

ROSEDALE KOZ / LOWER ORE YARD CLEANUP GRANT

THRESHOLD CRITERIA

A. Applicant Eligibility

The Johnstown Redevelopment Authority (JRA) is an Urban Redevelopment Authority chartered in 1949, as authorized by the Urban Redevelopment Law of 1945, and as such, is an eligible applicant. The JRA, just as all Redevelopment Authorities, exists and operates for the public purposes of the elimination of blighted areas through economically and socially sound redevelopment of such areas for residential, recreational, commercial, industrial, or other purposes, to provide healthful homes, a decent living environment, and adequate places of employment.

B. Letter from State Environmental Agency

A letter from the PA Department of Environmental Protection is attached to this application.

C. Site Eligibility and Property Ownership Eligibility

1. a. The **Rosedale KOZ /Ore Yard Site**
 - b. Ore Yard Road, **Johnstown**, Pennsylvania.
 - c. The current owner of this site is Tecumseh Redevelopment, Inc.
 - d. The Johnstown Redevelopment Authority anticipates acquiring ownership of the property by June 30, 2008.
2. a. The site is contaminated with hazardous substances.
 - b. This site was formerly part of the massive Bethlehem Steel Complex. The Rosedale KOZ/Ore Yard property was a raw material storage area in support of the steelmaking process at the adjacent Bethlehem Steel Lower Works. At one time, the Rosedale KOZ/Ore Yard contained an aboveground fuel oil storage tank. Upon Bethlehem's demise, the property was absorbed by International Steel Group, now Mittal Steel. The site is currently vacant and access is secured with locked gates.
 - c. **Past industrial activities** at the site, including placement of historic fill and remaining remnants of coal, **coke**, iron ore and ferromanganese, have contributed to poor and **degraded environmental** conditions for the ground surface and subsurface media.
 - d. The Rosedale KOZ/Ore Yard site is situated on a flat plateau directly above the former Bethlehem Steel Lower Works, once a booming steelmaking operation. The adjacent Rosedale KOZ/Ore Yard was a natural setting for Bethlehem to store raw materials associated with the steel works. Iron ore, coal, and ferromanganese all were stockpiled on the site. The property was also **impacted by historic slag fill**, a steel by-product that is prevalent in many abandoned steel mills. Our Phase II Environmental Site Assessment indicates that elevated levels of heavy metals – zinc, iron, vanadium, arsenic and cadmium are 0 to 2 feet below the surface in a concentrated area.
3. a. The site is not listed or proposed for listing on the National Priorities List.
 - b. The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to, or entered into by parties under CERCLA.
 - c. The site is not subject to jurisdiction, custody, or control of the United States Government.
4. A property specific determination is not required for this site.
5. An "**All Appropriate Inquiry**" Environmental Site Assessment was **performed** at the site in November of 2005. Phase II site assessment activities began in November 2005, and were completed in January 2006, with the submission of a report dated June, 2006. An updated Phase I Assessment will be conducted prior to purchase of the Rosedale KOZ/Ore Yard site.

6. The Johnstown Redevelopment Authority is not liable for contamination at the site. All environmental conditions at the site were in existence prior to the Authority taking ownership. The Redevelopment Authority is a bona fide prospective purchaser of the site, as defined under CERCLA 107(r). The Authority has undertaken a Phase I All Appropriate Inquiry Assessment as well as Phase II site investigations. The Phase I will be updated prior to taking ownership of the site, to comply with EPA guidelines.
7. There are no known environmental enforcement actions, inquiries or orders for the Rosedale KOZ/Ore Yard. As part of the All Appropriate Inquiry Environmental Assessment, our contract engineers **performed a thorough examination** of available environmental records.
8.
 - a. The Johnstown Redevelopment Authority does not currently own the Rosedale KOZ/Ore Yard site. We are working with the current owners, Mittal Steel (Tecumseh Redevelopment, Inc.) to secure sole ownership of the property. The Authority has **secured an irrevocable option** agreement with Mittal. The JRA has no relationship – familial, contractual, corporate, or financial, with any prior owners or potentially responsible parties.
 - b. All hazardous substances associated with the site are associated with the former owners. Neither the Redevelopment Authority nor Mittal Steel caused or contributed to any release at the site. The Redevelopment Authority has not at any time arranged for the disposal of hazardous substances at the site nor have we transported hazardous substances to the site.
 - c. In November of 2005, L. Robert Kimball & Associates, a long-established qualified licensed environmental engineering firm, performed an “All Appropriate Inquiry” Phase I Assessment of the site on behalf of the Redevelopment Authority.
 - d. As previously stated, the Redevelopment Authority does not own the property, but will acquire the site by June 30, 2008. The Rosedale KOZ/Ore Yard site has remained vacant since the closing of the Bethlehem Steel Corporation in 1992. **The property is gated to prevent public access.** Upon transfer to the Redevelopment Authority, we will maintain restricted access until the property can be remediated.
 - e. Upon obtaining the deed for this property, the Redevelopment **Authority will ensure that site access is secured.** Given the remote location of the property from residential areas, we will request increased police patrols to prevent any potential trespassers. Further, the Authority will prepare a Cleanup Plan and work toward full remediation of the site. The Johnstown Redevelopment Authority is committed to complying with all land use restrictions **and institutional controls.** We will cooperate with those performing the cleanup and assist all authorized representatives, and will provide site access to the property. We will comply with all informational requests and administrative subpoenas, and we will provide all legally required notices.

D. Cleanup Authority and Oversight Structure

1. The Johnstown Redevelopment Authority has **significant experience** in project oversight of many Brownfield sites in the region. The Authority will continue to utilize capable engineering firms to assist in the preparation of all cleanup plans and specifications.

We will be working in cooperation with the Pennsylvania Department of Environmental Protection to enroll the site in the **PA Act 2 Program**, ensuring that a Release of Liability is obtained, a critical factor for development and potential lending institutions and investors. To complement the PA DEP Cleanup Standards, Johnstown recognizes the importance of data quality above and beyond the State’s requirements. To ensure that valid data is received to protect human health and the environment, **EPA’s data validation package** will be required at cleanup sites.

All remedial tasks will be performed by **qualified professionals** that will be competitively procured, consistent with the competitive procurement provisions of 40 CFR 31.36.

- The JRA recognizes that contamination does not stop at artificial property boundaries, but can also impact neighboring landowners. If investigatory activities **during** the **cleanup** process prove this to be the case, the Redevelopment Authority will work with property owners to secure **rights-of-entry** or temporary easements to address the contamination.

E. Cost Share

To fulfill the cost share portion of the remediation activities, the Redevelopment Authority will utilize funds secured and in hand from the PA DCED.

RANKING CRITERIA FOR CLEANUP GRANT

A. Cleanup Grant Budget – Rosedale KOZ/Ore Yard

The Redevelopment Authority proposes to implement remediation activities at the Rosedale KOZ/Ore Yard site to gain a Release of Liability through the PA Act 2 Land Recycling Program.

Budget Categories (Programmatic Costs Only)	Project Tasks			Total
	Task 1 Outreach	Task 2 Remediation Plans	Task 3 Remediation	
Personnel	6,500	5,500	9,000	21,000
Travel	2,000	2,500	2,500	7,000
Supplies	2,500	2,000	2,000	6,500
Contractual	6,000	21,000	178,500	205,500
Total	17,000	31,000	192,000	240,000
Cost Share			40,000	40,000

BUDGET TASKS

Outreach Meetings with community groups, particularly those that are most impacted by brownfields. Preparation and publication of Public Involvement Plan, ABCA, including website, daily newspaper, and free community newsletter. Notification to public on remedial plans and cleanup activities.

Remediation Plans Retain an environmental engineering firm to develop a cleanup work plan to address metal-impacted contaminated soils. Preparation of ABCA and selection of site-appropriate cleanup methods for industrial re-use of site, meeting PA Act 2 Cleanup Standards.

Remediation Competitively retain a qualified environmental firm to undertake removal of contaminated soils to meet PA Act 2 Cleanup Standard for industrial re-use of site. (Supplemented with DCED funds)

B. Community Need

- Three disastrous floods, the decline of its major industries, and for many years, the highest unemployment rate in the nation - it is the special spirit of its people and the ability to overcome these misfortunes that makes Johnstown proud. The industrial heritage of Johnstown illustrates what made this City, and our Country, great in the first place. Johnstown built the **steel mills** and dug the coal that

sparked a country's industrial revolution, and **resulted** in the modern **creation of brownfield sites**. After the historical floods of 1889 and 1936, Johnstown was once again under water in 1977. Just as the City began to dry out, the steel industry was hit by tough overseas economic competition. Johnstown saw its population drop from 63,232 to its current day 23,906. Over **12,000 people lost their jobs** when the mills closed in 1992, from a town that once produced 2,000,000 tons of steel per year, to today's level of zero! In the worst of times, the unemployment rate was nearly 25%, and now consistently hovers between 6-8%, **above the national and state level** of 5%. The lack of family sustaining jobs has led to the out-migration of our youth, resulting in the so-called "brain-drain" in Johnstown.

Census 2000 statistics show that over **24%** of the population of Johnstown subsists on income **below the poverty level**. The poverty level for families with a **female head-of-household is a staggering 41.9%**. Johnstown ranks as one of the top communities with the highest amounts of public housing units, per capita, in the United States. Minorities comprise 13.7% of the City community, with the highest percentage of minorities of African descent. Many low-income families reside in neighborhoods **impacted** by derelict **brownfield properties**, subjecting them to additional potential health and environmental hazards.

Johnstown is also a **graying community**, with the average age of our population **over 40** years of age. The proportion of senior citizens in Johnstown's population is growing at a rate that is **50% higher** than the national average. According to the U.S. Census 2000, 25% of the total City population of 23,906 is over the age of 62. Nearly 10,000 people are retired or not in the labor force. Over 4,600 are on Social Security. This aging population is much more susceptible to health risks posed by the environmental hazards at brownfield sites. The subject site, Rosedale KOZ/Ore Yard, is located in the City of Johnstown and is adjacent to a small ethnic neighborhood of the City, known as Cambria City. Approximately 75% of the people residing in Cambria City are senior citizens. The cleanup of the Rosedale KOZ/Ore Yard Site will remove metal-laden dusts which could emanate into the elderly population's neighborhood.

2. Johnstown, forced to react to severe economic decline, has continued to be classified by the State as a **Distressed Community** operating under a State-mandated Recovery Plan, a step-by-step process for the City to undertake to increase job growth, create development opportunities, and diversify our economy. This Recovery Plan stresses the need to create economic growth through infill development and strategic promotion of adaptive reuse of older abandoned sites, utilizing their **solid base** of existing available **infrastructure**. **Smart growth principles** such as the revitalization of our Brownfield sites will **attract** new and diversified **development** that will complement our goals of recycling existing industrial sites and buildings, **preserving greenspace** and removing any potential health and environmental threats.

Without the empowerment provided by **EPA funds**, the City of Johnstown will not have the capacity to adequately clean up and create viable reuse plans for our Brownfields. Evidence shows that communities that utilize smart growth opportunities, such as the reuse of brownfields, have **stronger economies**. The remediation of the Rosedale KOZ/Ore Yard site will result in 60-acres of restored land ready for development – creating **economic and recreational opportunities** for growth in our landlocked city. A private developer is ready to invest in the site, with plans to expand his motorcycle and ATV business on this property, and create 50 jobs, only if costly cleanup of the site is performed. Jobs are sorely needed in our City with a 7.2% unemployment rate.

Johnstown has looked to the Brownfields sites and recognizes that the **potential exists** to reuse them in revitalizing the City. The stigma of Brownfields must no longer be an impediment to **sustainable development** in order to lead our City on the road to recovery. Sustainable reuse, envisioned by the Johnstown Project, highlights the importance of balancing economic, social, and ecological factors of land use with focus on community needs and future generations. We will undertake the

transformation of this inner-city **brownfield site** from an economic, social, and ecological drain on the community, **into** a site that will help to address the **community's** recreational, historical, and employment **needs** for future generations.

Our cleanup efforts at the Rosedale KOZ/Ore Yard site will **enable us** to **remove** the current **hazardous conditions** and pollutants that continue to impact human health and pose additional risks to our elderly population living in adjacent ethnic neighborhoods. Through assistance from our project partners, the JRA will ensure that public health issues are not compromised in the redevelopment process. The citizens of Johnstown deserve to live and work in healthy and convenient neighborhoods without sacrificing quality of life.

Although Johnstown has received previous EPA Brownfield Cooperative Agreements, all funds are obligated for other brownfield project sites. This Proposal is specific to the Rosedale KOZ/Ore Yard site, and addresses the need to cleanup the hazardous substances that are impacting human health and the environment. Without the assistance of EPA, the environmental degradation at the property will continue.

3. The visual impact of Brownfields on the City is readily apparent as one navigates through our town. Over **12 miles** of vacant or **underutilized steel mills** extend the entire length of the City and provide a stark reminder of the booming glory days of steel. The mills were built along the banks of the rivers traversing the landscape. Small neighborhoods or company towns were constructed nearby and now are populated by low-income families and individuals. The Johnstown Redevelopment Authority has previously undertaken & prepared a brownfield inventory of the City. We have currently identified 61 brownfield sites. These industrial sites provide an ugly blighting effect, and cannot be put into productive reuse because of the **potential or "perception" of contamination**. These properties are a haven for vagrants, rodents, and other unsafe conditions for the impacted neighborhood. Developers, wary of dealing with these present problems and liability concerns, turn to suburban greenspace and contribute to the suburban sprawl that is affecting our state and nation. These abandoned buildings are a direct correlation to the declining economic state of the City of Johnstown.

As a former one-industry town, Johnstown has been plagued with the side effects of past industrial practices and uses of many hazardous substances that are now known to be dangerous to public health. These past practices may impact our substantial elderly population with increased risks of cancer and respiratory infections. With the majority of our **senior citizens** having retired from the steel industry, the statistics of cancer disease and death is **higher** in our community. According to the latest PA Department of Health Profile (2005), the **incidence of cancer** in males from Cambria County is almost **double the rate** for the State of Pennsylvania. Johnstown's Hospital has recently established new state-of-the-art cancer centers, including the John P. Murtha Cancer Center, affiliated with the University of Pittsburgh Medical Center. Our local Congressman has been instrumental in bringing about the latest treatment and research cancer centers in the country. It is incumbent upon our Johnstown Project to **reduce** or **eliminate** any existing **risks**, especially to our significant senior citizen population in nearby Cambria City to remove the metal-laden soils and dusts at the Rosedale KOZ/Ore Yard property.

The **abandonment and underutilization** of large numbers of industrial and manufacturing parcels not only impacts human health, economic growth, and the vitality of our environment, but it also has resulted in a **social malaise**, and a sense of despair among the citizens. The job losses, a deterioration of the environment, increased amounts of vandalism, vagrancy and crime, and the loss of community pride have been difficult to overcome for many of our citizens. The **revitalization** of our City's **brownfields** will contribute to a **renewed spirit** of hope for our recovering city, providing a site where jobs will be created for many of our unemployed citizens.

C. Sustainable Reuse of Brownfields

1. Smart growth principles are a top priority for the City of Johnstown as it transforms into a revitalized community. Through the promotion of brownfield redevelopment, the City is **preventing** urban sprawl and the **loss of precious greenspace**. The Rosedale KOZ/Ore Yard's **proximity** to other vacant land and industrial buildings **ripe for redevelopment**, its location in an inner-city industrial park, and its central location to **existing** transportation **infrastructure** promotes smart growth and transportation solutions, thereby reducing consumption of gasoline and decreasing air emissions.

The Redevelopment Authority has been working in partnership with local, State, and Federal groups to **prevent** the creation of future **brownfields**. A critical component of our program and the substantive revitalization of the area's economy through smart growth is redevelopment and cleanup of existing brownfields. Remediating and revitalizing these blighted, potentially environmentally hazardous sites will create greater opportunity for new investment. Continued input from groups and representatives will help sustain economic growth and provide a coordinated social program for safer streets, stronger families, increased community pride, and **enhanced quality of life**.

To achieve "sustained" environmental quality in disadvantaged communities near the Brownfields, the targeted sites will use criteria to include mitigation of potential threats to residential areas, and economic viability to market the private sector. **Partnerships** will develop with the private sector **that do not invite** new environmental **risk** during and after cleanup and will preserve and **sustain cultural and environmental resources**. Obviously, the priority will be seeking the right job opportunities for disadvantaged residents in these communities, as well as providing tax revenues to the local municipality.

Establishing Brownfields Program **target communities** and implementing the comprehensive strategic plan for the area will enable these communities, in the future, to provide for a higher quality of life, new businesses, and employment opportunities. It will also **compliment** small **local initiatives** geared toward downtown and neighborhood revitalization in conjunction with the Comprehensive Plan. This will also assist local community leaders to maintain **momentum** as **created** by the Johnstown **Partnership** with clearly defined goals, plans, and resources. Through public and private efforts, the number of Brownfield sites in Johnstown will decline while revitalization efforts are expanding.

As a landlocked area located in a valley, surrounded by hilltop greenfield suburban settings, the Johnstown Redevelopment Authority is quite familiar with actively promoting the reuse of inner-city Brownfields as viable development sites. Nearly all available building space or land in the City has had a history of industrial use. The Redevelopment Authority has always stressed the value, both economically and environmentally, of **reusing** existing infrastructure to reduce the sprawling impact on greenfields. The concept of infill development in our land use planning is key to the growth of Johnstown.

The redevelopment plans for the Rosedale KOZ/Ore Yard site will be designed to **maximize the use of existing infrastructure**. Adjacent to an inner-city industrial complex, **existing rail** and **roadways** will be incorporated into the plans for building locations. Existing utility infrastructure at the adjacent Cambria Iron Works can provide the capacity for the Rosedale KOZ/Ore Yard site, thereby lessening the impact on energy and raw material consumption, as well as reducing development costs.

During full development measures, steps will be taken to ensure that **sustainable development** and smart growth principles are followed where possible, while combating environmental degradation. All new construction will implement **green building techniques** and technologies where reasonable. Where possible, demolition debris from removal of substandard abandoned concrete piers will be incorporated into site development plans as **fill reuse**. Their use will be verified by our engineering

team. Every effort will be made to create fuel and **energy efficient** structures utilizing the latest technologies and through simple measures, such as native landscaping, to take full advantage of **natural cooling** and lighting. Restoration plans at the project site will ensure the reintroduction of **native plantings** in selected greenspace areas under an approved site design. In addition, stormwater management is a primary concern for site development. Steps will be taken to utilize **stormwater management techniques** such as swales, filter strips, ponds, and wetlands.

Upon completion of cleanup, the Redevelopment Authority will then transfer the property to a developer. The Redevelopment Authority utilizes a standard form of a redevelopment contract when selling property which contains specific performance measures and objectives that the developer must meet. The Authority must first approve design drawings and specifications of the proposed development, which is required to be completed to the Authority's contract conditions. A formal "Certificate of Completion" must be achieved by the developer within a specified time frame, and is placed on record. This ensures that development plans are in accord with the Authority's objectives for the site.

2. The City of Johnstown recognizes that land recycling and brownfield redevelopment are vital components for **smart growth** and **economic recovery**. Declared a financially-distressed city in 1993, the City leaders and members of the community put into action plans designed to transform Johnstown from a one-industry, steel dependent town into a multi-faceted, economically diverse community. As part of these plans, **Brownfield redevelopment** is a **key component**. The unique geography of the City of Johnstown requires that we concentrate our efforts on **adaptive reuse** of our limited sites available for development. Using sustainable development strategies such as infill development, reuse of existing infrastructure, and the environmental remediation and marketing of former industrial sites and buildings for new economic opportunities, the City of Johnstown is jump-starting economic growth.

The Rosedale KOZ/Ore Yard Brownfield site adjacent to the Lower Cambria Works Industrial/Historical Complex is a **prime location** for redevelopment using principles of smart growth and sustainable development. It consists of **60-acres** of **flat developable land** within our **landlocked city** where space is limited. It is also situated along **existing rail** and road transportation corridors within an inner-city industrial complex, making it an ideal location for a starting point for infill development. Through cleanup of this former industrial site, we are simultaneously improving the environment through removal of contamination while also converting an underutilized, abandoned tract of land into a prime location for new economic and recreation opportunities. Through the provision of these developable properties, we are **spurring economic development** and **job creation** within our distressed city.

3. The remediation and redevelopment of the Rosedale KOZ/Ore Yard are part of the City's plan to transform our distressed City into a **multi-faceted community**. The strategic location of the Rosedale KOZ/Ore Yard within an inner-city industrial complex, adjacent to several ethnic neighborhoods and the central business district is ideal for smart growth. The recent remediation and redevelopment of the nearby Cambria Iron **Pedestrian Footbridge** and creation of the **Urban Greenway Trail** puts this inner-city industrial complex **within walking distance** of Johnstown's Central Business District and the neighboring ethnic communities – reducing reliance on automobiles and promoting healthy lifestyles through bike or **walk-to-work** opportunities. As well, the 60-acre tract will also provide a restored playground and ballfield for local recreation purposes, in addition to developable industrial and commercial space all in an environmentally friendly green neighborhood development.

The Rosedale KOZ/Ore Yard is traversed by Hinkston Run, a small stream that flows alongside the northern boundary of the property. Currently, Hinkston Run is impacted by stormwater runoff from metal-laden soils at the adjacent brownfield site. The Redevelopment Authority intends to place a

dedicated greenspace along the length of Hinkston Run, as a riparian buffer zone. This site will be held and maintained by the Authority.

D. Creation and/or Preservation of Greenspace/Open Space or Nonprofit Program

An eleven-acre portion of the 60-acre Rosedale KOZ/Ore Yard that is adjacent to a **low-income neighborhood** of Johnstown has been identified as a site that could be used for a neighborhood ballfield and playground. Although neighborhood children had previously used the site for play, it has an unknown environmental history. At one of our community input meetings, our partners at the Keystone Economic Development Corporation (a local nonprofit dedicated to assisting low-to-moderate income families) expressed an interest in seeing this property restored for neighborhood recreational purposes. The receipt of **EPA cleanup funds** will **ensure** that a **healthy** and safe recreational park and **playground** can be realized for a community that has been directly impacted by the decline of the steel industry. Ongoing maintenance of the facility will be assumed by Keystone, which will be outlined in the long-term lease or deed to the recreation site. Further, if engineering controls are required as part of the cleanup, we will work with PA DEP to ensure the long-term integrity of those controls.

The creation of the Hinkston Run buffer zone will also ensure that greenspace is part of the development of this brownfield site. The dedicated greenspace will be owned and maintained by the Redevelopment Authority, ensuring it's long-term preservation.

E. Pre-Award Community Notification

1. The Redevelopment Authority's proposal has its roots as a community effort that seeks to energize our region through productive reuse of Brownfields. As a current recipient of EPA Brownfield Cooperative Agreements, we have a **well-established policy** of working with our **neighborhood partners** to discuss the Johnstown Brownfield initiative. This proposal to cleanup the Rosedale KOZ/Lower Ore Yard is a component of the City of Johnstown Amended Recovery Plan, with ongoing workshop sessions to ensure that brownfield cleanups are addressed as part of our City's economic recovery and revitalization.

At our recent public meeting held on September 18, 2007, a resolution was adopted by our **Board** of Directors supporting the submission of this proposal to the EPA. On September 21, 2007, we discussed the proposal at the Greater Johnstown **Regional Partnership** Meeting, an organization of area businessmen, government officials, community groups and service agencies. The GJRP is not a government organization, but a long standing association that works toward the betterment of the City in economic, social, recreation, the arts, and environmental areas.

All public outreach has been and will continue to be conducted by the Johnstown Redevelopment Authority. The Johnstown Redevelopment Authority will be prepared to fully comply with the EPA requirements to establish a formal Public Relations / Community Involvement Plan. If selected for funding, we will shortly thereafter **hold a Public Hearing**, advertised in the daily newspaper, to discuss the Rosedale KOZ/Lower Ore Yard Cleanup Proposal, at which time comments and questions will be addressed by the Redevelopment Authority Staff. A 30 - 45 day period will be afforded to the public for comment on our proposed cleanup. The EPA Assessment proposal will be available for public review, as part of our **Administrative Record**, at both our office during business hours, and posted on our website – www.johnstown-redevelopment.org. Both handwritten and emailed comments will be accepted.

The Redevelopment Authority also publishes a **quarterly Brownfield Newsletter**, which will summarize the contents of our EPA proposal. This free publication is distributed to various local venues- City Hall, public library, Senior Activity Center, Penn Highlands Community College,

Keystone Economic Development Corp (a nonprofit organization targeting assistance to low and moderate income individuals), and the PA Department of Health.

2. We believe that our **notification plan** is comprehensive, and provides a broad range of awareness to our community. We have utilized these mediums before, and have realized much interest in our brownfield programs. As a small community, with an aging population that is concentrated in the downtown senior high-rise apartments, we believe that placing the proposal for review in our downtown office will be conducive for senior citizens to participate in the process. The **free newsletter** will heighten awareness among our lower-income residents, who are often the most impacted by brownfields.
3. We propose a thirty to forty-five day comment period for review of the current EPA proposal. During the initial comment period for this proposal, we will **encourage community comment** via our AmeriCorps Environmental Outreach Coordinator, who will attend various civic and community meetings to discuss our Cleanup Project. It is important to note that the Redevelopment Authority communicates with our **project partners on an ongoing basis** on all facets of our brownfield undertakings. We have previously partnered with the Hornerstown Business and Merchants Association on successful brownfield cleanups in that section of the City, and will work with the West End Citizens Group on the cleanup of the Rosedale site. As we move through the Cleanup, meetings will be held, press coverage will be performed, and Brownfield Update Newsletters will continue to be published.
4. As the cleanup of the Rosedale KOZ/Ore Yard site is a priority of the community, we anticipate receiving positive comments on efforts to reclaim this site. We will incorporate all comments received and place them into our Administrative Record of the Project. Our ABCA document will request public comment with the public giving input into appropriate cleanup methods for the site. Comments received from the public will factor into the selection of a cleanup method to remove the contaminated soils from the site. We will also solicit comments for PA DEP, who will be afforded an opportunity to review the cleanup proposal to ensure that it meets the PA DEP State Cleanup Standard for property reuse. Public comment will also be solicited during the redevelopment phase.

F. Ongoing Community Involvement

1. Brownfield cleanup and redevelopment are principles of smart growth that are continuously discussed and evaluated in the City of Johnstown, with recommendations made at **various community forums**. Locally, brownfields have been identified as a vital part of revitalization efforts in the City's Comprehensive Plan, based upon citizen input at **Public Hearings**. Reuse of the City's many brownfields is part of the Mayor-Council Strategic Plan. Brownfield cleanup is a strategic project of the Greater Johnstown Regional Partnership, with reuse of former industrial sites an important initiative of our revitalization efforts.

Upon notification by EPA of our receipt of grant funds, a **public spokesperson** will be designated to provide continuing updates on a regular basis through public press announcements. We will hold a public meeting to discuss the cleanup project, which will be advertised in the newspaper, posted on our website, and placed on public access TV. We will continue our Community Involvement Plan, enhanced with our AmeriCorps Environmental Outreach Coordinator, who will attend Neighborhood Civic Meetings. In particular, we will work with the West End Improvement Committee, a local neighborhood group that is focused on improving the West End of the City (West End includes Cambria City neighborhood). An **Administrative Record** will be created to house environmental reports and reuse plans that will be available for public comment. **Cleanup alternatives** will be presented and discussed in public forums, ensuring that affected citizens are provided a voice in the project. We will continue to **solicit** resident **opinions** as we move forward with this important project for the City's revitalization. With our cleanup and redevelopment efforts, in conjunction with the City's Community

and Economic Development Comprehensive Plan, we will strive to provide a coordinated program for safer streets, stronger families, increased community pride, **enhanced quality of life**, and family-sustaining jobs.

2. Brownfield restoration and reuse is a **priority** project of the **Johnstown Partnership**, a streamlined, cooperative economic development group that oversees and prioritizes relevant economic issues facing our community. The Partnership, composed of the City's Department of Community and Economic Development, The Johnstown Redevelopment Authority, the Chamber of Commerce, and Johnstown Area Regional Industries, all provide **cooperation**, administrative support and limited financial assistance toward the Brownfield Project. The Partnership will be able to cost-effectively assist prospective developers throughout the implementation process through its plethora of experience and technical knowledge. To place these brownfield sites on an equal footing, we will offer financial incentives for development of these sites. Many sources of financial assistance are available through the Johnstown Partnership, including **PA Industrial Sites Reuse Program** to address environmental cleanup, PA Industrial Development Loans and Small Business Loans for business development, Federal Community Development Block Grant funds, and State Enterprise Development Program funds. The Partnership will meet with interested developers to devise a workable strategy to eventual reuse, evaluating previously identified constraints and issues, and prepare a comprehensive **pre-development agenda** to be effectuated through a **public-private partnership** of resources.

We will continue to work in concert with the **PA DEP**, and through the **Land Recycling Program** in preparing viable remediation and redevelopment plans for the property. All remediation activities will be performed utilizing a PA DEP approved work plan, with the goal to remediate the site for public reuse pursuant to an appropriate PA Act 2 Cleanup Standard. To ensure that sustainable cleanup and redevelopment is achieved, it is critical that we partner with our **state agencies** that recognize that smart growth principles such as brownfield redevelopment are the future of small urban areas such as Johnstown.

3. The Johnstown Brownfield Project will **publish a free Brownfield Newsletter**, to notify the public of the cleanup of the Rosedale KOZ/Ore Yard to ensure that our message is clearly understandable to our elderly, we will provide any printed material in a large font type. As well, we will continue to attend the West End Improvement Group meetings to discuss the Rosedale KOZ/Ore Yard cleanup project and garner their input on the project. We maintain an informational page on the Johnstown Brownfield Project on our **website**. Project plans will be posted on our website, with the public afforded an opportunity to provide comment, and to receive a response to address any concerns. During the course of the project, status information on our Brownfield Cleanup Project will be discussed at City Council meetings, sessions of the Johnstown Partnership, and the Greater Johnstown Regional Partnership on an ongoing basis. Our designated public spokesperson will also provide updates through **public press announcements**. Creation of an administrative record will provide residents with access to remediation and reuse plans.

Throughout the project process, we will strive to make known any potential impacts on our sensitive populations through targeted charrettes, **involving Public Health officials and Senior Citizen and neighborhood groups**. The US Census 2000 states that only 1.2% of citizens in Johnstown "speak English less than well," with the largest segment (0.5%) of Indo-European descent, from our Eastern European Slovak heritage. Therefore, we will make our notifications in English, and obtain a Slovak translator if necessary.

4. The following is a list of community-based organizations involved in the Rosedale KOZ/Lower Ore Yard Cleanup Project:

Greater Johnstown Chamber of Commerce

An organization of business and industry representatives in Greater Johnstown committed to promoting business growth in the community

Robert F. Layo, Director (814) 536-5107

Johnstown Area Regional Industries

Local economic development agency providing assistance for business initiatives in the region

Linda R. Thomson, President (814) 535-8675

Community Foundation for the Alleghenies

Nonprofit public foundation that supports economic development and environmentally sustainable business initiatives in the region

Michael Kane, Director (814) 536-7741

Johnstown Regional Partnership

Association of local business and government entities that seek to promote the region through unification of community vision

Mark Pasquerilla, Chairman (814) 536-4441

Cambria County Planning Commission

County-wide agency that provides oversight on County Master Plan initiatives

Brad Beigay, Director (814) 472-2108

Keystone Economic Development Corporation

Nonprofit organization that provides job training, human resource services and low-income housing opportunities for the community

Allen P. Andrews, Sr., Director, (814) 535-6556

Greater Johnstown Watershed Association

Nonprofit focused on urban environmental concerns including rehabilitation of natural and historic resources and encourage economic development opportunities that are environmentally conscience

Mark W. Lazzari, Treasurer (814)536-6767

Cambria County Alliance of Business and Industry

An alliance of strategic economic development agencies that partner to promote priority economic development incentives in Cambria County

Kenneth Mesko, Coordinator (814) 472-7420

Johnstown Area Heritage Association

JAHA is committed to preserving Johnstown's history through its museum facilities, and acts as a catalyst for community development based on cultural tourism

Richard A. Burkert, Executive Director (814) 539-1889

Goodwill Industries

Providing job training assistance to enable citizens to seek work via an EPA Job Training Grant

Amy Noon (814)536-3637

Penn Highlands Community College

Cambria County community college that is providing courses for EPA Job Training Applicants

Lorraine Sylvia (814)532-5300

PA DEP

State environmental agency charged with the oversight of the Land Recycling Program

Tom Buchan (814) 472-1930

Discover Downtown Johnstown Partnership

A nonprofit dedicated to creating a thriving downtown

Lauren Lazzari, Economic Restructuring Committee Chair (814)533-7370

West End Citizens Improvement Committee

Neighborhood Group formed to address community issues in the West End of Johnstown

Marie Mock, Chairwoman (814) 539-0181

Alternative Community Resource Program

Nonprofit organization that offers family social service initiatives and assistance to at-risk youth

Frank Janakovic (814)536-5611

G. Reduction of Threats to Human Health and the Environment

1. With the receipt of EPA Brownfield funds for the Rosedale KOZ/Ore Yard, it will enable the Redevelopment Authority to perform a thorough site **cleanup** and prepare viable reuse plans. Since our ultimate goal is to make this abandoned land a functional environmentally friendly location for economic and recreational activities, it is imperative to **protect the health and safety** of future workers and visitors to the site, as well as of the surrounding communities. As the site was used for steel manufacturing and support facilities, past industrial practices included the use of many hazardous substances that may increase the risk for cancer. Our Phase II Assessment shows that the Rosedale/KOZ Ore Yard site is **contaminated with heavy metals**. Zinc, Iron, Vanadium, Arsenic, and Cadmium are **0 to 2 feet** below the surface in a concentrated area, approximately **1.7 acres**. As contamination exists at this surface level and shallow depths, dusts from the site are likely to become airborne and impact the adjacent neighborhood of Cambria City with a large population of elderly citizens. With 25% of our City's population over the age of 62, it is critical to **remove these hazards** that threaten the health of our elderly population. The airborne dusts also impact the workers at the adjacent Cambria Iron Works Complex, many of whom are working outdoors and have more exposure to the airborne metal-laden dusts. Without the empowerment provided by EPA funds, we will not have the capacity to **return the site to a healthy** and safe employment and recreation venue for the citizens of Johnstown.

With the cleanup of this site, we will also **improve the water quality** of the nearby Hinkston Run, which is currently impacted by the stormwater runoff that is emanating from the Rosedale KOZ/Lower Ore Yard site. The runoff from the site during rain events significantly reduces the water quality of the Hinkston Run. Our remedial activities will remove this impacted soil, and resultant site development will require **engineering controls** such as improved road access, new green building development, and reintroduced greenspace with clean fill. Engineering controls will be mandated in the developer's redevelopment plan and proposal, and will be monitored to ensure their integrity. Additional monitoring will be performed by the DEP. **Deed restrictions** regarding site usage will be **recorded** and passed along to the future site developer.

Further, our proposed cleanup of the site will remove the environmental threats that have depleted all **native species** and vegetation. Years of use as a steel support facility have left a significant impact on native vegetation. Restoration plans at the project site will ensure the reintroduction of native plantings

in selected **greenspace** areas in the complex that will be able to thrive with site remediation, through the removal of contaminated soils and introduction of clean soils.

2. It is incumbent upon our Brownfield Project team to **reduce or eliminate any existing risks** by actively addressing contaminants of concern. We intend to undertake cleanup activities utilizing valuable technical assistance from the PA Department of Environmental Protection and input from local and State Health Departments to ensure that all efforts adequately protect public health, reducing emissions, and **minimizing threats to adjacent neighborhoods**. We will research all available environmental and historic records and speak with former workers familiar with the site prior to initiating any disturbance of existing site conditions.

The site will be cleaned up to one of the acceptable levels provided through the PA DEP **Act 2** Program. Pursuant to the Act 2 Program, **cleanup** of the site is contingent upon the end use. Therefore, cleanup achieved at the recreation field will be more restrictive than cleanup levels at the industrial area. All cleanup processes will comply with the state program, and all documents will be available for public review and comment.

Reuse plans will be considered that minimize environmental impacts to our neighborhoods, including noise pollution or increased truck traffic through neighborhoods. The comments and input of our project partners, including the PA Department of Health, will enable the Redevelopment Authority to **ensure** that **public health** issues are **not compromised** in the redevelopment process. The citizens of Johnstown desire to live and work in healthy and convenient neighborhoods without sacrificing quality of life. The leaders of Johnstown have embraced the motto of “**Friendly, Safe, and Clean**” in their goal of revitalizing the City.

3. **Cleanup of the Rosedale KOZ/Ore Yard** site will remove all direct threats to human health and the environment by **eliminating contact and spread of the pollutants**. All cleanup activities will be undertaken to reduce or eliminate risks by actively addressing contaminants of concern. Criteria for remediation will also consider all impacts on the residents in the nearby community. Our formal workplan will be approved by the PA DEP, with **input from the EPA**. We will **monitor health conditions** during the cleanup process, identifying those that will be site appropriate.

In determining appropriate cleanup methods, we will avail ourselves of established new **innovative technologies to minimize impact** on the surrounding population, many of which are elderly. We will investigate the use of in-situ treatment, such as soil-washing or phytoremediation, which will eliminate the need to transport hazardous wastes through adjacent neighborhoods. The use of innovative technologies will allow the Redevelopment Authority to reduce the cost of cleanup and accelerate the cleanup schedule. Consequently, remediation technologies that minimize costs, shorten schedules, and/or positively affect other decision considerations (community acceptance, safety, logistics, etc.) will be prioritized.

Currently, the proposed site cleanup recommendation is the remediation of the area to a Site Specific Standard (PA Act 2 Program) utilizing a combination of soil removal/capping and the placement of institutional controls and infrastructure placement as a means of 100% **pathway elimination**. The estimated cost of remediation is \$240,000. However, all alternative viable cleanup plans will be compiled in our Alternative Brownfield Cleanup Analysis document, and will be made available for public review and comment.

H. Leveraging of Additional Resources

1. The Johnstown Redevelopment Authority has an impressive track record of leveraging funds to carry out the assessment, cleanup, and redevelopment of many brownfield sites in the Johnstown Community. At the **Cambria Iron Works**, EPA assessment and cleanup grants were **leveraged** with **\$7,406,000** of

State and Federal grants and private funds to restore four historic buildings, representing our 17 different funding sources. At the former Sani-Dairy site, EPA Assessment funds were leveraged with \$12.5 Million in State and Federal grants, which is the site of the new Greater Johnstown Regional High Tech Complex.

Therefore, the Redevelopment Authority will assure that the redevelopment of the Rosedale KOZ/Ore Yard site will come to fruition. Funds are in place to provide the necessary match to EPA funds to undertake cleanup activities. To facilitate infrastructure needs for access to the site (roads, utilities), we will seek PA DCED Infrastructure Development Funds and State Business in Our Sites Program funds. This will enable the **private developer** (Defense Contracting Firm) to invest over **\$5 Million** in constructing a new manufacturing and **assembly facility**, which will be located on a portion of the Rosedale KOZ/Ore Yard site. Also planned to be constructed is a Sports Related Complex, estimated at **\$2 Million** in private investment.

2. The Redevelopment Authority has significant expertise in leveraging funds to ensure full cleanup and redevelopment of **previous brownfield sites** that are now community and regional **success stories**. At the Johnstown High School Expansion Project, our agency secured \$385,000 from the PA Department of Community and Economic Development, used in conjunction with EPA Brownfield funds to assess and remediate the former industrial brownfield site that is now a **new \$40 million** state-of-the-art high **school campus**. At the Cambria Iron Works site, the Authority has received over \$7 million in grants, including recent awards from the PA DCED, the PA Historical and Museum Commission and the National Park Service, totaling over \$1,000,000, specifically to restore one building, the National Historic Landmark Blacksmith Shop, a recipient of EPA Cleanup funds.

At the **former Sani-Dairy** brownfield site, the Authority has received **\$4 million** from the Business In Our Sites PA DCED Program, **\$3 million** in Redevelopment Assistance Capital Program, and **\$750,000** in Housing and Redevelopment PA Assistance to undertake the new Greater Johnstown Regional Technology Complex, a **\$20 Million investment** in downtown Johnstown. The Regional Tech Complex is a major component in the City's economic diversification strategy.

For the cleanup of the Rosedale KOZ/Ore Yard site, the Authority will also pursue state funds that can help with site development costs, such as the PA DCED Business in Our Sites Program, or Infrastructure Development Program. The Authority **has successfully received grants** from these sources to undertake development of other City Brownfield sites.

I. Programmatic Capability

1. Established in 1949, the JRA has effectively and efficiently managed Federal, State, and local grants from a multitude of diverse sources. We are currently a recipient of an EPA Assessment Grant and Revolving Loan Cleanup funds and have provided all appropriate reporting requirements, contract information, and data. The Redevelopment Authority follows its approved Procurement Policy established in accordance with the provision of Office of Management and Budget Circular No. A-102, and applicable State and local law. All grant **management** and **procurement of services** will be handled in-house by experienced and skilled Redevelopment Authority staff.

The Johnstown Redevelopment Authority has had an **active Brownfield** program **since 1990**, with the environmental assessment, remediation, and reuse of the former Griffith-Custer Steel Building, the current home to Johnstown Welding and Fabrication, Inc., a now thriving welding and metal fabricating business that employs over 400 people. Another successful accomplishment, was the reuse of a former 60-acre U.S. Steel Plant in Johnstown, now known as the Johnstown Corporation. The former owner declared bankruptcy, leaving over 200 jobs in jeopardy. Through assessment activities conducted by the Redevelopment Authority, the entire 60-acre site received a Release of Liability through the PA Act 2

Program, enabling a private investor to purchase the steel foundry and keep it in operation. Over 200 **jobs** were **saved** at the foundry, and additional **jobs created** when outlying parcels within the project area were sold to private investors to create new businesses. Nearly \$19 million in **private investment** was created through this project, which was recognized as a **Showcase Site** by the PA DEP in 2000.

Another accomplishment is the assessment and cleanup of former industrial sites that were razed to construct the first new high school built in the City since the 1920's. EPA Pilot **funds** of \$50,000 were **leveraged** with a PA Industrial Sites Reuse Grant of \$200,000, and a School District contribution of \$75,000, to perform environmental assessments of the property. Remediation funds were received from the State and School District in the amount of \$185,000 to provide **necessary cleanup** activities to enable a \$40 million high school complex to be built. This project was featured as an **EPA Region 3 Success Story**.

The Authority is currently undertaking the complete remediation and restoration of three **National Historic Landmark buildings** formerly used in the iron and steel-making industry. The Machine Shop, dating from 1902, and the Carpenter Shop, built in the 1880's, have been assessed and remediated through a combination of EPA Assessment Grants and PA ISR Grants, totaling over \$500,000. Restoration of these massive, significant structures was accomplished through US EDA funds, US ARC funds, and PA DCED funds. The third building, the Blacksmith Shop, will be remediated and restored as an interpretive working blacksmith operation through EPA funds in conjunction with Department of Interior, PA DCED, and PA Historical and Museum Commission funds. The Cambria Iron Works Project was featured as a **Success Story by EPA Region 3**. The assessment and remediation via EPA funds of the Cambria Iron Electric Storage Building has led to the occupancy of the building by a light manufacturing company and fifteen jobs created. The **FolkFest** site has been assessed thanks to the EPA and now provides an **inner-city greenspace** for festivals. The **Sani-Dairy** inner-city brownfield, assessed via EPA funds, will become the home of Conemaugh Hospital's **Regional Technology Complex**. Over \$12 million of state grant funds have also been received on this **\$20 million project** that is projected to create over 600 jobs.

2. As stated above, the Authority is **currently managing** on EPA **assessment grant** and **cleanup revolving loan funds** with no adverse findings. We also have federal experience in administering a U.S. Department of Commerce Economic Development Administration Grant and an Appalachian Regional Commission Grant, as well as U.S. Department of Interior funds. The Authority is also a subrecipient of City of Johnstown CDBG entitlement funds from the U.S. Department of Housing and Urban Development. We have not received any adverse audit findings.
3. As a current recipient of Brownfield funding, we have provided all reports, including **timely** quarterly progress reports with detailed Brownfield reporting measures, annual financial reports, and MBE/WBE contractor utilization forms.

The Johnstown Redevelopment Authority has been the recipient of several EPA assistance grants, **beginning in 1998** with the receipt of a \$200,000 assessment demonstration pilot. All funds have been expended on assessment activities at the Greater Johnstown High School Project, the Sheesley Concrete Project, and on initial brownfield inventory efforts.

In 2002, the Authority was awarded \$200,000 in supplemental assistance for assessment of the Cambria Iron Works and the Folk Fest Park Greenspace. These assessments and cleanup activities have been **completed** and all funds have been exhausted.

In 2003, the Authority received \$200,000 for assessment of the Electric Storage Building, a vacant steel mill structure that has been targeted as priority sites for reuse. Assessment activities have been completed at the Electric Storage Building.

In 2004, the Authority was the recipient of a \$200,000 **assessment** grant for the Rosedale KOZ/Ore Yard site and other community priority brownfields, including the CSX Railyard Depot, and the former Sani-Dairy site, home of the future Conemaugh Hospital High Tech Complex. All funds have been expended.

A 2004 cleanup grant of \$200,000 was received to remediate the Electric Storage Building. All building remediation has been completed.

Also in 2004, the Authority received cleanup grants for the Cambria Iron Vacant Ground and the Blacksmith Shop. The \$200,000 Vacant Ground grant has been completed on remedial activities at the site. The Blacksmith Shop cleanup grant has also been expended on remediation activities at the property.

4. The Authority will track and measure progress of our Rosedale KOZ / Lower Ore Yard Project to assure timely completion of our project objectives. A **project task schedule** will be prepared, with anticipated dates of each project deliverable. Outputs such as community meetings and project work plans, and assessment reports will be required on a more regular basis, whereas other outputs will only be required once, such as Public Involvement Plan, establishment of **Administrative Record**, Alternative Brownfield Cleanup Analysis, Cleanup Plan Specifications, Health and Safety Plan, and at the end of the project, a Final Project Closeout Report.

Measured outcomes of the project will include the amount of public funds leveraged, the amount of private investment, the number of cleanup jobs leveraged, the number of redevelopment jobs leveraged, and the number of partnerships created to effectuate the project. All of the project data will be compiled for our Administrative Record for public review, and provided to the EPA.