



R06-22-R-001

**NARRATIVE INFORMATION SHEET**

Applicant Identification	<b>City of Houston</b> 611 Walker 25th Floor Houston TX 77002	
Funding Request	Grant Type: Individual RLF	
Federal Funding Requested	\$1,000,000	
RLF Boundaries	City of Houston, Harris County, Texas (Attachment A to Threshold Criteria)	
<b>Target Area (TA) and Priority Site Information (Census Tracts, Priority Site Addresses)</b>		
TA #1: Fifth Ward/ Kashmere Gardens	Census Tracts: 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2117, 2023 Priority Site #1: Jensen & Lyons, 0 Lyons Avenue	
TA #2: Near Northside	Census Tracts: 2104, 2105, 2106, 2107, 2123 Priority Site #2: Hardy Yards, 0 Burnett Street Priority Site #3: Thermal Processing Facility, 4111 Robertson Street	
TA #3: East End	Census Tracts: 3101, 3104, 3105, 3109, 3110, 3111 Priority Site #4: Velasco Incinerator, 0 N. Velasco Street	
<b>Contacts (name, phone number, email, mailing address)</b>		
<b><u>Project Director</u></b> Mark Wooten 832-394-9003 <a href="mailto:Mark.Wooten@houstontx.gov">Mark.Wooten@houstontx.gov</a> PO Box 1562 Houston, Texas 77251-1562	<b><u>Chief Executive</u></b> Mayor Silvester Turner 713-837-0311 <a href="mailto:mayor@houstontx.gov">mayor@houstontx.gov</a> PO Box 1562 Houston, Texas 77251-1562	
Population	Houston: 2,304,580 TA #1 (Fifth Ward/Kashmere Gardens): 26,659 TA #2 (Near Northside): 22,143 TA #3 (East End): 29,715	
<b>Other Factors</b>		<b>Page #s</b>
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 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 site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).		2, 3
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, or geothermal energy.		3, 4
The reuse of the priority site(s) will incorporate energy efficiency measures.		3
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.		N/A
Letter from Texas Commission on Environmental Quality (TCEQ)		Attached
Releasing Copies of Applications		N/A

Jon Niermann, *Chairman*  
Emily Lindley, *Commissioner*  
Bobby Janecka, *Commissioner*  
Toby Baker, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

November 22, 2021

Mr. Mark A. Wooten  
Brownfields Redevelopment Program  
City of Houston  
P.O. Box 2688  
Houston, Texas 77262-2688

Re: City of Houston's Proposal for a U.S. Environmental Protection Agency FY22 Brownfields Revolving Loan Fund Grant

Dear Mr. Wooten:

The Texas Commission on Environmental Quality (TCEQ) is pleased to offer this letter of support for the City of Houston's proposal to the U.S. Environmental Protection Agency (EPA) for a FY22 Revolving Loan Fund Grant. The TCEQ believes that the grant will enhance the local economy by creating jobs, increasing the tax base, and improving the environment. The TCEQ understands the target areas for the grant include Kashmere Gardens, Fifth Ward, Near Northside, and East End. The establishment of a revolving loan fund program will support affordable housing, food security, park expansion, and climate action initiatives.

The TCEQ looks forward to working with the City of Houston on its Brownfields initiative and supports the grant application. You may contact me at 512-239-2023 or [phylicia.allen@tceq.texas.gov](mailto:phylicia.allen@tceq.texas.gov) if you have any questions or if you would like additional information.

Sincerely,

A handwritten signature in black ink that reads "P. Allen".

Phylicia Allen  
Brownfields Program Coordinator  
Remediation Division

PA/cw



## 1. Project Area Description and Plans for Revitalization

**a. Targeted Area and Brownfields** i. **Background and Description of Target Area:** The City of Houston (City) (pop. 2,304,580)<sup>1</sup> in Harris County, Texas (TX) was founded in 1836 on the banks of the Buffalo Bayou, 50 miles east of the Gulf of Mexico. Houston was established as a port city with an early economy built on shipping cotton, lumber, and other manufactured goods produced on nearby plantations or made domestically by enslaved African Americans. Eleven railroad companies constructed 451 miles of railroad track prior to 1860, and by 1890, Houston was recognized as a railroad center in Texas.<sup>2</sup> In 1901, oil was discovered in TX and the City became the petrochemical capital of the United States (U.S.) and energy capital of the world, with several thousand miles of pipeline connecting chemical manufacturers, refineries, and fractionation plants along the Gulf Coast. The freight economy and oil boom brought more growth to Houston in the early-mid 1900s, coinciding with the time of Jim Crow laws restricting where African Americans and Hispanics could live and work. With no zoning regulations or land use restrictions, legally segregated neighborhoods became interspersed with railyards, manufacturing facilities, and processing plants. By the mid-1900s, these neighborhoods experienced a sharp decline caused by a variety of factors including public disinvestment, environmental degradation, interstate projects, and the boom-and-bust cycle of the oil and gas industry. The economic downside that followed resulted in decades of persistent poverty and concentrated brownfields in low-income, minority neighborhoods. The City's Brownfields Redevelopment Program (BRP) has identified three of these overburdened neighborhoods as Target Areas (TAs) for this Revolving Loan Fund (RLF) application. The TAs were selected based on community need, revitalization plans, and the capacity of development partners to cleanup and reuse brownfields for public good.

**TA #1 - Fifth Ward/Kashmere Gardens** (pop.<sup>3</sup> 26,659) target area consists of two contiguous communities: Fifth Ward and Kashmere Gardens. TA #1 is situated on the north bank of Buffalo Bayou (southernmost boundary) with the western boundary along Hardy Street, extending east to Wayside Drive and north to Interstate 610, and is bisected by U.S. Highway 59 (Hwy 59), Interstate 10 (I-10), and the large Union Pacific Englewood Railyard. From the turn of the century through the 1950s, this TA was a thriving African American community with an arts and music scene known as the Broadway of the South and was the original birthplace of Zydeco music. Population rapidly declined with urban renewal that led to the construction of I-10 and Hwy 59, which displaced thousands of long-time residents and **destroyed over 900 Black-owned homes and businesses.**<sup>4</sup> This rapid decline resulted in the abandonment of businesses and properties, resulting in the abundance of brownfields seen today.

**TA #2 - Near Northside** (pop. 22,143) is a historic community dating back to the 1880s, located just north of downtown and bounded by I-610 to the north, Interstate 45 (I-45) to the west, and the active north-south Union Pacific railroad to the east. The neighborhood was originally settled by immigrants from Europe, who worked at the nearby Southern Pacific Hardy Railyard (a priority site). After World War II, demographics changed, leading to the community becoming predominately Hispanic (81%<sup>3</sup>). Although industrial operations, including wood treatment facilities, metal recycling, and concrete batch plants, were well connected through a network of rail lines feeding into the Port, these rail lines and four major interstates have completely cut area residents off from jobs and essential services. Over the past decade, Near Northside has been a focus of public investment and revitalization, including a new light rail system, transit-oriented development, and an urgent push for affordable housing.

**TA #3 - East End** (pop. 29,715) consists of two contiguous neighborhoods: Second Ward and Magnolia Park (one of Houston's oldest Hispanic neighborhoods), with boundaries of downtown to the west, Buffalo Bayou to the north, the Harrisburg light rail line to the south, and the Houston Ship Channel Turning Basin to the east. East End has a long history of industrial development along the Buffalo Bayou waterfront, intermixed with residential areas lacking greenspace and local amenities. Community-supported projects for affordable housing, parks development, and small business have become infeasible and complicated by known environmental issues caused by over a century of heavy industry.

<sup>1</sup> United States Census Bureau, 2020 Decennial Census

<sup>2</sup> [https://ftp.dot.state.tx.us/pub/txdot-info/rail/freight/houston\\_study.pdf](https://ftp.dot.state.tx.us/pub/txdot-info/rail/freight/houston_study.pdf)

<sup>3</sup> Populations (Pop) source: 2019 5-Year Estimates from the US Census Bureau American Community Survey (ACS)

<sup>4</sup> Shelton, K. (2017). Power Moves. University of Texas Press.



Brownfields in these three TAs pose serious risks for disadvantaged residents and sensitive populations within these communities. Health disparities among area residents may be attributable to nearby contamination. Furthermore, real and/or perceived environmental risks have led to the decline of these neighborhoods. Brownfield RLF funding is needed to mitigate unacceptable levels of petroleum and hazardous substances in the soil and groundwater. Reuse plans for these parcels include affordable housing, retail, and public parks.

**ii. Description of the Priority Brownfield Site(s):** In TA #1, the BRP has identified over **350 brownfields**, including **81 abandoned or vacant parcels, 133 historic dry cleaners, and 128 former auto service stations**. In TA #2 and #3, BRP identified **43 brownfields** based on local knowledge, environmental records, and property research revealing sites with urban fill, illegal dumping, leaking petroleum storage tanks, chemical manufacturing, former meat packing plants, and scrap metal yard. The following is a list of key brownfield sites prioritized by the BRP and community stakeholders based on their alignment with community need and revitalization plans (Section 1.b.), as well as their threat to human health.

<b>Jensen &amp; Lyons - 0.86 acres @ 0 Lyons Avenue, TA #1   Census Tract (CT) 2123</b>
Jensen and Lyons Avenue is a historic intersection in Houston’s Fifth Ward. Former operations at the site have included drug stores, auto repair, and dry cleaners. Site infrastructure was demolished in 2004 before being purchased in 2009 by a local nonprofit and community partner (Section 2.b.i.&ii), Fifth Ward Community Redevelopment Corporation (CRC). <b>Env. Issues:</b> In 2020, the BRP completed a Phase II Environmental Site Assessment (ESA), finding total petroleum hydrocarbons (TPH) in the groundwater. High levels of lead, arsenic, and barium were also detected in soil on site. <b>Selection Criteria:</b> <i>Affordable housing, Cultural Arts District</i>
<b>Hardy Yards - 43 acres @ 0 Burnett Street, TA #2   CT 2123</b>
Hardy Yards was an active rail yard with a history dating back to the 1890s. Portions of Hardy Yards were redeveloped as mixed-use housing and retail in 2015. Currently, a 43-acre lot near downtown remains vacant/undeveloped. <b>Env. Issues:</b> Chlorinated solvents, creosote, petroleum, and heavy metals. <b>Selection Criteria:</b> <i>Affordable housing</i>
<b>Thermal Processing Facility- 4.6 acres @ 4111 Robertson Street, TA #2   CT 2105</b>
Thermal processing and metal treatment operations occurred at this facility from 1980s through 2017. The property is currently abandoned with an industrial building sitting idle. <b>Env. Issues:</b> 2015 Phase II ESA discovered heavy metals, chlorinated volatile organic compounds (VOCs), polyaromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and TPH in soil and groundwater. <b>Selection Criteria:</b> <i>Affordable housing</i>
<b>Velasco Incinerator - 4.55 acres @ 0 N. Velasco Street, TA#3   CT 3101</b>
The Velasco Incinerator was operational in the 1950s and 1960s. Incinerator ash and urban fill materials were discovered on site through recent Phase I and Phase II ESAs performed by the Texas Commission on Environmental Quality (TCEQ) and EPA Targeted Brownfields Assistance in 2017 and 2019. Today, the site is vacant and overgrown, attracting illegal dumping. <b>Env. Issues:</b> Heavy metals, TPH, and chlorinated VOCs have been detected in soil and groundwater above applicable standards, requiring remedial action. <b>Selection Criteria:</b> <i>Brownfields to Healthfields (B2H), Parks, Food Security, Climate Action, Economic Development</i>

**b. Revitalization of the Target Area: i. Reuse Strategy and Alignment with Revitalization Plans:** TA #1, 2, and 3 were chosen for Mayor Turner’s Complete Communities planning initiative, which was started in 2017 for “rebuilding neighborhoods that have been underserved and under-resourced for decades.” The TAs have also participated in community-wide planning efforts, as well as have conducted community revitalization plans of their own. Plans include Houston Parks Plan (2015), Resilient Houston (2020), Climate Action Plan (2020), East Sector Master Plan (2020), Fifth Ward Cultural Arts District Plan (2020), and Local Initiative Support Corporation’s (LISC) Greater Opportunities (GO) Neighborhoods (TA #1 2021 & TA#2 2015). Through extensive and meaningful public engagement conducted during various planning efforts, TA residents prioritized the following *criteria* to guide revitalization efforts for building equitable, resilient communities: **1) affordable and safe housing, 2) preservation of cultural heritage, 3) access to health resources, including clinics and fresh food, 4) parks and public space, and 5) inclusive economic development.** Additionally, Houston’s Climate Action Plan urges strategies for carbon reduction/sequestration and energy efficiency.

**Jensen and Lyons** [*Cultural Arts District Master Plan (2020), GO Neighborhoods QLA (2021), Selection Criteria #1, 2, and 5*] in **TA #1** is the westernmost extent of Houston’s newest Cultural Arts District (only African



American district in Houston). Redevelopment plans for the Jensen and Lyons property by local nonprofit developer include a mix of retail and affordable artist housing or studio space.

**Hardy Yards** [*Complete Communities (2018), GO Neighborhoods QLA (2015), Selection Criteria #1*] in TA #2 has been identified as a catalytic project for connecting Near Northside with downtown by creating affordable housing stock close to light rail and job opportunities throughout the City.

**Thermal Processing Facility** [*Complete Communities (2018), GO Neighborhoods QLA (2015), Selection Criteria #1*] in TA #2 has been identified by a local nonprofit community developer and brownfields program partner (Avenue Community Development Corporation – Avenue CDC) as an idea property suited to meet the urgent demand for low to moderate income housing.

**Velasco Incinerator** [*Complete Communities (2018), Buffalo Bayou Park East Sector Master Plan (2020), Selection Criteria #4, 5, and climate action*] in TA #3 is a high priority due to the known presence of up to 30 feet of incinerator ash on site. This ash is not only an environmental hazard but is also a challenge for reuse due to the fill's weak structural integrity. The City is currently working with local nonprofit developers and BRP partner, Buffalo Bayou Partnership (BBP) on reuse options to advance Buffalo Bayou Park's East Sector plans (recreation and greenspace) and potentially build a green-tech, carbon negative aquaponics farming hub for growing, processing, and distributing organic produce.

**ii. Outcomes and Benefits of Reuse Strategy:** Redevelopment in the TAs will benefit historically marginalized communities in Houston, meeting the Justice40 Initiative's definition of disadvantaged neighborhoods experiencing low incomes, persistent poverty, racial segregation, and substandard housing. Brownfields reuse strategies are intentionally designed to prevent gentrification, overcome inequality, and improve quality of life by aligning meaningful public participation and community-supported ideas. Reuse of the priority sites will generate over 200 units of low to moderate income housing. Economic benefits are also expected from brownfields by creating jobs in these low-income communities. Based on similar projects in Houston, these projects have the potential to create over 100 new jobs and enhance Houston's startup, entrepreneurial ecosystem. The BRP has been collaborating with innovators in agrotech from Houston's new East End Makerspace (TA #3) to design beneficial reuse strategies for the Velasco Incinerator priority site. Preliminary cleanup and reuse planning for a green tech aquaponic farm hub would leverage \$7-10 million for site build out, which will create 50 good paying jobs in green tech, support startups of 8-10 local area farms, provide community space for events, education, and business incubation. The farm will utilize retrofitted 40 x 8 ft. refrigerated shipping containers and will be equipped with solar panels, solar battery storage, a solar back-up generator, and rainwater harvesting making them self-sustaining. The farm will directly serve low-income residents by supplying sustainable food to community centers, after school programs, local restaurants, farmers markets, and food banks within all three TAs, advancing community goals to reduce residents living in food deserts by up to 87%.<sup>5</sup>

BRP has also prioritized brownfields reuse along Buffalo Bayou's waterfront to support the creation of 40 miles of hike/bike trails and 200 acres of new parks and greenspace. These trails and park system will directly combat poor physical and mental health conditions in TAs by promoting outdoor recreation, active lifestyles, as well as restoring natural ecosystems to improve air, soil and water quality through ecological restoration, riverbank cleanup and slope stabilization, and installation of native plants and trees. Based on a recent Houston Wilderness study, native trees planned for the Buffalo Bayou Parks East Sector are estimated to sequester 160,000 lbs. of carbon per year and improve air quality by reducing Particulate Matter (PM) 2.5 by over 2,000 lbs/year. A 2020 Houston heat study also demonstrated up to a 10 degree (F) drop<sup>6</sup> in air temperature with increased tree canopy and greenspace.

All priority sites and other TA brownfield reuse projects will incorporate energy efficient building upgrades, including high efficiency windows, insulation, and heating/cooling systems. LEED Certified new construction will be considered on affordable housing and commercial projects along with renewable energy, specifically solar panels for power.

<sup>5</sup> Reference Kashmere Garden's Complete Communities Plan

<sup>6</sup> <https://www.h3at.org>



**c. Strategy for Leveraging Resources: i. Resources Needed for Site Reuse:**

The City and its community partners are eligible for funding from various sources, including for priority sites.

<b>Tax Increment Reinvestment Zones (TIRZ)</b>
TIRZ were created by City Council to provide financing to incentivize redevelopment projects, including funding for environmental remediation and infrastructure updates. TIRZ have been established in all TAs.
<b>US Housing and Urban Development (HUD) Community Dev Block Grant (CDBG-DR)</b>
The City has approximately \$800,000 of funding to assist developers in replacing affordable housing stock and community assets lost during Hurricane Harvey, and expects additional \$5M+ in CDBG multifamily housing thru 2024.
<b>Houston Endowment</b>
A private philanthropic institution that provides approximately \$70 million in funding each year to civic causes, including significant funding to capital improvement projects (e.g., \$1.5 M to BBP for the East Sector Parks Plan)
<b>Local Initiative Support Corporation (LISC) &amp; Private Lending</b>
LISC offers a wide range of loans and equity investments for affordable housing, better schools, business, and other commercial development. LISC follows equal lending practices and supports local entrepreneurs with a commitment to minority borrowers. Private lending through Community Reinvestment Act programs will also be use.
<b>Other Federal Programs</b>
Economic Development Administration, U.S. Department of Agriculture, National Park Service, Small Business Administration, EPA’s Targeted Brownfields Assistance program, etc. are expected to support various projects.
<b>Other State Programs</b>
TX Historic Preservation Texas Credit Program, TX Enterprise Zone Program (state sale tax refund program encouraging private investment and job creation in economically distressed areas), Opportunity Zone designation (note, all TAs have Opportunity Zone CTs), and Texas Commission on Environmental Quality (TCEQ) and Railroad Commission of TX Brownfield Programs.

**ii. Use of Existing Infrastructure:** Existing site infrastructure, including buildings, will be reused on the priority sites to preserve the architecture of these historic neighborhoods and reduce the use of new lumber, concrete, and other building materials. Properties in the TAs are served by utilities (electricity, water, sewer, high-speed internet, and natural gas) and public infrastructure (roads and sidewalks). Improvements to storm water and drainage infrastructure is a priority of the Mayor’s Office to alleviate flooding and reduce contaminated stormwater runoff into bayous, like Hunting, Sims, and Buffalo Bayous, which cut through the TA’s. Necessary updates in public infrastructure are included in the TIRZ annual capital improvement budgets for each TA.

**2. Community Need and Community Engagement**

**a. Community Need: i. The Community’s Need for Funding:** Houston is limited in its ability to clean up contaminated sites without EPA assistance. Over the past five years, Houston has suffered unprecedented economic impacts caused by catastrophic climate events from the Memorial Day Flood (2015; damages of \$460 million), Tax Day Flood (2016; damages of \$65 million), Hurricane Harvey (2017; damages of \$125 billion), Tropical Storm Imelda (2019; damages of \$5 billion), and Winter Storm Uri (\$295 billion State-wide). The catastrophic damage from Hurricane Harvey, where 79% of homes flooded in TA #1, are still being felt today with 40% of Kashmere Gardens living in homes that need remediation.<sup>7</sup> Additionally, in 2020, Houston suffered the worst in economic loss from the COVID-19 pandemic compared to other major US metropolitan areas and is significantly lagging in recovery compared to other major Texas cities.<sup>8</sup> Since March 2020, Houston has lost 367,000 jobs to the initial lockdown period and **only 57.4% had returned by July 2021** (compared to 98.9% Dallas, 74.9 state-wide).

Residents living in the TAs have been the hardest hit by both natural disasters and economic distress in Houston, as these disadvantaged communities already experience high rates of unemployment and median incomes of less than half the TX/U.S. average. According to the 2021 Consolidated Appropriations Act, all of the project’s targeted CTs (2105, 2123, and 3101) are identified as “Areas of Persistent Poverty.” Table 1 below summarizes the most recent U.S. Census data, demonstrating these disparities in income, unemployment, and

<sup>7</sup> <https://www.houstonchronicle.com/local/gray-matters/article/kashmere-gardens-houston-hurricane-harvey-one-year-13185236.php>  
<sup>8</sup> <https://www.bauer.uh.edu/centers/irf/houston-updates.php>



poverty in CTs associated with priority sites. Although TA #3 per capita income is higher than the city, state, and U.S. average, this value is clearly indicative of gentrification when compared to unemployment (7%) and people in poverty (34%), which are much higher than city, state, and U.S. averages. Nearby CT 3110 has been included in the table for comparison, which better characterizes the degree of poverty in TA #3.

**Table 1: Community Need Data**

Demographics	Priority Sites in TA #1 & 2	Priority Site in TA #2	Priority Site in TA #3	Other sites in TA #3	Houston	Texas	US
Census Tract	2123	2105	3101	3110			
Median Income	\$25,392	\$37,323	\$70,510*	\$29,981	\$52,338	\$61,874	\$62,843
Unemployment	9%	7%	8%	7%	6%	5%	5%
Poverty Rate	36%	22%	34%	35%	20%	15%	12%

Note: 2019 5-Year Estimates from the US Census Bureau ACS. \*Median income in 3101 is indicative of gentrification. See comparison to nearby CT 3110.

**ii. Threats to Sensitive Populations:**

**1) Health or Welfare of Sensitive Populations:** Contaminants such as heavy metals, VOCs, PAHs, PCBs, and other hazardous substances on priority TA sites pose serious concerns to sensitive populations. Rates of children in poverty are near double in TA CTs (40-61% in CTs 2123, 2105, and 3101 vs. 32% in Houston, 23% in TX, and 17% in U.S.). Poverty rates in homes with children are strongly associated with environmental and social determinants of health. Children are also at higher risk of exposure to hazardous chemicals, as evidenced by Houston’s high rates of childhood lead poisoning and asthma.<sup>9</sup> The effects of poverty and environmental risks to children are reflected in educational attainment statistics in priority site census tracts: 35% of residents in CT 2123 have not graduated 9th grade (vs. 12% Houston, 8% TX, 5% US), 37% of residents in all TAs have not graduated high school (vs. 21% Houston, 16% TX, 13% US). Moreover, priority site census tracts are considered “low income and low access” with a significant number of residents living >1 mile from the nearest food store<sup>10</sup>.

Table 2 shows additional demographic indicators of vulnerability using EPA’s Environmental Justice Screening and Mapping Tool (EJSCREEN), with almost every category double that of TX/US averages.

**Table 2: EJSCREEN Demographic Indicators**

Demographic Indicators	TA #1	TA #2	TA #3	Texas	EPA Region	US
Demographic Index	73%	73%	78%	47%	44%	36%
People of Color	93%	93%	95%	58%	52%	39%
Low Income Population	53%	53%	60%	35%	37%	33%
Linguistically Isolated	18%	18%	32%	8%	6%	4%

Note: Add data downloaded from EJSCREEN on 11/14/2021. Shaded = indicators over 90th percentile compared to either state, region, or US.

EJSCREEN further shows that the TAs are in the 90<sup>th</sup> percentile for most of EPA’s Environmental Justice Indexes, including air quality indexes (Table 3). Chronic and wide-spread flooding exacerbates these problems, impacting residents who are concerned about the distribution of hazardous chemicals to their properties from nearby EPA-registered facilities.

The BRP is committed to selecting and prioritizing projects that advance equitable, inclusive, and resilient development strategies. By working with community developers and participating in/enhancing community-led planning efforts, BRP will align EPA resources with anti-displacement efforts to preserve cultural heritage, enhance community resources, and expand affordable housing.

**Table 3: Select EJ Indexes (Percentile in TX)**

EJ Index	TA #1	TA #2	TA #3
NATA Diesel PM	94	94	94
Traffic Proximity & Volume	93	93	86
Lead Paint Indicator	96	96	97
Superfund Proximity	99	99	98
RMP Proximity	91	92	88
Hazardous Waste Proximity	89	89	98
Wastewater Discharge	89	89	98

Note: Data downloaded from EJSCREEN on 11.14.2021. Results are similar when compared to EPA Region and US Percentiles.

<sup>9</sup> Interview with HHD 11/18/2021

<sup>10</sup> USDA Food Atlas. Current version 2019: <https://www.ers.usda.gov/data-products/food-access-research-atlas/download-the-data/>



**2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:** Adverse health conditions that exist in the TAs are known to be caused by contaminants identified in these communities, including at priority brownfields sites. The Houston Health Department (HHD) has identified all three TAs as “**environmentally disadvantaged and severe-needs communities**” with high risk for childhood **lead poisoning, asthma, and cardiac arrest**. Exposure to lead is associated with a range of serious health effects in children, including anemia, impaired hearing, detrimental effects on cognitive and behavioral development with serious personal and social consequences that may persist throughout their lifetime. According to the 2021 American Lung Association State of the Air Report, Houston’s air quality ranks 11<sup>th</sup> for high ozone days and 20<sup>th</sup> for annual particle pollution out of about 200 metropolitan areas across the US. Air pollution in Houston is known to pose an increased risk of asthma attacks and cardiac arrest, according to researchers at the HHD, Houston Fire Department, Rice University and Baylor College of Medicine. HHD’s 2021 Asthma Burden Report identifies the TAs as “High Burden Zip Codes” in which asthma exacerbations are more prevalent and access to care is limited (collectively representing 22.6% of all asthma hospitalizations in 2019).<sup>11</sup>

In 2019, the Texas Department of State Health Services (TDSHS) conducted a study covering all three TAs and found that **liver, esophagus, larynx, liver, lung, and bronchus cancers** were significantly greater in adults (>20 years old) compared to state data, defining the area (mostly TA #1 CTs) as a Cancer Cluster.<sup>12</sup> Follow-up research by TDSHS has also confirmed **childhood leukemia** at significantly high rates (TA#1 CT 2111) and high rates of the birth defect **gastroschisis**. The HHD conducted subsequent surveys of area residents: 43% of households surveyed reported some type of cancer, and households with cancer experienced financial stress, including depleted savings, debt, unpaid medical bills, and utility services cut off for nonpayment. 93% of households interviewed by the HHD reported that they were very concerned about the environmental contamination in their neighborhood. With underlying health issues, residents in TAs are more vulnerable to COVID-19. ABC 13 News reported in November 2020 that the TA#1 and #3 **neighborhoods had a death rate higher than 90-95% of counties in our country**.<sup>13</sup> Contaminated sites exacerbate the risk of cancer and non-cancer mortality for nearby low-income households. According to a life expectancy study by the University of Texas Southwestern Medical Center, TA residents have a shorter life expectancy (<70 – 75 years old) compared to the state average (about 80 years) and especially compared to west Houston (life expectancy >85 years old).<sup>14</sup>

The BRP is actively working with HHD to address health disparities throughout the TAs and will continue to prioritize brownfield redevelopment projects that result in eliminating exposure pathway by abating hazardous building materials, mitigating vapor intrusion, and remediating soil and groundwater. **Furthermore, the BRP supports the “Brownfields to Healthfields” (B2H) initiative, promoting reuse to enhance community health with parks, recreation centers, access to fresh food, and health clinics.**

### **3) Promoting Environmental Justice:**

As a result of destructive urban planning (segregation, redlining, and lack of zoning) and disinvestment from the 1950s to today, TA residents have suffered many decades of persistent poverty (up to 36% poverty rates<sup>15</sup>), environmental degradation, and poor public health conditions. Today, these neighborhoods have become a focus of public investments to improve quality of life for current residents. However, Houston’s population is steadily increasing, which is inflating real estate markets and increasing the cost of living. A 2016 study by the Rice Kinder Institute for Urban Research predicted CTs in the TAs had a 90-98% chance of gentrifying based on a variety of factors, including income, race, job access, housing stock, and climate disasters.<sup>16</sup> With close proximity to downtown, TA#2 is undergoing rapid gentrification and many long-time residents can no longer afford housing (median house price CT 3101= \$307,400; persons in poverty 34%).

<sup>11</sup> <https://www.houstontx.gov/health/asthma/documents/houston-asthma-burden-report.pdf>

<sup>12</sup> TDSHS reports downloaded from <https://www.houstontx.gov/health/Environmental/bccch/fifth-ward-kashmere-gardens-union-pacific-railroad-site-contamination-area-cancer-cluster.html>

<sup>13</sup> <https://abc13.com/covid-19-deaths-coronavirus-in-us-from-250/8103575/>

<sup>14</sup> <https://www.texashealthmaps.com/lfex>

<sup>15</sup> Reference Table 1.

<sup>16</sup> [https://kinder.rice.edu/sites/default/files/documents/Neighborhood%20Gentrification%20Across%20Harris%20County%201990%20to%202016\\_0.pdf](https://kinder.rice.edu/sites/default/files/documents/Neighborhood%20Gentrification%20Across%20Harris%20County%201990%20to%202016_0.pdf)





The BRP is committed to promoting environmental justice and ensuring project outcomes benefit marginalized and sensitive populations. Through partnerships with environmental justice advocacy organizations, community groups, and research institutions, the BRP has a disciplined focus on aligning EPA resources with community-supported projects and anti-displacement efforts to preserve cultural heritage and community assets, create inclusive economic opportunities, and expand safe, affordable housing. Brownfields cleanup and reuse will also eliminate hazardous substances and petroleum from these communities, reducing the cumulative impacts of environmental contamination on vulnerable populations.

**b. Community Engagement: i. & ii. Program Involvement and Roles:**

Table 4: List of Organizations/Entities/Groups & Roles

Name	Point of Contact	Specific Involvement
Fifth Ward CRC*	Kathy Payton, (713) 674-0175, <a href="mailto:kpayton@fifthwardcrc.org">kpayton@fifthwardcrc.org</a>	Site selection, real estate development, community involvement *CRC = Community Redevelopment Corporation
Avenue CDC**	Mary Lawler, (713) 864-8099, <a href="mailto:maryl@avenuecdc.org">maryl@avenuecdc.org</a>	Site selection, real estate development; community involvement. **CDC = Community Development Corporation
Houston Land Bank	Gonzalo Gonzalez, (713) 337-1238, <a href="mailto:ggonzalez@houstonlandbank.org">ggonzalez@houstonlandbank.org</a>	Site selection, prioritization, community involvement, real estate development, supplemental assessment funds
Buffalo Bayou Partnership (BBP)	Anne Olson, (713) 752-0314, <a href="mailto:aolson@buffalobayou.org">aolson@buffalobayou.org</a>	Environmental advocacy, resiliency projects, and East End waterfront parks development
Greater East End Management District	Veronica Gorczynski, (713) 928-9916, <a href="mailto:veronica@eastenddistrict.com">veronica@eastenddistrict.com</a>	Site selection, prioritization criteria, community involvement, reuse planning, development support
Black United Fund of Texas (BUFTX)	Nathan Hawthorne, (832) 874-4786, <a href="mailto:nathan@buftx.org">nathan@buftx.org</a>	Reuse planning for urban agriculture, community involvement, EJ advocacy
Texas Southern University	Dr. Michael Adams, (713) 313-7660, <a href="mailto:Michael.Adams@tsu.edu">Michael.Adams@tsu.edu</a>	Provide student projects and research for real world applications and job training, EJ advocacy
COCO***	Rev. James Caldwell, (832) 231-9176, [REDACTED]	Community outreach and engagement, EJ advocacy ***COCO = Coalition of Community Organizations
IMPACT 5 <sup>th</sup> Ward	Sandra Edwards, (832) 423-6696, [REDACTED]	Community outreach and engagement, EJ advocacy

**iii. Incorporating Community Input:** BRP recognizes the critical importance of meaningful community engagement to clean up and rebuild Houston’s disadvantaged neighborhoods, providing fair access for community members to participate in the full range of resources offered by the BRP, EPA, and program partners. The BRP uses a regularly updated Community Involvement Plan (CIP) to guide communications, outreach, and feedback mechanisms with BRP staff and community stakeholders. Using established and new program partners, BRP will disseminate information through partner networks via social media, mailings, and door-to-door canvassing; participate in public meetings hosted by community partners; and update a city-hosted website to serve as a central repository of resources and information to be used by a wide range of brownfields stakeholders. Over the past year of operating the BRP during the COVID-19 pandemic, the City and community members have become comfortable with virtual meetings, as well as hybrid in-person and virtual options. Platforms like Zoom and its extension to Facebook Live have proven to be effective at capturing a wider range of participants. Live surveys, Spanish subtitles, meeting recordings, live Tweets, and other virtual tools, like GIS StoryMaps and community message boards, will continue to be used to enhance traditional outreach tactics. Feedback received from community members and project stakeholders is incorporated into program decisions like prioritization criteria and site selection, as well as assessment of the projects themselves through community interviews, health studies, community visioning workshops, and reuse ideas.

**3. Task Description, Cost Estimates, and Measuring Progress**

**a. Program Description and Marketing Strategy:**

**i. Program Management:**

Houston’s BRP has been managing EPA brownfields assessment grants for over 20 years and has established management systems to ensure effective use of EPA funding (see Section 4.a.i). Upon award, BRP will establish a Loan Committee made up of HPW finance, real estate, and legal professionals to specifically help to develop



and maintain program documents; select borrowers/subgrantees and projects; structure and administer loans and subgrants; and facilitate financial underwriting. The application and underwriting process will involve loan documentation, credit reports, appraisals, and complete environmental documentation (Phase I/II ESAs, asbestos surveys, Cleanup/Abatement Plans, TCEQ-approvals and correspondence, etc.). The Loan Committee will select borrowers/subgrantees and projects based on their 1) eligibility and alignment with BRP values, 2) financial need and credit worthiness of borrower; and 3) ability to address community need and advance revitalization plans (affordable housing, food access, healthcare, parks and greenspace, and economic development). Borrowers/subgrantees will also be required to have site control, be enrolled in a TCEQ cleanup program, and have an abatement plan for hazardous building materials. Upon selection, loan terms will be negotiated with the applicant based on projected revenues, including below-market interest rates, payback period, and, if eligible, loan forgiveness for on-time repayment.

**ii. Revolution of the RLF Program:** The Loan Committee will establish processes and procedures that (1) adopt prudent underwriting practices with a goal of 0% default, (2) select projects with high likelihood of success and timely completion, (3) establish short loan term limits to position funding as “gap financing” vs. long-term support, and (4) prioritize applicants with sufficient organizational capacity to manage funding and complete project objectives. Subgrants will be limited to 20% of the loan to minimize spending non-revolving funds. The RLF program will be sustained through program income after the cooperative agreement is closed through new loans, interest, and loan fees. The BRP will use the City’s internal software systems for loan and grant management and will track loan repayment into a designated interest-bearing account. BRP staff will inform EPA on outcomes and outputs for the life of the RLF program income including progress reports, ACRES updates, success stories, additional projects, and loan repayment status. BRP will continue to provide project reuse updates after the grant period as additional data is available as a long-term commitment to EPA.

**iii. Marketing Strategy:** To market RLF resources, the BRP will develop targeted communications specific to the real estate and development community. Based on previous success, BRP will design trainings and presentations to educate potential loan borrowers on environmental risk and liability, cleanup financing, environmental justice in brownfields, and reuse planning. These trainings have historically been well received and often result in applications to the brownfields program. Trainings and presentations will be given via webinars, workshops, and guest speaking at organizations like the Urban Land Institute (ULI) and the U.S. Green Building Council (Houston chapter). The BRP will also leverage support from Kansas State University’s Technical Assistance to Brownfields Program (KSU TAB) to facilitate community visioning, host workshops, and educate stakeholders. Development partners, like the Houston Land Bank, Buffalo Bayou Partnership, and Fifth Ward CRC have already expressed interest in utilizing the RLF.

**b. Description of Tasks/Activities and Outputs:**

<b>Task 1: Program Management (Cooperative Agreement, grant administration and funding oversight)</b>
<b>i. Implementation:</b> Upon award, the BRP will assemble a Loan Committee made up of internal stakeholders and subject matter experts in real estate finance. Responsibilities of the BRP and Loan Committee will include: (1) coordination of financial underwriting process; (2) developing loan documents; (3) crafting individualized financing packages; (4) funding of loans and subgrants; (5) screening applicants for program, legal, and environmental threshold criteria; (6) selecting borrowers; (7) reporting tasks [quarterly reports, ACRES updates, DBE reports, close-out reports]; (8) review of Davis-Bacon certificates, invoices, and distribution of and collection of funds; and (9) attend EPA Region 6 grantee calls and trainings, as well as EPA’s National Brownfields Conference. The BRP Program Manager will be responsible for managing loans and associated financial record keeping and reporting.
<b>ii. Schedule:</b> The BRP will immediately set up an interest-bearing account to track loan program income. The Loan Committee will initially meet monthly to establish loan documents, application process, and management procedures. Once the RLF program is established, the Loan Committee will meet at a minimum once a quarter or as needed based on program activities. The Program Manager will process, monitor, and maintain records for all loans/subgrants on an on-going basis and provide reports to EPA on a quarterly basis, including ACRES updates, MBE/WBE reports, and RLF progress (outputs/outcomes).



**iii. Leads:** The Program Manager will be the lead for these activities and will work closely with the Loan Committee to complete specific tasks. The Program Manager may choose to delegate task activities to program staff, and committee members.

**iv. Outputs:** (1) Loan Committee meeting minutes and record of decisions, (2) loan document templates - application, loan agreement, promissory note, construction mortgage security agreement, guaranty agreement, etc., (3) loan/subgrant agreements, (4) 20 quarterly progress reports, (5) 10 semi-annual MBE/WBE reports, (6) five annual financial status reports, and (7) ACRES profiles (min. of 5)

**Task 2: Community Engagement & Program Marketing**

**i. Implementation:** As a **cost share**, the BRP will provide in-kind Community Engagement and Program Marketing services (personnel time). The BRP will also procure a public relations and marketing firm to support Task 2 activities, which will be partially funded by the RLF budget and through a city-funded cost share. Community engagement will build on the trusted relationships established with community stakeholders through implementation of the FY14 and FY18 CWA grants, which served the same TAs as this RLF proposal. New marketing materials specific to the RLF grant will be shared through established communication channels (e.g. social media, website, newspaper ads, and physical flyers) and community partnerships (Section 2.b.ii).

**ii. Schedule:** Community engagement will be ongoing throughout the five-year grant period, with outreach events at least once per quarter in the form of public meetings, workshops, or participation in meetings held by program stakeholders and community partners. Marketing will also be ongoing with the development of RLF specific content in the first 3 months of award and monthly updates to social media, website, newsletters, and other communication channels. However, the initial focus of community engagement and marketing will be to meet the City's goal to fully expend all budgeted amounts for loans/subgrants on eligible priority sites in the first 2 years of the grant.

**iii. Leads:** BRP Program Manager, HPW's communications staff, and select consultants will lead community engagement and program marketing activities.

**iv. Outputs:** 20 public meetings (as host or guest); marketing/informational materials (bilingual); applicant guidelines for public participation; and public meeting minutes/record of public comments.

**Task 3: Cleanup Oversight & Quality Control**

**i. Implementation:** The BRP has an established quality assurance team made up of partnerships between qualified BRP personnel, HPW legal team, and HHD's Chief Environmental Science Officer. This team of internal environmental and regulatory experts will review and approve Analysis of Brownfields Cleanup Alternatives (ABCAs) and Remedial Action Plans (or equivalent) to verify cleanup will be completed in a manner protective of public health and the environment, and in accordance with applicable regulations. The BRP Program Manager will confirm the applicant's enrollment in all relevant state programs, perform site visits while cleanups are in progress, and review remedial documentation (or other reports) confirming that cleanup was completed in accordance with plans and applicable State, federal, and loan/subgrant requirements. The BRP Program Manager will also serve as a community liaison to communicate program objectives, cleanup strategies, and construction schedule to the public, as well as address any public concerns.

**ii. Schedule:** The City's goal is to commit loan/subgrant awards to priority projects within the first 2 years of the grant. Based on this goal, it is anticipated that Task 3 activities will occur in year 2 and 3 of the 5-year grant cycle. Based on stakeholder feedback received through the recent FY18 CWA grants, the BRP is making a serious commitment to expediting document reviews and administrative activities that can often put a hold on construction schedules and complicate other financing. ABCA and RAP reviews will be turned around within 2 weeks from applicant's submittal.

**iii. Lead:** BRP Program Manager will lead this task, delegating technical or regulatory review to subject matter experts in the HHD, legal team, or General Services Environmental Division.

**iv. Outputs:** (1) Comments, correspondence, or notes documenting review of technical reports and plans (assessment reports, ABCAs, RAPs, abatement records, closure plans, health & safety plans, and regulatory reports), (2) field notes from site visits, and (3) public comments and correspondence during cleanup.

**Task 4: Loans & Subgrants**

**i. Implementation:** Starting with priority sites, BRP staff will work with applicants on application submittal and loan documents. The Loan Committee will review loan/subgrant applications and make a final decision through a consensus vote considering project eligibility, alignment with program objectives and community need, and financial



information of applicant (including credit worthiness). Loan processing, project oversight, and finance tracking (including Davis-Bacon requirements) is included under Tasks 1-3. The majority of the RLF funding will be committed to loans and subgrants. Borrowers will be responsible for procuring their own Qualified Environmental Professionals per 2 CFR 200.317-326 requirements. Upon completion of cleanup and reuse objectives, the BRP will host a celebration to highlight project accomplishments and promote the program.

**ii. Schedule:** Upon award, BRP staff will immediately begin working with Fifth Ward CRC, Buffalo Bayou Partnership, Houston Land Bank, TIRZ-18/Fifth Ward Redevelopment Authority, and private developers on applications for priority sites. Loan or subgrant terms and conditions will clearly outline a schedule for cleanup activities to be completed within 2 years of subawards, unless negotiated differently.

**iii. Lead:** Loan or subgrant recipients will lead activities funded under associated agreements. QEP(s) selected by recipients will be responsible for the implementation of cleanup activities funded by the loan or subgrant.

**iv. Outputs:** (1) 4-6 loans, (2) 1-2 subgrants, (3) 5-8 brownfield reuse stories (with ACRES profiles), and 4) documentation of regulatory completion (TCEQ Certificate of Completion or No Further Action letter) and/or Regulated Building Materials abatement completion.

**c. Cost Estimates** The proposed budget is summarized in Table 5 and 6. Loans account for >50% of the total award amount. No indirect or other costs are requested.

**Table 5: Cost Estimates**

Budget Categories		Task 1	Task 2	Task 3	Task 4	Totals
		Program Management	Community Engagement & Program Marketing	Cleanup Oversight & Quality Control	Loans & Subgrants	
Direct Costs	Travel	\$7,500	--	--	--	\$7,500
	Supplies	--	\$2,500	--	--	\$2,500
	Contractual	--	\$50,000	\$10,000		\$6,000
	Loans	--	--	--	\$744,000	\$744,000
	Subgrant	--	--	--	\$186,000	\$186,000
<b>Grant Subtotal</b>		<b>\$7,500</b>	<b>\$52,500</b>	<b>\$10,000</b>	<b>\$930,000</b>	<b>\$1,000,000</b>
Cost Share	Personnel	\$40,000	\$20,000	\$40,000	--	\$100,000
	Contractual	--	\$100,000	--	--	\$100,000
<b>Cost Share Subtotal</b>		<b>\$40,000</b>	<b>\$120,000</b>	<b>\$40,000</b>	<b>\$0</b>	<b>\$200,000</b>
<b>TOTAL</b>		<b>\$47,500</b>	<b>\$172,500</b>	<b>\$50,000</b>	<b>\$930,000</b>	<b>\$1,200,000</b>

Notes: \*No federal funds are requested for personnel, fringe benefit, or equipment costs, and therefore, these categories are not included on the table.

**Table 6 - Summary of Task Cost Development and Application of Funding**

<p><b>Task 1 – Program Management (Total Budget = \$47,500)</b></p> <p>Cost Basis and Assumptions: <u>Travel</u> costs of \$7,500 for at least one BRP personnel to attend one EPA/state brownfield conference per year for 5 years; costs are estimated at \$1,500/person/conference based on recent conference costs of approximately \$500 airfare, \$600 hotel, and \$400 incidentals per event. <u>Cost Share</u>: City-funded salaries for <u>two</u> key personnel for Program Management at \$50/hour for 80 hours each year for 5 years (= \$40,000).</p>
<p><b>Task 2 – Community Engagement &amp; Program Marketing (Total Budget = \$172,500)</b></p> <p>Cost Basis and Assumptions: <u>Supplies</u> of \$2,500 assumes \$500 per year for 5 years for miscellaneous supplies, like signage for cleanup projects, markers and large post-it notes for community meetings, and name tags. <u>Contractual</u> for public relations firm to enhance community engagement efforts (1 year at \$125/hr x 80hrs = \$10,000 x 5 years = \$50,000). <u>Cost Share</u>: City-funded salaries for key personnel for eligible community engagement and program marketing activities. Cost share estimate includes <u>two</u> personnel at \$50/hour for 40 hours each year for 5 years (= \$20,000). Task 2 will also be supported through a third-party consulting firm for eligible community engagement and marketing support (\$20,000 per year or \$125/hr x 160 hrs/yr x 5 years = \$100,000).</p>
<p><b>Task 3 – Cleanup Oversight &amp; Quality Control (Total Budget = \$50,000)</b></p> <p>Cost Basis and Assumptions: <u>Contractual</u> costs are estimated based on BRP’s current spending of about \$2,000 per year for 3<sup>rd</sup> party technical reviews (\$2,000/yr x 5 = \$10,000). <u>Cost Share</u>: City-funded salaries for two key personnel for cleanup oversight and quality control. Cost share is estimated for 2 staff x \$50/hr x 80 hrs/yr x 5yr = \$40,000.</p>



**Task 4 – Loans & Subgrants (Total Budget = \$930,000)**

Cost Basis and Assumptions: *Loans* were estimated as 80% of the total grant remaining after accounting for Tasks 1-3 (80% of \$930,000=\$744,000). *Subgrants* of \$186,000 account for the remaining 20%.

**d. Measuring Environmental Results:** The City’s BRP staff will facilitate projects from initial interest to site selection, through cleanup, loan repayment, and loan revolution. The BRP keeps an updated brownfields inventory, utilizing KSU TAB’s Brownfield Inventory Tool and internal GIS systems, which transfer data to ACRES as sites are funded to capture reuse metrics such as leveraged funding and jobs created. The BRP regularly report to EPA on outreach (type of events, number of attendees, outcomes) and project status, tracking deliverables and milestones on project spreadsheets. The BRP currently tracks site progress and notifies supervisors of any delays. The HPW finance group is set up to track loans and repayment schedules.

BRP funding has proven to be a catalyst for revitalization by removing barriers to redevelopment of community assets, rehabilitating tax delinquent properties, and creating jobs through construction and new business. By tracking, measuring, and evaluating progress, the BRP can demonstrate how outcomes contribute to the overall success of projects and revitalization efforts. The BRP uses metrics such as number of sites assessed; acres cleaned and/or redeveloped; acres of park and open space created; amount of hike and bike trails created; and number of businesses and/or employment opportunities created to measure and evaluate project progress throughout the City. Data for projects completed with EPA RLF funds will be tracked through the EPA ACRES database. Documenting community outreach efforts is another essential component to evaluating project successes.

**4. Programmatic Capability and Past Performance:**

**a. Programmatic Capability**

**i. Organizational Structure:** The RLF grant will be managed as part of the 20+ year old BRP, which was rebooted about 7 years ago by Houston’s Public Works (HPW) department. The BRP is managed by two full-time staff with a combined 40 years of experience managing environmental programs and EPA brownfields grants. The success of the BRP has been largely due to the diverse background HPW support staff, as well their collaborative relationships with other City departments. The BRP frequently leverages expertise of other HPW staff (4,000+) on brownfields projects or to enhance programmatic capabilities, especially with legal and financial matters, as well as timely and successful expenditure of funds.

The BRP Program Manager will be responsible for the day-to-day grant operations including updating and maintaining the brownfield inventory, distributing information about funded project to the community, and tracking project progress. The BRP Program Manager will manage and track all financial transactions and generate required financial reports, quarterly reports, and track all minority or women-owned business work for each site and submit the necessary reports to EPA, ensuring the completion of all technical, administrative, and financial requirements of the project and grant.

**ii. Description of Key Staff:**

- **Mark Wooten (Program Manager)** is the BRP manager and has been at the City for 15 years. Mark is currently a Ph.D. candidate in Urban Planning and Environmental Policy at Texas Southern University where he is actively researching the role of brownfields in community development and gentrification. *Primary role:* Program strategies, contractor oversight, grant administration and ACRES reporting.
- **Joellen Meitl (Project Manager)** has a B.S. in Geology and 25 years of experience in environmental assessments and regulatory oversight. *Primary role:* Outreach, contractor oversight, and technical reviews.
- **Greg Carrington** is a Certified Public Accountant in Texas and has served the City in disaster cost recovery going back to Hurricanes Katrina, Rita, and Ike. Greg managed preparation of the annual comprehensive financial report for the City’s aviation enterprise fund for 2 years and managed the citywide annual accounting and reporting of construction work and capital assets for 7 years. He previously worked 15 years in Telecom, international taxation, and audited internal controls for a CPA firm. *Role: Loan financing support*



- **Dr. Loren Hopkins, Ph.D. (Quality Control)** is the Chief Environmental Science Officer for the HHD and faculty at the Dept. of Statistics at Rice University teaching health risk assessment from environmental exposure and environmental statistics. *Primary role: Quality assurance and B2H collaboration, outreach*

**iii. Acquiring Additional Resources:** Houston Public Works employees over 4,000 dedicated professionals and has an annual operating budget of \$2.1 billion. HPW has a fully staffed human resources department with the resources, experience, and expertise to recruit qualified replacements for any key project staff that depart during the project timeframe. The City routinely contracts out for engineering and consulting services and has all management and procurement procedures in place to secure services through competitive processes compliant with 2 CFR 200.317-326 requirements, as well as the experience needed to manage contractors.

**b. Past Performance and Accomplishments:**

**i. Currently Has or Previously Received an EPA Brownfields Grant:** The BRP will draw upon its experience in successfully managing several EPA grants in the last several decades including most recently a two CWA grants for Petroleum and Hazardous Substances: \$400,000 FY14 (CA No. BF00F94801 & BF00F94701) and \$300,000 FY18 (CA No. BF01F47901).

**1. Accomplishments:** Since 2005, the City has assisted with redevelopment of over 75 sites. Successes include more than 3,000 acres restored to beneficial use, over \$5 million in tax revenue generated, \$800 million in investment for cleanup and redevelopment, and over 4,000 new jobs created or retained<sup>17</sup>.

- **FY14 CWA for Petroleum and Hazardous Substances (Closed):** This grant focused on assessing and cleanup/reuse planning of priority sites. **Outputs:** QAPP, QMP, five Phase I ESAs, six Phase II ESAs, quarterly reports, updated ACRES database, annual/final DBE and FFRs, and one grant closeout report. **Outcomes:** The assessment phase of the redevelopment of St. Elizabeth’s Hospital, a 2.88-acre, \$53 million multiphase project in progress that includes historic renovation as well as the new construction of a 5-story multifamily building. The project will create 179 residential units with at least 51% of the total units being affordable housing to help address the housing shortage in the community. **Outcomes:** Conversion of 3.2 acres of vacant land adjacent to the Proler Scrap Metal operation by St. Catherine’s Montessori to expand their high school campus and teach urban agriculture and natural resource conservation. This development also feeds into the 200-acre Buffalo Bayou East Sector Park system, currently under development by the City Buffalo Bayou Partnership.

- **FY18 CWA for Petroleum and Hazardous Substances (Active):** Although still active, 74% of this grant has been committed to Phase I, Phase II, and ACM/LBP surveys to advance affordable housing and economic development projects along the Lyons Avenue corridor. **Outputs:** QAPP, QMP, one Phase I ESAs, five Phase II ESAs, two regulated building material surveys, inventory updates and area-wide planning assessments, quarterly reports, updated ACRES database, and annual/final DBE and FFRs. **Outcomes:** In 2020, two priority brownfield sites (Rawley and Chew Street) received \$2.8 million in CDBG-DR Multifamily grants to build affordable housing. Chew Street also received Economic Development Administration funding for \$3.7 million to create a technology center that will provide co-working and office space for business startups. This project is expected to leverage \$925,000 in local funds, and create 5000 jobs, generate \$25 million in private investment.

**2. Compliance with Grant Requirements:** All ongoing, quarterly, and annual reporting requirements for past and current funding agreements (FY18 CWA currently open with >70% drawdown) have been submitted to the EPA per the cooperative agreement in a timely manner and in compliance with approved workplans. Each project has met or exceeded programmatic goals stated in work plans. Outputs and outcomes associated with all EPA funded projects have been, and will continue to be, entered in the ACRES database upon project completion. The City has successfully closed a Pilot Grant in FY1996 (\$600,000), as well as assessment grants awarded in FY05 (\$400,000), FY08 (\$400,000), and FY14 (\$400,000). All funds awarded by the EPA have been spent and the grants were closed out as required and are accurately reported in ACRES. For recent grants, >50% of the funding was spent on assessment activities.

<sup>17</sup> <https://www.houstontx.gov/brownfields/City-of-Houston-Brownfields-Strategic-Plan.pdf>



## THRESHOLD CRITERIA RESPONSE

**1. Applicant Eligibility:** The City of Houston

**2. Demonstration of Previous RLF Grant Status:** The City of Houston has not been awarded an EPA RLF Grant in the past and, therefore, does not have an open cooperative agreement for an RLF.

**3. Expenditure of Existing Multipurpose Grant Funds:** The City of Houston has not been awarded an EPA Brownfields Multipurpose Grant in the past and, therefore, does not have an open cooperative agreement for a Brownfields Multipurpose Grant.

**4. Description of RLF Boundaries:** City of Houston boundaries are established for incorporated areas. A map detailing the current city limits is provided as Attachment A.

Target Area	Description of Boundaries	Census Tracts
TA #1: Fifth Ward/ Kashmere Garden	Comprises two contiguous communities: Fifth Ward and Kashmere Gardens. TA #1 is situated on the north bank of Buffalo Bayou (southernmost boundary) with the western boundary along Hardy Street, extending east to Wayside Drive and north to Interstate 610, and is bisected by U.S. Highway 59 (Hwy 59), Interstate 10 (I-10), and the large Union Pacific Englewood Railyard.	2108, 2109, 2110, 2111, 2112, 2113, 2114, 2117, 2023*
TA #2: Near Northside	Located just north of downtown and bounded by I-610 to the north, Interstate 45 (I-45) to the west, and the active north-south Union Pacific railroad to the east.	2104, 2105, 2106, 2107, 2123*
TA #3: East End	Comprises two contiguous neighborhoods, Second Ward and Magnolia Park, with boundaries of downtown to the west, Buffalo Bayou to the north, the Harrisburg light rail line to the south, and the Houston Ship Channel Turning Basin to the east.	3101, 3104, 3105, 3109, 3110, 3111

\*Census Tract 2123 spans both TA #1 and #2.

### 5. Oversight Structure and Legal Authority to Manage a Revolving Loan Fund

Describe how you will oversee cleanup at sites:

The BRP has an established quality assurance team made up of partnerships between qualified BRP personnel, HPW legal team, and HHD’s Chief Environmental Science Officer. This team of internal environmental and regulatory experts will review and approve Analysis of Brownfields Cleanup Alternatives (ABCAs) and Remedial Action Plans (or equivalent) to verify cleanup will be completed in a manner protective of public health and the environment, and in accordance with applicable regulations.

Enrollment requirements for state or tribal response program:

Borrowers/subgrantees will be required to have site control, be enrolled in a Texas Commission on Environmental Quality (TCEQ) cleanup program, and/or have an abatement plan for hazardous building materials, as necessary. The BRP Program Manager will confirm the applicant’s enrollment in all relevant state programs, perform site visits while cleanups are in progress, and review remedial



documentation (or other reports) confirming that cleanup was completed in accordance with plans and applicable State, federal, and loan/subgrant requirements. The BRP Program Manager will also serve as a community liaison to communicate program objectives, cleanup strategies, and construction schedule to the public, as well as address any public concerns.

Procuring additional resources:

The BRP will likely procure a public relations and marketing firm and will comply with CFR 200.317-326. The majority of the RLF funding will be committed to loans and subgrants. Borrowers will be responsible for procuring their own Qualified Environmental Professionals per 2 CFR 200.317-326 requirements prior to beginning cleanup activities.

Legal Authority

Letter from Houston legal counsel is included as **Attachment B** demonstrating that the city has:

- (1) Legal authority to access and secure sites in the event of an emergency or default of a loan agreement or non-performance under a subgrant; and
- (2) Legal authority to perform the actions necessary to manage a revolving loan fund. At a minimum, legal authority must include the ability to hold funds, make loans, enter into loan agreements, and collect repayments.

**6. Statutory Cost Share**

The City of Houston will provide a cost share of 20% (\$200,000) of the total federal RLF Grant funds awarded (\$1,000,000 request). The cost share will be achieved by contributing city funding towards eligible RLF activities, like personnel and contractual (third party) expenses funded by the City of Houston budget (non-federal source). Anticipated eligible expenses include:

1. City-funded salaries for two key personnel for Program Management at \$50/hour for 80 hours each year for 5 years (**=\$40,000**).
2. City-funded salaries for key personnel for eligible community engagement and program marketing activities. Cost share estimate includes two personnel at \$50/hour for 40 hours each year for 5 years (**= \$20,000**).
3. City-funded third-party consulting firm for eligible community engagement and marketing support (\$20,000 per year x 5 years = **\$100,000**).
4. City-funded salaries for two key personnel for cleanup oversight and quality control. Cost share is estimated for 2 staff x \$50/hr x 80 hrs/yr x 5yr = **\$40,000**.

Additional cost share opportunities are expected to be provided by loan borrowers as in-kind contributions and additional funding leveraged for cleanup activities.

**7. Named Contractors and Subrecipients:** No contractors or subrecipients have been selected for this grant proposal. The City routinely contracts professional services and has all management and procurement procedures in place to secure services through competitive processes compliant with 2 CFR 200.317 thru 326 requirements.