

## **RESPONSE TO THRESHOLD CRITERIA**

### ***Threshold Criterion A: Applicant Eligibility***

Louisville-Jefferson County Metro Government is a general-purpose local government eligible for funding under the Small Business Liability Relief and Brownfields Revitalization Act.

### ***Threshold Criterion B: Letter from the State or Tribal Environmental Authority***

A current letter from the Kentucky Department for Environmental Protection acknowledging that the applicant plans to conduct assessment activities and is planning to apply for Federal grant funds is attached.

### ***Threshold Criterion C: Site Eligibility and Property Ownership Eligibility (Site- Specific Proposals Only)***

Not applicable – this is a community-wide assessment grant proposal.

## **RESPONSE TO RANKING CRITERIA**

### ***Ranking Criterion A: Assessment Grant Proposal Budget (10 points)***

**Provide the proposed budget for your proposal, including a detailed description and narrative of each task.**

This application is a part of a coordinated approach to brownfields redevelopment in the Park Hill Industrial Corridor. This approach includes a Master Plan for the Corridor to delineate the community's vision for enhancing its value as a place to work and live (the project is in the kickoff stage, with \$300,000 budgeted). Our redevelopment efforts have a strong public participation component through the three-year EPA-funded community involvement initiative called "Re-defining Brownfields". This initiative created a broad-based stakeholder group to develop a vision for the corridor's redevelopment and encourage community involvement in reuse planning. A number of economic development initiatives conducted by the applicant, including Economic Development Administration-funded market analysis of real estate in the targeted area and Department of Transportation-funded transportation needs assessment study, demonstrates Louisville's focused approach to redevelopment of Park Hills brownfields. This multifaceted approach tackles the Park Hill Corridor's brownfields simultaneously from multiple angles, leverages a potential EPA investment in brownfields assessments, and helps implement the consensus community vision for the area.

Brownfield inventory, community involvement, reporting, and strategic brownfields redevelopment planning activities are already a part of the regular duties of the Economic Development Department's (EDD) staff and, therefore, will not be charged to the grant. Louisville Metro is currently a partner in a substantial community participation and planning effort for brownfields redevelopment in the area targeted in this application – "Re-defining Brownfields" public education and participation project. This collaborative project is led by the University of Louisville's Center for Environmental Policy and Management, and includes a third partner, the non-profit Center for Neighborhoods. The project is

funded by the EPA under the “Brownfields Training, Research and Technical Assistance Grants and Cooperative Agreements” program. It provides Louisville Metro with the valuable community input that will help us plan and prioritize the actual sites for assessments, which, in turn, supplements the budget for community involvement in this application.

The Park Hill Industrial Corridor Community-wide Assessment Program (Hazardous Substances) is designed to further Louisville Metro’s initiatives in brownfield redevelopment. Our program is based on a notion that brownfields redevelopment should be a foundation for economic revitalization of socio-economically disadvantaged areas of the city. As our experience shows, the inertia of private markets towards brownfields areas, especially when burdened with the presence of socio-economically disadvantaged populations, may be reversed once the levels of environmental contamination are quantified, the management plans are established, and a degree of certainty is brought to a development. We view the possibility of EPA’s potential investment in our community as a unique financing mechanism that will cover substantial expenses for environmental assessments not available from any other source, whether public or private. This view is reflected in our budget which is designed to maximize the number of actual Phase I and Phase II assessments in the targeted community.

**Park Hill Industrial Corridor Community-wide  
 Assessment (Hazardous Substances) Program Budget**

Budget Categories	Project Tasks			
	<i>Task 1: Community Outreach/ Community Involvement</i>	<i>Task 2: Inventory and Phase I/II Assessments</i>	<i>Task 3: Cleanup Planning</i>	Total
(programmatic costs only)				
Personnel	<i>In-kind</i>	<i>In-kind</i>	<i>In-kind</i>	
Equipment				
Supplies	\$ 5,000			\$ 5,000
Travel			\$ 6,000	\$ 6,000
Contractual		\$ 189,000		\$ 189,000
<b>Total</b>	\$ 5,000	\$ 189,000	\$ 6,000	\$ 200,000

***Budget Tasks:***

***Task 1. Community Outreach/Community Involvement.*** This activity is already underway through the “Re-defining Brownfields” initiative and will be expanded to include public involvement in the selection and prioritization of assessment sites. The larger portion of the community outreach costs, as well as costs of programmatic activities associated with reporting will be covered in-kind through the staff time of the EDD’s economic development professionals. Additional \$5,000 is budgeted as “Supplies” to support miscellaneous public participation process costs such as printing and distribution of brochures, fliers or other informational materials over and above cost of outreach activities conducted as part of the “Re-defining Brownfields” project.

***Task 2. Inventory and Phase I/II Assessments.*** Our budget is designed to maximize the number of actual Phase I/II Assessments. “Contractual” (\$189,000) is budgeted to hire environmental consultants for the assessment work. As an estimate, and depending on size and history of uses at specific sites we expect to conduct 5-7 Phase I assessments (estimate: \$1,000 to \$4,000 each) and 2-4 Phase II

assessments (estimate: \$20,000 to \$80,000 each). Also, an environmental contractor will perform initial in-depth review of historic documents and inventory of the sites, serving as the database from which the targeted community will select the sites (estimate: \$10,000 - \$20,000). The actual breakdown of the contractual cost distribution for site inventory and activities under Phase I and Phase II assessment will be decided following the public involvement process in the selection and prioritization of assessment activities. Costs of reporting associated with this task will be provided in-kind by EDD.

**Task 3. Cleanup Planning.** Cleanup and redevelopment planning are a part of the EDD staff's regular work assignment, and therefore are shown as in-kind contribution to the project. Cleanup planning will be conducted by tapping into the existing "Re-defining Brownfields" initiative and integrating cleanup planning into the agenda of these regular public meetings. Cleanup planning will also be addressed during the Master Planning process. The "Travel" (\$6,000) line item will cover expenses of the applicant's staff for travel to the annual EPA Brownfield conferences and/or EPA educational workshops to learn the new approaches to site assessments and cleanup and to exchange ideas with the EPA representatives, other local governments, and environmental contractors. Costs of reporting associated with this task will be provided in-kind by EDD.

### ***Ranking Criterion B: Community Need (15 points)***

#### **1. Provide a detailed description of the target community that the project will benefit.**

The focus area of this EPA Community-Wide Assessment Grant Application is the Park Hill Industrial Corridor. This 2,100 acres area is located in the southeast corner of West Louisville, roughly matching Census tracts 27, 28 and 35. It is Louisville's old manufacturing center which, as a result of economic restructuring and numerous manufacturing plants' closures, suffered significant job losses. By focusing on this industrial zone, our goal is to leverage EPA grant funding to make a maximum impact on West Louisville as a whole, realigning its economy within the regional cluster network and replacing the lost heavy industrial jobs by supporting the demands of modern businesses. We expect that the spillover effects of our revitalization efforts will benefit all residents of West Louisville and truly reintegrate both Park Hill and West Louisville into the larger regional economy.

The Park Hill Industrial Corridor is a traditional-type industrial core which demonstrates the common symptoms of inner-city disinvestment and abandonment. The project area was hit the most by the economic restructuring. As an example of the severity of economic displacement, the following major manufacturing facilities located in the project area closed their doors in the last three decades: Philip Morris, Inc (employment in 1973 - 2,588), Henry Vogt Machine Co. (employment in 1973 - 1,200), and Fawcett Printing Co. (employment in 1973 - 1,100). The combined employment of only these three closed facilities is comparable to the whole current population of the area. Despite the strategic central location and available workforce, a weak market makes it difficult to stabilize and grow employment in the area. For example, in 2004 Corhart Refractories Co. closed its manufacturing facilities in the area resulting in the lay-off of 150 workers. The table below demonstrates the current level of distress in the project area and its immediate surrounding area (West Louisville), as compared to Louisville metro area, state of Kentucky and national data.

<i>Project Area Statistics</i>					
	<u>Park Hill Corridor (project focus area)</u>	<u>West Louisville (project impact area)</u>	<u>Louisville MSA</u>	<u>Kentucky</u>	<u>US</u>
<i>Population</i>	5,096	75,733	1,025,598	4,041,769	281,421,906
<i>African-American, %</i>	<b>80.6</b>	<b>69.0</b>	13.8	7.3	12.3
<i>Unemployed, %</i>	<b>16.0</b>	<b>12.1</b>	4.6	3.5	3.7
<i>Population Below Poverty Level, %</i>	<b>47.6</b>	<b>34.9</b>	10.9	15.8	12.4
<i>Source: U.S. Bureau of Census, 2000</i>					

As a large industrial zone, the target area for the assessment activities is mostly devoid of residents. No sensitive populations are present in the area. The ongoing public participation process through the “Re-defining Brownfields” initiative organized the residents of the neighborhoods surrounding the industrial zone to voice their opinion on the direction of future development in the Corridor. At these public meetings local stakeholders expressed concerns regarding environmental justice issues, expressing strong opposition to any development that may require erecting a smokestack. Environmental assessments are required before vacated and abandoned properties can be reused as modern environmentally clean employment generators meeting both the socio-economic needs of the area and health and safety concerns of the neighbors.

**2. Explain how the targeted community will benefit from this grant.**

The consequences of economic restructuring described above not only significantly damaged the economy of the area and its sense of community, but also left a number of abandoned, vacant or underutilized industrial sites. As a result, the Park Hill Industrial Corridor landscape is marred with brownfields. The perception of contamination stifles redevelopment of the area. A number of initiatives, including local, state and federal investments are currently implemented and are also being planned. EPA’s Assessment Grant will provide the targeted community with a funding source for community-wide assessments of possible contamination. This funding is not available from any other source. Together with other initiatives Louisville Metro and our community partners are implementing, this grant will fund a key part of the redevelopment strategy that is grounded in community participation, sound environmental data, and a focused goal of bringing jobs back to a distressed urban area through brownfields reclamation. Assessments funded by this initiative will promote cleanups, redevelopment, private investment, and, ultimately, new jobs for low-income residents of the neighborhoods surrounding the industrial core.

The opportunity to pursue a large-scale redevelopment in the corridor was a result of an earlier EPA-funded site-specific assessment project on a publicly owned property. EPA’s site-specific assessment grant (2005; \$350,000) for the former Rhodia facility in the Park Hill Corridor allowed us to create an innovative cleanup financing mechanism, where a contractor demolished the assessed site, recycled scrap materials and paid itself for demolition with proceeds of scrap recycling. Estimated multimillion dollars costs of cleanup made it impossible for the city to clean up the site. Using a site-specific EPA assessment grant to leverage a private-party self-financed demolition and cleanup, this project allowed us to eliminate a potential public health hazard (abandoned chemical plant) adjacent to a public housing project. In 2007, Louisville Metro applied for two community-wide EPA assessment grants

and an RLF grant for the area as a whole. We received a grant for petroleum assessments (\$200,000), and for the Revolving Loan Fund (\$1,000,000). This Hazardous Substances assessment application will allow us to establish a comprehensive program for assessment of all eligible contaminants in the targeted area. By bringing vacant and underutilized properties back to the marketplace, we will stimulate the local private sector and non-profit organizations to reverse the socio-economic disadvantages of the area, provide wealth building opportunities for its residents, and fully integrate the area into the modern regional economy.

### **3.Characterize the impact of brownfields on your target community.**

West Louisville in general, and the Park Hill Industrial Corridor in particular, are severely hampered in their ability to link to the regional economy because of high transaction costs associated with land assembly, environmental assessments, building obsolescence, environmental remediation and restoring land titles to marketable condition. The brownfields problem is the biggest constraint on the redevelopment of the Park Hill Industrial Corridor due to the uncertainty of the perceived environmental contamination. Unless this uncertainty is addressed, private investors are unwilling to assume the financial risk and threats of liability. Similar mechanisms negatively affect residential property values in the area, which are the lowest in the Louisville Metro. A Community-Wide Assessment Grant will allow us to address these uncertainties and open the possibilities for economic growth and a higher quality of life for its residents.

The whole 2,100 acres area targeted in this application is considered a brownfield due to the history of multiple industrial uses. It is impossible to initiate any redevelopment project on any parcel in the area without performing, at a minimum, a Phase I assessment. Since current market conditions in the corridor do not allow cost-effective market-rate redevelopment, if at least some costs of assessment and cleanup are not publicly subsidized, the properties are left abandoned and underutilized, denying low-income population of the surrounding neighborhoods access to jobs. EPA assessment grant will help us work with private sector developers to convert vacant and underutilized brownfields into job-generating and sustainable uses.

#### ***Ranking Criterion C: Site Selection Process (6 points)***

##### **1. Describe how sites were selected/will be selected and what site selection criteria were/will be developed.**

We use three specific site selection criteria (benchmarks) to establish the site selection process for this program. First, we rely on the expertise of the EDD's staff in collaboration with the environmental consultant and EPA grant manager to determine feasibility and cost-effectiveness of an assessment. Second, the benefits of the public investment in a site assessment should further the West Louisville Competitive Assessment and Strategy Project. This means that the priority in selection will be granted to sites with the greatest wealth building opportunities for residents and sustainable reuse potentials. Finally, sites are checked against the feedback Louisville Metro is obtaining from its ongoing participation in the EPA-funded community outreach initiative "Re-defining Brownfields". At this stage, any possible threats to public health, as well as opportunities to create greenspace will be discussed with representatives of community surrounding the Corridor. We will prioritize assessment on sites deemed most valuable by local stakeholders. The sites conforming to the three criteria above will be suitable candidates for assessment funding under this program.

##### **2. Describe possible or previous inventory activities, prioritization efforts, or other activities.**

Since the early 1990s the Louisville Metro Government is actively pursuing the strategy of inner-city revitalization through brownfield redevelopment. As a recipient of the early EPA Brownfields

Assessment Pilot Award in 1995 we created a parcel-specific database of property with layers of public environmental information throughout Louisville Metro. This database will serve as a template for the in-depth inventory activities in the Park Hill industrial core.

In 2000-2001, the Initiative for a Competitive Inner City in partnership with the City of Louisville brought together private, public and nonprofit leaders to develop the West Louisville Competitive Assessment and Strategy Project. By addressing market forces, building on competitive advantages and emphasizing economic growth, this inner-city revitalization strategy strives to increase the competitiveness of West Louisville as a business location, stimulate growth of West Louisville companies, increase jobs, income and wealth opportunities for West Louisville residents, and add to the growth and vitality of the regional economy. With the help of the West Louisville Economic Alliance Advisory Committee, this initiative is focused on sustainable reuse of underutilized brownfield sites.

Louisville Metro analyzed the area's land assembly and redevelopment potential, prioritized opportunities, and made information available to the development and business community. We manage a database of over 300 properties currently available for redevelopment or re-use.

**3. If you anticipate conducting assessment activities on privately owned sites, discuss possible access issues and how you would resolve the issues.**

A number of property owners and area business representatives actively participate in the "Re-Defining Brownfields" initiative and the West Louisville Advisory Committee work. Through their involvement in the community dialogue, they have expressed an explicit interest in Louisville Metro's redevelopment efforts. Our continuous community outreach efforts clearly show private property owners' interest in brownfields assessment funding. Before conducting assessment activities on private sites, Louisville Metro will enter into written agreements with property owners.

***Ranking Criterion D: Sustainable Reuse of Brownfields (12 points)***

**To what extent will this grant support the goals below:**

**1. Prevent pollution and reduce resource consumption through brownfield prevention, infrastructure reuse, etc.**

The underutilized sites in the Park Hill Industrial Corridor targeted by this community-wide application are located in a highly urbanized landscape. Their reuse will be land recycling in its best sense. Already compromised by earlier development, the assessment and cleanup allows reuse by developers who might otherwise go to greenfield sites. By providing alternative development opportunities, pressure may be relieved on remaining greenspace in Metro Louisville.

For any new construction in the corridor, there will be an opportunity to apply new ideas for building, siting, and design. In some instances, multiple goals may be achieved, such as addressing stormwater management issues through improved site design. EDD through its partner, Metropolitan Sewer District, is exploring techniques for reducing the extensive impervious surfaces in the Corridor. These techniques will be incorporated into the Master Plan.

Cornerstone 2020, the Jefferson County comprehensive plan adopted in 2000, is a form-based plan that seeks to assure appropriate design of proposed developments in the context of the pattern of surrounding development and the community's environmental goals. In addition, it seeks to assure multi-modal means of access to all development. The Metro Council recently adopted a new planning tool, Planned Development District, which provides greater flexibility for infill development. The tool facilitates mixed uses based on a master planning process with substantial community involvement.

Redevelopment of the Park Hill Industrial Corridor makes the best use of already existing infrastructure. The area is serviced by three railroads. All infrastructure is in serviceable condition. The City of Louisville recently invested in an expansion of the 9<sup>th</sup> Street Extension corridor which provides a modern connection from the industries in the area to Interstate 65, the major North/South highway. Any future use of the sites in the corridor could fully utilize the existing street grid system and rail lines. Water, sewer, gas and electric services to the majority of sites in the corridor are suitable for heavy or light industry. There are fiber optic cable lines in the street throughout the corridor. All lines could be used by future developments.

We are committed to promoting green building and energy efficiency standards in future construction in the area. Louisville Metro is an active participant in the “The Partnership for a Green City” – a partnership between Louisville Metro Government, University of Louisville, and Jefferson County Public Schools. The partnership project was established as a way to promote waste reduction, efficient energy use, and green infrastructure. As a part of this green initiative Louisville Metro is committed to the standards of environmental excellence. Any new public-purpose or educational facility that may be located in the Park Hill area following the assessments and remediation will strive to adhere to the green guidelines established by this initiative. Also, EDD has staff knowledgeable of the modern environmental technologies and innovative financing mechanisms, and will educate private and non-profit developers working in the Park Hill Corridor about the economic potential for green building technology as well as about federal incentives available for energy-efficient applications.

## **2. Promote economic benefits.**

Over the past years, Economic Development Department’s Commercial and Industrial Development division witnessed a substantial and growing interest in the private sector for bringing idle and underutilized real estate back to the marketplace. The desire of both public and private stakeholders in the community to identify catalyst projects and ignite economic revitalization of the area is well documented in the West Louisville Comprehensive Assessment and Strategy Project. The lack of funding for assessment activities substantially slows the pace of possible redevelopment. The assessment and cleanup activities in the area will raise market valuation of the corridor and be welcomed by property owners in this undervalued area of the city. The size of the brownfields assessment focus area provides us with a variety of sites suitable for assessment activities.

The redeveloped Park Hill Industrial Corridor will increase the community’s confidence in redevelopment prospects for West Louisville as a whole and will lead to increased investment in the area. New jobs expected due to redevelopment of the area will help residents reinvest their incomes in their community and trigger multiplier effects through the local economy. The increased property values resulting from the improvements in the area, and the new sources of revenue due to conversion of abandoned and underutilized properties into productive use will provide a welcome boost for local revenues which may be further reinvested into the redevelopment efforts for the benefit of socio-economically disadvantaged populations.

The work on the development of the West Louisville Comprehensive Assessment and Strategy Project revealed the community’s understanding of the link between brownfields redevelopment and inner-city economic revitalization. The need for contiguous land for modern employers can be met only through land assembly which, due to the history of use in the area, is impossible without environmental assessments. Park Hill Industrial Corridor is the only large infill industrial area in Louisville which meets the economic development needs outlined in the West Louisville Competitive Assessment and Strategy Project. It is critically important to develop the area in a manner that maximizes employment opportunities and supports regional industrial clusters. EPA’s investment in community-wide assessments will help us conduct redevelopment efforts with consideration of

environmental data, combining economic development goals with environmental justice and public health concerns.

### **3. Promote a vibrant, equitable, and healthy community.**

Despite the setbacks that Park Hill Corridor experienced in the past, it has a lot of potential for transformation into a vibrant, equitable and healthy community. The targeted area currently has many vacant lots/buildings, perceived and real brownfields, and a housing project whose residents represent some of the poorest in the area. Park Hill Industrial Corridor is often times perceived by residents and businesses as an “undevelopable” part of the city. By identifying sites for future redevelopment and assessing their environmental condition, we encourage cleanup and reinvestment, increase market valuation of the area, stimulate private business interest, and prevent abandonment of the properties which are in danger of becoming future brownfields.

Central location, adequate infrastructure, proximity to downtown, and public amenities in the surrounding neighborhoods make the Park Hill Industrial Corridor a suitable candidate for promoting alternative dense urban growth options. Excellent bus transportation routes exist in the area. Public buses on local routes have equipment installed to accommodate bike riders, facilitating alternative commute options. As the interest in unconventional housing choices is gaining momentum in the Metro Louisville, the proximity of the area to the University of Louisville campus and the historic Victorian Old Louisville neighborhood may promote redevelopment of old industrial buildings on the fringes of the area into loft-style housing and mixed use developments. By converting brownfields into employment centers suitable for modern businesses, mixed use housing alternatives, and greenspace we can revitalize the Park Hill Corridor and create a model of a vibrant urban community as an alternative redevelopment option for West Louisville and other communities. The Park Hill Industrial Corridor is an ideal location to apply the new planning tool, Planned Development District, recently adopted by the Metro Council.

#### ***Ranking Criterion E: Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purpose (5 points)***

**Describe the extent to which the grant would facilitate the creation of, preservation of, or addition to a park, greenway, undeveloped property, recreational property, or other property used for nonprofit purposes.**

The focus area is a large inner-city traditional industrial zone which has very little greenspace. During the “Re-defining Brownfields” public meetings, the local community expressed a strong desire for more greenspace in the Park Hill Industrial Corridor, including parks, areas for farmers’ markets and raised bed community gardens. Several locations of the possible greenspace were identified. This grant will help us assess these already identified sites for future greenspace and/or find alternative locations.

Identification of sites which started at the “Re-defining Brownfields” workshops will continue during development of the Master Plan for the Corridor. “Parks, Open Space, and Recreation” Element of the Master Plan will be developed with public input. This Element of the Master Plan will reflect community vision for greenspace, and outline overall redevelopment plans, including possible parks, bike and pedestrian trails, wetlands, botanical gardens, green streetscape, etc.

Louisville Metro Government provides long-term care and maintenance of the public green space within Louisville-Jefferson County Metro through its Metro Parks department. The department is adequately staffed and funded. If a new public greenspace is established in the Park Hill Corridor, long-term care and maintenance will be provided by the Metro Parks department.



### ***Ranking Criterion F: Pre-Award Community Notification (12 points)***

#### **1. Describe how the targeted community will be notified of your proposed plans.**

Our primary mechanism for community notification will be the “Re-defining Brownfields” workshops. More than a single public meeting, these workshops represent meaningful community participation in brownfields redevelopment. Over that last two years we held 20 meetings and workshops with an average attendance of 40-50 people. The makeup of the group is designed to fully represent the targeted community (West Louisville and Park Hill Industrial Corridor). During these public meetings EDD will describe the EPA Brownfield Assessment program, outline our grant application, and invite workshop attendants to ask questions, and provide comments and suggestions. The community stakeholders will be also invited to discuss details of the projects at the EDD office.

Besides the targeted public meetings, Park Hill redevelopment initiatives and EDD’s brownfields work in general attracts significant local media attention. In 2007, local newspapers already published several articles, including front page coverage, describing the Park Hill project. Several journalists are actively tracking the progress of the planning studies, as well as the Master Plan. Local TV stations reported on the Park Hill Petroleum Assessment grant and the Brownfields RLF grant; local residents, EPA representatives, and Louisville public officials were interviewed. Local National Public Radio affiliate regularly announces conferences and grant awards, providing the broadest coverage of Louisville Metro brownfields-related events. We will provide our media partners with up-to date information on grant announcements and the project process, and seek additional publicity covering our redevelopment efforts.

#### **2. Explain why the notification method provided above is the most appropriate way to reach your target community.**

We believe that tapping into a series of open, public and inclusive workshops involving West Louisville and Park Hill residents is substantive and effective community notification.

The makeup of the “Re-defining Brownfields” stakeholder group is designed to fully represent the targeted community, including residents, property owners, developers, nonprofits, businesses, and public sector representatives. In order to assure the broadest possible involvement in the series of workshops, Mayor Abramson invited a core group of over 125 individuals to participate via letter under his signature. This core group was recommended during the project’s planning stages by the “Re-defining Brownfields” project partners and community residents. All invitees received follow up phone calls to encourage their participation. Following this, the Center for Neighborhoods mailed postcards to 1000 community residents using contacts developed through the Annie E. Casey's Foundation's "Making Connections" Network. Following the original mailings, a second batch was distributed. In addition, the Network's Resident Organizing Coordinators personally recruited residents from the targeted community. Each year, additional efforts are made to reach those who missed the previous year’s announcements. To supplement these mailings, postcard invitations to the workshops are permanently displayed on the bulletin boards of the California Neighborhood Community Center and the Park Hill “Bridges of Hope” Community Center. We actively seek new participants and ask workshop attendees to invite other interested parties to join our discussions.

#### **3. How long of a comment period do you propose?**

An adequate time (2 to 4 weeks) for feedback between soliciting public comment and actual assessment work will be provided allowing for correcting our plans based on community input. Contact information for the EDD staff working on the project will be available. We will also reiterate

to this community stakeholder group that we will seek their active participation in the implementation of the grants, especially to prioritize and select targeted sites in the community-wide assessment and cleanup efforts.

#### **4. What are your plans for addressing comments received?**

“Re-defining Brownfields” initiative is an ongoing meaningful form of community engagement. All comments will be discussed in the public meetings and, before proceeding with actual assessment work, workplans will be adjusted to reflect community preferences.

#### ***Ranking Criterion G: Ongoing Community Involvement (16 points)***

##### **1. Discuss your plan for involving the affected community.**

Community involvement has always been the key characteristic of Louisville Metro’s approach to inner-city redevelopment projects. One such initiative, the West Louisville Competitive Assessment and Strategy Project, which emphasizes the reuse of brownfields and underutilized properties, was developed in 2000-2001 by Louisville Metro and Greater Louisville Inc. with a high level of community participation. West Louisville residents, media, businesses and non-profits were active in the Project’s decision-making process. We anticipate the same active participation of all stakeholders committed to the redevelopment and revitalization of West Louisville in planning for cleanup and reuse of brownfields assessed under this grant. Currently, a working sub-committee is focusing on developing or improving redevelopment incentives.

In 2005 Louisville Metro, University of Louisville and Louisville Community Design Center (now the Center for Neighborhoods) formed a coalition to create an innovative program for community participation and education on the issue of brownfield redevelopment. This coalition was formed out of mutual desire to jumpstart community and economic development in an area that is extremely difficult to redevelop due to environmental and socio-economic disadvantages. All partners are committed to establishing a process through which the community is able to contribute in constructive and meaningful ways to the brownfields redevelopment planning process in Metro Louisville. In the summer of 2005 the “Re-defining Brownfields” project received EPA funding under the “Brownfields Training, Research and Technical Assistance Grants and Cooperative Agreements” program.

Using the feedback from the “Re-defining Brownfields” initiative for planning and prioritizing site assessments will strengthen the community-wide assessment process. Louisville Metro will take full advantage of this unique opportunity by integrating cleanup decision-making and reuse planning into the 3<sup>rd</sup> year agenda of this pilot project. This combination may also provide a test ground for examining the impact of EPA-funded community-based brownfield training and research programs on the EPA-funded assessment and cleanup initiatives.

##### **2. Describe your efforts and/or plans to develop partnerships at the local, state, and/or tribal level with other stakeholders to ensure appropriate and sustainable cleanup and redevelopment of brownfields in your targeted community.**

EDD has a long and successful history of collaboration with the State of Kentucky when developing legislation and regulations for cleanup standards and procedures, as well as economic incentive packages targeting brownfields and in-fill development. EDD also has a successful track record of working with state environmental oversight authorities on ensuring environmental compliance of assessment, cleanup and redevelopment projects of various scales, both with a public purpose, and to support private redevelopment initiatives.

EDD strives to advance a brownfields revitalization agenda in the Louisville area and to establish lasting partnerships with stakeholders in the brownfields redevelopment field. EDD worked as a facilitator and a key actor in establishing the Kentucky Chapter of the National Brownfields Association. This organization serves as a vehicle for promoting the responsible redevelopment of brownfields in Kentucky. The inaugural meeting was held in Louisville, symbolically, at the Louisville Slugger Field, a former brownfield train depot and a recipient of Phoenix Award for excellence in brownfields redevelopment. The meeting was a great success with more than a 100 attendees, positive feedback, and overwhelming interest from the state and local brownfields redevelopment community. The activities of the Kentucky Chapter of the National Brownfields Association promise to be an important path for developing partnerships at the state and local level.

In October 2007, the applicant was one of the key organizers of the multiregional Sustainable Redevelopment in the Ohio River Valley Conference. Groups and individuals interested in learning about innovation in developing communities that lead to long-term benefits for the environment, public health and quality of life in communities were invited to attend. Park Hill redevelopment was discussed in detail during the conference, showing our commitment to public health and sustainable redevelopment. The conference also gave the Kentucky and Indiana Chapters of the National Brownfields Association an opportunity to gather and share brownfields redevelopment experiences.

### **3. Describe your specific plans for communicating the progress of your project to citizens.**

Communications to the targeted community will be coordinated with the EPA-supported series of open public meetings “Re-defining Brownfields”. Progress reporting, progress discussion, prioritization, and planning for action during the assessment project’s implementation will be integrated into the agenda of the “Re-defining Brownfields” workshops. This provides the most direct channel for communication and feedback between the Louisville Metro and the Park Hill Corridor community including its residents, business owners, real estate developers, and representatives of public and non-profit organizations. Agenda of the meetings, minutes, summaries, and copies of the presentations made during the workshops are available at [www.redefiningbrownfields.org](http://www.redefiningbrownfields.org)

The project area does not have a substantial non-English speaking population and thus does not require a separate plan for communicating in languages other than English. However, Louisville Metro Government has the Office for International Affairs which will provide assistance with foreign language communication if such need arises.

Moving beyond the boundaries of a single industrial zone, the meetings of the West Louisville Economic Alliance Advisory Committee (a stakeholder group which includes representatives of community-based organizations, area businesses, and public and nonprofit sectors, targeting a larger West Louisville revitalization agenda) will provide us with a stage to communicate the progress of the project and coordinate economic development concerns with the concerns of environmental cleanup and environmental justice on a Metro-wide scale.

### **4. Provide a list of the community-based organizations involved in this project.**

The following community based-organization will participate in the Park Hill Industrial Corridor Community-Wide Assessment (Hazardous Substances) project:

<b>Organization</b>	<b>Contact</b>	<b>Description</b>
<i>Center for Environmental Policy and Management (CEPM), University of Louisville.</i>	Dr. Peter B. Meyer, Director, (502) 852-8032; Dr. Lauren Heberle, Associate Director, (502) 852-4749.	An educational institution. CEPM is comprised of three research groups: 1) the Brownfields/Smart Research Group, 2) the Environmental Policy and Forecasting Team and 3) the EPA Region 4 Southeast Regional Environmental Finance Center. CEPM is a lead partner in the coalition with the Louisville Metro and the Center for Neighborhoods in an EPA-funded public participation project of building community knowledge, involvement and investment in brownfields redevelopment in Park Hill Industrial Corridor (“Re-defining Brownfields (Brownfields Institute)”).
<i>Center for Neighborhoods (CFN), formerly Louisville Community Design Center</i>	John I. Trawick, Executive Director, (502) 589-0343.	A non-profit organization. CFN is engaged in community building and neighborhood organizing work. CFN is a partner in a coalition with the Louisville Metro and the CEPM in an EPA-funded public participation project of building community knowledge, involvement and investment in brownfields redevelopment in Park Hill Industrial Corridor (“Re-defining Brownfields (Brownfields Institute)”).
<i>Greater Louisville Inc (GLI).</i>	DeVone Holt, West Louisville Economic Development Manager, (502) 625-0134.	A local chamber of commerce (a business group). GLI is an organization promoting economic development and representing interests of private businesses in Greater Louisville area. GLI is a key EDD collaborative partner in the implementation of West Louisville Competitive Assessment and Strategy Project.

***Ranking Criterion H: Reduction of Threats to Human Health and the Environment (26 points)***

**1. Describe how the funds will be used to address/facilitate the identification and/or reduction of threats to human health and the environment within the target area.**

The assessment grant will identify any threats to human health and the environment that may be present in the area by adequately assessing sites so that reasonable remediation goals can be pursued. Reports of scattered releases of various hazardous substances, pollutants, and contaminants, both documented and unknown prior to required reporting are prevalent throughout the area. “Re-defining Brownfields” initiative’s public participation process identified general public concern about the possibility of environmental contamination but did not uncover any evidence of actual negative health effects. With the possibility of hazardous substances present on various sites, thorough assessments are needed to assure that residents, remediation workers and future tenants of the sites are protected from exposures. Assessment and characterization of sites throughout the Park Hill Corridor is crucial to the safe and effective redevelopment of the area.

By thoroughly characterizing sites in the Park Hill Industrial Corridor using the EPA grant funds, environmental conditions will be identified allowing for the development of appropriate risk management plans. The sites then can be cleaned or managed with an assurance that the future occupants of the redeveloped properties will be protected. Prior to allowing new operations on assessed sites, EDD together with Metro Public Health and Wellness Department will make prospective users fully aware of all institutional and engineering controls in place and help them eliminate potential new exposures.

Park Hill brownfields redevelopment efforts are primarily an economic development initiative. We expect to convert vacant and underutilized brownfields into job-generating industrial and commercial uses, as well as property value-enhancing greenspace. This approach will minimize housing uses and corresponding risks of exposures. Appropriate engineering and institutional controls will be enforced with soil caps and deed restrictions, adequate for industrial, commercial, and recreational uses.

**2. To what extent are you working with your local, state or tribal health agency environmental authority and/or local public health department to ensure protectiveness of human health and the environment.**

EDD's staff will work with the Metro Public Health and Wellness Department and its Center for Health Equity to ensure consideration of potential public health problems during the assessments covered under this grant and future clean up efforts. This includes regularly informing the neighbors of project work, including assessment and future remediations and demolition. The expanded stakeholder network developed through the "Re-defining Brownfields" initiative allows us to communicate effectively with area residents and businesses.

The Kentucky Superfund Program housed within the Kentucky Environmental and Public Protection Cabinet is charged with protecting human health and the environment from the release of hazardous substances. The program seeks to ensure that contaminated sites are evaluated and cleaned up in a timely manner. EDD has a long history of working with the Cabinet and the Superfund Program including the establishment of a Voluntary Cleanup Program for Kentucky. Most recently, EDD worked with the Cabinet and the Governor's Brownfield Task Force to establish reasonable statewide cleanup standards for the program.

The 2001 Kentucky General Assembly enacted the Voluntary Environmental Remediation Act (VERA) to encourage cleanup of contaminated properties, or brownfields, through increased liability protection for participants. Kentucky's resulting Voluntary Environmental Remediation Program (VERP) allows volunteers and others to approach the cabinet and initiate cleanups on a property they wish to purchase and redevelop. As a result, volunteers can avoid the delays and costs associated with the enforcement process and conduct cleanups within the time frames needed for redevelopment or sale. Once a volunteer completes a cleanup in Kentucky under VERP, the cabinet will issue a "covenant not to sue" letter which provides additional liability protection for the applicant in the event further cleanup is needed in the future. Kentucky's cleanup regulations and statutes offer four tracks. These vary in eligibility, complexity and liability protection provided. EDD working together with Kentucky Environmental and Public Protection Cabinet will make all efforts to enroll sites assessed with the EPA funds into state VERP.

***Ranking Criterion I: Leveraging of Additional Resources (10 points)***

**1. Identify the funds that your agency/organization has committed or will commit to meet the assessment needs not met through this grant.**

Louisville Metro Government is committed to the advancement of brownfields redevelopment initiatives as a part of its mission to promote economic development in the socio-economically disadvantaged inner-city areas. Staff time is contributed to this project in-kind and is not charged to the grant. This staff time is funded through general revenues and it includes the work of the Project Manager, GIS Analyst, and three Economic Development Officers. We estimate the programmatic in-kind contribution of EDD's staff time to be valued at approximately \$70,000 (salaries and 20% fringe benefits) per year, bringing 3-year project total in-kind leverage to approximately \$210,000. After the assessments are completed on various sites throughout the Park Hill Corridor, EDD's staff will collaborate with private developers to provide technical assistance and identify the sites for future grant applications such as HUD's Brownfields Economic Development Initiative funding – a competitive brownfields redevelopment program requiring substantial public-private collaboration and strict job-creation criteria. EDD will also work with its public and private partners on potential options for financing economic growth in the Park Hill redevelopment area including, but not limited to such tools as Tax Increment Financing, and the federal tax credit mechanisms. EDD currently operates innovative program that permitted \$4,000,000 of the local allocation of the New Market Tax Credits to be used for smaller scale redevelopment projects, ranging in size from \$500,000 to \$1,000,000.

## **2. Demonstrate your ability to leverage funds.**

Park Hill Industrial Corridor Community-Wide Assessment Program (Hazardous Substances) represents a community-wide effort to connect brownfield redevelopment with an economic development strategy for West Louisville. As a part of Louisville Metro Government's overall commitment to further urban revitalization and economic development in socio-economically disadvantaged areas of the city, this EPA grant funding will be leveraged with other resources to the fullest extent possible. We use several funding mechanism to leverage the EPA Assessment dollars:

### *1. Applicant's Funds.*

*Local funding.* Assessment work funded by this project will be coordinated with the development and implementation of the public Master Planning process in the Corridor. Local funding budgeted for the Park Hill Corridor Master Plan is \$300,000.

*City staff time.* As described in the previous section, Louisville Metro will pay for the staff time of the Project Manager, GIS Analyst, and three Economic Development Officers. These services are provided to the project in-kind. We estimate the in-kind contribution of EDD's staff time to be valued at approximately \$70,000 per year, bringing 3-year project total in-kind leverage to \$210,000

*Economic development contracts.* Louisville Metro Government annually provides funds (\$1,200,000) to Greater Louisville Inc. (local chamber of commerce, a public-private partnership) to promote the City's economic development agenda, including West Louisville economic growth, and to market inner-city brownfields properties. Louisville Metro's contract with the Greater Louisville Inc. is an avenue to attract attention to our focus area and bring private redevelopment dollars to the area targeted in this brownfields assessment application.

*2. Federal Grants (other than EPA).* We seek a variety of opportunities for leveraging EPA investments in West Louisville's brownfields initiatives. Louisville Metro creatively pursues various sources of federal funding to further our efforts in the brownfields redevelopment. In 2006 EDD was awarded \$100,000 by the Economic Development Administration to pay for a study to examine the potential of the Park Hill Industrial Corridor from the market-centered, real-estate development angle, and identify the most promising sites for redevelopment. Also, in 2006 EDD was awarded two \$62,500 grants in Department of Transportation funds to commission a study of transportation needs

in the corridor. We expect that both studies will be completed in January 2008. The studies will provide important background information and help with site selection and prioritization.

*4. Private Investment.* One of the steps in the Master Planning process is to establish an actionable Implementation Strategy which will bring private development investment to the targeted area. Also, a consultant competing to perform Master Plan work will be required to create a joint team with an experienced national real-estate developer with a tract record of successful inner-city and brownfield redevelopment projects. This will help us leverage private development funding once community-wide assessment work is done, and the Master Plan guides redevelopment of the area.

*5. Previous EPA awards.* Our focus on the Park Hill Industrial Corridor is based in part upon the previous EPA investments in Louisville. During site-specific assessment work at the Rhodia site Metro Louisville sought input from the International Economic Development Council (IEDC) to capitalize upon the EPA and city investment in the site's assessment and clean up. IEDC panelists felt the redevelopment and reuse of the Rhodia site would be most successful if pursued simultaneously with the redevelopment of other industrial sites in the corridor. In addition, the EPA-funded "Re-defining Brownfields" program is a source of community participation and interest-building in the area's brownfields redevelopment. Public input from these workshops will guide our planning, assessment and remediation efforts.

In 2007 Louisville Metro received EPA Petroleum Assessment (\$200,000) Grant and Revolving Loan Grant (\$1,000,000). This Hazardous Substances assessment application will help us establish a comprehensive program targeting all eligible contaminants in the targeted area.

*6. State Funds.* In addition to the described above funding sources EDD will pursue State funding for the redevelopment efforts in the Park Hill Industrial Corridor. For example, following the completion of the EPA-funded assessment activities at the 17-acre brownfield Rhodia site, EDD sought funding from the State of Kentucky to prep the site for redevelopment and enhance its marketability. Once prepped for redevelopment the site will serve as the Park Hill Industrial Corridor's economic development catalyst.

### ***Ranking Criterion J: Programmatic Capability (20 points)***

#### **1. Demonstrate your ability to manage this grant and successfully perform all phases of work under this grant.**

The Louisville-Jefferson County Metro Government has grants management and finance offices that produce reports, pay invoices, and manage accounts for all federal grants and flow-through awards. The Louisville-Jefferson County Metro Government has all the necessary accounting policies and procedures in practice to be in compliance with all federal accounting regulations. The Economic Development Department employs professional staff which will provide close control and oversight of environmental contractors. Personnel, full- or part-time, will be hired if necessary to provide an additional support for the assessment activities.

Louisville has a successful tract record of completed brownfield projects using both the EPA Brownfields awards as well as other public and private sources of funding. Public-private partnerships resulted in the development of the Phoenix Award Grand Prize-winner Papa John's Cardinal Stadium at the University of Louisville. In 2002, the City received another Phoenix Award for "A Riverfront Reclaimed," which touted the reclaimed waterfront park and a new Triple A baseball stadium.

Region IV EPA Brownfields Assessment Demonstration Pilot was efficiently used to: create parcel-specific database of property with layers of public environmental information to assist redevelopers; assess the Garfield pilot project, which was sold to a private investor, bringing an idle site back to the

tax rolls and providing a place of business for a neighborhood resident; assess Muhammad Ali Museum site, opened to public in 2005; assess the Trolley Barn – a site of the future African American Heritage Museum (opening to public soon); assess Gibson Landfill site, now under lease to Louisville Soccer Alliance; assess Park DuValle Town Center; assess Exmet site; hire part-time interns to assist with community outreach.

Rhodia Brownfields Assessment Grant was used to characterize an extensively polluted site of the former chemical plant. As the assessment is complete, the site prep and demolition continues, resulting in more useable land. Demolition and site prep are working towards eliminating the blighted appearance of the vacant old industrial facility. Ultimately, the goal is to bring jobs for the neighborhood residents, thereby strengthening families and neighborhoods.

## **2. Describe your history of managing federal funds.**

Louisville-Jefferson County Metro Government (formerly the City of Louisville), over its 228-year history, has managed numerous federal loans, grants and cooperative agreements, and has been found to be in compliance with all laws and regulations. There has never been an adverse audit finding or “high risk” terms and conditions imposed as a result of compliance issues.

## **3. If you are, or have been, a recipient of an EPA Brownfields cooperative agreement(s), provide information regarding your compliance with quarterly progress reports, brownfields reporting measures, and annual financial status reporting.**

Louisville has managed EPA Brownfields cooperative agreements since 1995. City of Louisville was a recipient of the following EPA Brownfields cooperative agreements: Region IV EPA Brownfields Assessment Demonstration Pilot, \$750,000 (award year -1995); and Rhodia Brownfields Assessment Grant, \$350,000 (award year – 2005). All work under the cooperative agreements is now completed. No funds remain in either program. We have provided the required quarterly and annual progress and financial reporting on all EPA awards within all requested time frames. The grant periods for both programs ended in September 2005. Since then EDD staff submitted to the EPA the final reports and the financial documentation and closed these cooperative agreements.

In 2007, Louisville was awarded two EPA brownfields grants: a \$200,000 community-wide petroleum assessment grant, and a \$1,000,000 Revolving Loan Fund grant. We have submitted all required grant and workplan documentation on time and executed cooperative agreements. We started initial site selection and property eligibility research. Since the grant period officially started October 2007, no quarterly or other reports were yet due. We will submit all the required project documentation timely and accurately.

## **4. Describe your plans for tracking and measuring progress.**

EDD will use grant management procedures established during the implementation of the Region IV EPA Brownfields Assessment Demonstration Pilot and the Rhodia Brownfields Assessment Grant and track the following quantitative and qualitative progress measures: identified hazardous materials on sites; assessment activity leverages hazardous materials cleanup; number of sites cleaned and beautified; planning activities conducted; marketing activities conducted; number of jobs created; value of property returned to tax rolls as a result of redevelopment; improvements to neighborhoods surrounding the targeted area; community satisfaction with redevelopment scope/process.