



# CITY OF TOPEKA

Planning & Development  
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## RE: FY2025 EPA Brownfields Community-Wide Assessment Grant Application

The City of Topeka (the City) is pleased to submit this proposal for FY2025 Brownfields Community-Wide Assessment Grant funding. Below we provide the information requested.

<b>1. Applicant Identification</b>	<b>City of Topeka, Kansas</b> 215 SE 7 <sup>th</sup> Street Topeka, KS 66607	
<b>2. Website URL</b>	<a href="https://www.topeka.org/#gsc.tab=0">https://www.topeka.org/#gsc.tab=0</a>	
<b>3. Funding Requested</b>	<b>Grant Type:</b> Community-Wide Assessment <b>Federal Funds Requested:</b> \$500,000	
<b>4. Location</b>	<b>Cities:</b> City of Topeka <b>Counties:</b> Shawnee County <b>State:</b> Kansas	
<b>5. Target Area and Priority Site Information</b>	<b>Target Area (TA):</b> <ul style="list-style-type: none"> <li>The TA extends from US Highway 24 southward through North Topeka, the Kansas River riverfront, and Dynamic Core to Southwest 37th Street. The corridor extends east to California Avenue and west to Southwest Burlingame Road.</li> <li><u>15 Census Tracts (CTs):</u> 20177000400 (CT4), 20177000500 (CT5), 20177000600 (CT6), 20177000700 (CT7)*, 20177000800 (CT8)*, 20177001000 (CT10)*, 20177001100 (CT11)*, 20177001200 (CT12), 20177001300 (CT13), 20177001500 (CT15), 20177002200 (CT22)*, 20177002800 (CT28)*, 20177002900 (CT29)*, 20177003001 (CT30.01)*, &amp; 20177004000 (CT40) * Denotes only a portion of the CT is within the TA boundary</li> </ul> <b>Addresses of Priority Sites:</b> <ul style="list-style-type: none"> <li>White Lakes Mall – 3600 Southwest (SW) Topeka Boulevard</li> <li>Historic Former Van Buren School and Proposed Affordable Housing Parcels – 1601 SW Van Buren Street</li> <li>Historic East Topeka Junior High – 1210 Southeast 8th Avenue</li> </ul>	
<b>6. Contacts</b>	<b>Project Director</b>	<b>Chief Executive/Highest Ranking Elected Official</b>
Name	Dan Warner, AICP, Planning Division Director	Michael A. Padilla Mayor
Phone Number	(785) 368-3728	(785) 368-3895
Email Address	<a href="mailto:dwarner@topeka.org">dwarner@topeka.org</a>	<a href="mailto:mayor@topeka.org">mayor@topeka.org</a>
Mailing Address	620 SE Madison Topeka KS 66607	215 SE 7th Street, Room 350 Topeka, KS 66603
<b>7. Population (2020) *</b>	<b>Population of the City of Topeka Jurisdiction: 126,431</b> * Census estimated population, between 2018-2022, <a href="http://www.policymap.com">www.policymap.com</a> , downloaded on 11/12/24.	



# CITY OF TOPEKA

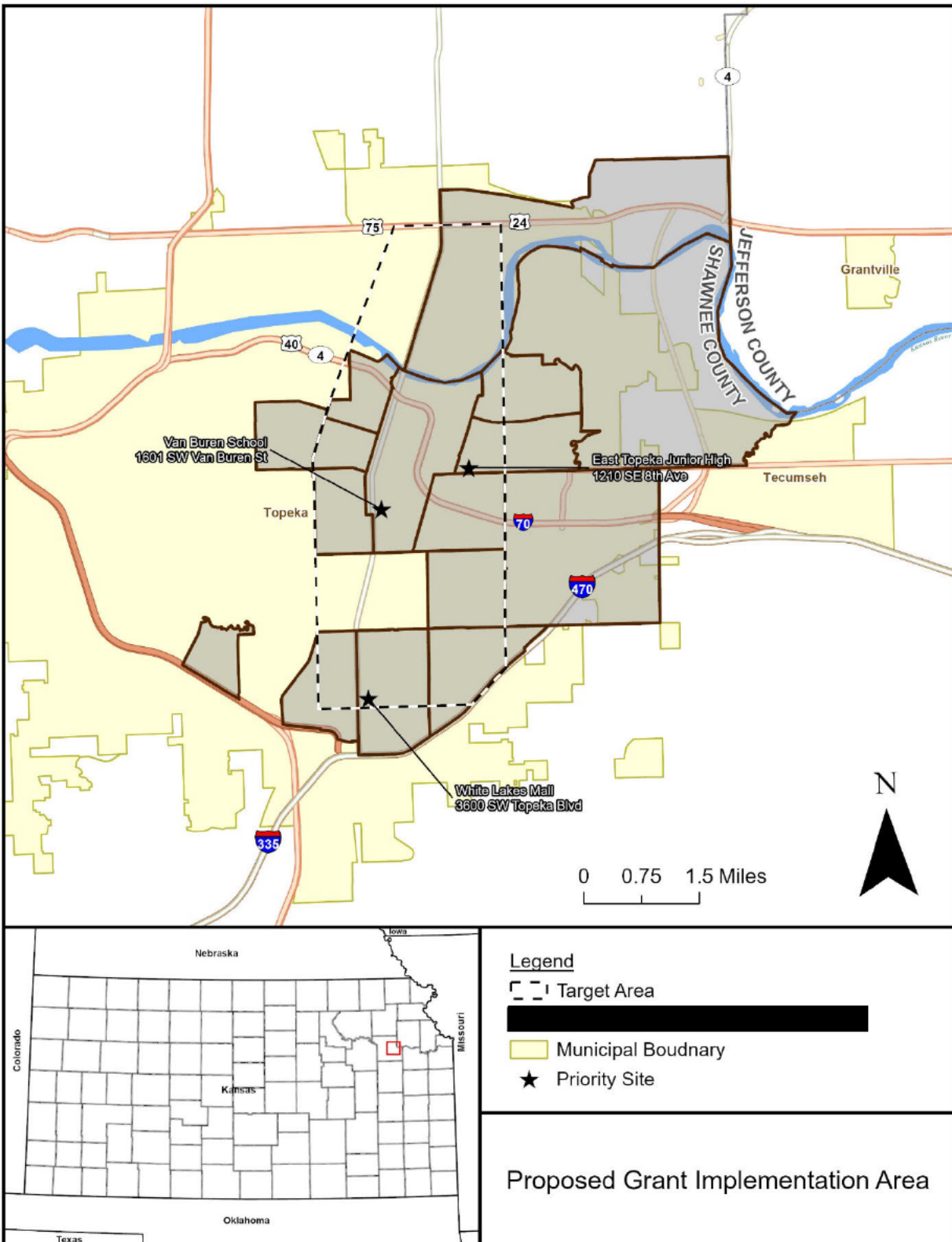
8. Other Factors	Page #
Community population is 15,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of 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).	1 & 2
The priority site(s) is in a federally designated flood plain.	1 & 2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	2
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	2 & 6
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	N/A

**9. Letter from the State or Tribal Environmental Authority:** A letter of acknowledgement from the Kansas Department of Health and Environment (KDHE) is attached.

**10. Releasing Copies of Applications:** The application does not contain confidential, privileged, or sensitive information.



# CITY OF TOPEKA



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Janet Stanek, Secretary

Laura Kelly, Governor

October 30, 2024

Dan Warner  
Planning Division Director  
City of Topeka  
215 SE 7<sup>th</sup> St.  
Topeka, Kansas 66603

**Re: EPA Brownfields Assessment Grant for the City of Topeka**

Dan Warner:

This letter is written in support of the EPA Brownfield Assessment Grant Application to be submitted by the City of Topeka to the U.S. Environmental Protection Agency (EPA). KDHE understands the purpose of the grant is to inventory, assess, cleanup and reuse planning, and community involvement in an effort to revitalize the Topeka Boulevard corridor. The funds received from the U.S. EPA will be utilized to assess, protect, and restore the environmental integrity, environmental justice, and climate change included in the Brownfield target areas. KDHE confirms the City of Topeka has the programmatic capabilities to administer such a grant. This can be further bolstered by the City of Topeka's success in administering a 2017 and 2021 Brownfield Community-wide Assessment (CWA) Grant. The CWA Grant will enable the assessment and redevelopment of additional sites within the target areas.

KDHE commends the City's revitalization efforts in the community, which represent the very ideals and goals of the Brownfields Program. The City of Topeka has previously utilized the KDHE Brownfields Program for brownfields assistance in this and other areas of the community and such support will continue during this project.

KDHE fully supports your grant application and looks forward to working with you on this and future Brownfields projects within your area. If you have any questions, please feel free to contact me at (785) 291-5519 or email at [seth.mettling@ks.gov](mailto:seth.mettling@ks.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Seth Mettling".

Seth Mettling  
Brownfields Coordinator  
Long Term Stewardship & Brownfields  
Bureau of Environmental Remediation



## **1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:**

**1.a. Target Area & Brownfields: 1.a.i. Overview of Brownfield Challenges & Description of Target Area:** The City of Topeka (the City) is the capital of Kansas and is home to the Brown v. Board of Education National Historic Site, which preserves the legacy of this transformative 1954 Supreme Court decision.<sup>a</sup> The City (population 126,431)<sup>b</sup> is in northeast Kansas on the banks of the Kansas River. Settlers began passing through the area in the 1840s when a ferry crossing was established on the Kansas River on an eastern segment of the Oregon Trail.<sup>c</sup> The first permanent settlement was created in 1854.<sup>c</sup> Although the City has been a center of government since its founding, manufacturing and other industry and commerce have played a significant role in the local economy throughout its history. The peak of manufacturing employment in the City occurred in 1980 (coinciding with the approximate peak of manufacturing employment in the United States [US]).<sup>d</sup> The number of manufacturing workers declined by 25% between 1980 and 2000.<sup>e</sup> Additionally, in 1974, Forbes Air Force Base closed and more than 10,000 people left Topeka, influencing the City's growth patterns for years.<sup>f</sup> Although industry has provided many benefits to area residents and their communities, it also produced an undesirable legacy of old and obsolete brownfield sites located near the downtown area as well as in adjacent residential neighborhoods with higher percentages of low income, minority, and other socially or economically disadvantaged residents. This much needed grant will be utilized to build upon the successes of the fiscal year (FY) 17 and FY21 United States Environmental Protection Agency (EPA) Community-Wide Assessment (CWA) Grants by providing assessment, clean-up and reuse planning, and public outreach, to move properties forward to remediation/redevelopment and revitalization.

The Target Area for this grant is the **Topeka Boulevard Corridor**, which is comprised of all of or portions of the following 15 contiguous census tracts (CTs) 20177000400 (CT4), 20177000500 (CT5), 20177000600 (CT6), 20177000700 (CT7), 20177000800 (CT8), 20177001000 (CT10), 20177001100 (CT11), 20177001200 (CT12), 20177001300 (CT13), 20177001500 (CT15), 20177002200 (CT22), 20177002800 (CT28), 20177002900 (CT29), 20177003001 (CT30.01), & 20177004000 (CT40). Twelve of these CTs are Climate and Economic Justice Screening Tool (CEJST) CTs.<sup>g</sup> The Target Area extends from US Highway 24 southward through North Topeka, the Kansas River riverfront, and Dynamic Core to Southwest (SW) 37<sup>th</sup> Street (St). The corridor extends east to California Avenue (Ave) and west to SW Burlingame Road. According to the 2022-2024 *Neighborhood Revitalization Plan*, this area is primarily located within the “intensive care” census block groups of the City’s Neighborhood Health Map which indicate areas with serious distressed conditions that need immediate attention and intervention due to health, poverty, public safety, and property value risk including numerous brownfield sites as described below.<sup>h</sup>

**1.a.ii. Description of the Priority Brownfield Site(s):** The history of the Target Area includes frequent flooding, the most notable occurring in 1903 and 1951.<sup>i</sup> The 1951 flood caused tremendous damage, and many homes were razed or left uninhabitable. Homes were often replaced by mobile homes. Concurrently, suburban development trends accelerated migration from inner city neighborhoods to outlying areas. In an effort to encourage redevelopment, much of the area was rezoned to allow multi-family dwellings and highly intensive commercial and industrial uses. In the mid-1950s the US Army Corps of Engineers (USACE) built a new levee system to protect the area from flooding and reassure property owners, but the perception of the area as flood-prone lingered. As a decline in population continued into the 1960’s, a decline in neighborhood businesses followed leaving many buildings, factories, and homes abandoned within the area. The recession of 2007-09 and the associated collapse in the housing market, reductions in discretionary income, and the closing of commercial and retail businesses also resulted in a new generation of brownfield sites. The environmental concerns on brownfield properties in the target area include volatile organic compounds (benzene, chlorinated solvents, etc.), petroleum hydrocarbons, polycyclic aromatic hydrocarbons, heavy metals (lead, chromium, etc.), and asbestos from gas stations, manufacturing facilities, dry cleaners, and buildings constructed prior to 1980, respectively. The Kansas Department of Health and Environment (KDHE) Environmental Interest Finder (EIF) indicates 1,809 spill/regulated sites in the Target Area, many of which are brownfields.<sup>j</sup> Priority sites for revitalization in the Target Area are described below:

**White Lakes Mall:** The White Lakes mall located at 3600 SW Topeka Boulevard opened in October 1964 and was destroyed by an arson fire in December 2020.<sup>k</sup> The majority of the structures have been raised and the property is largely vacant providing a blight on the neighborhood. The property is extensive in size (approximately 36 acres). The KDHE EIF identified four spill sites, three storage tank sites and two Resource Conservation and Recovery Act generator sites on the property.<sup>l</sup> Redevelopment of the mall will require significant environmental assessment, cleanup planning, remediation and site specific/area-wide planning to provide for community input for future use.

**Historic Former Van Buren School and Proposed Affordable Housing Parcels:** The Former Van Buren School is located in the heart of the Monroe Neighborhood at the corner of SW 16<sup>th</sup> and SW Van Buren Streets (1601 SW Van Buren St). The school opened in 1910 and accommodated only white students before being integrated after Brown v. Board in 1954.<sup>1</sup> The property has been vacant since 1964 and the school building interior has collapsed. Known environmental hazards in the building are commingled asbestos-containing materials (ACM) and lead-based paint (LBP). Petroleum impacted soil is present in the area of a former heating oil tank. Affordable housing infill is planned for the area. As part of

<sup>a</sup> <https://www.nps.gov/articles/brownyboard.htm>, accessed on 11/10/24.

<sup>b</sup> [www.policymap.com](http://www.policymap.com), American Community Survey, 2018-2022, accessed on 11/8/24.

<sup>c</sup> <https://www.legendsofamerica.com/topeka-kansas/>, accessed on 11/10/24.

<sup>d</sup> <https://www.bls.gov/opub/mlr/2016/article/current-employment-statistics-survey-100-years-of-employment-hours-and-earnings.htm>, accessed on 11/10/24.

<sup>e</sup> <https://www.bls.gov/opub/mlr/2018/beyond-bls/the-fall-of-employment-in-the-manufacturing-sector.htm>, accessed on 11/10/24.

<sup>f</sup> <https://worldpopulationreview.com/us-cities/kansas/topeka>, accessed on 11/10/24.

<sup>g</sup> <https://screeningtool.geoplatform.gov/en/#/33.47/-97.5>, accessed 11/10/24.

<sup>h</sup> <https://www.topeka.org/planning/nrp/#gsc.tab=0>, accessed on 11/10/24.

<sup>i</sup> <https://www.weather.gov/safety/flood-states-ks>, accessed on 11/10/24.

<sup>j</sup> <https://maps.kdhe.state.ks.us/keif/>, accessed on 11/12/24.

<sup>k</sup> <https://abandonedks.com/white-lakes-mall/>, accessed on 11/12/24.

<sup>l</sup> <https://abandonedks.com/van-buren-school/>, accessed on 11/12/24.





redevelopment, the historic former school building property and five adjacent and nearby vacant lots will be converted. Supplemental assessment will be required for all the parcels and cleanup planning performed to facilitate residential redevelopment.

**Historic East Topeka Junior High:** The former East Topeka Junior High School (1210 SE 8<sup>th</sup> Ave) was vacated/abandoned in 1980 and is currently privately owned.<sup>m</sup> The site has architectural significance (modern movement art deco) and is on the National registry of Historic Places. Asbestos is known to be present and has hindered redevelopment in the past. Additional assessment, remedial planning, and site reuse planning is required to accurately evaluate abatement and remediation costs to allow redevelopment of the site, which will likely include adaptive reuse of the former school building (for example: affordable housing or other uses).

**1.a.iii. Identifying Additional Sites:** As described in Table 7 (Section 3.a; Task 2), the City will build upon the inventory and prioritization processes developed from their FY17 and FY21 grants and will manage inventoried sites in the Kansas State University's (KSU's) Targeted Assistance to Brownfields (TAB) Brownfield Inventory Tool (BIT) and geographic information system (GIS) software. Environmental Justice (EJ) Screen and the CEJST information, The KDHE EIF, existing georeferenced Sanborn fire insurance maps, city directory records, tax delinquencies, and building code violations will be utilized. The City will also survey the Brownfield Advisory Committee (BAC), local developers, real estate brokers, and other stakeholders for information on potential sites, conduct desktop studies and windshield surveys to verify existing site conditions. Economic viability of redevelopment will also be a factor. The City will work with the Qualified Environmental Professional (QEP) firm along with the BAC to review already established criteria to prioritize sites that offer the greatest benefits to inform the site selection process. The City has no shortage of available additional sites should one of the priority sites become a non-viable site for use of the is funding.

**1.b. Revitalization of the Target Area: 1.b.i. Reuse Strategy & Alignment with Revitalization Plans:** In order to recover from the multiple setbacks that began over a half a century ago, the Target Area has been the focus of recent planning and implementation projects to revitalize the business district, riverfront, and surrounding residential areas and to redefine the City's image as a viable mixed-use community of choice. The reuse strategies proposed for the priority sites are supported by the following revitalization plans:

- **Historic Former Van Buren School and Proposed Affordable Housing Parcels** is targeted for affordable housing infill. The site was previously sold by the city to a private developer for 81 new affordable housing units with an estimated improvement of approximately \$10 million dollars but that fell through.<sup>n</sup> The Topeka Housing Authority now owns the site and continues to work towards redevelopment.
- **White Lakes Mall** currently has support from government officials to provide "a chance to create new memories" at the mall, which is a "fairly blighted area".<sup>o</sup> The City has created the "South Topeka Redevelopment District"<sup>p</sup> which will allow for the use of tax-increment financing (TIF) to encourage economic development. These efforts are also supported by the "Bring Back the Boulevard" working group whose mission is to "improve the first impression of Topeka" and continue to give new life to the area.<sup>q</sup> This grant would be used in the future planning and assessment efforts for this budding commercial reuse endeavor.
- **Historic East Topeka Junior High** is noted in the *East Topeka Neighborhood Revitalization Plan* as no longer being open, but still stands, and is an "architectural monument that can be restored and re-used as an integral part of life for area residents."<sup>r</sup> They also indicate in the plan that the building is a tremendous asset for an adaptive re-use and is a central focal point in the community's history.<sup>s</sup> Current plans are to utilize the existing building for multi-family residential adaptive reuse.

Significant additional planning is in process or in place for the Target Area. The *Historic North Topeka East Neighborhood Plan*<sup>t</sup> prioritizes the North Topeka (NOTO) Arts District, schools, and redevelopment of the Great Overland Station (an historic train depot in the National Register of Historic Places). Further, the *North Topeka Arts District Master Plan*<sup>u</sup> identifies expansion of the area to include reuse of underutilized properties in the surrounding neighborhood to bring in more businesses and tourism/entertainment. The anticipated reuse of the of the Proposed Oregon Trail Riverfront Park Properties and River South Waterfront Properties sites from former industrial use to park and mixed commercial/residential reuse aligns with the plans for the specific sites as well as the plans for the entire Target Area. These include: *Topeka Riverfront Vision Plan*<sup>v</sup> proposes an iconic pedestrian bridge over the Kansas River connecting NOTO to downtown. This plan also ties together the River South Waterfront and Proposed Oregon Trail Riverfront Park properties as well as recreational amenities on the Kansas River. The *Downtown Topeka: River South, Brownfields Area-Wide Planning Study*<sup>w</sup> financed with FY17 CWA funds and *Pappan's Ferry Charrette and Plan*<sup>x</sup> also address this area. The *Downtown Master Plan*<sup>y</sup> which was completed for the *Dynamic Core* area, supports/informs revitalization efforts from an economic

<sup>m</sup> <https://abandonedks.com/east-topeka-junior-high/>, accessed on 11/12/24.

<sup>n</sup> <https://www.cjonline.com/story/news/politics/government/2017/12/26/city-considering-selling-ex-van-buren-school-other-property-1/16516308007/>, accessed on 11/13/24.

<sup>o</sup> <https://www.cjonline.com/story/news/local/2022/10/03/topeka-eyes-tif-district-to-spur-development-white-lakes-mall/69520476007/>, accessed on 11/13/24.

<sup>p</sup> <https://www.topeka.org/finance/community-improvement-tax-increment-financing-districts/#gsc.tab=0>, accessed on 11/13/24.

<sup>q</sup> <https://tkmagazine.com/blog/2024/1/9/revitalization-of-the-boulevard>, accessed on 11/13/24.

<sup>r</sup> <https://www.topeka.org/wp-content/uploads/planning/EastTopekaNeighborhoodRevitalizationPlan.pdf>, accessed on 11/13/24.

<sup>s</sup> <https://www.topeka.org/wp-content/uploads/planning/HNTEPlanDraftforOnline.pdf>, accessed on 11/12/24.

<sup>t</sup> <https://s3.amazonaws.com/cot-wp-uploads/wp-content/uploads/planning/NOTOMasterPlan.pdf>, accessed on 11/12/24.

<sup>u</sup> <https://tinyurl.com/bdt7x72t>, accessed on 11/12/24.

<sup>v</sup> <https://www.topeka.org/planning/downtown-master-plan/river-south-district/#gsc.tab=0>, accessed on 11/12/24/

<sup>w</sup> [https://s3.amazonaws.com/cot-wp-uploads/wp-content/uploads/planning/PappansFerry\\_Final\\_July\\_2\\_2018R.pdf](https://s3.amazonaws.com/cot-wp-uploads/wp-content/uploads/planning/PappansFerry_Final_July_2_2018R.pdf), accessed on 11/12/24.

<sup>x</sup> <https://cot-wp-uploads.s3.amazonaws.com/wp-content/uploads/planning/DowntownMP/DowntownMasterPlan.pdf>, accessed on 11/12/24.

<sup>y</sup> <https://cot-wp-uploads.s3.amazonaws.com/wp-content/uploads/planning/DowntownMP/DowntownMasterPlan.pdf>, accessed on 11/12/24.

viability standpoint and highlights redevelopment potential throughout this area. The *Land Use and Growth Management 2040<sup>y</sup>* plan stresses the need for compact urban density with a sense of place, walkability, diversity, and transportation choices to attract residents. The *Topeka Bikeways Plan and Updates<sup>z</sup>* provides for extension of existing pedestrian trails in the Target Area with linkage to other areas of the city (Landon Nature Trail, Schunga Trail, and Soldiers Creek Trail). The plans include elements that support the US Department of Housing and Urban Development (HUD)-Department of Transportation-EPA Livability Principles with the intention of creating a resilient, sustainable, livable, and revitalized community, as described further in Section 1.b.ii. below.

**1.b.ii. Outcomes & Benefits of Reuse Strategy:** Cleanup and redevelopment of the properties per the plans described in 1.b.i will reduce potential exposures to hazardous substances/petroleum and attract residents and business to the area by providing healthy life choices and jobs in a safe, walkable environment including improvements to the business areas, trails, riverfront and park amenities as well as entertainment offerings, and upgrades to the surrounding neighborhoods to **boost the economic viability of the area**. Specifically, assessment, remediation and redevelopment of the priority sites will help facilitate affordable housing choices in the Monroe Neighborhood (former Van Buren School and associated properties), reduction of blight caused by the vacant White Lakes Mall, and adaptive reuse of historic East Topeka Junior High (job creation, tax revenue and other quantitative benefits are not currently available). Affordable housing increases disposable income by residents since they can **direct more of their income toward other spending** such as dining out, shopping, and other leisure activities; thereby stimulating economic development within the Target Area.<sup>aa</sup> Adaptive reuse and new construction will improve local climate adaptation/mitigation by allowing the use of solar and other energy efficiency measures, such as incorporation of energy efficient appliances, replacement of single-pane windows, and pursuit for Leadership in Energy and Environmental Design (LEED) certification. A recent study noted buildings constructed to LEED standards contributed 50% fewer greenhouse gases.<sup>bb</sup> Resilience to protect residents and community investments shall be achieved by allowing redevelopment in flood-protected areas

**1.c. Strategy for Leveraging Resources:** **1.c.i. Resources Needed for Site Reuse:** The City will pursue leveraging sources, within the Target Area and toward the Priority Sites as appropriate. Two tax incremental finance districts, *Dynamic Core Redevelopment District* and *South Topeka Redevelopment District* are in place to assist with redevelopment in the Downtown and White Lakes Mall areas. *Neighborhood Revitalization Act<sup>cc</sup>* property tax rebates that offset taxes due to site improvements are also available. The *Topeka Land Bank<sup>dd</sup>* is a pilot program with the goal of transforming vacant and blighted properties into affordable housing. *Reinvestment Housing Incentive District<sup>ee</sup>* formation is also available and captures the incremental increase in real property taxes created by housing development projects for up to 25 years. *Community Improvement District<sup>ff</sup>* funding could also be used and allow a district to leverage retail sales taxes to pay for appropriated costs of growth, such as building improvements. *KSU Technical Assistance to Brownfields* provides Public outreach, technical assistance, and reuse strategies.<sup>gg</sup> The *KDHE Targeted Brownfield Assessment (TBA) Program* provides assessment assistance.<sup>hh</sup> The *Kansas Petroleum Storage Tank Program<sup>ii</sup>* and *Kansas Dry Cleaning Program<sup>jj</sup>* provide assessment and remediation for eligible sites. The *EPA TBA Program* provides assessment and planning assistance.<sup>kk</sup> In addition, the *Build Kansas Fund* provides matching state dollars for projects to accelerate local infrastructure investment.<sup>ll</sup> *EPA Brownfield Cleanup Grants* and *Revolving Loan Fund Grants* may also be utilized. Additional resources will be utilized as appropriate for assessment, cleanup and reuse may include *Community Development Block Grants<sup>mm</sup>*, *HUD Lead Hazard Reduction Grants<sup>nn</sup>*, *US Small Business Administration Loans<sup>oo</sup>*, *historic tax credits*, and/or donations.

**1.c.ii. Use of Existing Infrastructure:** The Target Area and priority sites described in 1.a.ii.-iii. represent the oldest developed areas in the city and are served with municipal water, wastewater and storm water systems, levee systems, electricity (3-phase, etc.), natural gas, existing roads, and other infrastructure, which will enhance sustainability, resiliency, and reduce redevelopment costs. Redevelopment in these areas, particularly with energy efficient and green infrastructure upgrades aligns with the goals described in 1.b.ii. If the need for infrastructure improvements arises, the funding methods described in 1.c.i. can be leveraged.

## **2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:**

**2.a. Community Need:** **2.a.i. The Community's Need for Funding:** The Target Area CTs are disproportionately affected with the inability to draw on other funding sources to carry out environmental assessment/remediation and subsequent reuse, which impacts their ability to subsequently reuse underutilized critical spaces within the CTs and Target Area due low-

<sup>y</sup> <https://www.topeka.org/planning/land-use-growth-management-plan-2040/#gsc.tab=0>, accessed on 11/12/24.

<sup>z</sup> <https://topekampo.org/bikeways-master-plan/>, accessed on 11/12/24.

<sup>aa</sup> <https://embraceliving.org/economic-benefits-affordable-housing/#:~:text=Affordable%20housing%20can%20also%20benefit,shopping%20and%20other%20leisure%20activities.>, accessed on 11/13/24.

<sup>bb</sup> "Quantifying the Comprehensive Greenhouse Gas Co-Benefits of Green Buildings", <https://escholarship.org/uc/item/935461rm>, accessed 11/10/24.

<sup>cc</sup> <https://www.topeka.org/planning/nrp/#gsc.tab=0>, accessed on 11/12/24.

<sup>dd</sup> <https://www.topeka.org/government/boards-commissions/topeka-land-bank/#gsc.tab=0>, accessed on 11/12/24.

<sup>ee</sup> <https://www.kansascommerce.gov/program/community-programs/rhid/>, accessed on 11/12/24.

<sup>ff</sup> <https://services.topeka.org/departments/finance/community-improvement-district/#gsc.tab=0>, accessed on 11/12/24.

<sup>gg</sup> <https://www.ksutab.org/>, accessed on 11/12/24.

<sup>hh</sup> <https://www.kdhe.ks.gov/DocumentCenter/View/2769/Brownfield-Targeted-Assessment-Application-Guidance-PDF>, accessed on 11/12/24.

<sup>ii</sup> <https://www.kdhe.ks.gov/1021/Storage-Tank-Trust-Funds>, accessed on 11/12/24.

<sup>jj</sup> <https://www.kdhe.ks.gov/327/Kansas-Dry-Cleaning-Facility-Release-Tru>, accessed on 11/12/24.

<sup>kk</sup> [https://19january2021snapshot.epa.gov/brownfields/targeted-brownfields-assessments-tba\\_.html](https://19january2021snapshot.epa.gov/brownfields/targeted-brownfields-assessments-tba_.html), accessed on 11/12/24.

<sup>ll</sup> <https://kshub.org/ks-infrastructure-hub-build-overview>, accessed on 11/12/24.

<sup>mm</sup> <https://www.hudexchange.info/programs/cdbg/>, accessed on 11/12/24.

<sup>nn</sup> [https://www.hud.gov/program\\_offices/cfo/gnomgmt/grantsinfo/fundingopps/lead\\_hazard\\_reduction](https://www.hud.gov/program_offices/cfo/gnomgmt/grantsinfo/fundingopps/lead_hazard_reduction), accessed on 11/12/24.

<sup>oo</sup> <https://www.sba.gov/funding-programs/loans>, accessed on 11/12/24.





income prevalence. All CTs, suffer **higher than normal rates of poverty and lower per capita income** compared to the City, Shawnee County (County), KS, and the US (Table 1). Unemployment in a majority of the Target Area, including the average of the CTs within the Target Area (7.67%), is higher than the rates for the City, County, the State, and the US - and in some cases, **more than two times the unemployment and poverty rates in the US.** (Table 1). **African American individuals in poverty in some of the CTs is more than triple the State, and the US rates** (Table 1). As seen in Table 1 and Table 2 (2.a.ii.), the average Hispanic rate in the Target Area (25.81%) is not only greater than the US, but the average rate of **Hispanic people in poverty (18.58%) is also greater than the national rate** (Table 1). Additional select demographic data is provided below showing critical need.

Table 1: Demographic Indicators	CT4 <sup>A</sup>	CT5 <sup>A</sup>	CT6 <sup>A</sup>	CT 7*	CT 8* <sup>A</sup>	CT10* A	CT11* A	CT12 <sup>A</sup>	CT13 <sup>A</sup>	CT15	CT22*	CT28* <sup>A</sup>	CT29* <sup>A</sup>	CT 30.01* <sup>A</sup>	CT 40 <sup>A</sup>	Topeka	Shawnee County	KS	US
Total population	4,015	1,843	2,032	2,301	3,725	3,105	3,644	2,037	4,239	2,378	2,594	4,047	2,395	3,788	2,028	126,431	178,625	2,935,922	331,097,593
Unemployment rate	<u>9.77%</u>	<u>5.48%</u>	<u>5.74%</u>	<u>15.51%</u>	<u>14.39%</u>	<u>7.13%</u>	<u>9.53%</u>	3.48%	<u>8.89%</u>	<u>10.24%</u>	4.25%	4.22%	<u>6.96%</u>	2.47%	<u>7.01%</u>	4.99%	4.17%	4.01%	5.33%
Family Poverty	<u>30.83%</u>	<u>27.46%</u>	<u>28.77%</u>	11.99%	<u>22%</u>	<u>22.57%</u>	<u>38.43%</u>	<u>24.74%</u>	<u>19.07%</u>	<u>23.68%</u>	<u>18.54%</u>	11.3%	<u>26.85%</u>	6.71%	<u>22.32%</u>	16.04%	12.87%	11.58%	12.53%
Per capita income	<u>\$20,779</u>	<u>\$23,960</u>	<u>\$19,311</u>	<u>\$32,013</u>	<u>\$21,254</u>	<u>\$26,464</u>	<u>\$15,739</u>	<u>\$18,465</u>	<u>\$20,400</u>	<u>\$29,478</u>	<u>\$31,658</u>	<u>\$27,685</u>	<u>\$21,165</u>	<u>\$23,555</u>	<u>\$23,510</u>	\$32,176	\$36,011	\$38,108	\$41,261
Black in Poverty	<u>47.4%</u>	6.67%	<u>49.21%</u>	0%	<u>45.57%</u>	<u>26.28%</u>	<u>75.73%</u>	<u>26.88%</u>	<u>26.51%</u>	19.32%	<u>24.07%</u>	4.94%	<u>22.71%</u>	8.27%	<u>37.56%</u>	26.74%	25.61%	23.34%	21.46%
Hispanic in Poverty	<u>34.28%</u>	3.95%	<u>18.83%</u>	5.56%	12.24%	<u>43.65%</u>	<u>20.34%</u>	<u>23.41%</u>	<u>24.38%</u>	<u>42.43%</u>	0%	8.19%	<u>31.77%</u>	0%	9.68%	21.82%	19.66%	18.41%	17.24%
Native American in Poverty	<u>56.14%</u>	<u>26.67%</u>	<u>48.39%</u>	N/A	<u>27.87%</u>	<u>44.59%</u>	N/A	<u>93.88%</u>	N/A	N/A	N/A	0%	<u>68.75%</u>	0%	N/A	34.56%	29.62%	19.34%	22.6%
Poverty rate for disabled	<u>24.3%</u>	<u>26.88%</u>	<u>38.02%</u>	<u>28.34%</u>	<u>40.73%</u>	<u>36.12%</u>	<u>21.42%</u>	12.7%	7.55%	<u>26.38%</u>	<u>41.16%</u>	<u>47.22%</u>	11.66%	<u>27.17%</u>	<u>40.18%</u>	25.38%	24.59%	22.58%	20.84%

[www.policymap.com](https://www.policymap.com) accessed November 8, 2024. Notes: **Bold** is greater or worse than Topeka. **Shaded** is greater or worse than County. **Red** is greater or worse than the state of Kansas. **Underlined** is greater or worse than the US. \* Data is for the entire CT, but the Target Area only contains a portion of the CT. N/A indicates insufficient data. <sup>A</sup> CT is a CEJST area.

For all criteria in Table 1, clear disparities are evident when comparing the CTs to the City, County, State, and US. All these indicators signify the low income/poverty conditions of the CTs. Award of a FY25 CWA grant to the City will provide critical supplemental services, which include overall strategy, inventory, planning, assessment, remedial planning, and public outreach. Redevelopment on identified priority sites in the Target Area will provide for reduction of blight and health threats, as well as increased jobs (and benefits), healthy life choices, tax base, and improved welfare to the Target Area. The grant will be essential to provide initial sources of funding (seed money) to assess and plan for redevelopment that is not available from other funding sources.

#### 2.a.ii. Threats to Sensitive Populations: 2.a.ii(1) Health or Welfare of Sensitive Populations:

Table 2: Sensitive Populations	CT4 <sup>A</sup>	CT5 <sup>A</sup>	CT6 <sup>A</sup>	CT 7*	CT 8* <sup>A</sup>	CT10* A	CT11* A	CT12 <sup>A</sup>	CT13 <sup>A</sup>	CT15	CT22*	CT28* <sup>A</sup>	CT29* <sup>A</sup>	CT 30.01* <sup>A</sup>	CT 40 <sup>A</sup>	Topeka	Shawnee County	KS	US
% Hispanic	<u>22.76%</u>	<u>20.62%</u>	<u>19.73%</u>	3.74%	8.13%	<u>31.72%</u>	<u>56.31%</u>	<u>54.74%</u>	<u>32.41%</u>	<u>29.73%</u>	3.39%	11.76%	<u>32.99%</u>	<u>31.02%</u>	<u>28.06%</u>	16.37%	13.2%	12.6%	18.65%
% Black	<u>18.88%</u>	<u>21.98%</u>	3.1%	8.47%	<u>11.03%</u>	9.44%	<u>18.47%</u>	<u>22.83%</u>	<u>18.78%</u>	<u>26.11%</u>	2.08%	<u>22.96%</u>	<u>28.31%</u>	<u>21.44%</u>	<u>16.22%</u>	10.2%	8.03%	5.57%	12.47%
% Native American	<u>1.42%</u>	<u>0.81%</u>	<u>1.53%</u>	0.43%	<u>1.64%</u>	<u>2.38%</u>	0.38%	<u>2.41%</u>	0.19%	0%	0.19%	0.64%	0.67%	<u>0.74%</u>	<u>1.04%</u>	0.73%	0.6%	0.75%	0.84%
Elderly in Poverty	<u>38.04%</u>	<u>15%</u>	<u>11.52%</u>	<u>11.42%</u>	6.94%	<u>35.61%</u>	<u>43.14%</u>	<u>44.9%</u>	0.19%	<u>13.99%</u>	<u>10.13%</u>	7.79%	<u>22.59%</u>	<u>12.45%</u>	<u>13.02%</u>	11.76%	9.28%	8.23%	9.95%
Persons with disabilities	<u>18.05%</u>	<u>19.48%</u>	<u>24.85%</u>	<u>20.22%</u>	<u>22.36%</u>	<u>18.74%</u>	12.12%	6.48%	12.44%	<u>22.37%</u>	<u>15.65%</u>	<u>23.58%</u>	<u>14.45%</u>	<u>13.75%</u>	<u>22.72%</u>	15.2%	13.67%	13.43%	12.86%
Poverty rate for children	<u>23.26%</u>	<u>42.01%</u>	<u>36.48%</u>	9.94%	13.37%	<u>23.02%</u>	<u>36.76%</u>	<u>32.33%</u>	12.6%	<u>35.45%</u>	<u>23.21%</u>	4.61%	<u>34.67%</u>	6.98%	0%	19.08%	15.34%	13.91%	16.66%
Housing built 1979 or earlier	<u>73.61%</u>	<u>91.38%</u>	<u>92.68%</u>	<u>61.58%</u>	<u>73.06%</u>	<u>86.63%</u>	<u>75.5%</u>	<u>70.83%</u>	<u>92.36%</u>	<u>81.82%</u>	<u>85.69%</u>	<u>79.98%</u>	<u>90.59%</u>	<u>91.92%</u>	<u>94.16%</u>	69.9%	64.91%	57.38%	51.33%

[www.policymap.com](https://www.policymap.com) accessed November 8, 2024. Notes: **Bold** is greater or worse than Topeka. **Shaded** is greater or worse than County. **Red** is greater or worse than the state of Kansas. **Underlined** is greater or worse than the US. \* Data is for the entire CT, but the Target Area only contains a portion of the CT. <sup>A</sup> CT is a CEJST area.

The Target Area has economic distress (Table 1; 2.a.i) and higher percentages of sensitive populations (Table 2; 2.a.ii) as compared to the remainder of the City, County, State, and much of the US. According to Table 2, the average percentage of Native Americans in the Target Area (0.96%) is greater than the City, County, State, and US. In addition, the average rate of **Native Americans in poverty (40.69%) is almost two times the rate for the State and the U.S** (Table 1; 2.a.i). The **highest percentage of Native Americans in poverty in the Target Area is 93.88%**. A public welfare concern in all the areas is the blighting influence of vacant or abandoned former commercial and industrial buildings on the surrounding residential neighborhoods and their sensitive population. For example, the Target Area has **higher average elderly in**





**poverty population** (19.12%) and higher average **poverty rate of children** (22.31%) than the US., State, County, and City areas (Table 2). Reuse after Brownfield assessment also eliminates vagrants and criminals from using the buildings and vacant sites, thus increasing neighborhood safety, further stabilizing, and revitalizing these neighborhoods. The majority of the sites are located within several blocks of schools, adjacent to or within one block of major recreational trails, adjoining or within residential areas, and adjacent to or within several blocks of community parks (see Section 1.b). As seen on Table 2, **over 50% (up to 94.16%) of the housing in all the Target Area were built pre-1979**, increasing the potential for lead exposure to the (sensitive) child poverty population (where the average is above national rates at 22.31%; see Table 2). Research has found that children from low income families, have higher proportions of detectable and elevated blood lead levels and these levels increase as the degree of poverty increases.<sup>PP</sup> The reuse strategy will not only investigate (Phase I Environmental Site Assessment [ESAs], Phase II ESAs, and Site Investigations) and create plans (Remedial Action Plans [RAPs]) to reduce/remediate sites with contaminant releases, but investigations will also occur at sites that have a likelihood of asbestos and lead-bearing paint (primarily buildings built before 1979). This will reduce these threats that are currently plaguing these sensitive populations.

**(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:** Sensitive populations that face greater than normal incidence of public health impacts associated with exposure to hazardous substances or petroleum in the Target Area are largely undocumented; however, the **all ages death rate (1 person per 100,000 patients) for chronic lower respiratory diseases**, potentially attributable to environmental factors (e.g., lead-based paint and asbestos) **in Shawnee County is 25% higher (71.0) than the State death rate (56.7)** from 2022 (CT- and City-specific data is not available).<sup>QQ</sup> Long-term effects of childhood lead poisoning include neuropsychological defects, including decreased Intelligence Quotient performance and attention deficit hyperactivity disorder (ADHD), which may persist into adulthood.<sup>TT</sup> The most recent data from 2020 indicates that **87% more of the children tested for blood lead in Shawnee County had elevated blood lead levels compared to the State average** (3.73% compared to 1.99%; only county-level data available).<sup>SS</sup> Lead may be harmful to the developing immune system, causing production of excessive inflammatory proteins; this mechanism may mean that lead exposure is a risk factor for asthma in children.<sup>UU</sup> Although most lead poisoning for children is attributable to deteriorated lead-based paint surfaces in homes, additional sources of lead associated with brownfield sites represent an increased threat for children already at risk for lead poisoning, as with the extreme example discussed in 2.a.ii.1 and Table 2 through Table 3.b. According to the Centers for Disease Control (CDC), asthma, cancer, and birth defects have higher occurrences in the Target Area CT/County than the US., State, and/or City averages as noted in Table 3.a and 3.b below:

Table 3.a: CDC Health Data	CT4 <sup>A</sup>	CT5 <sup>A</sup>	CT6 <sup>A</sup>	CT7*	CT8* <sup>A</sup>	CT10* <sup>A</sup>	CT11* <sup>A</sup>	CT12 <sup>A</sup>	CT13 <sup>A</sup>	CT15	CT22*	CT28* <sup>A</sup>	CT29* <sup>A</sup>	CT 30.01* <sup>A</sup>	CT 40 <sup>A</sup>	Topeka	County	US
Current asthma prevalence among adults aged ≥ 18 years	13.7%	13.5%	13.4%	12.3%	13.2%	12.3%	13.6%	12.9%	13.2%	12.8%	11.9%	12.2%	13.8%	11.9%	12.5%	12.2%	11.4%	9.9%
Cancer (excluding skin cancer) among adults aged ≥ 18 years - 2021	5.7%	6.2%	6.5%	9.4%	8.4%	8.6%	5.8%	5.4%	6.4%	7.6%	9.3%	9.8%	5.7%	7.4%	6.2%	8.6%	9.3%	8.2%

*Bold font* designates where the CT has a greater percentage of prevalence than the City. *Red font* designates where the CTs have greater percentages of prevalence than the County. *Shaded font* designates where the Target Area CTs have greater percentages of prevalence than the US Source: <https://www.cdc.gov/places/downloaded/11/11/24>. <sup>A</sup> CT is a CEJST area.

Table 3.b: CDC Public Health Tracking Data	Shawnee County	Kansas
Birth defects – Prevalence of cleft lip without cleft palate per 10,000 births over a 5-year period (2016-2020)	6.79	6.00
Birth defects – Prevalence of hypospadias per 10,000 births over a 5-year period (2016-2020)	34.85	34.62
Birth defects – Prevalence of limb deficiencies combined per 10,000 births over a 5-year period (2016-2020)	2.91	2.07
Birth defects – Prevalence of Trisomy 21 per 10,000 births to mothers <35 years of age over a 5-year period (2016-2020)	11.32	7.56

*Shaded font* designates where the County exceeds the State prevalence for birth defects. Data only available at the County-level. Source: Centers for Disease Control and Prevention. Environmental Public Health Tracking Network. Birth Defects Prevalence, <https://ephrtracking.cdc.gov/DataExplorer/>, accessed 11/11/24.

Potential ingestion, inhalation, and dermal contact with contaminated soil, water and vapor poses a public health risk, especially to children and elderly individuals. The City will continue the work facilitated by the FY17 and FY21 Grants by utilizing the FY25 CWA Grant funding to identify, assess, and plan cleanup for these and other contaminant concerns within the Target Area, recognizing that many of the adverse health conditions that exist in this Target Area may be caused by the contaminants at priority brownfield sites and other nearby brownfields. Assessing and developing cleanup plans for these sites will lead to a reduction in inhalation and direct contact of these contaminants.

**2.a.ii(3) Environmental Justice:** *3.a Identification of Environmental Justice Issues & 3.b Advancing Environmental Justice:* In combination with zoning, persistent policies and questionable industrial operators have historically disproportionately impacted the community. The Target Areas' legacy of heavy industrial/commercial activity and associated pollution has resulted in a disproportionate burden to sensitive populations (minority/low-income communities,

<sup>PP</sup> <https://tinyurl.com/527xrmxv>, accessed 11/11/24.

<sup>QQ</sup> [https://scisearch.gov/health/physiological\\_effects.html](https://scisearch.gov/health/physiological_effects.html), accessed 11/11/24.

<sup>TT</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1257653/>, accessed 11/11/24.

<sup>SS</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1257653/>, accessed 11/11/24.

<sup>UU</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1257653/>, accessed 11/11/24.

elderly, and children). Table 4 summarizes disproportionate EJ impacts in the Target Areas and in a community disproportionately burdened with poor air quality, increased risk to children/elderly (Table 2;2.a.ii) from lead exposure in housing (lead paint indicator), abundant risks to water quality (risk management plan [RMP] facility proximity), and hazardous waste/underground storage tank (UST) proximity. Table 4 was generated for the Target Areas using EPA's EJSCREEN Tool:

<b>Table 4: Environmental Justice Indexes Selected Variables Below</b>	<b>Topeka</b>	<b>KS</b>	<b>US</b>
PM 2.5 ( $\mu\text{g}/\text{m}^3$ )	<b>8.9</b>	8.03	8.45
Ozone (ppb)	<b>58.7</b>	56.8	61.8
Lead Paint (Pre-1960 Housing)	<b>0.61</b>	0.36	0.3
RMP Facility Proximity (facility count/km distance)	<b>1.3</b>	0.78	0.57
USTs (count/km <sup>2</sup> )	<b>6.5</b>	3.4	3.6

Source: <https://www.epa.gov/ejscreen> downloaded on 11/11/24. EJ Indicator values greater than the state values in **BOLD** in the table above. EJ Indicator values greater than the US values are highlighted in **red** in the table above. Target Area is a User-defined polygon; PM = Particulate Matter,  $\mu\text{g}/\text{m}^3$  = microgram per cubic meter; ppb = parts per billion; km = kilometer; km<sup>2</sup> = kilometer squared.

**A majority of the Target Area and all of the priority sites exist within a CEJST area.** CEJST areas are considered disadvantaged because they meet more than one burden threshold and the associated socioeconomic threshold. These thresholds associated with the Target Area are summarized in Table 5:

<b>Table 5: CEJST Thresholds</b>		
	<b>Burden Threshold(s)</b>	
CT4, CT5, CT6, CT8, CT10, CT11, CT12, CT13, CT28, CT29, CT30.01, & CT40	<ul style="list-style-type: none"> <li>Energy cost: <b>90<sup>th</sup> – 97<sup>th</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>4, 5, 6, 11, 12</sup></li> <li>Asthma: <b>91<sup>st</sup> – 93<sup>rd</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>4, 5, 6, 11, 12, 29</sup></li> <li>Low life expectancy: <b>92<sup>nd</sup> – 97<sup>th</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>4, 5, 8</sup></li> <li>Low median income: <b>91<sup>st</sup> – 98<sup>th</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>4, 5, 6, 40</sup></li> <li>Poverty: <b>93<sup>rd</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>4</sup></li> <li>Unemployment: <b>92<sup>nd</sup> – 95<sup>th</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>4, 6, 8</sup></li> <li>Housing cost: <b>92<sup>nd</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>5</sup></li> <li>Lead paint: <b>91<sup>st</sup> – 96<sup>th</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>6, 10, 11, 13, 40</sup></li> </ul>	
	<ul style="list-style-type: none"> <li>Lack of indoor plumbing: <b>92<sup>nd</sup> – 97<sup>th</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>8, 11, 13, 28</sup></li> <li>Projected wildfire risk: <b>93<sup>rd</sup> – 96<sup>th</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>10, 30.01</sup></li> <li>Proximity to RMP facilities: <b>93<sup>rd</sup> – 96<sup>th</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>10, 11</sup></li> <li>Projected flood risk: <b>93<sup>rd</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>11</sup></li> <li>Diabetes: <b>90<sup>th</sup> – 94<sup>th</sup> percentile</b> above the 90<sup>th</sup> percentile.<sup>11, 12</sup></li> <li>CT with Historic underinvestment: <b>Yes.</b><sup>8, 11, 12, 40</sup></li> </ul>	
	<b>Socioeconomic Threshold(s)</b>	
	<ul style="list-style-type: none"> <li>Low income: <b>68<sup>th</sup> – 97<sup>th</sup> percentile</b> above the 65<sup>th</sup> percentile.<sup>4, 5, 6, 8, 10, 11, 12, 13, 28, 29, 30.01, 40</sup></li> <li>Less than high school education: <b>12% – 22% above 10%.</b><sup>4, 5, 6, 8, 40</sup></li> </ul>	

CEJST threshold values accessed on 11/11/24 (<https://screeningtool.geoplatform.gov/en/#33.47/-97.5>). Given that 12 of the CTs within the Target Area are designated CEJST areas, each statistic has been denoted with its applicable CT as such: 4 = CT4, 5 = CT5, 6 = CT6, 8 = CT8, 10 = CT10, 11 = CT11, 12 = CT12, 13 = CT13, 28 = CT28, 29 = CT29, 30.01 = CT30.01, & 40 = CT40.

Assessment, remediation and redevelopment per the plans in 1.c.i should provide better access to affordable housing, jobs, health care, and access to healthy food to the disadvantage communities noted in Table 5. The two ZIP codes that comprise a majority of the Target Area (66603 and 66612) have the highest rates of both food insecurity (29.2 percent and 28.9 percent, respectively, in 2019) and poverty.<sup>uu</sup> Use of this grant will support meaningful community engagement and involvement of EJ residents by partnering with community-based organizations that celebrate/support the City's community, of which has a diversity score of 86 out of 100.<sup>vv</sup> In addition to economic viability, to ensure that EJ advancement and engagement is a priority, the BAC will assess whether CWA funds would be utilized to achieve the following three criteria: 1) **Addresses an essential community need** e.g., access to healthy food, parks/open space, health care, or affordable housing; 2) **Support of climate adaptation & resilience** programs, high-quality jobs, strong labor practices, & equitable workforce pathways; and 3) **Promotes or advances EJ for underserved communities** or populations that has elevated EJ indices according to EJScreen or is a community in a disadvantaged CT as identified in CEJST. The prioritization system shall minimize unintended displacement of residents and/or businesses within the Target Area. Properties that are unable to satisfy a majority of these criteria will be assigned a lower priority for use of grant funds and will only be assessed after other brownfield properties in the Target Area or City Jurisdiction that meet one or more of these criteria has had a completed assessment.

**2.b. Community Engagement:** i. & ii Project Involvement and Roles: The City will engage citizens, local groups, and other entities through the reuse planning processes, and quarterly BAC meetings. These meetings will be open to the public and include accommodations for those in need. Entities and roles that are committed to serving on the BAC are listed below.

<sup>uu</sup> [https://www.khi.org/wp-content/uploads/2022/03/understanding\\_food\\_insecurity\\_in\\_shawnee\\_county\\_ks-1.pdf](https://www.khi.org/wp-content/uploads/2022/03/understanding_food_insecurity_in_shawnee_county_ks-1.pdf), accessed on 11/11/24.

<sup>vv</sup> <https://bestneighborhood.org/race-in-topeka-ks/>, diversity score, accessed on 11/11/24.





Table 6: List of Organization/Entity/Group	Entity's Mission	Point of Contact (name & email)	Specific Involvement in the Project or Assistance Provided
Shawnee County Parks and Recreation	Inspire active and healthy lifestyles through a diverse system of parks, facilities, programs and people.	Tim Laurent <a href="mailto:tim.laurent@snco.us">tim.laurent@snco.us</a>	Shawnee County will serve on the BAC and will specifically own and develop the proposed Oregon Trail Riverfront Park. Shawnee County also owns and runs the Great Overland Station. They also maintain Shunga, Landon, and Soldiers Creek Trails.
Greater Topeka Partnership/Go Topeka	GO Topeka creates county-wide economic success for all companies and citizens through implementation of an aggressive economic development strategy that capitalizes on the unique strengths of the community.	Matt Pivamik <a href="mailto:matt.pivamik@topekapartner-ship.com">matt.pivamik@topekapartner-ship.com</a>	The Partnership Topeka Chamber will support the project by distributing information, attending the BAC meetings, and helping to identify and prioritize the brownfield sites in addition to the priority sites.
Historic North Topeka East (HNTE) Neighborhood Improvement Association (NIA)	The HNTE NIA serves to provide neighborhood input to City and other local government entities regarding development, crime prevention, street conditions, lighting, preservation, and revitalization.	Garrett Scudder [REDACTED]	The HNTE NIA will support the project by distributing information, attending the BAC meetings, and helping to identify and prioritize the brownfield sites.
NOTO Arts District Organization	NOTO offers something for everyone! It is home to some of the most celebrated art galleries, shops, and experiences in the region with beautiful parks, outdoor art, and plenty of free parking. NOTO is comprised of independent small businesses.	Pedro Concepcion <a href="mailto:pedro.concepcion@notoartsdistrict.org">pedro.concepcion@notoartsdistrict.org</a>	NOTO Arts District Organization has worked to develop a 2-block business area in the target which had been devastated by a major flood of 1951 and deteriorated into an unsafe part of town into a vibrant district of nearly 40 businesses. The NOTO Arts District will support the project by distributing information, attending the BAC meetings, and helping to identify and prioritize the brownfield sites for further redevelopment.
Riverfront Advisory Council and the Riverfront Authority Board	Riverfront Advisory Council and the Riverfront Authority Board are dedicated to promoting the general welfare and encourage capital investment by fostering the creation of recreational, retail, entertainment, economic development and housing within the river district.	Greg Schwerdt [REDACTED]	The Riverfront Advisory Council will support the project by distributing information, attending the BAC meetings, and helping to identify and prioritize the brownfield sites.
Topeka Rescue Mission	Topeka Rescue Mission, is dedicated to helping the homeless and impoverished in the community by providing emergency shelter, meals, clothing, and other needed items, programs, and services.	La Manda Broyles <a href="mailto:lbroyles@tmonline.org">lbroyles@tmonline.org</a>	The Mission will participate in future BAC meetings to explore and help design action plans and sustainability efforts in the Target Area.
East Topeka South Neighborhood Improvement District	East Topeka South NIA serves to provide neighborhood input to City and other local government entities regarding development, crime prevention, street conditions, lighting, preservation, and revitalization.	Ta'nia Gibbs [REDACTED]	East Topeka South NIA s will support the City in this project by distributing relevant information through its newsletter and website and participating on the BAC. The former East Topeka Junior High is in this neighborhood.
Monroe Neighborhood Improvement Association	Monroe NIA uses a multifaceted approach to improve the lives and change the narrative of the neighborhood for its residents.	Stephanie Stanley [REDACTED]	The Monroe NIA will support the project by distributing information, attending the BAC meetings, and helping to identify and prioritize the brownfield sites. <b>The Historic Former Van Buren School and Proposed Affordable Housing Parcels are located here.</b>
Bring Back the Boulevard	Bring Back the Boulevard working group represents an area from SW 21st Street to SE 45th Street along Topeka Boulevard. The group works to revitalize and rehabilitate the corridor to its once vibrant nature.	Matt Pivamik <a href="mailto:matt.pivamik@topekapartner-ship.com">matt.pivamik@topekapartner-ship.com</a>	Bring Back the Boulevard will support the project by distributing information, attending the BAC meetings, and helping to identify and prioritize the brownfield sites for further redevelopment. <b>The White Lake Mall is in this area.</b>

**2.b.iii. Incorporating Community Input:** Since the beginning of the FY17 Grant and continuing through the FY21 Grant, the City has proactively involved communities including disproportionately affected residents, particularly as part of the many open house and steering committee meetings conducted as part of brownfield area-wide planning process. This will continue as part of the FY25 CWA grant implementation. The BAC will guide and advance brownfield redevelopment, community outreach and involvement, reuse planning, and site assessments as the project progresses. Quarterly meetings will be held in Americans with Disabilities Act accessible community facilities and will be widely promoted to encourage





attendance and promote awareness throughout the City to promote strong community connections. These meetings will provide background information on the program as well as the Target Area and solicit input from the public. Although in-person BAC meetings will be held, the City will provide virtual participation options for BAC and other meetings to make meetings convenient to those who may not be able to physically attend.

The City will also hold public meetings annually, inviting residents and other stakeholders to participate in the cleanup decisions, and reuse planning. The public meetings will include grant program updates and progress reports, education on the program, grant activity and the status of funding as the program progresses, and opportunity to incorporate neighborhood feedback in the assessment, cleanup and redevelopment planning and decision-making processes. Following the meeting, additional methods used to communicate progress and solicit input will include additional public meetings, updates on the City website, BAC websites, fact sheets, social media, and mailers as appropriate. As activities occur related to reuse planning or site assessment, the BAC will conduct neighborhood-level outreach to affected populations, underrepresented populations, and relevant partner organizations. The methods for communicating project progress to the community will be adjusted in response to feedback from the community, but is likely to include providing flyers in Spanish, where appropriate. The programmatic quarterly reports, site technical reports, area-wide plans, quarterly fact sheets, and success stories will be posted on the comprehensive, interactive, and engaging City website to communicate progress to all stakeholders and will summarize completed or scheduled activities, funding sources secured or identified, and outreach activities performed. City with assistance from a QEP and others (KSU TAB, KDHE, EPA, etc.) will be made available to meet with local representatives and if appropriate, host public meetings.

### 3. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS:

**3.a. Description of Tasks/Activities & Outputs:** 3.a.i. Project Implementation: 3.a.ii. Anticipated Project Schedule:

3.a.iii. Task/Activity Lead: 3.a.iv. Outputs: The City is requesting \$500,000 in EPA CWA funding to assess and plan the cleanup/reuse of the priority sites and other sites. The scope of work has been organized into four tasks described below.

<b>Table 7 - Description of Tasks/Activities &amp; Outputs</b>
<b>Task 1: Cooperative Agreement (CA) Management, Reporting, &amp; Conferences</b>
<b>i. Project Implementation:</b> The City will manage all aspects of the project, including coordination with the EPA and QEP. Reporting will include Quarterly Progress Reports (QPRs); Assessment, Cleanup and Redevelopment Exchange System (ACRES) Updates; Annual/Final Disadvantaged Business Enterprise (DBE) and Federal Financial Reports (FFRs); and a Final Performance Report documenting accomplishments, outputs, outcomes, and success stories. The City has procured a QEP and will oversee their work and any additional contractors needed. Three City staff members will attend local, regional, and/or state conferences and/or the EPA National Brownfield Conference. Any proposed scope changes will be discussed with and approved by EPA.
<b>ii. Schedule:</b> Management & reporting will be ongoing throughout the 4-year implementation period. Attendance of 2 State, regional, national workshop/conference(s) are anticipated from 2025-2029.
<b>iii. Leads:</b> The City will lead this task including financial management, execution, and compliance with the terms and conditions of the CA. The QEP will assist with reporting activities.
<b>iv. Outputs:</b> 16 QPRs; 4 DBE/FFR Reports; ongoing ACRES Updates; 1 Final Performance Report; 2 Brownfield Workshops/Conferences attended by City staff.
<b>Task 2: Brownfield Inventory and Site Prioritization/Selection</b>
<b>i. Project Implementation:</b> The City will work with the QEP along with the BAC to continue expanding the site inventory and prioritize sites. Environmental database, Sanborn fire insurance maps, city directory records, tax delinquencies, and building code violations will be utilized. EJ and CJEST information will also be reviewed. The KSU TAB BIT will be utilized as well as GIS format with each site catalogued using the parcel tax ID numbers. The City will also survey the BAC, local developers, real estate brokers, and other stakeholders for information on potential sites, conduct desktop studies and windshield surveys to verify existing site conditions. The City will work with the QEP firm along with the BAC to review already established criteria to prioritize sites that offer the greatest benefits to inform the site selection process. The City will use its existing georeferenced historical FIM and access KDHE EIF and other records.
<b>ii. Schedule:</b> BAC Meetings: will be held each quarter through the lifecycle of the grant; Initial Brownfield Inventory/Site Prioritization: Q1 '26 and will continue throughout the lifecycle of the grant; GIS Data Mapping: Q4 '25-Q3 '29.
<b>iii. Leads:</b> The City, QEP Firm, and BAC will continue to update the developed brownfield inventory including prioritization and selection of sites for environmental site assessments (ESAs) and planning.
<b>iv. Outputs:</b> Inventory – GIS files, list of priority sites
<b>Task 3: Phase I &amp; II ESAs, Regulated Building Material (RBM) Surveys, &amp; Response Action Plans (RAPs)</b>
<b>i. Project Implementation:</b> It is proposed that 56.5% of the grant funds will be used for this task. Under the direction of the City, the QEP Firm will complete Eligibility Determination (ED) request forms and submit to EPA (hazardous substances) and/or KDHE (petroleum). Upon confirmation of eligibility, Phase I ESAs will be completed in accordance with 40 CFR Part 312, the All-Appropriate Inquiries Final Rule, and the standards set forth in the ASTM E1527-21 Phase I ESA process. All reports will be provided electronically (e.g., Adobe Acrobat) to the City by the QEP Firm and submitted to EPA. A Quality Assurance Project Plan (QAPP) will be prepared and approved to EPA prior to conducting any Phase II ESAs/other sampling activities. Phase II ESA Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HASPs) will be prepared for each site and submitted to EPA. Phase II ESAs will





follow standards set forth in the ASTM E1903-19 Phase II ESA process. The QEP Firm under the direction of the City will perform Phase II ESAs, supplemental assessment activities, RBM surveys, and/or RAPs on priority sites that meet eligibility requirements.

**ii. Schedule:** Task 3 activities will be completed throughout the life of the grant EPA/KDHE Eligibility Determinations, Site Access Agreements, conduct Phase I ESAs: Q1 '26–Q2 '29. Preparation and submittal of QAPP: Q1 '26; ACM/RBM surveys: Q1 '26–Q3 '29; Conduct Phase II ESAs: Q2 '26–Q2 '29; Prepare RAPs: Q3 '26–Q3 '29.

**iii. Lead:** Under the direction of the City, the QEP Firm will complete Phase I & II ESA activities and reporting, supplemental assessment activities, RBM surveys, and/or RAPs that meet the eligibility requirements.

**iv. Outputs:** 9 EDs, 8 Phase I ESAs, 1 QAPP, 3 QAPP updates; 3 HASPs/SAPs; 5 RBM surveys; 3 Phase II ESAs; and 2 RAPs.

#### **Task 4: Reuse/Area-Wide Planning (AWP) Studies and Community Outreach**

**i. Project Implementation:** As described in 2.b.iii., the City, with support of the QEP Firm and BAC will perform a comprehensive community outreach program that will include options for traditional, targeted, innovative, and virtual engagement in the event of social distancing or other restrictions. Including but not limited to meetings and forums, development and distribution of marketing and informational materials, and joint outreach and education efforts with local organizations. City staff with assistance from the QEP will be made available to meet with local representatives (and if appropriate, host public meetings) for any owners that express a need and interest in participating in the project. Care will be taken to invite and involve residents in the Target Areas as well as keep public and government organizations informed. Community involvement for individual sites will be on a case-by-case basis, as needed. The QEP Firm will also complete 2 Reuse/AWP Studies in the Target Areas that will include an extensive community outreach.

**ii. Schedule:** Task 4 will be ongoing on an as warranted basis throughout the duration of the grant implementation. Outreach communications: Q1 '26–Q4 '29 and Reuse/AWP studies: Q1 '26–Q3 '29.

**iii. Lead:** The QEP Firm will lead this task under the direction of the City with support from the BAC.

**iv. Outputs:** Outreach meetings; Outreach documentation & supplies; Online communications; 2 Reuse/AWP Studies.

**3.b. Cost Estimates:** Approximately 85% of the total grant funding will be allocated to complete Phase I/Phase II ESAs, cleanup and planning (Tasks 3 & 4) at Target Area Priority Sites. The other 15% of funding will address brownfield sites throughout the City. The overall budget is summarized below. **The City is not requesting personnel, fringe, or indirect costs.**

Table 8: Budget Categories	Task 1	Task 2	Task 3	Task 4	Total
	Cooperative Agreement (CA) Management, Reporting, & Other Eligible Activities	Brownfield Inventory & Site Prioritization/ Selection	Phase I & II ESAs; SSSAPs; RAPs; & RBM Surveys	Reuse/AWP Studies & Community Outreach	
Travel	\$12,000	\$0	\$0	\$0	\$12,000
Supplies	\$0	\$0	\$0	\$1,000	\$1,000
Contractual	\$22,500	\$32,000	\$282,500	\$150,000	\$487,000
<b>Total Budget</b>	<b>\$34,500</b>	<b>\$32,000</b>	<b>\$282,500</b>	<b>\$151,000</b>	<b>\$500,000</b>

The following table provides a summary of the estimated costs for project outputs by task and budget category. **56.5% of funding is allocated towards Phase I & II ESAs; RBM Surveys; and RAPs.**

#### **Table 9 - Summary of Task Cost Development and Application of Funding**

##### **Task 1: Cooperative Agreement (CA) Management, Reporting, & Conferences: Total Budget = \$34,500**

**Cost Basis and Assumptions:** Contractual Costs of \$22,500 is budgeted for 150 hours (hrs.) to be completed by the QEP at an estimated \$150/hr. This includes budget for quarterly, annual/final DBE and FFR, and ACRES reporting. Travel Costs of \$12,000 (\$6,000 for airfare and transportation, \$3,000 for hotel, \$1,500 for conference registrations, and \$1,500 for meal expenses) is budgeted for expenses for three City staff to attend local, regional, and/or state, conferences and two EPA National Brownfield Conferences.

##### **Task 2: Brownfield Inventory and Site Prioritization/Selection: Total Budget = \$32,000**

**Cost Basis and Assumptions:** Contractual Costs of \$32,000 is budgeted for an estimated 150 hrs. (@ \$150/hr.) of work by the QEP for developing the brownfield inventories. This includes records research, GIS data entry and mapping, interviews with community members, & presentations/meetings and \$9,500 for georeferencing FIMs and mosaic map preparation.

##### **Task 3: Phase I & II ESAs; RBM Surveys; & RAPs: Total Budget = \$282,500**

**Cost Basis and Assumptions:** Contractual Costs of \$282,500 is budgeted for the QEP to complete one QAPP (\$10,000) and 3 Annual QAPP Updates (\$2,500 each = \$7,500); 9 ED forms (\$1,000 each = \$9,000); 8 Phase I ESAs (\$7,000 each = \$56,000); 3 HASP/SAPs (\$5,000 each = \$15,000); 4 Phase II ESAs (\$35,000 each = \$140,000); 5 RBM surveys (\$5,000 each = \$25,000); 2 RAPs (\$10,000 each = \$20,000).

##### **Task 4: Reuse/AWP Studies and Community Outreach: Total Budget = \$151,000**

**Cost Basis and Assumptions:** Contractual Costs of \$144,000 are budgeted for the QEP to complete two Reuse/AWPs (960 hrs./Reuse AWP @ \$150/hr. = \$72,000 per Reuse AWP); \$6,000 for Outreach Documents and Meetings (40 hrs. @ \$150/hr.). Supply Costs of \$1,000 includes \$800 for printing (\$500 for community outreach events and \$300 for brochures) and \$200 for mailings (274 pieces at \$0.73).

**3.c. Plan to Measure and Evaluate Environmental Progress and Results:** The City will utilize a variety of tools to track, measure, and evaluate progress in achieving various outputs listed in Table 7 (Section 3.a.iv) as well as overall project results and desired



outcomes. One tool for the FY25 CWA grant will be a detailed spreadsheet which will be used to track basic information (ownership, history, environmental concerns, etc.) for all nominated sites, as well as information for assessment, cleanup and reuse planning, etc. completed on each site. The spreadsheet will be used to efficiently track and report progress to EPA on ACRES and via the quarterly progress reports and posted on the project webpage. The City will also track the various standard outcomes recorded in ACRES, including public and private funding leveraged, acres of land made available for reuse, number of jobs created, etc.

#### **4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:**

**4.a. Programmatic Capability: 4.a.i.-iii. Organizational Capacity, Structure and Description of Key Staff:** The City has successfully managed two EPA Brownfield CWA grants (FY17 & FY21) and will be responsible for compliance with all administrative and programmatic conditions under this grant. The Planning and Development Department is highly engaged in infill and redevelopment, particularly in the Target Area. Lead City staff and their roles are described below:

***Project Director – Dan Warner, AICP, Planning Division Director, City of Topeka:*** Mr. Warner will serve as Project Director. He managed the FY17 and FY21 CWA Grants and has 24 years of wide-ranging planning experience. He currently directs the Planning Division of the Topeka Planning & Development Department. Previously Mr. Warner worked as a Long-Range Planner for the City of Lawrence, Kansas where he prepared long-range sector plans and had various current planning duties. Mr. Warner also worked previously as a Neighborhood Planner for the City of Topeka.

***Assistant Project Director – Bryson Risley, Neighborhood Planner/Planning Analyst, City of Topeka:*** Mr. Risley will serve as the Assistant Project Director and served in that capacity for the FY 21 CWA Grant. He will ensure project continuity in the event that Mr. Warner should become unavailable to fulfill the duties of Project Director. Mr. Risley has five years of land use and comprehensive planning experience. Currently, Mr. Risley works as a Neighborhood Planner and Planning Analyst, coordinating the development of neighborhood specific plans, monthly Development and Growth Management Report and maintains the datasets required for annual reports.

The members of the BAC include three representatives of the City Planning and Development Department (Rhiannon Friedman, Director; Dan Warner, Planning Division Director; and Bryson Risley, Neighborhood Planner/Planning Analyst) and the organizations/entities/groups listed in Table 6 (Section 2.b).

**4.a.iv. Acquiring Additional Resources:** The City has a professional human resources department with the staff resources, experience, and expertise to recruit qualified replacements for any key Project staff that depart. The City also routinely contracts out for engineering and environmental services and has all the management and procurement procedures in place to procure these services through a competition qualifications evaluation, and/or bidding process, and to manage the QEPs as they complete assignments on behalf of the City. The City Budget and Procurement Division recruits locally and emphasizes supplier diversity, with workshops and other assistance on how to offer goods and services to the City.

#### **4.b. Past Performance & Accomplishments: 4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: 4.b.i.(1 & 2) Accomplishments and Compliance with Grant Requirements:**

**EPA Brownfield Assessment Grant for Hazardous Substances and Petroleum (FY17; BF-97761201-0) 1. Accomplishments:** Numerous accomplishments were recorded in the ACRES database. This included Phase I ESAs of 15 parcels, Phase II ESAs/Site investigations of 12 parcels, cleanup planning for 13 parcels, and completion of an area-wide reuse plan for the River South Neighborhood, including 12 public meetings with property owners and stakeholders for the River South area and an EPA Press Conference to announce the grant and Public meeting for a cleanup plan. As part of inventory and prioritization of sites the City acquired georeferenced fire insurance maps. In addition to project quarterly reports, project updates were provided on the City website and Facebook sites. The City also attended and presented grant related information at three conferences; 1) 2019 US EPA Region 7 Federal Grant Writing Workshop; 2) 2019 National Brownfield Conference and 3) 2020 American Planning Association C3 conference (Virtual Event). Additional leveraging occurred for the area through use of data from this grant. This included application/designation of the Target Area as three opportunity zones (CT-7, CT-8 and CT-40). \$850,000 was also set aside by the City for the Oregon Trail Park. Approximately \$300,000 was spent from the funds to demolish structures and acquire/assemble the property parcels.

**2. Compliance with Grant Requirements:** The City of Topeka met all schedule and reporting milestones and maintained compliance with the work plan, schedule, and all terms and conditions of the cooperative agreement. All project milestones were recorded using the ACRES database as well as quarterly reports. The FY17 grant period ended September 30, 2020.

**EPA Brownfield Community-wide Assessment Grant (FY21; No. BF97787001) 1. Accomplishments:** Site assessments, supplemental investigation and remedial planning were focused on three contiguous industrial properties in the River South Neighborhood adjacent to the Kansas River and Levee system. The Site is approximately 23.3 acres and includes 15 active commercial/industrial buildings. In addition to a large-scale soil and groundwater investigation, hazardous materials surveys (ACM, LBP, and restricted waste inventories) were performed at 12 buildings located on the three properties. Coordination with the KDHE Brownfield and Orphaned Sites programs, EPA and the USACE was critical due site histories and location immediately adjacent to the City levee system. Remedial planning was conducted for a former foundry property, which has documented hazardous waste throughout the property and significant other contamination. This information will be used for planned property acquisition, remediation and redevelopment of the area.

**2. Compliance with Grant Requirements:** The City of Topeka met all schedule and reporting milestones and maintained general compliance with the work plan, schedule, and all terms and conditions of the cooperative agreement. All project milestones were recorded using the ACRES database as well as quarterly reports. The FY21 grant period ended July 31, 2024. As of October 1, 2024, the FY21 grant was drawn down 98% (\$296,062.22) of the \$300,000 awarded (See Attachment A of the Threshold Criteria Response). The remainder will be drawn down as part of FY21 grant closeout.



# **THRESHOLD CRITERIA**



## Threshold Criteria for Community-Wide Assessment Grants

### **1. APPLICANT ELIGIBILITY:**

(a) Applicant Type: City Government

(b) Eligibility: The City of Topeka (the City) is a “general purpose unit of local government” as that term is defined in 2 CFR § 200.64 and is therefore eligible to receive a United States Environmental Protection Agency (EPA) Brownfields Assessment Grant. If awarded funding by EPA, the City of Topeka will administer this grant.

### **2. COMMUNITY INVOLVEMENT:**

Since the beginning of the fiscal year (FY)17 Grant and continuing through the FY21 Grant, the City has proactively involved communities including disproportionately affected residents, particularly as part of the many open house and steering committee meetings conducted as part of brownfield area-wide planning process. This will continue as part of the FY25 CWA grant implementation. The Brownfield Advisory Committee (BAC) will guide and advance brownfield redevelopment, community outreach and involvement, reuse planning, and site assessments as the project progresses. Quarterly meetings will be held in Americans with Disabilities Act accessible community facilities and will be widely promoted to encourage attendance and promote awareness throughout the City to promote strong community connections. These meetings will provide background information on the program as well as the Target Area and solicit input from the public. Although in-person BAC meetings will be held, the City will provide virtual participation options for BAC and other meetings to make meetings convenient to those who may not be able to physically attend.

The City will also hold public meetings annually, inviting residents and other stakeholders to participate in the cleanup decisions, and reuse planning. The public meetings will include grant program updates and progress reports, education on the program, grant activity and the status of funding as the program progresses, and opportunity to incorporate neighborhood feedback in the assessment, cleanup and redevelopment planning and decision-making processes. Following the meeting, additional methods used to communicate progress and solicit input will include additional public meetings, updates on the City website, BAC websites, fact sheets, social media, and mailers as appropriate. As activities occur related to reuse planning or site assessment, the BAC will conduct neighborhood-level outreach to affected populations, underrepresented populations, and relevant partner organizations. The methods for communicating project progress to the community will be adjusted in response to feedback from the community, but is likely to include providing flyers in Spanish, where appropriate.

The programmatic quarterly reports, site technical reports, area-wide plans, quarterly fact sheets, and success stories will be posted on the comprehensive, interactive, and engaging City website to communicate progress to all stakeholders and will summarize completed or scheduled activities, funding sources secured or identified, and outreach activities performed. City with assistance from a Qualified Environmental Professional (QEP) and others (Kansas State University Technical Assistance to Brownfields), Kansas Department of Health and Environment, EPA, etc.) will be made available to meet with local representatives and if appropriate, host public meetings.



## Threshold Criteria for Community-Wide Assessment Grants

### **3. EXPENDITURE OF EXISTING GRANT FUNDS:**

The FY2021 grant period ended September 30, 2024. As of October 1, 2024, the FY2021 grant was drawn down 98% (\$296,062.22) of the \$300,000 awarded (See Attachment A). The remainder will be drawn down as part of FY2021 grant closeout.

### **4. CONTRACTORS AND NAMED SUBRECIPIENTS:**

Contractors: The City has selected a firm under a “dual procurement process” for both grant writing and grant implementation services. The procurement process was completed in accordance with 2 CFR Part 200 and 2 CFR Part 1500.18 and the Best Practice Guide for Procuring Services Under EPA Assistance Agreements. The City’s procurement method used was a Request for Proposal (RFP). Details regarding the City’s RFP process are described in detail below:

- The City Executive Committee authorized staff to continue pursuing EPA Brownfield grant funding and to procure a QEP firm for grant writing and implementation; and to continue the submittal of Brownfield Assessment grant applications to the EPA for FY2025.
- The RFP and related documents were issued and posted on the City’s website on June 10, 2024 (<https://www.topeka.org/procurement/bid-tabulations/#gsc.tab=0>); solicited in the Topeka Metro News newspaper (June 10, 2024).
- The proposal submission deadline was July 10, 2024.
- Three proposals were received in response to the RFP released on June 10, 2024.
- The chosen QEP firm, Stantec Consulting Services Inc. (Stantec) was notified on August 14, 2024.

Below is the timeline of the RFP process as seen in the RFP released on June 10, 2024:

Brownfield Grant Applications Consultant: Grant Application and Potential Implementation

US EPA Brownfield Grant RFP Event #3039-0

Issued: June 10, 2024

PROPOSAL SUBMISSION DEADLINE: Submitted through their procurement portal by 2pm CST July 10, 2024

NO LATE PROPOSALS WILL BE ACCEPTED

Selection committee from the City of Topeka consisted of:

- Dan Warner, AICP - Planning Division Director
- Quinn Cole - Management Analyst
- April Hazen-Shaffer – Senior Grant Administrator
- Bryson Risley – Neighborhood Planner

Scoring matrix was based on:

- 25% - Demonstration of experience in addressing contaminated properties
- 15% - Demonstration of experience in successfully completing tasks/projects
- 10% - Demonstration of experience in effectively engaging with community members and federal and state agencies
- 15% - Experience and capacity of project team/personnel
- 25% - Reasonableness of cost/price proposal based on a comparison of prices among competing offerors and other available information on market rates for consulting services
- 10% - References





CITY OF  
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## **Threshold Criteria for Community-Wide Assessment Grants**

A copy of RFP Event #3039-0 can be found in Attachment B.

Subrecipients. No subrecipients are named in this grant application.

### **ATTACHMENTS TO THRESHOLD CRITERIA RESPONSE**

A – Drawdown of EPA Brownfields Assessment Grant (FY2021)

B – Documentation of Request for Proposals