

City Hall Room 308A, 30 Church Street Rochester, New York 14614-1290 www.cityofrochester.gov

Narrative Information Sheet 835-855 West Main Street and 42 York Street, Rochester, NY

IV.D.1 Applicant Identification

City of Rochester, NY 30 Church Street City Hall – Room 307A Rochester, NY 14614

IV.D.2 Funding Requested

IV.D.2.a Grant Type: Multipurpose

IV.D.2.b Requested Amount: \$800,000

IV.D.3 Location

City of Rochester, Monroe County, New York

The Priority Brownfield Sites are located in the Bull's Head Brownfield Opportunity Area (i.e., the Target Area). Additionally, the Priority Brownfield Sites are within the "12-acre Redevelopment Site," a portion of the Target Area which is the focus of redevelopment efforts.

IV.D.4 Contacts

IV.D.4.a Project Director

Mr. Richard Rynski, AICP, Associate Administrative Analyst 585-428-6932, <u>Rick.Rynski@cityofrochester.gov</u> 30 Church Street, City Hall, Room 005A, Rochester, NY 14614

IV.D.4.b Chief Executive/Highest Ranking Elected Official

Mayor Lovely A. Warren 585-428-7045, <u>Lovely.Warren@cityofrochester.gov</u> 30 Church Street, City Hall, Room 307A, Rochester, NY 14614

IV.D.5 City of Rochester Population: 205,695 (2019 estimate from the U.S. Census Bureau, Population Estimates Program)

Phone: 585.428.7045 Fax: 585.428.6059 TTY: 585.428.6054 EEO/ADA Employer



IV.D.6 Other Factors Checklist

Other Factors	Page #(s)
Community population is 10,000 or less.	n/a
The applicant is, or will assist, a federally recognized Indian tribe or United States	
territory.	n/a
The priority brownfield site(s) is impacted by mine-scarred land.	n/a
The priority site(s) is adjacent to a body of water (i.e., the border of the priority	n/a
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).	
The priority site(s) is in a federally designated flood plain.	n/a
The reuse of the priority site(s) will facilitate renewable energy from wind, solar,	n/a
or geothermal energy; or will incorporate energy efficiency measures.	
At least 20% of the overall project budget will be spent on eligible site reuse or	n/a
area-wide planning activities for priority brownfield site(s) within the target area.	

The "Other Factors" listed above are not applicable to the proposed project.

IV.D.7 Letter from the State or Tribal Environmental Authority

Please refer to Attachment A

Attachment A

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Bureau of Program Management 625 Broadway, 12th Floor, Albany, NY 12233-7012 P: (518) 402-9764 | F: (518) 402-9722 www.dec.ny.gov

October 2, 2020

Joseph Biondolillo City of Rochester City Hall, Room 300B 30 Church Street Rochester, NY 14614

Dear Mr. Biondolillo:

This is to acknowledge that the New York State Department of Environmental Conservation (DEC) received a request from the City of Rochester, dated September 25, 2020, for a state acknowledgement letter for a Federal Year 2021 United States Environmental Protection Agency (USEPA) Brownfields grant.

I understand that the City of Rochester plans to submit a Brownfield Multipurpose grant application for \$800,000. Focus of the funding will be to conduct both assessment and cleanup activities for hazardous substances and petroleum contamination on multiple parcels within the Bull's Head Brownfield Opportunity Area (BOA). Known contamination has been documented in several property-specific Phase I and II Environmental Site Assessments, as well as Bull's Head BOA reports. Funding will also be allocated to conduct associated community involvement activities.

DEC encourages initiatives to redevelop brownfields with the goal of mitigating any environmental and health impacts that they might pose.

Sincerely,

Bernadette Anderson

Burner Al

Chief, Policy and Planning Section Bureau of Program Management

ec:

T. Wesley, USEPA Region 2

A. Devine, USEPA Region 2

M. Cruden, DEC Albany

M. Zamiarski, DEC Region 8

D. Pratt, DEC Region 8

V. Brawn, City of Rochester

R. Rynski, City of Rochester



City of Rochester, New York EPA Multi-Purpose Grant Program 835-855 West Main Street and 42 York Street, Rochester, NY

IV.E Narrative

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

IV.E.1.a. Target Area and Brownfields

IV.E.1.a.i. Background and Description of Target Area

The Bull's Head Brownfield Opportunity Area (BOA), a 185-acre area on Rochester's west side, represents the Target Area. The Bull's Head neighborhood is considered a key historic gateway to Rochester, and has been a focus of the City's revitalization efforts with over a decade of community-based revitalization planning. The Target Area is bounded by the CSX railroad and primarily industrial land on the north, Jefferson Avenue on the east, Clifton Street on the south and Ames Street on the west. Within the Target Area is the Bull's Head Urban Renewal Area (URA), a 34-acre sub-area identified as being significantly impacted by blighted conditions. Additionally, the eastern portion of the URA has been identified as a 12-acre Redevelopment Site, which is the most strategically-important section of the Target Area for physical transformation to achieve its revitalization. The 12-acre Redevelopment Site was traditionally home to neighborhood commercial retail storefronts, neighborhood service businesses including automotive repair and filling stations, and other commercial establishments serving the immediate neighborhood. The Bull's Head BOA Revitalization Plan identified and characterized 59 brownfield sites within the Target Area, including 835-855 West Main Street and 42 York Street parcels which are the subject of proposed assessment and cleanup activities for this Grant. The 835-855 West Main Street site is known as Bull's Head Plaza, constructed as an auto-oriented commercial/retail shopping center Former occupants of the plaza included laundry, dry cleaning, machine shop, machine manufacturing and auto sales businesses. The plaza is currently plagued by vacancies and is obsolete by today's commercial/retail standards. Contamination identified at this site includes chlorinated volatile organic compounds (VOCs) in soil and groundwater, and heavy metals and semi-volatile organic compounds (SVOCs) in fill material and soil and therefore poses a health risk to nearby residents. The 42 York Street site was previously developed with residential properties and parking areas. Fill material historically deposited on this property is contaminated with heavy metals and SVOCs. It appears that the 42 York Street site and other properties in this area were filled with waste ash and other materials. These Priority Brownfield Sites are key parcels within 12-acre Redevelopment Site.

The Target Area's legacy of environmental contamination directly contributed to its economic distress and decline. Decades of environmental contamination have resulted in blighted vacant and abandoned buildings and lots, disinvestment, decreasing property values, high poverty, unemployment, crime rates, and tax foreclosures. U.S. Census data for the Target Area indicates 36.3% of individuals are below the poverty threshold, much higher than the City's 27.2%, the County's 12.8% and the State's 13.4%. Moreover, approximately 9.2% of Target Area residents are unemployed, 47.3% are not in the labor force, and 43.4% are employed. The existing blighted conditions severely limits the potential to attract private investment that would employ economically disadvantaged persons. Remediation of brownfield sites in the Target Area will spur private investment, create new jobs, and reduce poverty.

IV.E.1.a.ii. Description of the Priority Brownfield Site(s)

835-855 West Main Street, at 4.22 acres, is the largest single City-owned parcel within the Target Area's 12-acre Redevelopment Site. This site is occupied by a 94,097sf commercial/retail shopping plaza (currently 65% vacant) and a paved parking lot, constructed in the 1950s. Former occupants included laundry, dry cleaning, machine shop, machine manufacturing and auto sales businesses. The plaza is currently plagued by vacancies and is obsolete by today's commercial/retail standards. Contamination identified at this site includes chlorinated VOCs in soil and groundwater, as well as heavy metals and SVOCs in fill material and soil. The extent of impact is not fully defined. Of particular concern for community health is the potential for vapor intrusion of chlorinated

VOCs into buildings. (Refer to Section IV.E.2.a.ii for a discussion of community health.) Contamination at this site has hindered investment and/or development, resulting in an underutilized, deteriorating property. This site is a priority because of the potential for contaminants to affect public health (vapor intrusion pathway) as well as its key location, size, and potential for strategic and transformative redevelopment south of West Main Street, as evidenced by its inclusion in the 12-acre Redevelopment Site. The City proposes to use Grant funds to complete critical environmental assessments, which are needed before future remedial planning, cleanup and redevelopment can move forward.

42 York Street, a City-owned 0.48-acre parcel within the Target Area's 12-acre Redevelopment Site, is an unused paved parking lot (formerly residential and parking lots), which contains fill material with ash layers that are considered non-hazardous industrial regulated waste. Heavy metals and SVOCs present in the soil/fill material on this parcel impede redevelopment, present geotechnical challenges, and would require off-site disposal at an approved regulated landfill facility if displaced. The extent of impact is not fully defined. This site is a priority because of its potential for strategic and transformative redevelopment north of West Main Street, as evidenced by its inclusion in the 12-acre Redevelopment Site. The City proposes to use Grant funds to complete environmental assessment and cleanup of this site with the goal of assembling marketable sites for future redevelopment based on the Bull's Head BOA Revitalization Plan's redevelopment recommendations (see IV.E.1.b.i below) in order to promote neighborhood revitalization, create increased economic development and achieve maximum public benefit.

IV.E.1.b. Revitalization of the Target Area IV.E.1.b.i. Overall Plan for Revitalization

The Bull's Head Brownfield Opportunity Area (BOA) Revitalization Plan (Plan), developed pursuant to the New York State Department of State's (NYSDOS) BOA Program, is an area-wide plan prepared for the Target Area. The goals of the Plan seek to create a healthier community through sustainable mixed-use and affordable housing development, new multi-modal infrastructure, and open space that will promote a healthier community lifestyle. The Plan identified 59 brownfield sites within the Target Area including 835-855 West Main Street and 42 York Street which are the two subject Priority Brownfield Sites of this Grant. These sites are located within the 12-acre Redevelopment Site and were identified in the Plan as "strategic sites" for their potential to be transformative catalysts for neighborhood revitalization. The Plan also includes a redevelopment plan specific to the 12-acre Redevelopment Site based on a community visioning process. The objective of this redevelopment plan is to create a renewed community mixed-use hub that supports existing and new local businesses, includes new public spaces, offers new affordable housing, and creates a more safe and accessible transportation network. The planning process was community-led with public meetings and design charrettes, and directly aligns, supports, and advances the City's recently adopted Comprehensive Plan. Under the NYSDOS BOA program these Priority Brownfield Sites will also qualify for priority state funding, resulting in economic development benefits including new construction, permanent jobs, and an increased tax base.

IV.E.1.b.ii. Outcomes and Benefits of Overall Plan for Revitalization

The proposed assessment and cleanup activities are anticipated to have a significant economic impact on the highly distressed 12-acre Redevelopment Site within the Target Area. The sites are strategic, catalytic, and critical for the realization of the 12-acre Redevelopment Site's recommended plans to guide planning efforts and overcome contamination constraints. Historically, the 12-acre Redevelopment Site was a strategic community hub of diverse economic activity. Based on market research, the site has strong demand for spaces to accommodate local businesses and new affordable housing. In addition, community input received overwhelmingly focused on the 12-acre Redevelopment Site with a strong desire for its redevelopment and reuse. The Priority Brownfield Sites are located in a federally-designated Opportunity Zone which is a further indicator of the 12-acre Redevelopment Site's current economic distress. Assessment and cleanup of these Priority Brownfield Sites will remove significant barriers to neighborhood revitalization, facilitate the redevelopment plans for these sites; thus, spurring new employment opportunities for residents and provide new

spaces for local existing and new businesses. Planned future infrastructure improvements will improve vehicular, pedestrian and bicycle safety and circulation for all users. Enhanced/new public open space will improve quality of life for community residents while potentially attracting residents and visitors from a broader geography throughout the city and region. Job creation in the short term would primarily involve consultants and contractors involved in cleanup activities, whereas long-term job creation from future redevelopment is expected to be significant, from new construction jobs to employment in the various new facilities constructed.

IV.E.1.c. Strategy for Leveraging Resources IV.E.1.c.i. Resources Needed for Site Reuse

The project is located at 835-855 West Main Street and 42 York Street which were identified as strategic transformative sites due to their location and size. Once remediated, these sites will have the potential to catalyze redevelopment in the Target Area's 12-acre Redevelopment Site. The NYSDOS prioritizes strategic sites for future redevelopment funding, elevating their importance from a community revitalization perspective. The City previously secured a \$284,745 grant from the NYSDOS to fund community revitalization and land use planning for the Target Area that resulted in the Bull's Head BOA Revitalization Plan (Plan). The City has committed \$8 million in local funding to undertake land assembly activities necessary for preparing the 12-acre Redevelopment Site. These implementation activities including site acquisition and occupant relocation in compliance with the federal Uniform Relocation Assistance and Real Property Acquisition Act, building demolition, environmental due diligence, and community planning/engagement, were advanced to position the 12-acre Redevelopment Site for reuse and revitalization in accordance with the Plan. Other potential funding sources for the reuse of the 12-acre Redevelopment Site include federal CDBG and HOME program funds, U.S. Economic Development Administration funds, as well as funding from state agencies such as NYS Empire State Development, NYS Housing and Community Renewal, and NYSDOS.

IV.E.1.c.ii. Use of Existing Infrastructure

Existing infrastructure, where possible, will be utilized to accommodate future redevelopment of the Target Area's 12-acre Redevelopment Site. Given the sites location in a developed portion of the city, existing infrastructure already exists and serves the Target Area. Existing infrastructure includes vehicular, pedestrian, bicycle, and transit facilities (streets and sidewalks, transit stops) and utilities (sewer, water, gas, electric, telecommunications). Although existing infrastructure is largely adequate, the Plan includes recommendations for enhancements to the infrastructure within the 12-acre Redevelopment Site to improve efficiencies. Specific recommendations to promote vehicular and pedestrian circulation/safety and multi-modal transportation initiatives consistent with best practices include intersection improvements/realignments, travel lane reconfigurations, a new roundabout to improve traffic flow and pedestrian safety, incorporation of bicycle, pedestrian and transit infrastructure, and public realm improvements.

IV.E.2. Community Need and Community Engagement

IV.E.2.a. Community Need

IV.E.2.a.i. The Community's Need for Funding

The City of Rochester's Office of Management and Budget initially projected a total budget gap for Fiscal Year 2021 of \$40.5 million. As a result of the financial crisis due to the COVID 19 pandemic, however, this gap has increased to \$64.4 million. Additionally the projected gap for Fiscal Year 2022 is \$65.2 million. As a result, the City's 2022 funded capital allocations for site investigation and cleanup activities will be reduced by 30%. In addition, New York State's municipal Environmental Restoration Program has not accepted applications for new investigation and cleanup projects since 2008. Currently, New York State does not offer brownfield assessment and due diligence funding resources directly to the private sector. The current lack of local and state funding together with the Target Area's legacy brownfields and decades of disinvestment further increase the need for outside funding sources. 835-855 West Main Street and 42 York Street (Priority Brownfield Sites) are included among 59 brownfield sites identified in the Target Area and specifically within the 12-acre Redevelopment Site. Moreover, a deteriorating and increasingly vacant (17%) housing stock, a substantial number of vacant parcels, a

disproportionally high poverty rate (36%), and an unemployment rate of 9.2 %, all contribute to the immediate need to assess and remediate environmental conditions at the Priority Brownfield Sites. U.S. Census data indicates that the annual median household income of the Target Area is \$18,000, significantly lower than city and county residents (\$31,000 and \$53,000, respectively). Moreover, 36.3% of individuals in the Target Area are below the poverty threshold, compared to 27.2%, 12.8%, and 13.4% for the city, county and state, respectively. Although data from 2020 is currently unavailable, the COVID-19 pandemic has further exacerbated these conditions in the Target Area and therefore the percentages are likely substantially higher.

IV.E.2.a.ii. Threats to Sensitive Populations IV.E.2.a.ii.1. Health or Welfare of Sensitive Populations

As previously indicated, the Target Area has a high proportion of sensitive populations that include women (53%), children under 15 years old (> 25%), African Americans (76%), and seniors (65+) (13%). U.S. Census data indicates an annual median household income of \$18,000 for the Target Area, significantly lower than city and county residents of \$31,000 and \$53,000, respectively. Moreover, 36.3% of individuals in the Target Area are below the poverty threshold, higher than the city and county of 27.2% and 12.8% respectively. A deteriorating and increasingly vacant (17%) housing stock, a significant number of vacant parcels, and vacant land, a disproportionally high poverty rate (36%), and an unemployment rate of 9.2 %, all contribute to blight, crime, vandalism and vacancies and strain municipal services and budgets, resulting in lack of funds for environmental assessment and cleanup. Further, these grim statistics are exacerbated by setbacks due to the COVID-19 pandemic and substantiate the immediate need to remediate environmental contaminants at 835-855 West Main Street and 42 York Street (Priority Brownfield Sites). While the Target Area population in the age 65+ cohort is slightly higher than the city as a whole, the 75-84 and 85+ age cohorts are increasing at a much faster rate. Between 2000 and 2016, population in the 75-84 age cohort increased by 8% in the Target Area compared to 4% for the city. In the 85+ age cohort, the increase was even more significant, rising by 17% in the Target Area compared to a decrease of 4% for the city. These statistics indicate that the most vulnerable, sensitive population group, seniors, is overrepresented in the Target Area. Coupled with environmental contamination and potential exposure pathways associated with the Priority Brownfield Sites, the health and welfare of the Target Area's elderly population is highly susceptible to illness and/or death. It is noted that according to the Finger Lakes Health Systems Agency's Healthi Kids 2016 Data Brief, African Americans and Latinos who reside in the Target Area have a level of premature mortality that is 300% higher than whites who live outside of the area. As such, the EPA Multipurpose Grant will support assessment (further identify the nature and extent of contaminants) and remediation of the health threats posed to sensitive populations (the elderly in particular) at the Priority Brownfield Sites within the Target Area's 12-acre Redevelopment Site. Previously detected contaminants include semivolatile organic compounds (SVOCs), heavy metals such as lead and mercury, and chlorinated volatile organic compounds (VOCs). These contaminants pose carcinogenic, acute toxicity and chronic toxicity concerns to sensitive populations. The cleanup will remediate these contaminants and health hazards, and improve the health and welfare of the sensitive populations in the Target Area. These sensitive populations are served by St. Mary's Campus, a healthcare and human services facility operated by Rochester Regional Health, located in close proximity to the Priority Brownfield Sites. The Grant will facilitate redevelopment of the Target Area's 12-acre Redevelopment Site, thereby addressing blighted and unsafe conditions, vacant land and structures, while introducing new, healthy and sustainable mixed-use development and affordable housing.

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

According to the Health Equity Report prepared for the City of Rochester by the New York State Department of Health (February 2017), sensitive populations within the city including the Target Area have higher incidences of disease and adverse health conditions than the county and state populations. For example, the percent of cancer cases diagnosed in late stages were higher in most categories when compared to Monroe County. Moreover, the percentage of preterm births for the city including the Target Area was 12.4% compared to 10.5% for Monroe County, and low birthweight births a r e 9.3% and 6.5% for the city and county, respectively. The Finger Lakes Health Systems Agency's Healthi Kids 2016 Data Brief further supports disparities in the Target Area: African American and Latino Families who reside in the Target Area experience premature mortality levels 300% higher

than whites who live outside the area. According to the CDC's 500 Cities Project (2015), significantly higher rates of adult asthma are present in the Target Area compared to the city as a whole. Adult asthma prevalence in the Target Area ranges from 14.2%-15.9%, which on average is estimated to be nearly 26 % higher compared to the rest of the city. Further, according to a report released by Common Ground Health in 2017, asthma related emergency department visits in the Target Area were nearly three times higher than in the rest of the city. The Target Area is identified by the City as a Lead High Risk Area (properties recorded with historic elevated blood level data). The proliferation of brownfield sites in the Target Area, including the Priority Brownfield Sites, suggests a correlation between exposure to hazardous substances, pollutants, and contaminants and the higher incidences of cancer and asthma.

IV.E.2.a.ii.3. Disproportionately Impacted Populations

Pre-development assessment and cleanup activities to address contamination concerns will have a profound impact on residents over the long term, ameliorating public health issues on sensitive populations and promoting equitable redevelopment within the Target Area. By addressing site contamination, the existing threat to impacted populations within the Target Area will be eliminated, setting the stage for revitalization. New, equitable mixed-use development and affordable housing that encourages a healthy lifestyle with less reliance on the automobile and greater reliance on walking, biking and public transit, will reverse disinvestment, improve property values, reduce carbon emissions and other air pollutants, and increase employment access. These benefits will advance positive health and environmental justice outcomes for the community. Green infrastructure will increase environmental resiliency and promote positive health in the Target Area. In addition, public engagement to date has been an extensive and inclusive process, involving Target Area residents and non-governmental organizations who were instrumental in shaping the vision, goals, objectives and values for the neighborhood's revitalization. This public engagement process will continue and will further promote environmental justice, providing Target Area residents and other stakeholders with an increased degree of protection from environmental and health hazards and equal access to decision-making processes moving forward. Cleanup and development of the 12-acre Redevelopment Site will provide sustainable and equitable mixed-use development and affordable housing, improved public infrastructure, new multi-modal mobility and recreational and open space opportunities, thereby improving the quality of life for disproportionately impacted populations in the Target Area.

IV.E.2.b. Community Engagement IV.E.2.b.i. Project Involvement

The Bull's Head BOA Revitalization Plan (Plan) was developed with and supported by City staff and the Project Advisory Committee (PAC), which is comprised of Target Area stakeholder and community representatives. It is anticipated that the PAC will continue to be the primary organization involved in ensuring community engagement for assessment, cleanup and other predevelopment activities. At the October 14, 2020 Southwest Quadrant public meeting, the City presented and discussed the Multipurpose Grant proposal, and provided opportunity for comments. The agenda and presentation regarding this meeting are also posted on the City's Multipurpose Grant web page.

Three public meetings are planned as part of the proposed project: (1) after completion of the 42 York Street Phase II assessment; (2) after completion of the 835-855 West Main Street Phase II assessment and (3) prior to cleanup at 42 York Street (i.e.: upon completion of the ABCA document). Depending upon the COVID-19 situation at the time, the meetings may be held virtually. If in-person public meetings are possible, the venue will be accessible to disabled individuals. These meetings will be publicized via newspaper and website notice as well as through the PAC member organizations. Additionally, information generated during the project will be shared through the website, social media outlets and the public document repository at the Rochester Public Library - Arnett branch.

The Target Area demographics indicate English as the primary language; however, the City's web domain is equipped for translation to several alternative languages. Language translation or translation for the visually or

hearing impaired are accommodated through the City's Office of Constituent Services. The City will accommodate hearing impaired individuals through the use of sign language interpreting services as needed.

IV.E.2.b.ii. Project Roles

List of Organization/Entities/Groups and Roles					
Name of organization/entity/group	Point of Contact (name, phone and email)	Specific involvement in the Project or assistance provided			
19 th Ward Community Association (PAC member)	John DeMott 585-313-2559 jnj_demott@juno.com	Community/Stakeholder Engagement Liaison			
Neighborhood United Neighborhood Assoc. (PAC member)	Bill Washington 585-966-9707 Goodwashe967@gmail.com	Engagement of Association Membership and Community*			
Changing of the Scene Neighborhood Assoc. (PAC member)	John Lightfoot 585-464-9007 cotsna@gmail.com	Engagement of Association Membership and Community*			
Susan B. Anthony Neighborhood Assoc. (PAC member)	Dawn Noto 585-313-0995 dnoto1872@gmail.com	Engagement of Association Membership and Community*			
Rochester Regional Health (PAC member)	Michael Owen 585-922-4883 Michael.Owen@rochesterregiona l.org	Target Area major employer, provides public meeting venue			
DePaul Community Services (PAC member)	Gillian Conde 585-777-3599 GConde@depaul.org	Provides input on Target Area disadvantaged populations' needs			
Monroe County Department of Health	John Frazer, P.E., Sr. Public Health Eng. 585-753-5060 jfrazer@monroecounty.gov	Potential review qtr. updates & provide input on health issues			
NYSDEC, Region 8	David Pratt, P.E., Regional Hazardous Waste Remediation Engineer 585-226-5449 david.pratt@dec.ny.gov	Potential project assessment and remediation guidance			

^{*}This role consists of informing/involving their membership and neighborhood residents, making transportation arrangements and/or arranging for equipment for virtual meeting participation, as needed.

IV.E.2.b.iii Incorporating Community Input

The Bull's Head BOA Revitalization Plan was developed with significant public and stakeholder support in accordance with Bull's Head BOA Community Participation Plan (CPP). The PAC, (see list of members above) provided guidance and insight throughout the community planning process. This translated into significant public outreach efforts and robust attendance at a number of public meetings at St. Mary's Campus, an ADA-accessible health care facility in the Target Area. Community input will be a continuation of these public outreach efforts and includes public meetings, PAC meetings, direct outreach (flyers, mailings, etc.), and website updates. These tasks will be conducted in accordance with an updated CPP and the EPA Community Relations Plan (CRP). It is noted that if the COVID-19 pandemic still exists, virtual outreach methods will be incorporated, as appropriate, to ensure continued community input. If in-person outreach is conducted during the COVID-19 pandemic, restrictions to achieve any applicable social distancing requirements will be required. Such methods will be assessed prior to commencement of the Grant activities and adjusted as needed.

IV.E.3. Task Descriptions, Cost Estimates, and Measuring Progress IV.E.3.a. Description of Tasks/Activities and Outputs

Task 1 Grant Management

- i. Project Implementation: City Division of Environmental Quality (DEQ) and City Department of Neighborhood and Business Development (NBD) will manage the Grant, including programmatic requirements. This will include cooperative agreement oversight, procurement of contractual entities, quarterly reporting, MBE/WBE/DBE reporting, assistance with financial reporting, management of Assessment, Cleanup and Redevelopment Exchange System (ACRES) database files, correspondence with EPA and other agencies, and attendance at meetings, including one EPA National Brownfield Conference.
- ii. Anticipated Project Schedule: The City will perform the program management work over the 5-year period of the Grant.
- iii. Task/Activity Lead: City DEQ and NBD
- iv. Outputs: The outputs for this task include quarterly reports, MBE/WBE/DBE reports, financial reports, updates to the ACRES database for the priority sites, and Grant closeout documentation.

Task 2 Community Engagement and Participation

- i. Project Implementation: The City will continue to engage the community through its existing CPP and updates to the web page on the City's website for its EPA Multipurpose Grant application for the Bull's Head Target Area. In addition, an EPA CRP will be prepared to provide a summary of the assessment and cleanup activities being performed under the Grant, provide opportunities for community involvement, and encourage communication with community members before decisions are adopted. This document will outline activities such as neighborhood meetings and notices that will be completed. A document repository and project web page will be maintained with the CRP, work plans, reports, an Analysis of Brownfields Cleanup Alternatives (ABCA), and other project information.
- ii. Anticipated Project Schedule: The City will conduct community engagement and participation over the 5-year Grant period. The web-page will be updated as the project progresses. A subsequent public meeting will be conducted when a Draft ABCA for the 42 York Street parcel is ready for public review and comment (anticipated in year 2 or year 3 of the Grant period).
- iii. Task/Activity Lead: City DEQ, City NBD, and Environmental Professional
- iv. Outputs: The outputs for this task include the CRP, a PowerPoint presentation to be used at the public meeting, and a response summary addressing comments received from the community.

Task 3 Phase II Environmental Site Assessments

i. Project Implementation: Phase II Assessments will be completed for 835-855 West Main Street and 42 York Street. For each site, a Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP) will be completed. The draft QAPP will be finalized subsequent to addressing any EPA comments. Upon EPA QAPP approval, Phase II Assessment work will be initiated.

For the 835-855 West Main Street, the scope of the assessment will include: observation, screening and collection of samples from direct-push test borings for two days; observation screening and collection of samples during installation of eight bedrock groundwater monitoring wells; analytical laboratory testing of three soil field samples, three field groundwater samples, and six associated QA/QC samples for full target compound list/target analyte list (TCL/TAL) parameters and emerging contaminants (EC) that consists of Per- and Polyfluoroalkyl Substances (PFAS) and 1,4-Dioxane; analytical laboratory testing of twenty soil field samples, thirteen field groundwater samples, and four associated QA/QC samples for VOCs; third-party data validation of the analytical laboratory results; and characterization, transport and disposal of investigation-derived wastes. The test boring and well locations will be used to fill in data gaps primarily in the area of the existing building after it is demolished using City funds outside of the Multipurpose Grant.

For the 42 York Street, the scope of the assessment will include: observation, screening and collection of samples from test pits for one day; observation screening and collection of samples during installation of one overburden/bedrock groundwater monitoring well; analytical laboratory testing of six soil field samples, two field groundwater samples, and six associated quality assurance\quality control (QA/QC) samples for VOCs, SVOCs, and metals; third-party data validation of the analytical laboratory results; and characterization,

- transport and disposal of investigation-derived wastes. The test pits and well location will be used to fill in data gaps across the site.
- ii. Anticipated Project Schedule: The components of the Phase II Assessments will be completed in the first year of the Grant period.
- iii. Task/Activity Lead: Environmental Professional and its subcontracted entities.
- iv. Outputs: The outputs for this task include: analytical laboratory data packages; data usability summary reports (DUSRs), and draft and final Phase II Assessment reports.

Task 4 Site Cleanup

- Project Implementation: Site cleanup will be completed at 42 York Street initially, an Analysis of Brownfields Cleanup Alternatives (ABCA) will be prepared, and the ABCA will provide a recommended remedial alternative for the site. A draft of the ABCA will be submitted to the EPA and also made available to the community via a public notification, a public meeting, the document repository, and the City's project web page. Subsequent to addressing comments, the ABCA will be finalized, and the selected remedial alternative will be identified in a Decision Memo. A Remedial Work Plan (RWP) will then be prepared that also includes a QAPP and HASP. The HASP will include health and safety monitoring for on-site environmental workers and a Community Air Monitoring Plan (CAMP) for the safety of the surrounding community which will be implemented during cleanup activities. The Monroe County Department of Health (MCDOH) will be made aware of the project through the Monroe County Waste Site Advisory Committee, of which the City of Rochester is a member. A draft of the RWP will be submitted to the EPA. The draft RWP, it will be finalized subsequent to addressing any EPA comments. Upon EPA RWP approval, the cleanup work will be initiated. It is anticipated that the cleanup will involve the removal of approximately 3,500 cubic yards of fill material from the Site that is contaminated with elevated SVOCs and/or metals and/or is identified as an industrial regulated solid waste that is also geotechnically unsuitable for redevelopment of the site with structures. The removed fill material will be transported and disposed off-site at an appropriate regulated landfill facility. Post excavation soil samples would be collected, ten soil field samples and three associated QA/QC samples would be analyzed for SVOCs and metals; and third-party data validation would be performed on the analytical laboratory results. Approximately 3,500 cubic yards of imported geotechnical fill (e.g., crushed stone) would be placed and compacted in the excavation to match existing grade. As a non-EPA Grant resource, the City of Rochester cost share of \$40,000 (from the City's fiscal year 2019-2020 Cash Capital) will be applied to \$40,000 of subcontracted entity contractual costs that are necessary to assist in carrying out this task.
- ii. Anticipated Project Schedule: The components of the cleanup will be completed in the second through fourth year of the Grant period.
- iii. Task/Activity Lead: Environmental Professional and its subcontracted entities.
- iv. Outputs: The outputs for this task include: a draft and final ABCA, a decision memo, analytical laboratory data packages; DUSRs, and a draft and final Cleanup Report.

IV.E.3.b. Cost Estimates

Budg	get Categories	Categories Project Tasks (\$)				
		Task 1 Grant Mgmt.	Task 2 Citizen Engagement & Participation	Task 3 Phase II ESA's (QAPP, HASP, Implementation Reporting)	Task 4 Site Cleanup (ABCA, Dec. Memo, RWP, QAPP, HASP, Implementation Reporting	Total
rect	Personnel	\$5,080	\$2,918	\$6,654	\$9,474	\$ 24,126
	Fringe Benefits	\$2,855	\$1,640	\$3,740	\$5,324	\$ 13,559
	Travel ¹	\$1,750	\$0	\$0	\$0	\$ 1,750

Equipment	\$0	\$0	\$0	\$0	\$ 0
Supplies	\$0	\$0	\$0	\$0	\$ 0
Contractual	\$0	\$5,250	\$147,800	\$606,950	\$760,000
Other (Fact sheets & other documents)	\$0	\$ 565	\$0	\$0	\$ 565
Total Direct Costs	0	0	0	0	0
Indirect Costs	0	0	0	0	0
Total Federal Funding (Not to exceed \$800,000)	\$9,685	\$10,373	\$158,194	\$621,748	\$800,000
Cost Share (\$40,000) ²	\$0	\$0	\$0	\$40,000	\$40,000
Total Budget (Total Direct Costs + Indirect Costs + Cost Share)	\$9,685	\$10,373	\$158,194	\$661,748	\$840,000

¹Travel to brownfields-related training conferences is an acceptable use of these Grant funds.

The estimated project contractual assessment and cleanup costs are based on a project-specific Opinion of Probable Cost (OPC) prepared by an experienced environmental professional with input from the City, and includes environmental professional services, expenses, subcontracted services, and a 5% contingency, which is reasonable for this type and scale of project. The OPC is based primarily on estimated quantities and unit rates for other recent brownfield assessment and cleanup projects of similar size and magnitude. Total City personnel, fringe, travel & other costs of \$40,000 were developed based on the specific tasks identified, and the City's extensive experience with successfully implementing numerous EPA funded assessment and cleanup projects of comparable magnitude. The costs associated with each task are further discussed below.

Task 1 Grant Management (Total Costs = \$9,685)

City personnel and fringe costs for this task are \$7,935, and will involve approximately 110 hours of City DEQ & NBD staff time at an average direct salary of \$46.18 per hour plus the applied City average fringe rate of 56.2%. Tasks include contractual procurement, completing the required financial and MBE/WBE/DBE reports, quarterly reports, and ACRES database updates. The travel cost of \$1,750 includes conference registration, airfare, baggage, hotel, public transportation, and meals for one City staff person to attend the EPA National Brownfield Conference.

<u>Task 2 Community Engagement and Participation</u> (Total Costs = \$10,373)

City personnel and fringe costs for this task are \$4,558, and will involve approximately 66 hours of City DEQ & NBD staff time at an average direct salary of \$44.21 per hour plus the applied City average fringe rate of 56.2%. Tasks include updating the City's project web page, coordinating and participating in public meetings with community stakeholders and the general public, preparing and reviewing information/fact sheets and other documents for informing the community about the project, and answering questions from the community over the duration of the project. Contractual costs, which include assistance with preparation of a CRP and preparation for and attendance of a public meeting, are \$5,250 (comprised of professional labor cost). Other direct costs of \$525 are for project information/facts sheets printing and distribution.

Task 3 Phase II Environmental Site Assessments (Total Costs = \$158,194)

²Applicants must include \$40,000 cost share in the budget.

City personnel and fringe costs for this task are \$10,394, and will involve approximately 146 hours of City DEQ & NBD staff time at an average direct salary of \$45.57 plus the applied City average fringe rate of 56.2%, to manage all aspects of the assessments, including site visits during fieldwork, review of field observations and laboratory results as they become available, meetings and communication with the environmental professional and its subcontracted entities, review of daily summary reports, correspondence with the EPA, approving waste profiles for investigation-derived waste, evaluating change orders or assessment scope deviations, review and approval of invoices, and compliance with the terms and conditions of the professional services agreement between the City and their environmental professional. Contractual costs of \$147,800 for assessments of the 835 - 855 West Main Street and 42 York Street Sites include environmental professional and subcontracted costs for: preparation of QAPPs and HASPs; meetings and communication with the City; completion of test pits, test borings and monitoring wells; development of monitoring wells; collection and analysis of samples of various media; data validation; characterization, transport and disposal of investigation-derived wastes; and preparation of reports. The total assessment contractual cost for 835-855 West Main Street is \$117,000, which includes \$52,500 for professional labor, \$3,000 for expenses, and \$61,500 for subcontracted entities. The total assessment contractual cost for 42 York Street is \$30,800, which includes \$14,300 for professional labor, \$1,000 for expenses, and \$15,500 for subcontracted entities.

Task 4 Site Cleanup (Total Costs = \$621,748)

City personnel and fringe costs for this task are \$14,798, and will involve approximately 208 hours of City DEQ & NBD staff time at an average direct salary of \$45.55 plus the applied City average fringe rate of 56.2%, to manage all aspects of the site cleanup, including site visits during fieldwork, review of field observations and laboratory results as they become available, meetings and communication with the environmental professional and its subcontracted entities, review of daily summary reports, correspondence with the EPA, approving waste profiles for wastes, evaluating change orders or RWP deviations, review and approval of invoices, and compliance with the terms and conditions of the professional services agreement between the City and their environmental professional. Contractual costs of \$606,950 for cleanup of the 42 York Street site include environmental professional and subcontracted costs for: preparation of an ABCA, a RWP, a QAPP and a HASP; meetings and communication with the City; mark-out, excavation, characterization, transport and disposal of approximately 3,562 cubic yards of fill material; collection and analysis of soil samples; data validation; import, placement, compaction, and compaction testing of clean backfill; and preparation of reports. This total cleanup contractual cost includes \$55,000 for professional labor, \$3,000 for expenses, and \$548,950 for subcontracted entities. As a non-EPA grant source, the City of Rochester cost share of \$40,000 (from the City fiscal year 2019-2020 Cash Capital) will be applied to contractual costs that are necessary in carrying out this task.

IV.E.3.c. Measuring Environmental Results

The City measures outcome data for specific sites on a city-wide basis including: numbers of sites and acres assessed and remediated/year. These data are tracked for all city brownfield sites and reported in the City's annual budget. Average remedial costs/acre are calculated and tracked based on intended future use (i.e. commercial, industrial, residential). The City also tracks: outside and private sector site investment, increases in assessed valuation and annual property tax revenues, and project specific job retention and creation, specifically for brownfield sites. Progress will be reported to the EPA during the project through the ACRES database, and quarterly reports will be provided to the EPA and used to measure results.

IV.E.4 Programmatic Capability and Past Performance

IV.E.4.a Programmatic Capability

IV.E.4.a.i Organizational Structure and Experience and IV.E.4.a.ii Description of Key Staff

The City of Rochester's Division of Environmental Quality (DEQ) provides services for environmental due diligence assessments, environmental cleanups, implementing the City's environmental institutional control system, and assistance with brownfield remediation and redevelopment projects. DEQ has successfully remediated numerous impacted sites and will be responsible for ensuring the timely and successful expenditure

of EPA Multipurpose Grant funds, and, with the assistance of the City's Department of Neighborhood and Business Development (NBD), the completion of all technical, administrative and financial requirements of the project and the Grant. City DEQ has successfully managed 25 EPA brownfield assessment, cleanup, RLF, EWDJT, and area-wide planning grants since 1995. The City's brownfield project manager has 32 years of professional environmental cleanup experience and has been working for City DEQ since 1996. The DEQ includes: six full-time, degreed, environmental professionals; three geologists with over 60 years' experience overseeing Phase I Environmental Site Assessments, Phase II Subsurface Investigations and environmental cleanup projects a full-time grants/budget financial coordinator; and, one part-time economic development specialist. The grants/budget coordinator has 18 years of experience with EPA grant compliance including quarterly and MWBE reporting, ACRES reporting, consultant contract and Cooperative Agreement administration and payments for over 20 EPA grants. The development project manager in NBD is a certified planner with the American Institute of Certified Planners (AICP) and has extensive project related experience with over 27 years in urban planning, brownfield/community revitalization, brownfield development, and associated grant management. The size of and depth of experience in the DEQ & NBD staff allows for substitution of experienced professionals in the event of an unexpected absence or departure. Additionally, DEQ's permit-based environmental institutional control system currently tracks 260 parcels in the city.

IV.E.4.a.iii. Acquiring Additional Resources

DEQ has an established procedure for hiring qualified environmental professionals for brownfield cleanup and assessment services, and is experienced in procuring environmental professional services under the EPA's brownfield Cooperative Agreement procurement requirements. City procedures follow required competitive Procurement Standards in 2 CFR 200.317-326 when hiring contractors. Proposals received by the City are reviewed, rated using quantitative rating criteria, and ranked. Proposed fees are carefully analyzed and compared. If needed, interviews are held prior to selection. Once environmental professionals are selected, City Council authorization is required prior to executing a professional services agreement. DEQ completes the process from Request For Proposal issuance to execution of an environmental professional service agreement in about four months.

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

IV.E.4.b.i. Currently Has or Previously Received an EPA Brownfields Grant

Rochester has received prior EPA brownfield grant funding. Recent activity is summarized in the table below:

Category and Site	EPA Funding and Type	Award Year (FY)	Use of Funds	Balance of Funding	Estimated Completion
Brownfield Cleanup	\$200,000 Petroleum	2018	Cleanup at 121-123 Reynolds Street	\$19,500	9/30/2021
Community Wide Assessment	\$200,000 Haz. Substance	2018	Brownfield Opportunity Area Site Assessment	\$129,000	9/30/2021
Brownfield Cleanup*	\$408,000 Petroleum	2020	Cleanup at 24 and 32 York Street	\$408,000	9/30/2023

^{*}The 24 and 32 York Street Cleanup grant is a new grant that was awarded in September 2020

IV.E.4.b.i.1 Accomplishments:

The cleanup grant for 121-123 Reynolds Street is substantially complete with remaining tasks involving routine operation and maintenance including ground water sampling, remedial closure report, engineering and institutional control related work/documents, and NYSDEC spill closure petition. The 2018 Brownfield Opportunity Area Site Assessment Program (BOASAP) grant has resulted in one OPC, 11 Phases I's and one Enhanced Phase I to date. We will begin the City Council approval process within the next three months to appropriate the new grant funding for the cleanup at 24 and 32 York Street.

In addition, Rochester has recently completed one (1) EPA funded petroleum cleanup grant of a .25-acre site at 937-941 Genesee Street; and two (2) assessment grants. The Petroleum Assessment Community Brownfield Assistance Program (CBAP) included the development and implementation of a city-wide Petroleum Assessment Program in accordance with EPA program requirements. A local environmental professional assisted Rochester with researching sites, developing property profiles and developing scopes of work for eligible sites. The Petroleum CBAP resulted in the investigation of ten sites and included seven Phase I's, three Phase II's and two Preliminary Phase II's, and resulted in DEQ executing agreements with the NYS Oil Spill Fund to allow NYSDEC to initiate cleanup on three City-owned former gasoline stations. The 2014 Hazardous Substance BOASAP resulted in the investigation of 29 sites which included 25 Phase I's, five Phase II's, 1Environmental Management Plan, one Soil Vapor Intrusion assessment, one Opinion of Probable Cost, one Remedial Investigation Implementation assistance, one waste characterization, and the development of an Urban Fill Training program that was presented to both City staff and developers. DEQ has reported progress and successes directly to its EPA Region 2 project manager, through accurate quarterly and ACRES reporting.

IV.E.4.b.i.2 Compliance with Grant Requirements:

Rochester has consistently met its work plan and cooperative agreement requirements and ensured timely achievement of results through effective management of project environmental professionals, budgets, and schedules. The grants/budget coordinator monitors compliance with cooperative agreements, work plans, financial budgets, environmental outputs, and deliverables, and helps assemble data. Site approval requests were submitted on a timely basis. Actual work plan outputs, schedules, and key results are compared against work plan estimates and reported on a timely basis. Quarterly progress reporting, and annual financial reports are up to date and have been completed in a timely manner. The City's quarterly reporting routinely links progress toward achieving grant output goals, for example, numbers of site assessments completed, to actual performance. The City has communicated progress and accomplishments to both its EPA Region 2 Project Officer as well as through the EPA ACRES program as required. Several parameters are calculated including program demand, efficiency, costs, and results which are tracked and reported to the EPA. Rochester's performance, including the completion of EPA funded assessment and cleanup projects demonstrates that it is achieving the results expected. DEQ completed and closed one cleanup grant in 2017, one petroleum assessment grant in 2019, and one hazardous substance assessment grant in 2019. The total remaining balance for all of these closed grants combined was \$29,696. The majority of this balance was in the 937-941 Genesee Street petroleum cleanup grant contractual category and was due to environmental professional efficiencies in the remedial phase of the cleanup project.

IV.E.4.b.iiHas Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

IV.E.4.b.ii.1 Purpose and Accomplishments Not Applicable

IV.E.4.b.ii.2 Compliance with Grant Requirements Not Applicable

IV.E.4.b.iii Never Received Any Type of Federal or Non-Federal Assistance Agreements Not Applicable

IV.F. Leveraging

The City will not seek leveraged funds because the costs identified are accurate based on current site information and prior project costs. Should additional funds be needed to complete the project, the funding will come from the City's fiscal year 2019-2020 Cash Capital.

Threshold Criteria for Multipurpose Grants 835-855 West Main Street and 42 York Street, Rochester, NY

III.B.1. Applicant Eligibility

The City of Rochester, New York is the applicant. The City of Rochester is an incorporated general purpose unit of local government in New York State.

III.B.2. Community Involvement

Community involvement has been a key component of the Bull's Head Revitalization Project since 2009 and the Brownfield Opportunity Area (BOA) Revitalization Plan process since 2016. The City of Rochester is committed to continuing and expanding this robust community involvement program. The City has already involved the community in the proposed EPA Brownfield Multipurpose Grant: City personnel presented the scope of this Grant at a virtual meeting of the Southwest Quadrant District Council on October 14, 2020 to solicit input. Additionally, the City has established a public document repository at the Rochester Public Library - Arnett Branch and maintains a website for this Grant proposal.

The Bull's Head Revitalization Plan Project already has an established Project Advisory Committee (PAC) comprised of neighborhood community organizations, stakeholders, and community health services agencies within the Target Area (see **page 6** of the application Narrative). The PAC continues to be an active part of the Bull's Head community revitalization process and will continue to be the primary organization involved in ensuring community engagement for the proposed assessment and cleanup activities at 835-855 West Main Street and 42 York Street (Priority Brownfield Sites) and as implementation moves forward.

Community input will be a continuation of public outreach efforts that supported the Bull's Head BOA Revitalization Plan process and includes PAC meetings, public meetings, direct outreach (flyers, mailings, etc.), website and public repository updates. These tasks will be conducted in accordance with an updated BOA Community Participation Plan (CPP) and the EPA Community Relations Plan (CRP). Information generated during the project will be shared through periodic PAC and public meetings and regularly updated on the project website, repository and other social media outlets.

It is noted that if the COVID-19 pandemic still exists, virtual outreach methods will be incorporated, as appropriate, to ensure continued community input. If in-person outreach is conducted during the COVID-19 pandemic, restrictions to achieve any applicable social distancing requirements will be required. Such methods will be assessed prior to commencement of the Grant activities and adjusted as needed.

III.B.3. Target Area

The Bull's Head Brownfield Opportunity Area (BOA) is an approximately 185-acre area located on the west side of the city of Rochester, NY and represents the Target Area. The Bull's Head neighborhood is considered a key historic gateway to the city of Rochester, and has been a focus of the City's revitalization efforts with over a decade of community-based revitalization planning.

The BOA or Target Area is bounded by the CSX railroad corridor and primarily industrial land uses on the north, Jefferson Avenue on the east, West Main Street, West Avenue, and Clifton Street on the south and Ames Street on the west. Within the Target Area is the Bull's Head Urban Renewal Area (URA), a 34-acre sub-area identified as being significantly impacted by blighted conditions. Additionally, the

eastern portion of the URA has been identified as the 12-acre Redevelopment Site, which is the most strategically-important physical transformation towards the revitalization of the Target Area. The 835-855 West Main Street and 42 York Street sites (the Priority Brownfield Sites which are the subject of the proposed Grant assessment/cleanup activities) are located in this strategically-important portion of the 12-acre Redevelopment Site within the Target Area.

Decades of environmental contamination have constrained cost-effective development when compared to other areas across the region. This has resulted in vacant and abandoned buildings and lots, decreased employment opportunities, disinvestment, decreasing property values, high poverty, unemployment and crime rates, and an increasing number of tax foreclosures. Remediation of contaminated brownfield sites will create new jobs, reduce poverty, and spur private investment.

III.B.4. Affirmation of Brownfields Site Ownership

The City of Rochester is the sole owner of both the 835-855 West Main Street property and the 42 York Street property, having acquired these properties via a warranty deed and negotiated purchase on and October 31, 2018 and December 15, 2016 respectively. The City affirms that these parcels meet the CERCLA § 101(39) definition of a brownfield and: a) are not listed (or proposed for listing) on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

III.B.5. Use of Grant Funds

Grant funds will be used to conduct assessment activities on the 835-855 West Main Street property and assessment and cleanup activities on the 42 York Street property. The plan for assessment and cleanup expenditures is presented on **pages 8-10** of the Narrative portion of this application. A community-based revitalization plan for the Target Area including a more specific redevelopment plan for the 12-acre Redevelopment Site, were already completed. Therefore, funds will not need to be expended on planning tasks (i.e.: Bull's Head Revitalization Plan dated January 2020). Having an existing revitalization plan allows the City to concentrate on site assessment and cleanup, thus moving closer to the overall redevelopment goals of the 12-acre Redevelopment Site within the Target Area.

III.B.6. Required Cost Share

The City acknowledges and commits to a \$40,000 cost share associated with this Grant. The cost share of \$40,000 will come from the City's fiscal year 2019-2020 Cash Capital and will be applied to contractual costs.