

NARRATIVE – Hillcrest Redevelopment Site

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

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

The Greater East Side neighborhood of the City of St. Paul has an industry and commerce history dating back to the mid-1800s. By the early 1900s several railroad corridors ran through the Greater East Side. Industries developed along these corridors. Notable among the major employers in the Greater East Side were the 3M Company, with its world headquarters and all its manufacturing facilities, Whirlpool Corporation, the Hamm's Brewery (later the Stroh's Brewery), Canon Conveyor and facilities supporting the railroads. These major employers were at the heart of the Greater East Side's vibrant economy. During their heyday in the 1950's, these companies offered comfortable middle-class lifestyles to their combined workforce of more than 10,000 employees, supporting a strong local economy of countless small businesses.

Beginning in the 1960s, with 3M's relocation to the suburbs and continuing through the closure of the Stroh's Brewery in 1997, the Greater East Side neighborhood experienced a steady decline in major job centers, pulling local neighborhood economies into a downward spiral. Job losses due to the closing and downsizing of these major manufacturing enterprises altered the economic and cultural landscape of the neighborhood. Jobs left the neighborhood, and residents with disposable incomes followed. As a result, commercial corridors servicing the neighborhood slipped from thriving prosperity to blighted decline. Over one hundred years of unregulated or under-regulated hazardous substance management at large and small businesses across the Greater East Side resulted in areas of known or suspected contaminated soil and groundwater. These historic land uses left behind a legacy of underdeveloped or vacant brownfield sites and depressing property values in the Greater East Side. The Saint Paul Port Authority (SPPA) mission is to create quality job opportunities, expand the tax base, address environmental justice, and advance sustainable and equitable development. The chief means of accomplishing this mission is the redevelopment of brownfield properties into new commercial/industrial "business centers." Using census data, Police Crime Reports, Minnesota Department of Health data, the City of Saint Paul's Neighborhood Plans and 2040 Comprehensive Plan, SPPA has identified the Greater East Side as one of the neighborhoods in the City of St. Paul with the greatest need for assistance, based on economic indicators and racial disparities. People of color make up 61% of all Greater East Side residents. The unemployment rate for people of color is nearly double the unemployment rate for white people in the neighborhood. About 75% of white households own their own homes, but only 23% of black households do. Nearly a quarter of Greater East Side residents live below the poverty level.

1.a.ii. Description of the Proposed Brownfield Site(s)

The 112-acre former Hillcrest Golf Course was built in the early 1920s and at the height of anti-Semitism in America became one of the only golf courses in the St. Paul/Minneapolis metropolitan area open to the Jewish community. Prior to its use as a golf course the property was used for agricultural grazing. As the neighborhood surrounding the golf course became more economically depressed and experienced higher crime rates, the Hillcrest golf course became a less desirable destination for golfers. In 2017 the golf course closed, abandoning the Clubhouse and several other buildings which occupied the Site. These boarded up vacant buildings are now a blight on the local community, attracting trespassers and vandalism, and facilitating illegal drug use and other criminal activities. The former golf course property is now completely overgrown and no longer resembles a golf course. The unattended property suffers from frequent illegal waste dumping and has raised significant concerns amongst the local community. The blighted conditions of the property, at a very large scale, further drag down the already depressed Greater East Side economic conditions.

An environmental assessment of the property has revealed mercury, polycyclic aromatic hydrocarbon, petroleum and arsenic contamination at concentrations exceeding risk based cleanup action levels. Notable contamination is the wide-spread, high concentrations of mercury contaminated soils and wetland sediments that have been identified at the Site. The mercury is believed to have accumulated in soils through annual application of mercury containing fungicides for up to 60 years. Surface run-off from the application areas is believed to be the source of wetlands mercury contamination, which now threatens off-site surface water bodies.

SPPA purchased the Hillcrest Site in June 2019 with the intent to redevelopment the property. SPPA believes that reuse of the Hillcrest Site will bring immediate and substantial positive social and economic benefits to the Greater East Side neighborhood, including job-dense business centers and needed workforce housing. Elimination of this blighted property will spur additional, well needed economic growth in the Greater East Side neighborhood.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

SPPA has participated with the City of Saint Paul in the Master Planning for reuse of the Hillcrest Site. The Master Planning process directly involved representatives from the community and project partners in developing a reuse strategy for the Site. SPPA's proposed reuse strategy for the Site includes a mix of job centers, workforce housing, and public greenspace with recreational amenities. After the Master Plan has been approved in early 2022, SPPA will remove environmental and geotechnical barriers to redevelopment, add any required infrastructure to the Site, and prepare the Hillcrest Redevelopment Site for reuse. Property will be sold directly to businesses and private developers with development projects that conform to the Master Plan approved by the City and meet SPPA job and housing density goals, livable wages with low barriers to entry, neighborhood workforce utilization and sustainability. The reuse strategy and resulting Master Plan are in alignment with the City's 2040 Comprehensive Plan that was developed with considerable citizen input, which identified "Providing Land for Jobs" as one of the Land Use Strategies for achieving the Plan's primary goal of "creating a city that is economically strong, environmentally responsible, vibrant, and attractive." The Comprehensive Plan identifies the Hillcrest property as an Opportunity Site with a land use designation of Mixed-Use. The Comprehensive Plan names SPPA as the key partner in redeveloping brownfield properties to "provide land for jobs." The City's Small Area Plan for the Greater East Side Neighborhood specifically identifies promoting Mixed Use Transit Oriented Redevelopment within the area occupied by the Hillcrest Site.

1.b.ii. Outcomes and Benefits of Reuse Strategy

The Hillcrest Site reuse strategy will create over 1000 new jobs and add over 1000 units of much needed workforce housing at the Site and increase the economic competitiveness of the Greater East Side neighborhood. The SPPA reuse strategy for the Site includes community benefits agreements requiring businesses building within Business Centers at the Hillcrest Site to commit to job creation and incentives for hires from the Greater East Side neighborhood. The anticipated outcome of the planned Hillcrest Site cleanup will include an increased community vibrancy in the form of more jobs and workforce housing for Greater East Side residents, increased tax revenue, and replacement of blight with attractive, energy efficient buildings and sustainably landscaped spaces. The Hillcrest Redevelopment will include 20 acres that will be dedicated to public greenspace, including wetland preservation, stormwater retention ponds, recreational areas, and other passive green areas. Walking trails and bikeways will provide connections for the local community to these created green amenities. Replacing the abandoned, blighted Hillcrest brownfield property with remediated land and approximately \$250,000,000 of private investment that will result in around 2,000,000 SF of housing and job producing businesses will transform not only the Hillcrest Site, but the surrounding neighborhood as well. The added residential density and the disposable income that will come with the created jobs will spur private investment in the Greater East Side neighborhood, adding small businesses to service the Hillcrest Redevelopment and inspiring addition redevelopment projects.

Through the planning process for the Hillcrest Site, several strategies for achieving aggressive energy reduction targets and reducing reliance on fossil fuels are being evaluated. The redevelopment intends to achieve the City's rigorous Sustainable Building Policy goals and is targeting the U.S. Green Building Council's LEED for Communities certification at the Platinum Level. This goal has been applauded by neighborhood groups in the area. In addition to employing zero and low carbon design strategies for all buildings and site infrastructure, the project partners are exploring alternative systems for further reducing greenhouse gas emissions including a district energy system, elimination of natural gas on the site, electrification of building heating systems, requirements to maximize rooftop photovoltaics, and a renewable microgrid.

1.c. Strategy for Leveraging Resources

1.c.i. Resources for Site Reuse

Funds are needed for site acquisition, reuse planning, cleanup planning, remediation, and redevelopment activities. The SPPA issued \$10 million in General Obligation Bonds to acquire the Hillcrest Site for the purpose of environmental cleanup and subsequent reuse of the property. The SPPA is leveraging its capital as a committed source for the \$100,000 cost share required by the grant and is committing SPPA staff to complete in-kind services supporting the cleanup and development of the Hillcrest Site. The following are funding sources that the SPPA has used for cleanup planning, remediation, and redevelopment of brownfields in the past and will seek to use for the Hillcrest Site to augment EPA Brownfield Cleanup Grant funds:

MN Dept of Employment and Economic Development (DEED) Contamination Cleanup Grants provide funds for assessment, cleanup planning, and remediation of brownfield sites. The SPPA regularly applies for, obtains, and manages these grants. The SPPA has been awarded over \$32,000,000 leveraged from the DEED cleanup funding program since 1995. The SPPA is confident in our ability to obtain future grants for the Hillcrest Site. *DEED Redevelopment Grants* are available to fund land acquisition, demolition, infrastructure improvements, soil stabilization, and stormwater management. The SPPA has been successful in obtaining these grants when needed. In the last two decades SPPA has secured nine of these grants totaling nearly \$7 million.

Metropolitan Council Tax Based Revitalization Account (TBRA) grants fund investigations and cleanup of brownfield properties for economic redevelopment projects that enhance the tax base while promoting job retention or job growth and/or the production of affordable housing. The SPPA has been consistently successful in winning these grants. Over \$12,000,000 has been leveraged in Metropolitan Council funds since 1996.

Ramsey County Environmental Response Fund (ERF) grants are used for remediation in combination with the state and Metropolitan Council grants for remediation projects within Ramsey County. The SPPA has leveraged over \$2,600,000 in Ramsey County ERF funds since 2000.

Tax Increment Financing is being considered by the City to help offset public investment required to return the Hillcrest Site to the public tax rolls.

The state and local brownfield Grant Programs described above all award grants on a competitive basis semi-annually for projects which will begin redevelopment within six months of being awarded a grant. SPPA intends to apply for state and local funding after Site's Master Plan has been adopted in early 2022.

1.c.ii. Use of Existing Infrastructure

The Hillcrest Site is in a fully developed urban neighborhood. Transit access, trunk sanitary sewer, stormwater, electric, gas and other small utilities are available to the Site. This existing infrastructure has more than enough capacity to accommodate the proposed site reuse plans and site redevelopment will rely on this existing major infrastructure capacity. Because of the historic single facility use of the 112-acre Site, distribution of existing infrastructure capacity within the site boundaries will be necessary to connect existing utilities to the proposed redevelopment. Water mains and other utilities will be linked through the Site allowing for a more resilient grid system in the neighborhood. These new utility connections will improve the efficiency of the existing infrastructure. The new development will link traffic from an area west of the Site to a major north south artery east of the Site. Distribution within the Site will be paid for by SPPA and recouped through future land sales.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

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

The Greater East Side neighborhood is burdened by 379 known environmentally impacted properties, including 39 known brownfield sites. The known as well as potential additional brownfields sites that exist in the Greater East Side are due to the contamination legacy remaining after the exodus of job producing businesses in the mid- to late-1900s. Brownfield sites in the Greater East Side are strongly concentrated along transportation corridors where these large, industrial job centers were formerly located. Job losses due to the closing of job centers altered the economic and cultural landscape of the neighborhood. The economic decline brought blighted conditions, which lowered property values, and as a result property taxes have steadily decreased. The economically depressed Greater East Side does not have the means to fund environmental remediation of its brownfield properties. Low median income, high poverty rates, and high unemployment rates plague the neighborhood. 4.9% of neighborhood residents are unemployed compared 3.8% unemployment in the State. 21.1% of neighborhood residents live below poverty levels compared to 10.5% and 10.1% nationally and statewide, respectively. The median household income in the neighborhood is \$52,286, compared with \$68,703

and \$68,411 nationally and statewide, respectively. 46% of children in the Greater East Side live in single-parent households. Crime is unusually high in the Greater East Side. In 2017 it had the 5th highest call rate of 17 St. Paul neighborhoods for murder, rape, and aggravated assaults.

The SPPA mission is to assist neighborhoods in St. Paul by redeveloping brownfield properties that have not been redeveloped by the private sector due to environmental liability and contamination issues. SPPA identified the Hillcrest brownfield site as property that would substantially help the neighborhood if the Site could be cleaned up and redeveloped with new jobs and new housing units. The 112-acre Hillcrest Site represents 4.5% of land making up the Greater East Side. Cleaning up this property will have an immense impact on eliminated contaminated property in the Greater East Side and spurring economic growth. With strong community and political support, the SPPA purchased the Site in 2019 with the intention of cleaning up and reusing the property. An EPA Cleanup Grant is essential for the SPPA to fulfill their promise to the Greater East Side to help the low-income neighborhood move back towards the economic stability it once had.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The Hillcrest brownfield site is a threat to nearby sensitive populations through direct exposure to contamination and by the blight and related welfare impacts that limit redevelopment and economic activity. Mercury, present in large volumes of contaminated soil at the Hillcrest Site, is a neurotoxin, which interferes with the brain and nervous systems in adults, children, and fetuses. Exposure to mercury can cause a host of health issues in humans including mental retardation, cerebral palsy, deafness, blindness, learning disabilities, autism, developmental disorders, and an increase in heart disease. The young and the old are particularly sensitive to the adverse effects of mercury exposure. The following table summarize this sensitive population in the Greater East Side neighborhood.

Age Group	Population	Percent of Population
Children (12 and under)	7,918	26.30%
Elderly (65 and older)	2,229	7.40%
Women of Childbearing Age	7,074	23.50%

The Hillcrest Site is surrounded by residential property on all sides, providing ample opportunity for sensitive populations to be exposed to the mercury contamination present at the Site. There are 2 recreation centers, 6 schools, 6 public parks, and three public playgrounds located within 2 miles of the Site. A daycare, a public park, and a playground are all located less than 3 blocks from the Site. Two group homes serving residents with disabilities are located across the street from the Hillcrest Site.

Contamination threats are compounded with other social issues faced by the Greater East Side. The neighborhood has high poverty, high unemployment and high crime.

Cleaning up 112 acres of mercury contamination from the Hillcrest Site will eliminate a substantial source of mercury contamination threatening sensitive populations in the Greater East Side. Eliminating blight associated with the Site and stimulating economic growth at the site and surrounding areas will help reduce poverty, lower unemployment, and facilitate crime reduction, thereby reducing the cumulative impacts of exposure to contamination from environmentally impacted properties and related welfare impacts.

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

Mercury contamination is present across the Hillcrest Site in near surface soils, in sand traps associated with the former golf course use, and in wetlands located on the Site at concentrations 280 times health risk standards for safe residential land use and 140 times health risk standards for safe commercial/industrial land use. The former golf course property was open to the public and frequented by the neighborhood populations most sensitive to the adverse health effects of mercury exposure. Soil and sand disturbances through wind and water erosion from the now abandoned and unmaintained property can expose mercury contaminated soil leading to potential dermal contact. The exposed mercury contaminated soil and sand can also lead to airborne inhalation, dermal exposure and ingestion of mercury contaminated dust. The potential also exists for contamination present in the onsite wetlands to impact offsite surface water via natural surface water drainage.

Greater than normal incidents of disease and adverse health conditions caused by exposure to mercury is a concern that has been expressed by the Minnesota Dept. of Health and Pollution Control Agency due to a history of airborne mercury contamination from coal fired power plants and taconite production, and

cumulative exposure through fish consumption. For over a decade there have been statewide efforts to reduce mercury exposure to the overall population. The remediation of mercury contamination at the Hillcrest Site will eliminate mercury exposure from the Site to Greater East Side residents, and subsequently reduce disease and adverse health conditions associated with mercury exposure in the Greater East Side neighborhood.

(3) Promoting Environmental Justice

Crime, depressed quality of life, inadequate access to health care and the lack of quality paying jobs opportunities are poverty indicators that show negative impacts on the Greater East Side's health and welfare due to a high number of environmentally impacted sites in the neighborhood. Brownfield sites and other environmentally impacted properties in St. Paul are concentrated along transportation corridors where job centers were formerly located. A disproportionately high percent of property within the Greater East Side compared to the rest of the City lies within major transportation corridors. As such, the Greater East Side has a disproportionately high concentration of environmentally impacted property and associated negative environmental consequences on its population. The Greater East Side neighborhood is burdened by 379 known environmentally impacted properties, including 39 brownfield sites, 218 hazardous substance facilities, 12 dump sites, 7 air quality sites and 143 sites with violations, spills, and leaks. The disproportionately high number of properties with environmental issues, including the brownfield sites in this neighborhood that have not been remediated and redeveloped, represents an environment justice challenge for neighborhood residents, compounding other economic burdens faced by the neighborhood residence. The reuse of the Hillcrest brownfield site located in the Greater East Side, facilitated by environmental remediation of the site, will reduce exposure to contamination, alleviate health impacts on populations with elevated incidents of disease and adverse health effects, and increase opportunities for livable wage jobs for neighborhood residents and add tax base, which can be funneled back into these disproportionately impacted neighborhoods.

2.b. Community Engagement

2.b.i. Project Involvement

The Saint Paul Port Authority (SPPA) will work closely with the City of St. Paul's Greater East Side Community Council (GESCC), representing the Greater East Side neighborhood, to help involve the community in the cleanup and redevelopment planning and implementation at the Hillcrest Site. The SPPA will also work closely with the North East Neighborhood Development Corporation (NENDC), a local non-profit Community Development Corporation serving the Greater East Side neighborhood, to help us focus housing and commercial redevelopment activity within and near the planned Hillcrest Site job centers. The Community Advisory Committee (CAC), established during the Master Planning process to involve the community in cleanup and redevelopment planning, will continue to assist with community engagement during implementation of the Master Plan. Our neighborhood non-profit workforce service providers partner, represented collectively as the East Side Employment Exchange (ESEE), will be critical to our efforts to ensure the Greater East Side's rich diversity is represented during redevelopment the Hillcrest Site. The ESEE is a collaboration of 11 organizations (American Indian Family Center, East Side Financial Center, Chicanos Latinos Unidos En Servicio (CLUES), Goodwill Easter Seals, Hmong American Partnership, Latino Economic Development Agency, Merrick, Metro State University, Urban Roots, Dayton's Bluff Community Council, Neighborhood Development Alliance), and is a single point of access to connect jobseekers, employers and service providers. These community based and largely culturally focused groups provide valuable insight into the needs of the community's diverse neighborhoods. Our focus on job creation and economic development at these sites requires close coordination with those working with job seekers in the impacted area and working to maximize local hiring resulting from our efforts. The East Side Area Business Association (ESABA) will provide SPPA with insight into the business needs that serve the neighborhood. St. Paul 350, the local chapter of 350.org, the international climate change advocacy organization will also be a valuable partner. We have already had two meetings with its members to gather their input on the project's environmental issues. We have also activated a vendor/supplier diversity initiative at Hillcrest, focused on minority chambers of commerce to procure 'project eco-system-wide' scopes of work with a racial equity focus.

2.b.ii. Project Roles

Upon completion of the Master Planning Process and approval of a Hillcrest Master Plan in early 2022, SPPA will meet quarterly with a sub-committee of the CAC, including members of the NENDC, the GESCC and other stakeholders to review and comment on remediation work and progress. The ESABA and ESEE will also meet separately with SPPA at least quarterly to discuss cleanup and redevelopment at Hillcrest. Additionally, An Alternative Urban Areawide Review (AUAR), an alternative to the Environmental Assessment Worksheet required by Minnesota Rules for proposed large development sites, will be prepared concurrent to cleanup planning during first year of the Cleanup Grant term. The AUAR evaluates several different development scenarios for a potential site including traffic analysis, stormwater, water, wastewater, geology, environmental, hazardous waste, habitat, and historic review. As part of the AUAR a public engagement meeting hosted by the SPPA will be held, providing the public a chance to comment on the cleanup plan and development plan for the Hillcrest Site. The AUAR will include a 30-day public review and comment process.

List of Project Partners	Partner	Point of contact (name/email/phone)	Specific role in the project
	Greater East Side Community Council	Executive Director	Facilitate Community Input on Project Cleanup and Development Plans
	Community Advisory Committee	Anne DeJoy, CAC Co-Chair Executive Director, adejoy@esndc.org	Facilitate Community Input on Project Cleanup and Development Plans
	North East N’Hoods Dev Corporation (NENDC)	Executive Director	Development partner, community convener & facilitator
	East Side Area Business Assoc	Paris Dunning, Executive Director, 651-621-2766, paris@esaba.org	Community business location and Business Center design input.
	East Side Employment Exchange	Ann Tyler, atylor@clues.org , 651-632-3870	Connecting Businesses located on former brownfield properties with community job seekers.

2.b.iii. Incorporating Community Input

The SPPA will leverage its public/private expertise to lead a comprehensive community engagement process, which will result in a Community Relation Plan (CRP) that includes a vision, guiding principles, and goals for the project. The CRP will include methods and strategies to ensure traditionally underrepresented groups have been intentionally engaged to assist in the co-creation of cleanup and redevelopment strategies. This will include local community and cultural group outreach, email collaboration, pop-up events, and engagement activities including interviews with community leaders and elders, surveys, public exhibits, workshops and micro-targeted social outreach. By effectively following the CRP and including community members in the cleanup and redevelopment process for the Hillcrest Site, community values, needs, and wants will be reflected in the final development. SPPA will work with the project and community partners to obtain neighborhood input into development decisions and incorporate Greater East Side priorities into redevelopment and cleanup plans. NENDC, GESCC, and other stakeholders will be meeting quarterly to discuss the Hillcrest cleanup and redevelopment implementation. The SPPA will convene and facilitate the meetings. We will also meet with our partners at the ESABA and ESEE quarterly during cleanup and development implementation to seek input as we work on business-to-business relationships with the new development and workforce recruitment and placement, respectively. The SPPA and the City of St. Paul will maintain websites, which will be updated monthly, to inform the public on the cleanup planning, cleanup, and redevelopment of the Hillcrest Site. Website updates will include links to social media to accomplish a broader reach for community engagement. Quarterly meetings with NENDC, GESCC, and members of the CAC and with the ESABA and ESEE will be held remotely by video conferencing platforms and can also be attended via phone call. This will be the meeting format until the COVID pandemic emergency is resolved. SPPA staff is committed to implementing the most effective and current methods of engaging the community during the COVID pandemic. Meeting materials will be posted on the City of Saint Paul’s and the SPPA Hillcrest Project websites. Community input will be solicited in virtual meetings and gathered electronically through the web page portals. Responses to and/or incorporation of community input will be discussed in meetings, placed in meeting minutes and posted to web

page portals discussed above. A running tracker of community input, questions and responses and resolutions will be developed and maintained throughout the process. We will hold a community wide meeting when the ABCA is finalized and issue an Administrative Record for public review and comment.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

The anticipated Cleanup Plan for the Hillcrest Redevelopment Site will consist of excavation of all contaminated soil and sediment exceeding health risk based cleanup standards established in the cleanup plan approved by Minnesota Department of Agriculture (MDA) and Minnesota Pollution Control Agency (MPCA), as appropriate for commercial/industrial and residential reuse. Mercury is the primary constituent of concern at the Hillcrest Site. Certain areas of mercury contaminated soils and wetlands sediment include comingled petroleum, arsenic, polycyclic aromatic hydrocarbons contamination with mixed debris. Portions of the Site with the highest concentrations of mercury contaminated soil and sediment, along with comingled contaminants will be excavated, loaded directly onto trucks, and hauled to a permitted off-site landfill for disposal. The remaining portions of the Site with low to moderate mercury contaminated soils and sediments, along with comingled contaminants will be excavated, consolidated, and managed on-site within public road and trail right-of-ways. Clean soil separation zones will be established over the managed contaminated material to prevent direct contact. Road or trail pavement covering the management areas will further prevent direct contact and minimize stormwater infiltration through the managed contaminated soil and sediment. The location of the contaminated soil and sediment managed on-site will be documented in a Restrictive Covenant.

3.b. Description of Tasks/Activities and Outputs

i.	<p>Project Implementation: Task 1 - Community Engagement: Saint Paul Port Authority (SPPA) commits its own staff and resources to complete community engagement activities, which includes meeting with community partners individually and in group meetings, presenting at community meetings, conducting community involvement activities and updating websites and social media. Qualified professionals will support the SPPA with its efforts to keep the community informed with cleanup and reuse planning for the Hillcrest Redevelopment Site and to seek continuous public input as cleanup and redevelopment activities are completed. Task 2 - NHPA and ESA: Qualified professionals will satisfy National Historic Preservation Act (NHPA) and Endangered Species Act (ESA) requirements for the reuse of the Hillcrest Site. SPPA commits its own staff and resources to review materials prepared by the professionals and oversee this process. Task 3 - Cleanup Planning: Qualified environmental professionals will complete cleanup planning for the Hillcrest Site, including completion of the ABCA and completion of a Response Action Plan (RAP). SPPA commits its own staff and resources to review materials prepared by the professionals and oversee this process. Task 4 - Remediation: Qualified earthwork and environmental professionals will implement the RAP, secure liability protections, oversee RAP implementation, and prepare environmental reports documenting RAP implementation. SPPA commits its own staff and resources to review materials prepared by the professionals and oversee this process. Task 5 - Program Management: SPPA commits its own staff and resources to complete program management activities, including engaging qualified professionals, meeting the requirements of the Cooperative Agreement, populating ACRES reporting, satisfy cost share requirements, processing grant payments, preparing quarterly reports, preparing annual reports, maintaining necessary administrative records, and general communication with EPA. A qualified Grant Management professional will assist the SPPA with its efforts to complete this work. SPPA staff will travel to EPA National and State Brownfield Conferences.</p>
ii.	<p>Anticipated Project Schedule: Task 1 - Community Engagement activities will be completed continuously throughout the 3-year grant term. Quarterly meeting will be held with project partners. Social media and websites will be updated monthly. Task 2 - NHPA and ESA actions will be completed in the first year of the grant term. Task 3 - Cleanup Planning will be completed within the first year of the grant term. Task 4 - Remediation activities will be completed during the final two years of the grant term. Task 5 - Program Management will be completed throughout the 3-year grant term. Environmental, Civil Engineering, and Grant Management consultants were procured following federal procurement requirements and are currently under contract with the SPPA to complete or assist with grant eligible activities. Qualified Historic Preservation consultants and Environmental consultants will be procured by the SPPA following federal</p>

	procurement requirements in the first quarter of the first year of the grant term to complete NHPA and ESA activities, respectively. A qualified earthwork professional will be engaged in the fourth quarter of the first year of the grant term to complete Remediation activities. Three SPPA staff will travel to the next EPA Brownfield and the next State Brownfield Conferences held during the term of the cleanup grant.
iii.	<u>Task/Activity Lead</u> : SPPA will be the Task/Activity Lead entity for completing Task 1 - Community Engagement and Task 5- Program Management activities. Historic Preservation and environmental consultants will be the Task/Activity Lead entity for completing Task 2 - NHPA and ESA actions, respectively. Environmental consultants will be the Task/Activity Lead entity for completing Task 3 - Cleanup Planning and Task 4 - Remediation activities.
iv.	<u>Outputs</u> : Task 1 - Community Engagement : Quarterly meeting with project partners. Social media and websites updates. Task 2 - NHPA and ESA : NHPA and ESA statutory requirements will be in the form of concurrence letters from Minnesota State Historic Preservation Office (MN SHPO) and Minnesota Department of Natural Resources (MN DNR) that no NHPA or ESA impacts have occurred at the site. Task 3 - Cleanup Planning : Completion of the final ABCA document and RAP report. Task 4 - Remediation : RAP Implementation Report and Determinations from the MPCA and MDA concerning liability and the completion of remediation at the Site in accordance with the RAP. Task 5 - Program Management : ACRES Database reporting, Quarterly Reports, Annual DBE and Federal Financial Reports, grant disbursements, administrative record. SPPA staff attending one National Brownfield Conference and one state Brownfield Conference.

3.c. Cost Estimates

CLEANUP GRANT BUDGET

Budget Category	Community Engagement	NHPA & ESA	Cleanup Planning	Remediation	Program Management	Total
Personnel	\$0	\$0	\$0	\$0	\$0	\$0
Fringe Benefits	\$0	\$0	\$0	\$0	\$0	\$0
Travel	\$0	\$0	\$0	\$0	\$12,000	\$12,000
Equipment	\$0	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0	\$0
Contractual	\$15,000	\$12,000	\$9,300	\$531,750	\$19,950	\$588,000
Other	\$0	\$0	\$0	\$0	\$0	\$0
Total Direct Costs	\$15,000	\$12,000	\$9,300	\$531,750	\$31,950	\$600,00
Total Federal Funding	\$15,000	\$12,000	\$9,300	\$431,750	\$31,950	\$500,000
Cost Share	\$0	\$0	\$0	\$100,000	\$0	\$100,000
Total Budget	\$15,000	\$12,000	\$9,300	\$531,750	\$31,950	\$600,000

Community Engagement activities include public meeting attended by various consultant disciplines. Approximately 100 hours of consultant time is anticipated at \$150 per hour.

NHPA & ESA activities will include research, correspondence and communication with MN SHPO and MN DNR to establish concurrence of no adverse impacts under NHPA or ESA. Approximately 80 hours at an average rate of \$150/hr.

Cleanup Planning activities will include preparation of final ABCA (30 hours at \$150/hr.) and preparation of a RAP (32 hours at \$150/hr.).

Remediation activities will include excavate, load, transport and dispose of mercury contaminated soil and sediment off-site (1,550 tons at \$55/ton), excavate, load, transport and dispose of comingled Arsenic, PAH, petroleum, and mixed debris contaminated soil off-site (2,930 tons at \$30/ton), excavate and stockpile mercury contaminated soil and sediment (12,300 CY at \$15/CY), placement of stockpiled contaminated soil and sediment for on-site management (12,300 at \$10/CY), field monitoring and sampling (200 hours at \$125/hr.), soil analytical testing (150 samples at \$35/sample), field monitoring equipment use fee for field implementation duration (estimated at \$2,100), preparation of RAP Implementation Report (90 hours at \$150/hr.), and consulting for liability assurances and regulatory assurances (35 hours at \$150/hr.). \$100,000 of the eligible remediation costs will be paid for with SPPA funds to cover the Cost Share.

Program Management expenditures include grant reporting over the three-year term of the grant (75 hours at \$175/hr.), reviewing costs for grant eligibility (39 hours at \$175/hr.), and SPPA staff travel to National and State Brownfield Conferences, 3 staff people per year for two years, estimated travel expenses of \$2,000 per staff (National Conference expenses include \$186 airfare, \$375.66 per diem, and \$80 registration per staff; registration for the State Conference is anticipated to be \$25 per staff with no airfare or per diem expected).

3.d. Measuring Environmental Results

SPPA will track all outputs and outcomes associated with grant activity on a routine basis through quarterly reports and quarterly data input into the ACRES database. Output documentation will be attached to quarterly reports. Logs of all community engagement meetings are maintained by the SPPA. The SPPA maintains accurate accounting records of the tax-base increase, job creation, private and public funds leveraged, and acres cleaned up for each redevelopment project it undertakes. These established procedures form the foundation for tracking these outcomes. The SPPA will conduct quarterly meetings to measure and evaluate the progress of outputs and ultimate outcomes by comparing goals, expectations, deadlines, and overall schedule detailed in the Work Plan. If necessary, corrective measures will be made in order to avoid potential delays. The SPPA Project Manager responsible for the grant will report to the SPPA Development Team on the status of outputs and outcomes after each quarterly meeting.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Structure

The Saint Paul Port Authority (SPPA) has the systems, processes and procedures in place to effectively manage this grant as demonstrated by the following information. SPPA's Project Manager overseeing federal grants is responsible for reviewing project vendor invoices to identify grant eligible expenses and code the invoices according to funding sources that will be used to pay the invoices. The Finance Department enters the coded invoice information into a spreadsheet that tracks the funding sources used to pay the invoices. The Financial Operations Manager is responsible for maintaining a grant tracking spreadsheet and conducting the grant draws. Each draw request is documented with a summary table identifying the invoices and grant eligible costs, along with a copy of the invoices included in the draw. Contractor invoices are paid by electronic transfer or checks that are mailed the 4th Friday of each month. Cost Share and costs identified in the invoices as ineligible for the grants are coded and paid with SPPA Development Funds budgeted for the Project. The Finance Department maintains accounting records of funds received and invoices paid.

The SPPA has developed over 20 inland Business Centers, which are occupied by approximately 550 companies and 25,000 good paying jobs in the City of Saint Paul. Since the late 1990s SPPA has received and successfully managed multiple EPA Brownfield Grants to assist with funding these projects.

4.a.ii. Description of Key Staff

Prior to joining the SPPA, SPPA Project Manager Ava Langston-Kenney gained over 20 years of experience in California as a Brownfield Coordinator and Regulatory Manager of a Regional Water, Waste Water and Stormwater Utility, including substantial experience managing several projects in Stockton and Sacramento in which community organizations, governmental agencies, consultants and contractor efforts required coordination to achieve project completion, including managing a \$200,000 Federal EPA Brownfield Pilot Grant for the City of Sacramento and subsequent EPA Site Specific Assessment grants awarded to the City. For the past 3 years, Ms. Langston-Kenney has managed brownfield projects for SPPA, overseeing EPA, state, and local grant compliance and management, including active SPPA EPA Assessment and RLF Grants. SPPA Financial Operations Manager, Dana Krueger has 22 years of experience in governmental accounting and finance, administering tax increment financing, Minnesota sales tax, federal, state, and local grant draws, and tracking and maintain accounting for invoice payment and accounts receivable.

4.a.iii. Acquiring Additional Resources

SPPA uses an open and broadly advertised procurement process that is consistent with 40 CFR31.36 to select the consultants. Using this process, SPPA has engaged environmental, civil engineering, and grant management consultants to assist the SPPA with community engagement, completion of cleanup planning, remediation oversight and to manage grants. SPPA plans to acquire qualified professionals for the remediation earthwork and NHPA/ESA assessments. SPPA has experience procuring professionals following the federal procurement

regulations, completing its last procurement process in 2016 by selecting five environmental consultants with expertise in brownfield assessment and cleanup, three civil engineering firms with expertise in brownfields redevelopment, and two firms with experience with brownfields grant funding. SPPA Project Managers have the authority to select professionals from this pool to complete the activities proposed in this grant application.

4.b. Past Performance and Accomplishments

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

SPPA has received multiple EPA Brownfield Grants since the late 1990s. Recent grants include: FY2020 Assessment Grant for \$300,000; FY2012 RLF Grant for \$2,050,000, and FY2012 Assessment Grant for \$400,000.

(1) Accomplishments

During the terms of the referenced FY2012 grants SPPA has completed Phase I and Phase II Environmental Site Assessment, developed cleanup plans, and completed remediation for five sites. Over 70 acres have been cleaned up and 617 jobs created or retained across five Business Centers or business sites. The tax base at properties for which EPA grant funds have been used increased by over \$1,740,000. During this period, SPPA has also leveraged approximately \$13,500,000 in public funds and \$74,000,000 private funds. All outputs and outcomes have been reported accurately and timely in ACRES since inception of the ACRES reporting system. The SPPA often sells the development ready property at a cost below market rate and records restricted land use covenants and benefits agreements with the buyers. In return for providing a reduced price on the land, the SPPA secures benefits to the City of Saint Paul and the neighborhoods it is targeting for assistance, including aesthetic value of the appearance of new building, energy efficiency of the new building, number of Jobs the project will produce, requirements for local hiring from the targeted neighborhood and requiring living wages. Its redevelopment strategy at these sites involves environmental assessment, environmental cleanup, geotechnical correction, demolition, and infrastructure improvements. The end use at these redeveloped sites are light manufacturing, commercial, and/or office use jobs, and increased property value leading to increased property tax base. The SPPA intends to follow this well-honed reuse strategy when it uses EPA Cleanup Grant funds for the Hillcrest Redevelopment Phase One Site.

(2) Compliance with Grant Requirements

The SPPA is currently meeting all grant requirements of its FY2020 Assessment Grant and is meeting or exceeded all requirements and expected results of its FY2012 Assessment and RLF Grants. SPPA complied with quarterly reports and annual MBE/WBE and FFR reporting and regularly updates timely site profile data into the ACRES database. SPPA currently has two open EPA Grants: FY2012 RLF and FY2020 Assessment. The remaining RLF balance will be used to cleanup and redevelop brownfield properties adjacent to the new Minnesota United soccer stadium and at two additional private development brownfield sites, Minnesota Chemical and Hmongtown Marketplace, for which the SPPA will be making RLF grant funds available. SPPA has used its FY2020 Assessment Grant to complete environmental investigation and begin conceptual cleanup and redevelopment planning. The SPPA fully utilized its FY2012 Assessment Grant on eligible costs.

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