percentile**.⁶ Without the EPA Brownfield Grant funding for site assessments, the City will be unable to identify potential target area contaminants that magnify these sensitive health conditions. However, **by addressing these sites and their environmental concerns**, the revitalization process of creating new businesses, a convention center and a hotel, and new affordable housing will spur generations of healthier growth for these **sensitive** populations.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: **The city limits are in two larger CT that are designated as Justice40 Disadvantaged Communities by CEJST**. The blight throughout the target area created by the **abandoned and vacant sites** presents an **ongoing environmental concern**. The target area suffers from ever-decreasing taxable revenue and decreasing property values. It is extremely hard to market for redevelopment when all a business investor sees is an area with **EJ issues** such as **extremely low income, high unemployment rates, substandard housing, and distressed neighborhoods**. **The target area's**

⁵ EJ Screen Report

⁶ Climate and Economic Justice Screening Tool

⁷ CHI St. Luke's Health Brazosport Hospital Report 2021

⁸ EJ Screen Report

⁹ www.cancer-rates.com/tx



disadvantaged CTs show a 93rd percentile in low-income, an 85th percentile in unemployment, and an 84th percentile in poverty.⁶ The effects of the EJ issues have taken a toll on these underserved residents and have never allowed them the opportunity to see their lives change when communities flourish. With the help of a Brownfields Assessment Grant, the City will be able to continue to reduce the EJ issues facing the **disadvantaged** community.

(b) Advancing Environmental Justice: The proposed reuse of the priority sites as **small business retail, affordable housing, a convention center, and a hotel** will enhance the health and well-being of residents and remedy many environmental and socioeconomic justice issues affecting the target area **disadvantaged and underserved** community. Bringing new life and business opportunities back to the target area will help negate the environmental consequences and threats by the identification, assessment, and remediation made possible by the EPA Brownfield Grant funding. By creating **new employment opportunities with better wages, improving walkability with local employment, adding the convention center and hotel to promote tourism and economic stability, and creating new affordable housing options**, the City will address the **Justice40 Initiatives** that have plagued the **underserved** residents of this area and create a hope for a bright future for generations to come. The two priority sites are currently abandoned and vacant; therefore, **no displacement of businesses or residents** will occur. However, if other sites are identified that could cause displacement, the City will work with the business or resident to find a place to relocate.

b. Community Engagement i. Project Involvement & ii. Project Roles: The following community organizations will assist the City with site inventory, prioritization, outreach, and future reuse planning during the grant project.

Name of Org.	Point of Contact	Specific involvement in the project or assistance provided
Brazoria County Hispanic Chamber of Commerce	Gina Adams gaguirre@bchispanicchamber.com 979-417-3269	The Brazoria County Hispanic Chamber of Commerce is dedicated to creating a healthy and prosperous business environment for the Hispanic business community. They will assist with future site reuse planning, community outreach, and education activities.
Main Street Advisory Board	Margaret McMehan [REDACTED] 979-201-9006	The Main Street Advisory Board meets regularly to strategize and plan for the promotion and development of Freeport's city center. They will assist with site identification, future site reuse planning, and site inventory assistance.
St. Mary's Star of the Sea Church	Father Sebastine Soja Okoye pastor@stmarystarofthesea.org 979-201-6914	St. Mary's Star of the Sea is a Catholic church with a robust ministry of community involvement. They will provide assistance with community outreach and education.
Brazosport Lions Club	Ronnie Martin grapevinegiftslj@aol.com 979-236-8817	The Brazosport Lions Club does charitable work in the Freeport community, including fundraising, community cleanups, and food donation. They will assist with community outreach and education.

iii. Incorporating Community Input: The City recognizes the importance of including community residents and stakeholders throughout project planning and implementation. The Brownfields Grant Program and the Assessment Grant Application were discussed during the Freeport Economic Development Corporation public meeting on the October 10, 2023. A Community Involvement Plan (CIP) will be created to outline the planned community engagement activities, schedule, project background, and key players. The CIP will be made available for review at City Hall and on the City's website and will ensure engagement with the target area's underserved community.

To educate city residents on the Brownfield Program and to help identify potential brownfield sites in the target area, the City will perform community outreach and review the suggested



brownfield sites provided by community members during quarterly meetings. The **Brownfield Project Team** will review and evaluate comments and community input during quarterly meetings, recording all community member suggestions and information in the minutes and posting them on the City’s Brownfield Program website. All suggestions and input will be addressed on an individual basis within a week and promptly posted to the City’s Brownfield Program website for further public review. The Brownfield Project Team will maintain a site inventory of the suggested brownfield sites and will review the list routinely, updating it at each quarterly meeting. The community and Brownfield Project Team will work together to prioritize sites based on community need and the City’s Brownfield Program goals. Priority will be given to those sites that most benefit **underserved**, sensitive populations in the target area.

The City’s CIP will incorporate several forms of media. Brownfields updates will be posted to the City’s Facebook page in addition to the City’s Brownfield Program webpage. Additionally, the City will use the community’s monthly water bills, where they often insert flyers and important information. Mobile message boards and digital displays throughout the City are another form of communication that could be used. The City will provide resident interaction via the website and social media as an alternative to in-person community engagement. The City will disseminate Brownfield Project information through signage in government buildings, press releases, and local newspapers, and will update organizations and community members through City Council meetings, community education meetings held throughout the target area, and charrettes/visioning sessions. All promotional materials will be **available in English and Spanish**, and the names and contact information of the City’s Brownfield Program Team will be posted on the City’s brownfield webpage, facilitating community-member contact with Brownfield Project Team members. In the event there are non-English speaking individuals present at events, a translator will be made available.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs:

Task 1: Outreach	
i.	<i>Project Implementation:</i> The City’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). City staff will lead the community meetings to keep the public informed about project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, and software to manage the grant.
ii.	<i>Anticipated Project Schedule:</i> CIP created within three months of award (upon completion, a more concrete schedule will follow). Community meetings held the 1 st and 3 rd quarter during Years 1–3 and 1 st quarter of Year 4. Website and outreach materials created in the 1 st quarter and posted quarterly throughout the grant project.
iii.	<i>Task/Activity Lead:</i> City: Mr. Tim Kelty, City Manager, Brownfield Project Director
iv.	<i>Outputs:</i> CIP, Brownfield Website, 7 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA required Quarterly Reports.
Task 2: Site Inventory	
i.	<i>Project Implementation:</i> The City’s Brownfield Project Director will work with residents living in the target area during community meetings to create a thorough site inventory for assessment. Abandoned and underutilized properties identified by the residents of the target area will be researched further by City staff using Brazoria County’s GIS website. Once a list is compiled, the EC will work with City staff to create an evaluation ranking tool, with the help of residents, to determine the order in which the sites will be addressed, with sites in underserved areas being prioritized.



ii.	<i>Anticipated Project Schedule:</i> Community meeting held in 1 st quarter will continue the preliminary inventory process that began with this application. Evaluation ranking process taking place in the 2 nd quarter and continues throughout the grant project.
iii.	<i>Task/Activity Lead:</i> City: Mr. Tim Kelty, City Manager, Brownfield Project Director
iv.	<i>Outputs:</i> Evaluation Ranking Tool, Site Inventory List
Task 3: Assessment	
i.	<i>Project Implementation:</i> 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.	<i>Anticipated Project Schedule:</i> Assessment activities begin the 2 nd quarter and continue throughout the grant.
iii.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects of the project with oversight from the City: Mr. Tim Kelty, City Manager, Brownfield Project Director.
iv.	<i>Outputs:</i> 16 Phase I ESAs, 1 Generic QAPP, 9 Phase II ESAs including SS-QAPP, Site Access Agreements and Property Eligibility Determinations.
Task 4: Remediation/Reuse Planning	
i.	<i>Project Implementation:</i> For projects identified for cleanup, the EC will prepare the Analysis for Brownfields Cleanup Alternatives (ABCA) and/or Cleanup Plans. Cleanup planning will include evaluating cleanup alternatives, calculating cleanup costs, and determining site appropriate remediation and/or reuse planning to reduce health/environmental risks. The EC will assist the City in hosting charrettes/visioning sessions to be held for key properties. A planner will create Site Reuse Assessments and a Brownfield Revitalization Plan.
ii.	<i>Anticipated Project Schedule:</i> Plans & Charrettes begin in the 6 th quarter and continue throughout the grant.
iii.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects of the project with oversight from the City: Mr. Tim Kelty, City Manager, Brownfield Project Director.
iv.	<i>Outputs:</i> 4 ABCAs, 2 Vision Sessions/Charrettes, 2 Site Reuse Assessments, 1 Market Study, 1 BF Rev. Plan
Task 5: Programmatic Support	
i.	<i>Project Implementation:</i> The City will procure an EC to assist with the Brownfield Grant Project. The City's Brownfield Project Director will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The EC will assist the City in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant. The travel budget allows for two staff to attend three national/regional/grantee brownfield training conferences/workshops.
ii.	<i>Anticipated Project Schedule:</i> ACRES Reporting begins in the 1 st quarter, and Quarterly Reporting begins in the 2 nd quarter and continues throughout the grant project. Annual Reporting and Forms created in the 5 th , 9 th , and 13 th quarters and during final closeout.
iii.	<i>Task/Activity Lead:</i> City: Mr. Robert Johnson, Brownfield Project Manager
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Annual Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend 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. **Fifty-Five percent (55%) of the budget will be spent on site-specific work through the Assessment Task, and 34% spent on areawide planning.**

Task 1 Outreach: Contractual: Community Involvement Plan \$3,000 (25hrs x \$120); Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$2,200 (20hrs x \$110); 7 Community Education Meetings \$7,000 (7 x \$1,000/meeting). Supplies: Outreach Supplies \$1,000 (printed brochures \$800 [800 x \$1.00]; printed display boards \$100 [1 x \$100]; notebooks, paper, pens, other miscellaneous office supplies \$100). **Task 2 Site Inventory:** Contractual: Potential



Brownfield Site Inventory and Evaluation Ranking Tool Creation \$10,000 (80hrs x \$125). **Task 3 Assessment:** Contractual: 16 Phase I ESAs \$3,800 each for a total of \$60,800; 1 Generic QAPP \$5,000; 9 Phase II ESAs including SS-QAPP at \$23,000 each for a total of \$207,000. **Task 4 Remediation/Reuse Planning:** Contractual: 4 ABCAs \$5,500 for a total of \$22,000; 2 Vision Sessions/Charrettes \$5,000 (\$2,500/meeting); 2 Site Reuse Assessments \$30,000 each for a total of \$60,000 (Planner: 40hrs x \$150; Market Analyst: 168hrs x \$125; Contractor: 24hrs x \$125); 1 Marketing Study \$10,000 (Principal Planner 30hrs x \$215, Senior Planner 20hrs x \$150, and Environmental Professional 5.5hrs x \$100); 1 Brownfield Revitalization Plan \$75,000 (Senior Planner: 250hrs x \$150; Market Analysts: 150hrs x \$125; Environmental Professional: 150hrs x \$125). **Task 5 Programmatic Support:** Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period \$20,000 (160hrs x \$125). Travel: Two staff to attend three conferences \$12,000 (flights at \$800, 3 nights in a hotel at \$300/night, incidentals and per diem at \$100/day x 3 days x 2 attendees x 3 events).

Category	Tasks					Totals
	<i>Outreach</i>	<i>Site Inventory</i>	<i>Assessment</i>	<i>Remediation/Reuse Planning</i>	<i>Programmatic Support</i>	
Travel					\$12,000	\$12,000
Supplies	\$1,000					\$1,000
Contractual	\$12,200	\$10,000	\$272,800	\$172,000	\$20,000	\$487,000
Total Budget	\$13,200	\$10,000	\$272,800	\$172,000	\$32,000	\$500,000

c. Plan to Measure and Evaluate Environmental Progress and Results: To ensure this EPA Brownfield Project is on schedule, the Brownfield Project Team, which will include the 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. In addition, project expenditures and activities will be compared to the projects schedule to ensure the grant project will be completed within the four-year time frame. Site specific information will be entered and tracked in the ACRES database. The outputs 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. The 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, the City has countermeasures in place to address this problem. The City will make monthly calls to their EPA Project Officer and, if needed, will create a Corrective Action Plan to help the project to get back on schedule.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Capacity, ii. Organizational Structure, & iii. Description of Key Staff: The City operates under a Mayor–Council form of municipal government. The City has the organizational capacity to handle a project through the office of the City Administrator with support from the City’s government officials (City Council) led by the Mayor. The City Manager, **Mr. Tim Kelty**, will be the **Brownfield Project Director**. Mr. Kelty has been the Freeport City Manager since 2018. He is responsible for the oversight and management of municipal departments, budget preparation, and facility and equipment maintenance and management, and serves as Project Director for City initiatives. Before coming to Freeport, Mr. Kelty held key roles such as City Manager and Economic and Community Developer in several other cities and counties. Mr. Kelty has worked in local government for the



past 30 years and will be responsible for the day-to-day activities, timely and successful expenditure of funds, and completion of administrative and financial requirements of the Brownfields Program. The Executive Director of Economic Development Corporation (EDC), **Mr. Robert Johnson**, will be the **Brownfield Project Manager**. As Executive Director of the EDC, Mr. Johnson is responsible for overseeing issuance of grants and loans to qualified small businesses, developing and implementing projects to facilitate economic growth, and promoting community improvement within the City. Although he started with the City in 2022, Mr. Johnson worked for eight years as an Economic Development Director and has worked in different capacities at the state government level for over 25 years prior to his economic development experience. Mr. Johnson will assist Mr. Kelty with the administration of the City's Brownfields Program. The **Brownfield Finance Director** will be **Ms. Cathy Ezell**. Ms. Ezell has been the City's Finance Director since 2021. Ms. Ezell came to the City of Freeport with over 25 years of experience as Finance Director and other financial positions within other municipalities along with extensive experience managing numerous local, state, and federal municipality grants. Ms. Ezell is proficient in the City's accounting software, online banking service, accounting, payroll, accounts payable, and reporting. Ms. Ezell will be responsible for managing the finances and all drawdowns through ASAP.gov for this EPA grant project. An EC will assist with the technical portions of the Brownfields Project.

iv. Acquiring Additional Resources: The City will procure a qualified environmental contractor and subcontractors to assist with technical and reporting aspects of the Brownfield Community-wide Assessment. Procurement procedures will comply with both the local contracting and procurement processes and with EPA requirements for "Professional Service." The City will promote strong practices, local hiring, and will link members of the community to potential employment opportunities for all brownfield-related redevelopment via community outreach practices and project updates to project partners.

a. 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: In 2021, the City of Freeport received two grants from the Texas General Land Office (GLO) worth a total of \$11.8 million. The first was a Community Development Block Grant (CDBG) award of \$5.93 million to replace sewer lines throughout the City. The City is successfully replacing approximately 34,750 linear feet of sewer line with this grant, helping to upgrade the City's sewer system. The replacement of the sewer lines is expected to be completed in mid-2024 using the full \$5.93 million in grant funding to help over 3,000 households. The second grant from CDBG was a Wastewater Treatment Facility Grant worth \$5.99 million. This grant was for upgrades to the City's Wastewater Treatment Plant. The Wastewater Treatment Plant Improvement Grant will replace the existing 1.6 million gallons per day (mgd) package plant that is at the end of its life. Work on the Wastewater Treatment Plant will be completed in mid-2024 and will use the full \$5.99 million in grant funding.

(2) Compliance with Grant Requirements: The City has a history of compliance with grant work plans, schedules, and terms and conditions, and has an excellent history of timely reporting with all award agencies. The City is on schedule with the CDBG grant for the replacement of sewer lines throughout the City and is in compliance with the GLO. The Brownfield Project Team is skilled in project management and will monitor all grant activities to ensure compliance with all financial reporting requirements.



Freeport, TX
FY24 Brownfields Assessment Grant
Threshold Criteria



Threshold Criteria

1. Applicant Eligibility

- a. City of Freeport (City) is eligible to apply for the EPA Brownfields Community-wide Assessment Grant as a general-purpose unit of local government as defined under 2 CFR § 200.64.
- b. The City is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Community Involvement

The City recognizes the importance of including community residents and stakeholders throughout project planning and implementation. The City Council approved the resolution to apply for Brownfield Assessment funding at their November 6, 2023, regularly scheduled meeting. A Community Involvement Plan (CIP) will be created to outline the planned community engagement activities, schedule, project background, and key players. The CIP will be made available for review at City Hall and on the City's website, and will ensure engagement with the target area's underserved community.

To educate city residents on the Brownfield Program and to help identify potential brownfield sites in the target area, the City will perform community outreach and review the suggested brownfield sites provided by community members during quarterly meetings. The **Brownfield Project Team** will review and evaluate comments and community input during quarterly meetings, recording all community member suggestions and information in the minutes and posting them on the City's Brownfield Program website. All suggestions and input will be addressed on an individual basis within a week and promptly posted to the City's Brownfield Program website for further public review. The Brownfield Project Team will maintain a site inventory of the suggested brownfield sites and will review the list routinely, updating it at each quarterly meeting. The community and Brownfield Project Team will work together to prioritize sites based on community need and the City's Brownfield Program goals. Priority will be given to those sites that most benefit **underserved**, sensitive populations in the target area.

The City's CIP will incorporate several forms of media. Brownfields updates will be posted to the City's Facebook page in addition to the City's Brownfield Program webpage. Additionally, the City will use the community's monthly water bills, where they often insert flyers and important information. Mobile message boards and digital displays throughout the City are another form of communication that could be used. The City will provide resident interaction via the website and social media as an alternative to in-person community engagement. The City will disseminate Brownfield Project information through signage in government buildings, press releases, and local newspapers and will update organizations and community members through City Council meetings, community education meetings held throughout the target area, and charrettes/visioning sessions. All promotional materials will be **available in English and Spanish**, and the names and contact information of the City's Brownfield Program Team will be posted on the City's brownfield webpage, facilitating community-member contact with Brownfield Project Team members. In the event there are non-English speaking individuals present at events, a translator will be made available.



3. Expenditure of Existing Grant Funds

The City affirms that it does not have an active EPA Brownfields Assessment Grant or Multipurpose Grant.

4. Contractors and Named Subrecipients

Not Applicable.