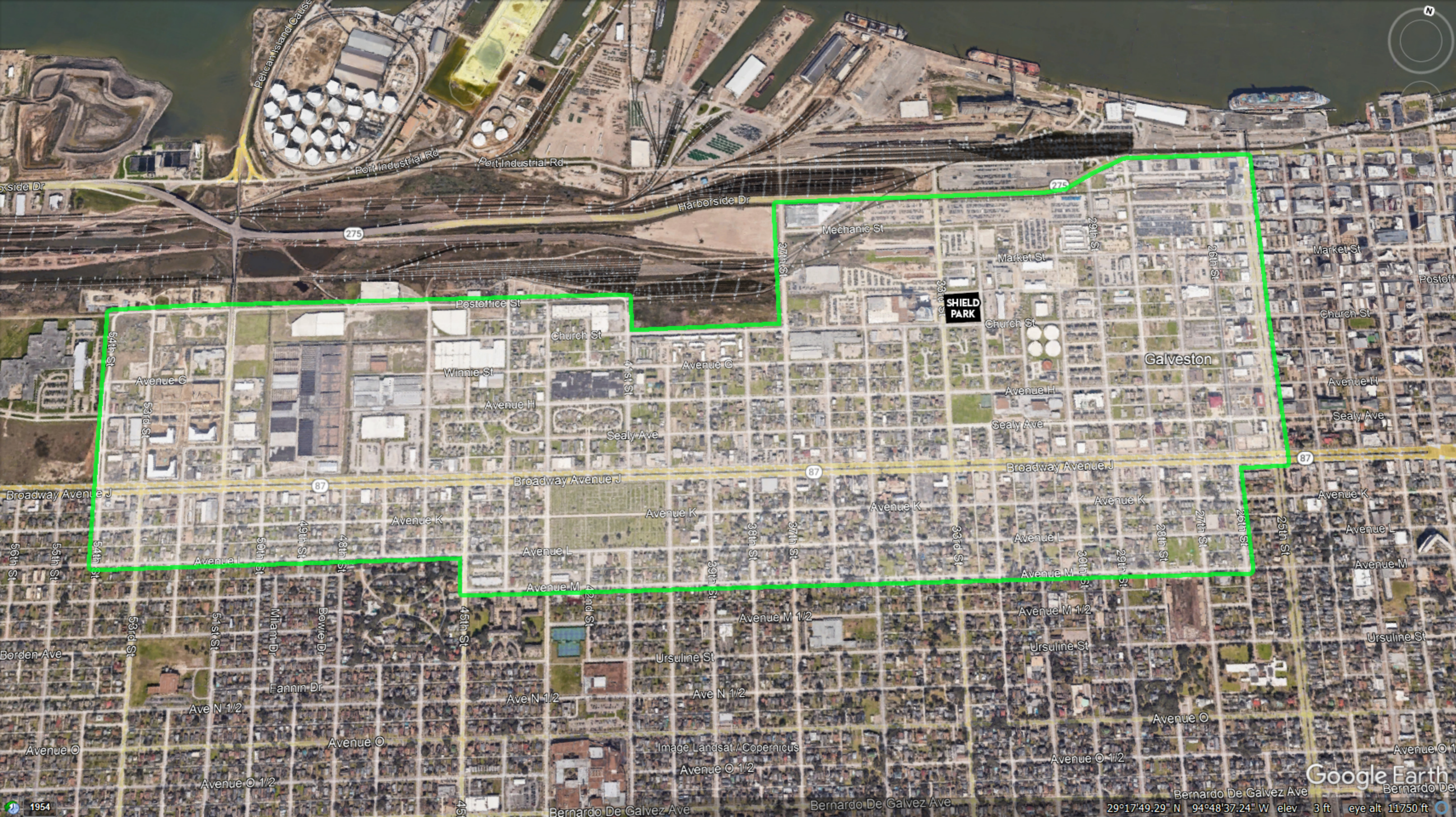




APPLICATION INFORMATION SHEET

R06-26-C-006

| | | |
|--|---|---|
| Applicant Identification | City of Galveston 823 Rosenberg Street Galveston, TX 77550 | |
| Website URL | https://www.galvestontx.gov | |
| Funding Requested | Grant Type: Single Site Cleanup | |
| | Federal Funds Requested: \$2,000,000 | |
| Location | Galveston, Galveston County, Texas | |
| Property Information | Shield Park 3228 Church St Galveston, TX, 77550 | |
| Contacts | Project Director | Chief Executive Officer |
| Name | [REDACTED] | [REDACTED] |
| Phone Number | [REDACTED] | [REDACTED] |
| Email Address | [REDACTED] | [REDACTED] |
| Mailing Address | [REDACTED] [REDACTED] | 823 Rosenberg Street Galveston, TX 77550 |
| Population | City of Galveston: 53,348 | |
| 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). | | N/A |
| The priority site(s) is in a federally designated flood plain. | | 2, 5 |
| The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | | 3, 4 |
| The reuse of the priority site(s) will incorporate energy efficiency measures. | | N/A |
| The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters. | | 3 |
| At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section 3.A.(2), for priority sites within the target areas. | | N/A |
| The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing. | | N/A |
| Releasing Copies of Applications | This application contains no confidential business information (CBI). All Point of Contact information may be considered sensitive and should be redacted for public release. | |



Petean Island Causeway

Port Industrial Rd

Port Industrial Rd

Harborside Dr

Mechanic St

Market St

29th St

26th St

Market St

Postoff

Postoffice St

Church St

SHIELD PARK

Church St

Galveston

Church St

Avenue G

Winnie St

Avenue C

Avenue H

Avenue H

Sealy Ave

Avenue H

Avenue H

Sealy Ave

Sealy Ave

Broadway Avenue J

87

Broadway Avenue J

87

Broadway Avenue J

Avenue K

Broadway Avenue J

Avenue K

Avenue K

Avenue K

Avenue K

Avenue L

Avenue M

Avenue L

Avenue L

Avenue K

Avenue K

Avenue L

Avenue M

Avenue M

Avenue M 1/2

Avenue M 1/2

Ursuline St

Ursuline St

Avenue M

Avenue M 1/2

Ursuline St

Ave N 1/2

Ave N 1/2

Avenue O

Avenue O

Avenue O

Image Landsat / Copernicus

Avenue O 1/2

Avenue O 1/2

Avenue O 1

Avenue O 1/2

Ave N 1/2

Fannin Dr

William Dr

Bowe Dr

49th St

48th St

50th St

51st St

53rd St

54th St

55th St

56th St

54th St

53rd St

54th St

55th St

56th St

54th St

55th St

56th St

54th St

55th St

56th St

54th St

55th St

56th St

54th St

55th St

56th St

45

Bernardo De Galvez Ave

Bernardo De Galvez Ave

Bernardo De Galvez Ave

Bernardo De

Google Earth

29°17'49.29" N 94°48'37.24" W elev 3 ft eye alt 11750 ft

1954



(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields | 1a. Overview of Brownfield Challenges and Description of Target Area: The City of Galveston (City) (pop. ~53,000) was founded in the early 1800s on a barrier island along the Texas Gulf Coast approximately fifty (50) miles southeast of Houston and quickly emerged as one of America’s most important port cities. Galveston’s early economy was driven by maritime trade, shipping, and warehousing, with the Port of Galveston serving as a key gateway for cotton, goods, and later industrial materials moving between Texas and global markets. By the late nineteenth and early twentieth centuries, Galveston had become a major commercial and industrial hub along the Gulf Coast, with rail connections, port facilities, gas plants, and storage operations fueling the regional economy. Although this industry was vital for fueling American prosperity, the concentration of industrial operations along the waterfront and interspersed within residential neighborhoods has created significant environmental and economic challenges, especially with waves of abandonment of these facilities over the past century coinciding with infrastructure damage from major hurricanes Carla (1961), Alicia (1983), Ike (2008), Harvey (2017), and Beryl (2024)—and relocation of industry inland to the Port of Houston.

The **Old Central and Carver Park (OCCP) neighborhoods**, the target area (TA) for this grant, bears the brunt of economic hardship, repeat property damage, and exposure to hazardous industrial contamination from abandoned properties. The OCCP is located near the Port of Galveston and associated industrial corridors along Broadway and Avenue K (approximately 1.87 miles long and between 0.45 and 0.75 miles wide). The TA is bound from 54th Street on the west to 25th Street on the east with the northern boundary following the Union Pacific Railroad right-of-way, Port Industrial Boulevard, and Wharf Road, transitioning into active port and industrial uses along the waterfront. The southern boundary generally follows Avenue M, Avenue L, and adjacent residential blocks near Ball High School and Morgan Elementary School. Historically, the OCCP was central to Galveston’s working waterfront and the growth of its port economy, housing generations of dockworkers, tradespeople, and families whose livelihoods were directly tied to maritime and industrial activity. Its streets, homes, and community institutions developed alongside ship channels, rail spurs, and industrial corridors. By the mid-20th century, industrial and commercial sites in the OCCP TA were abandoned or underutilized due to shifts in regional and global trade to larger ports such as Houston, recurring hurricane damage and flooding, mid-century industrial decline, and legacy contamination from decades of maritime and industrial operations. As a result, these brownfields have sat idle for decades and continue to limit economic growth and community revitalization along waterfront-adjacent neighborhoods. Today, OCCP residents, 31% of whom live below the poverty line (ESRI Demographics, 2025), live next to over 20 identified brownfields or active cleanup sites, and experience blight on almost every block, according to recent planning and inventory studies.

Galveston is a low-lying barrier island which intensifies brownfields challenges due to increasing risks from storm surge, sea level rise, flooding, and hurricanes. Brownfields located in flood-prone areas pose heightened concerns for residents and city officials because storm events can mobilize contaminants, accelerate structural deterioration, and increase exposure pathways. These conditions also raise cleanup costs, complicate site design, and make redevelopment infeasible without federal assistance, particularly in low-income neighborhoods (e.g. OCCP) where local resources are limited. However, community leaders and city officials are committed to overcoming these challenges to improve the quality of life for OCCP residents and connect them to emerging opportunities in tourism, the cruise ship industry, and Port expansion. Because of distressed economic conditions, low tax base, and urgent demands on the city’s operating budget for hurricane response, infrastructure upgrades, etc., the City lacks resources to cleanup environmental contamination. As such, the city is asking EPA to fund cleanup activities at Shield Park—which will eliminate a public health risk, create a much-needed community asset, and catalyze revitalization of the OCCP TA by attracting other investments into the area.

1b. Description of the Proposed Brownfield Site(s): Shield Park (Site) is a 1.79-acre¹ recreational park located at 3228 Church Street in Census Tract (CT) 7240 (pop. 3,484) in the OCCP TA. The Site is bound by Post Office

¹ Note – The Analysis of Brownfields Cleanup Alternatives (ABCA) report from 2024, included with this application, uses 2.87 acres to define the site. This number is an error. An official site survey confirms that the site is 1.79 acres in size.



Street (north), 33rd Street (west), Church Street (south), and 32nd Street (east), and is surrounded by a mix of commercial, municipal, and residential properties, including the former Falstaff Brewing Company, a municipal garage, Texas Gas Service, and nearby residential developments. The Site contains paved recreational areas, parking areas, and scattered green space, and is generally flat at approximately 6-7 feet above mean sea level. Historically, the northern portion of the Site stored manufactured gas plant (MGP) products in aboveground storage tanks (ASTs) from the mid-1880s through the 1950s, while the southern portion was used for industrial operations associated with nearby facilities. By the 1970s, Falstaff Brewing Company took over ownership of the larger industrial property and leased the Site to the City for use as a baseball field. The City took ownership of the Site in 1993 and developed it into Shield Park. The Site has since experienced accelerated decay of amenities and infrastructure due to extreme weather, which caused billions in damage throughout Galveston Island.

In alignment with City and community goals identified in various revitalization plans (Section 1.c), the City began plans to redevelopment Shield Park in 2021; however, those plans were stalled with the discovery of environmental contamination in soil and groundwater. Assessments conducted by Texas Commission on Environmental Quality (TCEQ) and EPA Region 6 from 2021-2025 found lead, total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs) in soil and/or groundwater above applicable regulatory standards. This discovery has not only created a significant financial burden for redevelopment; it has also restricted site use and caused concern for residents who have historically used the park. With no other parks available in the OCCP TA, residents have no access to outdoor recreation, perpetuating population conditions of poor physical and mental health (Section 2.b.) Further, the lack of progress to redevelop this hazardous Site signals to private developers or prospective new residents that the OCCP TA may not be a worthy investment. To make the property safe for unrestricted recreational use and to unlock funding to complete the revitalization of the park, EPA Cleanup funding is critical. The Analysis of Brownfields Cleanup Alternatives (ABCA) conducted by EPA Region 6 in 2024 and updated cleanup planning estimates by qualified environmental professionals (QEP) in 2026 confirmed that cleanup of the Site will surpass the City's budget for redevelopment. Without an EPA Cleanup Grant, the property will remain a public health risk for vulnerable populations (especially children) and continue to perpetuate blight and disinvestment.

Revitalization of the Target Area | 1c. Reuse Strategy and Alignment with Revitalization Plans: Reuse plans for Shield Park, documented in the *Green Galveston Plan* (2021), envision a flexible, welcoming neighborhood park that includes a new restroom facility, stage and event lawn, table games, upgraded basketball courts, shaded play and rest areas, and a historical monument to support recreation, programming, and community gathering. These reuse concepts were developed through an extensive, collaborative planning process that engaged hundreds of community members and stakeholders, including more than 200 residents who participated in an in-person community feedback event at Shield Park, along with broader island-wide engagement involving thousands of residents through surveys, digital tools, and outreach activities. The process also involved multiple City departments—including Parks and Recreation, Public Works, Planning, and Emergency Management—to align community preferences with recreation needs, stormwater management, flood mitigation, and broader neighborhood revitalization goals. Across these planning efforts, residents consistently emphasized the need for parks that promote physical activity, social connection, and environmental stewardship. Also, on June 5, 2025, Kansas State University's Technical Assistance to Brownfields (KSU TAB) program hosted a targeted community visioning session, providing additional local resident input specific to the Shield Park redevelopment.

The Shield Park project advances capital improvement and revitalization objectives identified in various local and regional planning studies and initiatives, including the *City of Galveston Comprehensive Plan* (2011), Vision Galveston's strategic framework and the *Green Galveston initiative* (current, 2026), and the *Galveston Assessment: Toward a More Just, Resilient, and Sustainable Future* (Texas Living Waters Project, 2023). Shield Park is located within a federally designated high-risk flood zone (FEMA Zone AE) and the *Galveston Assessment* identifies the OCCP TA as highly vulnerable to flooding, sea level rise, and legacy infrastructure challenges. The Assessment emphasized the need to preserve and enhance green space, implement nature-based stormwater



solutions, and prioritize community-serving investments to improve resilience and quality of life. **Shield Park's reuse strategy advances these recommendations through flood-adaptive design, bioswales, rain gardens, and community amenities that reduce environmental risk while strengthening neighborhood livability.**

1d. Outcomes and Benefits of Reuse Strategy: Shield Park will transform 1.79 acres by removing contamination, reducing blight, promoting healthy lifestyles, and catalyzing long-term economic growth nearby. **Economic Benefits:** The Trust for Public Land found that [local park and recreation agencies in the United States generated more than \\$201 billion in economic activity and supported nearly 1.1 million jobs, contributing over \\$63 billion in labor income through operations and capital spending in 2021](#). The Shield Park project is expected to result in similar economic outcomes, specifically by: (1) *Enabling Future Job Creation and Business Growth* by attracting investments (\$1M+ in nearby projects), visitations (100% increase), supporting local entrepreneurs and small businesses (~5 new businesses), and employment opportunities in park construction, maintenance, and programming (5+ new jobs); (2) *Informing Property Value Stabilization and Investment* by helping to stabilize and potentially increase nearby property values ([by 5-15%](#)) (EPA, 2026), encouraging investment and reducing blight; and (3) *Supporting Tourism* by creating an attractive setting for adjacent mixed-use or commercial projects seeking to capitalize on the steadily growing cruise ship industry. **Non-Economic Benefits:** The project will foster [shared, community-driven social and environmental outcomes](#) by: (1) *Eliminating Exposure to Hazardous Chemicals* by removing up to 3,000 tons of soil and the exposure pathway to deeper soil and groundwater contamination; (2) *Expanding Public and Recreational Green Space* by creating an accessible 1.79-acre park with play areas and flexible event lawns that support neighborhood connectivity, recreation, and healthier lifestyles; (3) *Enhancing Neighborhood Character and Livability* by strategically planning and co-designing to reduce blight, improve streetscapes, and strengthen overall community function; (4) *Promoting Social Cohesion* by engaging residents, local schools, and community organizations in planning and design to foster collaboration and a shared vision for the neighborhood; (5) *Supporting Workforce and Community Needs* by providing high-quality, public space, the park will serve families, essential workers, and vulnerable populations, reinforcing shared access and neighborhood stability (Kinder Institute, 2023); and (6) *Improve Resilience to Extreme Weather and Natural Disasters* through green stormwater management infrastructure, flood mitigation design, and expansion of shade-creating structures to offer residents respite from extreme heat. Further, the Park will utilize solar-powered lighting, low-carbon infrastructure, and sustainable landscape practices based on recommendations from the *Galveston Assessment* (Texas Living Waters Project, 2023).

Strategy for Leveraging Resources | 1e. Resources Needed for Site Characterization: The City of Galveston worked with TCEQ and EPA to complete site characterization and cleanup planning activities, including: Phase I Environmental Site Assessment (ESA) (June 2021), geophysical survey (August 2022), Phase II ESA (March 2023), ABCA (draft October 2024), and a Supplemental Phase II ESA (May 2025) to close data gaps. Additionally, in January 2026, qualified environmental professionals (QEPs) working with the City prepared an ABCA Modification Memo to update the remedial approach based on the 2025 Phase II. The Memo recommended that the City complete an estimated \$126,000 of assessment activities by June 15, 2026 to achieve sufficient site characterization for remediation. The City will enter the Site into the TCEQ Voluntary Cleanup Program (VCP) in January 2026 and affirms our commitment to the June 15th deadline. The City will leverage city funding described in Section 1g to complete assessment activities and TCEQ's Brownfields Program confirmed via email (dated January 27, 2026) that they will fund a supplemental Phase II assessment in early 2026.

1f. Resources Needed for Site Remediation: The EPA funding requested in this application will be enough to complete the remediation of Shield Park, including excavation/disposal of contaminated soils, installation of engineering controls, groundwater use restrictions, regulatory reporting, confirmatory sampling, and management tasks related to cleanup. No additional resources are needed.

1g. Resources Needed for Site Reuse: The total cost to cleanup and redevelop Shield Park is expected to be about \$3M based on preliminary designs and cost estimates—\$2M of which is needed for cleanup activities. The following table summarizes funding that has been committed to the Shield Park redevelopment.



| Source | Commitment & Use of Funding | Amount |
|---|--|---|
| City Industrial Development Corporation (IDC) | <i>Operating and Capital Budgets:</i> The City IDC has approved the accrual of \$100,000 annually from FY 2025 through FY 2028 (\$400,000 total), with an additional \$500,000 allocation in FY 2026, for a total planned investment of \$900,000 for Shield Park. These funds are needed to complete park improvements not funded through the EPA Cleanup Grant, including infrastructure, drainage, long-term stewardship and assessment activities (by June 15, 2026). | \$100,000/year x 4 years + \$500,000 = \$900,000 |
| Vision Galveston | A \$100,000 commitment will support design and community engagement, ensuring cleanup is promptly followed by implementation of amenities, site activation through programming, and return of the property to productive public use. | \$100,000 |

The above-referenced funding should be sufficient to complete park improvements; however, if additional resources are needed to enhance park features or protect against project overruns, the City and its partners are eligible to secure additional funding through (1) *Philanthropic and Nonprofit Organizations* like **The Trust for Public Land** and the **Moody Foundation**, (2) **Texas A&M University at Galveston**, which uses academic resources, graduate studios, and interns for landscape architecture, environmental planning, and community engagement support, (3) **KSU TAB** to support reuse planning and stakeholder engagement, and (4) *Volunteer and In-Kind Support* from partners like **Better Parks for Galveston** and **Vision Galveston** who can organize volunteer labor, in-kind materials, and community engagement support for park construction and activation.

1h. Use of Existing Infrastructure: Shield Park’s existing infrastructure is in poor condition and cannot be reused in its current form; however, consistent with the Green Galveston guiding principles and concept design for Shield Park, the project will leverage the existing park footprint and surrounding public infrastructure to implement targeted, resilient upgrades that improve access, safety, and ecological function. Planned improvements include rebuilding surrounding sidewalks to provide safe, ADA-accessible pedestrian connections, enhancing nearby bike infrastructure to support active transportation, upgrading electrical utilities to support lighting, irrigation, and future solar-powered amenities, and making minor water and utility upgrades to serve playgrounds, gathering areas, and community events. To address flooding and heat impacts identified in the Green Galveston framework, the project will incorporate nature-based stormwater management features such as rain gardens, bioswales, and permeable pavements, along with sustainable materials including recycled plastic playground surfacing, low-VOC and recycled-content site furnishings, and solar-powered lighting and irrigation controls. Together, these improvements embed green infrastructure and weather-responsive design strategies to ensure Shield Park functions as a safe, connected, and resilient community asset that enhances neighborhood livability.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need | 2a. The Community’s Need for Funding: Over the past decade, Galveston has experienced uneven economic conditions that limit the City’s ability to invest in environmental remediation. The OCCP TA has a small population (~4,200) and significantly lower income levels compared with the wider region. Current Census data show that Galveston’s citywide median household income is approximately \$57,800, and Galveston’s per capita income is about \$39,100, with a poverty rate of nearly 20%. By contrast, the OCCP neighborhoods have a lower median household income (~\$30,100) and per capita income (~\$20,000)—below the city average and well below Galveston County’s median household income of ~\$85,000 and per capita income of ~\$46,000. The TA experiences a poverty rate of 31%, more than two and a half times the County rate of 12%, underscoring the extent of economic distress within the community. Unemployment in the TA is higher than the city average. The city’s unemployment stands at 4.8% for individuals over the age of 16 versus 11.5% in the TA. Within the city, 9.5% of adults over the age of 25 do not have a high school diploma or GED versus 12.4% in the TA (ESRI Demographics, 2025). These socioeconomic conditions reduce personal and municipal tax revenues, narrowing funding options for environmental assessment and cleanup. Galveston’s economic constraints are amplified by over 70 years of frequent hurricanes, storm surge, and coastal flooding. Major events—Carla (**\$300 million in damage**), Alicia (~\$3 billion), Ike (**\$30 billion**), and Harvey (**\$125 billion**)—have caused recurring and costly impacts, highlighting the need for resilient land use and redevelopment strategies (NOAA, 2023; NOAA, 2025). As a result, limited local and philanthropic funds are consistently directed toward disaster recovery, infrastructure repair, and flood mitigation, leaving little capacity for proactive environmental assessment and site planning



(Texas General Land Office, 2021). Additionally, the City of Galveston's general fund is largely directed toward core services, tourism infrastructure, and resilience planning, leaving limited discretionary funding for site remediation in residential zones. Local nonprofit partners like the OCCP Neighborhood Associations and Better Parks for Galveston have no funding reserves to cover the full cost of redevelopment.

2b. Health or Welfare of Sensitive Populations: Sensitive populations in the TA include children in low-income households, seniors (65+) living in poverty, and residents with chronic health conditions or disabilities. The City of Galveston has a disproportionately high number of seniors (~23%) compared to the County (18%), State (15%), and Nation (19%). In CT 7240, where Shield Park is located, roughly 31% of households live below the federal poverty level, more than double the County average (12%), indicating elevated socioeconomic vulnerability (ESRI Demographics, 2025). Children in low-income households are more vulnerable to environmental exposures, including contaminated soil and air pollutants, and are at higher risk of asthma and other respiratory conditions (Francis, Lucine et al., 2018). Older adults and residents with pre-existing conditions may also be disproportionately affected. Site contaminants include lead, petroleum hydrocarbons, benzo(a)pyrene and other PAHs, VOCs such as benzene and naphthalene, and chromium, posing direct exposure risks through soil contact and ingestion, inhalation, and dermal contact, especially for older adults and those with chronic respiratory or cardiovascular conditions, residents with limited mobility, and those who spend extended time near the site. Chronic exposure to pollutants is linked to respiratory, neurological, and cancer risk (EPA, 2025).

The area around Shield Park also lacks other accessible parks or safe outdoor recreational spaces, limiting opportunities for regular physical activities and the associated mental health and stress-reducing benefits. Local data indicate a 36% obesity rate among residents, underscoring the consequences of limited access to recreational amenities (CDC Places, 2023). Research also links limited park access with lower physical activity, higher rates of obesity and chronic disease, and poorer mental health, disproportionately affecting low-income and environmentally burdened communities (Trust for Public Lands, 2023). This lack of park access amplifies existing health disparities among TA residents. Extreme heat further compounds public health risks. The *Green Galveston Plan* (2021) identifies the surrounding neighborhood as lacking tree canopy and shade, creating urban heat island effects that increase heat stress for seniors, children, and residents with cardiovascular or respiratory conditions. Limited access to cooling features and shaded public spaces exacerbates these risks (CDC, 2024). The CT is also in FEMA's 100-year floodplain and is designated as a high-risk flood zone (FEMA, 2024). Flooding can mobilize petroleum compounds, PAHs, and metals in site soils, increasing exposure through inhalation, skin contact, and incidental ingestion. In Galveston, projected sea level rise (3-8 feet by 2100) may further exacerbate contaminant transport (NASA, 2022). This poses substantial risk, as most of the CT is no more than 12 feet above sea level.

2c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: Chronic exposure to pollutants—including particulate matter, heavy metals, and VOCs—is linked to respiratory, neurological, and cardiovascular effects (EPA, 2025). Residents of CT 7240, where Shield Park is located, experience greater-than-normal incidence of chronic disease and adverse health conditions compared to county averages: asthma (10.1% vs. 9.8%), high blood pressure (40.9% vs. 35.7%), COPD (8.4% vs. 6%), heart disease (8.5% vs. 5.9%), diabetes (15.5% vs. 12.3%), obesity (36.3% vs. 34%), and stroke (4.5% vs. 3.3%) (CDC Places, 2023). These elevated rates are concentrated in a neighborhood with long-term exposure to legacy industrial sites, transportation corridors, port operations, petroleum facilities, and aging infrastructure. Citywide, 19% of households report a child with asthma symptoms and 49% of adults have hypertension (Nolen, LB et al., 2014). Asthma-related Emergency Department visits exceed 109,000 annually in Galveston County, with 8,500 hospitalizations, and lung cancer incidence is 59.2 per 100,000 (Texas Health and Human Services, 2024; Memorial Hermann, 2025). This grant addresses these elevated health burdens by eliminating direct contact and ingestion pathways to contaminants of concern (COCs) associated with chronic, critical, and carcinogenic effects. Exposure occurs only where direct contact or transport pathways exist, highlighting the critical need for site remediation to reduce disproportionate health risks in the community.



2d. Economically Impoverished/Disproportionately Impacted Populations: Shield Park is located in CT 7240, which has concentrated economic hardship and demographic characteristics that reflect disproportionate environmental and social burdens compared to surrounding areas (U.S. Census Bureau, 2023). In this CT, an estimated 31% of residents live below the federal poverty level—more than double the poverty rate in Galveston County (11.5%)—and the median household income is approximately \$38,000, substantially lower than the county (~\$85,300) and city (~\$57,800) (U.S. Census Bureau, 2023). These indicators show the TA is significantly more economically disadvantaged than broader geographies. Although CT 7240 is not currently designated as a federal Opportunity Zone (OZ), it has been identified as likely eligible for future OZ designation based on income, poverty, and distress indicators. Screening indicates that CT 7240 meets or closely aligns with statutory eligibility thresholds typically used to identify OZ-eligible tracts (Novogradac, 2026). Thus, CT 7240 residents experience conditions comparable to those in designated OZs—high poverty rates, low median household income, and long-standing disinvestment—without access to the same place-based investment incentives. Educational attainment in the CT lags behind both the city and county. Nearly 29.3% of residents over age 25 lack a high school diploma or GED, compared to 12.4% citywide and 9.5% countywide (U.S. Census Bureau, 2023). Lower educational attainment is linked to reduced access to higher-wage jobs, health literacy challenges, and limited economic mobility (OECD, 2025). These factors, combined with historic underinvestment, place residents at greater risk of experiencing negative consequences from industrial, municipal, and commercial activities, including exposure to environmental hazards, flood-prone infrastructure, and limited access to recreational and community resources.

Community Engagement | 2e. Project Involvement & 2f. Project Roles

| Org. & Point of Contact | Entity’s Mission & Role |
|---|---|
| TCEQ VCP [Redacted] | <i>Mission:</i> Encourage and facilitate the cleanup and redevelopment of contaminated properties by providing regulatory oversight, technical guidance, and liability protections. <i>Role:</i> Advise site cleanup and remediation plans to ensure activities meet state environmental standards. |
| Galveston City Council [Redacted] | <i>Mission:</i> Govern the city by establishing policy, setting strategic direction, and ensuring accountable administration to promote the well-being and quality of life of its residents. <i>Role:</i> Approve project actions, provide policy guidance, act as liaison to the target neighborhood. |
| Galveston Health District [Redacted] | <i>Mission:</i> Protect and promote the optimal health and well-being of all Galveston County residents through the comprehensive “One Health” strategy. <i>Role:</i> Advise on health risks, exposure mitigation plans, and public health outreach and education, especially to sensitive populations, and provide technical assistance to ensure compliance with public health standards. |
| Vision Galveston [Redacted] | <i>Mission:</i> Unite our collective voices of Galveston to transform big ideas into organized actions that make a difference in our community. <i>Role:</i> Coordinate co-design workshops, collect resident feedback, plan park activation and programming. |
| OCCP Neighborhood Association [Redacted] | <i>Mission:</i> Advocate for the interests, well-being, and quality of life of OCCP residents by promoting neighborhood revitalization, fostering resident engagement, and supporting improvements to public spaces and services. <i>Role:</i> Facilitate community input, advocate for neighborhood priorities, guide co-design workshops. |
| Better Parks for Galveston [Redacted] | <i>Mission:</i> Enhance local parks and recreational facilities through funding, volunteer support, and community partnerships to create greener, more accessible, and enjoyable public spaces for Galveston residents and visitors. <i>Role:</i> Fundraising, community engagement, technical assistance for park design and programming. |

2g. Incorporating Community Input: Community engagement, transparency, and meaningful partnerships with local stakeholders are central to the success of the cleanup and reuse of Shield Park. The City will maintain a dedicated project website to provide updates, post reports, and share other critical information with residents and stakeholders. A site-specific Community Involvement Plan (CIP) will outline opportunities to inform the public, solicit feedback, and ensure input is incorporated into project decisions. The project team will host quarterly in-person and virtual meetings during cleanup and redevelopment to provide updates and gather community input. Engagement will also occur “where the community is,” including local events, neighborhood gatherings, and school or civic meetings. Project partners (Section 2e/2f) with ties to the community will amplify outreach, engagement, and involvement by distributing information and ensuring resident feedback is communicated to the project team. Feedback will be accepted through multiple channels—including the project website, social media,



email, phone, newsletters, and comment forms. The City, consultants, and key partners will evaluate community input against project objectives, technical feasibility, and regulatory requirements. Responses to comments will be provided in writing and discussed in public meetings, and, where appropriate, project plans will be adjusted to reflect stakeholder priorities, including cleanup methods, park design features, and community amenities. This iterative process will ensure that community input directly informs decision-making. Communications and materials will be offered in English and Spanish, with virtual participation available via Zoom or livestreams.

(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3a. Proposed Cleanup Plan: As described in the 2024 ABCA, Soil Alternative #3 and Groundwater Alternative #2 were the most cost-effective strategies to protect human health and the environment while supporting the Site's reuse. The following cleanup plan breakdown is based on the 2024 ABCA, updated in 2026 by QEPs to incorporate 2025 Phase II data and current labor and disposal rates: (1) **Soil Excavation:** Removal of surface soil from 0-3 feet in areas where Contaminants of Concern (COCs) exceed applicable TCEQ standards for residential use or reuse features require surface level soil removal for construction (like bioswales and raingarden areas). (2) **Protective Barrier:** A direct contact barrier will be constructed over about 75% of the site (~58,511 square feet) and split between an earthen design and hardscape. The earthen barrier, covering an estimated 29,256 square feet (1,084 cubic yards - cy) of the Site, will be constructed with 12 inches of compacted clay soil topped with six inches of vegetated topsoil to prevent erosion. A geotextile membrane will be placed at the base of the barrier as a demarcation boundary to prevent penetration below the cap. The hardscape barrier, covering an estimated 29,256 square feet of the Site, will consist of concrete and/or asphalt at a thickness of at least two inches. This may include recreational features like basketball courts and walking paths or paved parking areas. Concrete and grass will need to be removed to construct the protective barrier. This will require the removal of an estimated 800 tons of concrete (32,800 square feet), including three basketball courts, two concrete pads, and two parking lots. (3) **Groundwater Restricted Use:** Groundwater exposure pathways will be controlled through a Municipal Setting Designation (MSD) ordinance from the City and MSD Certificate from TCEQ, which together prohibit groundwater withdrawal for potable use. (4) **Post-Closure Maintenance:** Soil and groundwater remediation will require post-closure maintenance and monitoring.

3b. Project Implementation – 3e. Outputs

| |
|---|
| Task 1: Project Management |
| <i>b. Project Implementation:</i> <u>EPA-Funded:</u> A dedicated City staff will manage grant requirements per the Cooperative Agreement (CA), including the Assessment, Cleanup and Redevelopment Exchange System (ACRES) reporting, competitive contractor procurement (2 CFR Part 200), quality assurance, budget, and schedule. Two City staff will attend one regional or national brownfields conference annually. A brownfields consultant will support compliance reporting and project management. <u>Non-EPA-Funded:</u> Other City departments will support with coordination and logistics. |
| <i>c. Anticipated Project Schedule:</i> Sept. 2026 – Dec. 2030 |
| <i>d. Task/Activity Lead:</i> City of Galveston |
| <i>e. Outputs:</i> 16 quarterly progress reports via ACRES; 4 annual compliance and Davis Bacon reports; and 1 final closeout report. |
| Task 2: Community Engagement |
| <i>b. Project Implementation:</i> <u>EPA-Funded:</u> The City will lead community outreach, including developing and updating a CIP; sharing updates via website and social media; preparing outreach materials; holding quarterly public meetings; and documenting/responding to community feedback to guide cleanup and institutional controls. Communications consultant(s) will support with public relations, engagement, translation, and outreach. |
| <i>c. Anticipated Project Schedule:</i> CIP developed within 3 months of award, updated annually. Website and initial outreach materials developed during the first quarter. Community meetings held quarterly throughout period of performance. |
| <i>d. Task/Activity Lead:</i> City of Galveston |
| <i>e. Outputs:</i> At least 16 outreach meetings with notices, agendas, presentations, sign-in sheets, and summaries; outreach materials, including fact sheets, handouts, and website/social media updates (translated, as needed); CIP with annual updates; summaries of community feedback and responses; and outreach documentation included in EPA quarterly reports. |
| Task 3: Cleanup Planning and Regulatory Compliance |
| <i>b. Project Implementation:</i> <u>EPA-Funded:</u> the QEP will support the development of the Remedial Action Plan (RAP), confirmatory groundwater sampling, the Quality Assurance Project Plan (QAPP), Health and Safety Plan (HSP), Sample |



Analysis Plan (SAP), MSD Ordinance and TCEQ Certificate, quarterly TCEQ status reports, TCEQ correspondence and miscellaneous reporting, and deed restriction recording. Planning will also include finalizing and obtaining EPA approval for the ABCA, Stormwater Pollution Prevention Plan (SWPPP), and other TCEQ-required reports. Funding supports remedial investigation to confirm excavation limits, finalize design specifications, and conduct groundwater monitoring before, during, and after cleanup. City staff will support QEP activities, including cleanup planning, regulatory oversight, consultant and TCEQ meetings, and document review. Non-EPA-Funded: QEP will coordinate with TCEQ under the VCP to prepare the Affected Property Assessment Report (APAR), a drinking water report, and install groundwater monitoring wells by June 15, 2026.

c. *Anticipated Project Schedule:* Sept. 2026 – Dec. 2030, with cleanup planning in the first 6-9 months

d. *Task/Activity Lead:* QEP (under City of Galveston oversight)

e. *Outputs:* Final ABCA; QAPP; HSP; SAP; APAR & RAP; SWPPP; drinking water report; 8 quarterly status; confirmatory groundwater sampling reports (est. 3); the MSD Ordinance and TCEQ Certificate; TCEQ correspondence and miscellaneous reports; deed restriction recording; and bid documents with procurement results.

Task 4: Cleanup & Post-Closure Activities

b. *Project Implementation:* EPA-Funded: The City will oversee cleanup and construction activities led by QEP, including site preparation/mobilization, excavation and off-site disposal of soils, groundwater management, health and safety measures, installation of protective barrier, backfill and grading, and stormwater measures, etc. QEP will complete Remedial Action Closure Report (RACR) and Post Closure Monitoring Report (PCMR) documenting remediation and post-closure activities.

c. *Anticipated Project Schedule:* Oct 2027 – Jan 2028 (10 weeks of construction), RACR (June 2029), PRMR (June 2030)

d. *Task/Activity Lead:* QEP (under City of Galveston oversight)

e. *Outputs:* Excavation and off-site disposal of up to 3,000 tons of contaminated soil, including waste manifests; installation of temporary fencing and site controls; installation of a geotextile barrier; and site restoration activities including soil placement, grading, and seeding. MSD application demonstrating no further action for groundwater, and an approved MSD ordinance from the City and TCEQ restricting groundwater use on site.

3f. Cost Estimates: The City of Galveston is requesting \$2 million in EPA funding to support the cleanup of Shield Park. Cost estimates are based on (1) local market rates for professional services; (2) contractual hourly rates reflecting the expertise required for activities such as regulatory reporting, cleanup oversight, and quality assurance; and (3) construction costs from the 2024 ABCA and 2026 ABCA Modification Memo. Administrative and grant management costs are limited to project- and grant-related oversight and do not exceed five percent (5%) of total EPA-requested funds.

| Budget Categories | | Project Tasks | | | | | Total |
|--------------------|-----------------|---------------|----------|-----------|-------------|-------------|-------------|
| | | Task 1 | Task 2 | Task 3 | Task 4 | Admin Costs | |
| Direct Costs | Personnel | \$18,432 | \$11,520 | \$12,288 | \$7,680 | \$60,000 | \$109,920 |
| | Fringe Benefits | \$9,400 | \$5,875 | \$6,267 | \$3,917 | \$30,600 | \$56,059 |
| | Travel | \$11,130 | \$0 | \$0 | \$0 | \$0 | \$11,130 |
| | Equipment | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| | Supplies | \$0 | \$5,000 | \$0 | \$2,356 | \$0 | \$7,356 |
| | Contractual | \$28,800 | \$28,800 | \$246,000 | \$160,000 | \$0 | \$463,600 |
| | Construction | \$0 | \$0 | \$0 | \$1,350,735 | \$0 | \$1,350,735 |
| | Other | \$1,200 | \$0 | \$0 | \$0 | \$0 | \$1,200 |
| Total Direct Costs | | \$68,962 | \$51,195 | \$264,555 | \$1,524,688 | \$90,600 | \$2,000,000 |
| Indirect Costs | | \$0 | 0 | \$0 | \$0 | \$0 | \$0 |
| Total Budget | | \$68,962 | \$51,195 | \$264,555 | \$1,524,688 | \$90,600 | \$2,000,000 |

Task 1: Project Management [Total Budget = \$68,962]

Personnel [\$18,432]: Estimated 288 hours (6 hours/month for 48 months) x \$64/hour for quarterly, annual, and financial reporting and coordination with regulatory agencies. **Fringe [\$9,400]:** 51% of personnel costs. **Travel [\$11,130]:** 2 staff to attend the National Brownfields Training Conference (2027 and 2029 anticipated) x \$3,710/year x 2 years = **\$7,420**. Costs are estimated at \$1,855/person/conference based on recent conference costs of approximately: \$750 airfare, \$480 hotel (4 nights x \$120/night), \$375 per diem (\$75/day x 5 days), and \$250 in ground transportation or other incidentals. In alternate years, participants may attend EPA workshops or regional conferences at approximately half the cost due to closer proximity and shorter duration (\$927.50/person x 2 people x 2 years = **\$3,710**). **Contractual [\$28,800]:** The City plans to hire a brownfields consultant for compliance reporting and project management support (4 hours/month x \$150/hour for 48 months). **Other [\$1,200]:** National



| |
|--|
| Conference registration for 2 City staff/year x \$300/person x 2 years, based on 2025 conference rates. Assumes EPA workshops and regional conferences have no registration fee. |
| Task 2: Community Engagement [Total Budget = \$51,195] |
| Personnel [\$11,520]: Estimated 192 hours (4 hours/month x 48 months) x \$64/hour for website management, social media, and outreach materials related to cleanup activities. Fringe [\$5,875]: 51% of personnel costs. Supplies [\$5,000]: Estimate \$1250/year x 4 years for public meeting supplies (e.g., pens, markers, ink, name tags, poster board). Contractual [\$28,800]: Communications consultant(s) for public relations, engagement, translation, and outreach (4 hours/month x \$150/hour x 48 months). |
| Task 3: Cleanup Planning and Regulatory Compliance [Total Budget = \$264,555] |
| Personnel [\$12,288]: Estimated 192 hours (4 hours/month for 48 months) x \$64/hour for cleanup planning, regulatory oversight, consultant/TCEQ meetings, and document review. Fringe [\$6,267]: 51% of personnel costs. Contractual [\$246,000]: Confirmatory Groundwater Sampling [\$8,000 x 4 events/yr x 2 yrs = \$64,000], MSD Ordinance and TCEQ Certificate [\$60,000], RAP [\$30,000], 8 quarterly TCEQ status reports [\$2,500/report x 8 quarters = \$20,000], TCEQ Correspondence & Misc. Reporting [\$50,000], Deed Restriction Recording [\$10,000], and QAPP/HSP/SAP [\$12,000]. |
| Task 4: Cleanup & Post-Closure Activities [Total Budget = \$1,524,688] |
| Personnel [\$7,680]: Estimated 96 hours (10 hours/month x 12 months) @ \$64/hour = \$7,680 for construction inspectors to oversee remediation activities and address City or community concerns. Fringe [\$3,917]: 51% of personnel costs. Supplies [\$2,356]: Supplies to support cleanup activities, including signs for the site, marker flags, sharpies, and personal protective equipment for city inspectors (disposable gloves). Contractual [\$160,000]: Cleanup oversight [10 weeks of construction x 40 hours/week x \$150/hour x 2 people = \$120,000, RACR [\$30,000], First PCMR [\$10,000]. Construction [\$1,350,735]: Based on estimates included in the ABCA and ABCA Update Memo, construction costs include Soil Removal (\$300,000), Protective Barrier Construction (\$705,588), Site Management (\$80,000), Plug and Abandon Wells [\$1,500/well x 10 = \$15,000]; 25% standard contingency on construction costs [\$1,085,588 x 0.25 = \$271,397]. |
| Admin Costs [Total Budget = \$90,600] |
| Personnel (\$60,000): \$1,250/month x 48 months for administrative staff support for financial tracking, reimbursement processing, audit coordination, and records retention. Fringe Benefits (\$30,600): 51% of personnel costs. |

3g. Plan to Measure and Evaluate Environmental Progress and Results: The City will implement a structured system to track, measure, and evaluate progress for all cleanup and outreach activities. Project staff will hold weekly internal meetings to monitor progress, track tasks, and resolve issues. Contractors, regulatory agency staff, and other partners will be invited as needed to provide technical updates on soil and groundwater remediation and ensure compliance with project plans. Regular meetings with TCEQ will review site conditions and coordinate regulatory oversight. Project management software will track milestones, tasks, and responsibilities, while the City’s finance and project management teams manage invoicing and EPA compliance. Monthly meetings with EPA staff will ensure reporting requirements, including ACRES updates, are met. Progress metrics will be shared with the public via quarterly community meetings, project website updates, and social media. Metrics include soil excavation and geotextile installation, cubic yards of soil removed, groundwater managed, stormwater compliance, park acreage created, funding leveraged and spent, community meetings held, participant numbers, public comments received, and follow-up actions. This approach ensures environmental progress, regulatory compliance, and community transparency are systematically tracked throughout cleanup and post-closure phases.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4a. Organizational Structure: The City has the systems, processes, procedures, and staff in place to effectively manage this EPA Cleanup Grant. As a municipality, the City qualifies as a “general purpose unit of local government” under 2 CFR 200.64 and is therefore eligible to receive EPA funds for brownfields cleanup. Annually, the City currently oversees approximately \$232 million in federal funding across various programs, demonstrating both the capacity and experience required to administer a federal grant efficiently and responsibly. Shield Park falls under the City’s Parks and Recreation Department, which will serve as the primary grant recipient and fiscal agent. The City will oversee all technical, administrative, and financial aspects of the grant, including contractor procurement and oversight, project management and scheduling, compliance with EPA reporting requirements, and financial management, invoicing, and documentation of expenditures.

4b. Description of Key Staff: The follow staff will implement grant administration, project management, and oversight to ensure timely completion of the project. **Megan Pierce**, Recreation, Events, & Projects



Administrator, City of Galveston (*Program Manager, 15+ years experience, BFA.*), will oversee the overall management of the project, including technical, administrative, and financial responsibilities. Megan has served the City of Galveston in multiple roles within the Parks and Recreation and Public Works Departments, currently overseeing the Recreation Division, approximately 60 annual special events, and numerous park projects and improvements. She serves on the City's Emergency Management Core Team and has extensive experience managing grants from the Texas Parks and Wildlife Department and FEMA disaster recovery reimbursements. **Barbara Sanderson**, Executive Director of Parks, Recreation and Community Outreach, City of Galveston (*Project Director, 34+ years experience, Texas Certified Public Manager*), will oversee the overall management of the project. She brings extensive experience leading community initiatives, having directed hundreds of projects and programs that have positively impacted thousands of residents across Galveston. **Tesa Wroblecki**, Director of Disaster Recovery & Grants, City of Galveston (*Grant Finance Manager, 30+ years experience, BS Emergency Administration & Planning*) will oversee the finance and administration of the grant. She brings extensive experience managing disaster recovery and grant programs for local government, ensuring sound financial oversight and compliance.

4c. Acquiring Additional Resources: The City has access to extensive resources to ensure project success, including technical and support staff, as well as community-based partners and local nonprofits, to assist with implementation activities. The City is prepared to fill project needs and responsibilities in the case of staff changes, which will eliminate project delays and ensure staff who are reassigned to the project have appropriate qualifications and experience. The City also strives to secure the best quality services through the most cost-effective means in accordance with all City policies and State and Federal Laws. The City routinely contracts with consultants and has established equal opportunity procedures to ensure a fair bidding process. Through the City's established procurement process, and in conformance with 2 CFR 200.317-200.326, the City will procure one or more consultants to support grant activities, including a QEP and qualified remediation contractor(s) to complete under multi-year contracts. The City has also been actively engaged with KSU TAB to support community engagement efforts, resource road mapping, community visioning, and general program advisory services to support grant administration and management.

4e. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Financial Assistance Agreements: (1) *Purpose and Accomplishments:* The City has a strong record of managing federal assistance agreements, demonstrating its capacity to implement complex, community-focused projects. Three recent examples illustrate this capability. Between 2009 and 2012, the City completed two HUD Hurricane Ike grants, including a \$4.3 million Municipal Incinerator removal and an \$860,000 soil remediation project, both managed by the City's Engineering and Construction departments with no regulatory findings. In 2023, the City began managing a \$43 million FEMA mitigation grant to construct a drainage pump station on 14th Street, overseeing all design, engineering, and construction internally. In 2024, the City received combined FEMA and HUD funding to construct a 7.5-million-gallon water storage tank (\$17 million total) and replace the 1894 Causeway waterline (\$18 million total), demonstrating experience managing complex, high-value projects that directly benefit the community. (2) *Compliance with Grant Requirements:* The City has consistently complied with workplans, schedules, and terms for all federal financial assistance agreements, submitting timely and accurate reports and demonstrating progress toward project objectives. All grants have been successfully managed with no findings, de-obligations, or non-compliance. Minor adjustments to maintain timelines or meet funding requirements were documented, communicated to awarding agencies, and successfully implemented to ensure project goals were achieved.



THRESHOLD CRITERIA RESPONSES

1. A statement of applicant eligibility if a city, county, State, or Tribe.

The City of Galveston, Texas, is an incorporated municipality and a political subdivision of the State of Texas. As a city government, the City of Galveston is an eligible applicant.

2. Documentation of applicant eligibility if other than a city, county, State, or Tribe; e.g., resolutions, statutes, Intertribal Consortium documentation, or documentation of 501(c)(3) tax-exempt status or qualified community development entity.

Not applicable. The City of Galveston is a city.

3. A statement of the applicant's 501(c)(4) tax-exempt status and, if applicable, legal opinion regarding lobbying activities.

Not applicable. As a city government, the City of Galveston is not organized under Section 501(c)(4) of the Internal Revenue.

4. Information on previously awarded Cleanup Grants.

The City of Galveston affirms that the proposed site has not received funding from any previously awarded U.S. EPA Brownfields Cleanup Grant.

5. Documentation of the available balance on an open Multipurpose Grant; or an affirmative statement that the applicant does not have an open Multipurpose Grant.

Not applicable. The City of Galveston does not have an open U.S. EPA Brownfields Multipurpose Grant.

6. Site ownership information.

The site that is the subject of this Cleanup Grant application, Shield Park, located at 3228 Church St, is owned in fee simple by the City of Galveston, Texas. The City holds legal title to the property through a recorded deed and is the sole owner of the site. The City of Galveston currently owns the site and will continue to retain ownership for the duration of the period in which Brownfields Cleanup Grant funds are disbursed.

7. Basic site information.

Shield Park. 3228 Church Street, Galveston, TX, 77550.

8. Status of history of contamination at the site.

(a) The site is contaminated by both hazardous substances, including lead, total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs) detected in soil and/or groundwater above regulatory standards for recreational use. Previous assessment reports indicated a potential presence of underground storage tanks (USTs) based on subsurface anomalies identified in the 2022 geophysical survey; however, subsequent data and report opinions from qualified environmental professionals (QEPs) concluded that these abnormalities were not likely USTs, rather they were related to historical aboveground storage tanks (ASTs) or associated piping. This determination supports the conclusion that the project is not subject to petroleum-only requirements.

(b) Historically, the northern portion of the site stored manufactured gas plant (MGP) products in aboveground storage tanks from the mid-1880s through the 1950s, and the southern portion supported industrial operations associated with nearby facilities. By the 1970s, the site was used as a baseball field. Between 1994 and 2005, it was developed into its current use as Shield Park, a 1.79-acre recreational park with paved recreational areas, parking, and scattered greenspaces.



(c) Chemicals of Concern (COCs) in soil and/or groundwater include lead, TPH, and/or benzo(a)pyrene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, benzene, ethylbenzene, m,p-xylene, naphthalene, o-xylene, styrene, toluene, and/or total xylenes (2024 ABCA).

(d) Contamination resulted from historical MGP operations and other industrial activities. Cleanup and/or risk mitigation is required to prevent direct human contact soil in the northeast and southeast corners of the Site where COCs exceeded the Texas Risk Reduction Program (TRRP) total-soil-combined ($TotSoil_{Comb}$) Protective Concentration Limit (PCL) in soil boring locations SB-02, SB-05, SB-06, SB-12, SB-14, SB-15, SB-17, SB-18, SB-20 and B-2. Groundwater collected for the May 2025 Supplemental Phase II ESA showing multiple COCs exceeded the Tier 1 groundwater-ingestion ($^{GW}GW_{Ing}$) and groundwater-to-air ($^{air}GW_{Inh-v}$) PCLs. The City has applied to the TCEQ VCP program and is committed to conducting additional assessment activities by June 15, 2026, to achieve sufficient site characterization for remediation to begin per TCEQ VCP approval. However, based on the 2024 ABCA and 2026 ABCA Modification Memo, sufficient characterization has been completed to determine the most appropriate remedial alternative. New assessment data will be used for regulatory reporting and to refine the remedial design.

9. An affirmative statement that the site meets the definition of a brownfield site.

The City of Galveston affirms that the proposed Shield Park site: (a) is not listed or proposed for listing on the National Priorities List (NPL); (b) is not subject to any unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) is not under the jurisdiction, custody, or control of the U.S. government. Therefore, the site meets the definition of a brownfield site under CERCLA § 101(39) and is eligible for funding under CERCLA § 104(k).

10. Description of the environmental assessment conducted at the site.

The City of Galveston worked with TCEQ and EPA to complete site characterization and cleanup planning activities, including: ASTM E1903-19 Phase I Environmental Site Assessment (ESA) (June 2021), geophysical survey (August 2022), Phase II ESA (March 2023), ABCA (draft October 2024), and a Supplemental Phase II ESA (May 2025) to close data gaps. Additionally, in January 2026, qualified environmental professionals (QEPs) working with the City prepared an ABCA Modification Memo to update the remedial approach based on the 2025 Phase II.

11. Information on whether the site(s) is required to be enrolled in the State or Tribal voluntary response program environmental site assessment performed to date is sufficient.

The City of Galveston will enter the Shield Park site into the Texas Commission on Environmental Quality (TCEQ) Voluntary Cleanup Program (VCP) in January 2026 (pending application acceptance) and has obtained a current letter from TCEQ specifically supporting the FY26 Brownfields Cleanup Grant application (Attachment C). The TCEQ letter affirms that: (a) the City has requested TCEQ oversight for the site; (b) the Shield Park site is eligible to be overseen by the TCEQ VCP; and (c) based on environmental site assessment activities completed to date, additional assessment is needed to sufficiently characterize the site for remediation to begin. The City further affirms that all necessary environmental site assessment activities will be completed by June 15, 2026, to ensure sufficient site characterization for remediation to begin, and that updated information will be submitted to TCEQ to request an updated oversight letter if necessary. The City acknowledges that failure to meet this requirement by June 15, 2026, may result in EPA not making the award. The attached TCEQ letter satisfies the requirement for a single oversight letter covering both eligibility and site characterization circumstances.

12. Information on enforcement or other actions or an affirmation that there are no enforcement or other actions.



The City of Galveston affirms that there are no known ongoing or anticipated environmental enforcement or other actions related to the Shield Park site for which Brownfields Cleanup Grant funding is being sought. There are no inquiries, orders, or liens from federal, State, or local government entities regarding the City's responsibility for contamination or hazardous substances at the site.

13. Property-specific determination information or an affirmative statement that a Property-specific determination is not required.

The City of Galveston affirms that the Shield Park site does not require a Property-Specific Determination to be eligible for FY26 Brownfields Cleanup Grant funding. The site is not subject to planned or ongoing CERCLA removal actions, administrative or court orders, RCRA corrective action requirements, TSCA remediation, LUST Trust Fund cleanup, or other conditions that would trigger the need for a Property-Specific Determination.

14. Property ownership eligibility information for hazardous substances sites, if applicable.

The City of Galveston acquired Shield Park by purchase from Falstaff Brewing Company on June 22, 1993 (thus, a publicly owned brownfield sites acquired prior to January 11, 2002). Prior to purchase, the City leased the property from Falstaff Brewing Company, beginning in 1970. The City has sole fee simple ownership of the property. To our knowledge, there were no familial, contractual, corporate, or financial relationships between the City and Falstaff Brewing Company beyond the lease and purchase. All disposal of hazardous substances at the site occurred before the City acquired the property. The City has not caused or contributed to any release of hazardous substances at the site. The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site. No formal inquiries into previous ownership, property uses, or environmental conditions were conducted prior to acquisition. As the acquisition occurred prior to January 11, 2002, BFPP-specific All Appropriate Inquiries (AAI) requirements under ASTM E1527-21 do not apply. Since leasing in 1970 and purchasing in 1993, the property has been used exclusively as a community park maintained by the City. The City will take reasonable steps to prevent or limit exposure to any hazardous substances, stop any continuing releases, and prevent any future releases. The City will comply with any land use restrictions, not impede institutional controls, assist and cooperate with cleanup efforts, provide access to authorized personnel, comply with all CERCLA information requests and subpoenas, and provide all legally required notices.

15. Property ownership eligibility information for petroleum sites, if applicable.

Not Applicable: Previous assessment reports indicated a potential presence of underground storage tanks (USTs) based on subsurface anomalies identified in the 2022 geophysical survey; however, subsequent data and report opinions from qualified environmental professionals (QEPs) concluded that these abnormalities were not likely USTs, rather they were related to historical aboveground storage tanks (ASTs) or associated piping. This determination supports the conclusion that the project is not subject to petroleum-only requirements.

16. Description of cleanup authority and oversight structure.

The City of Galveston will ensure that cleanup activities at the site comply with all applicable federal and State laws and protect human health and the environment. The City will submit an application to the Texas Commission on Environmental Quality (TCEQ) Voluntary Cleanup Program (VCP) in January 2026 to enroll the site in a State response program, ensuring oversight by the appropriate regulatory authority. Oversight will include coordination with State environmental personnel, review and approval of cleanup plans, and monitoring of site activities to ensure compliance with regulatory standards. The City will engage qualified environmental professionals, including licensed engineers and certified environmental specialists, to conduct, manage, and oversee all aspects of the cleanup, including remediation design, implementation, and confirmatory sampling. If access to adjacent or neighboring properties is necessary to conduct cleanup activities, perform confirmation sampling, or monitor offsite migration of contamination, the City will secure access through formal agreements with property owners, easements,



or temporary right-of-entry permits. Off-site investigations will start with access to city easements and public areas, including sidewalks and roads pending formal access to adjacent lots.

17. Community Notification documents.

The City of Galveston provided community notification of its intent to apply for an EPA Brownfields Cleanup Grant for Shield Park and offered the public an opportunity to comment on the draft application and draft ABCA. Notification went live on the City's website on January 14, 2026, and a screenshot of the webpage is attached as proof. The notification explained how to access the draft application and ABCA, how to submit comments, and the date, time, and format of the public meeting. The public comment period closed January 25, 2026, with responses posted January 26, 2026. Meeting notes, a summary of comments received, the City's responses, and the meeting sign-in sheet/participant list are included as attachments, demonstrating that all target community members were given the opportunity to review and comment on the draft application.

18. Discussion on contractors and named subrecipients; or an affirmative statement that a contractor has not been procured and a subrecipient has not been named.

At this time, the City of Galveston has not selected any contractors nor named any subrecipients for work funded under this EPA Brownfields Cleanup Grant. When contractors or subrecipients are procured or named in the future, the City will follow all applicable EPA competitive procurement and subaward requirements.

19. A copy of (or link to) the solicitation documents and the signed executed contract as applicable.

Not applicable. Not executed contracts to date.

Brooke T. Paup, *Chairwoman*
Catarina R. Gonzales, *Commissioner*
Tonya R. Miller, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 14, 2026

Megan Pierce
Recreation, Events, and Projects Administrator
City of Galveston
823 Rosenberg
Galveston, TX 77553

RE: City of Galveston's Application for a U.S. Environmental Protection Agency Brownfields Cleanup Grant for Shield Park Located at 3228 Church Street Galveston, TX 77550

Dear Ms. Pierce:

The Texas Commission on Environmental Quality (TCEQ) acknowledges that the City of Galveston, plans to conduct the cleanup of a brownfield site and is applying for an FY26 EPA Brownfields Cleanup Grant.

The City of Galveston has developed an application requesting site-specific federal Brownfields Cleanup funding for Shield Park located at 3228 Church Street Galveston, Texas 77550.

The Texas Commission on Environmental Quality (TCEQ) affirms that:

- i. The City of Galveston will request TCEQ oversight for the site;
- ii. The site is eligible to be overseen by the TCEQ Voluntary Cleanup Program; and
- iii. Additional assessment is needed to sufficiently characterize the site for the remediation work to begin. The City of Galveston plans to complete additional assessment work needed to sufficiently characterize the site by June 15, 2026.

For any questions regarding this letter, please contact Richard Scharlach at 512-239-1787 or email at Richard.Scharlach@tceq.texas.gov.

Sincerely,

A handwritten signature in blue ink that reads "Richard Scharlach".

Richard Scharlach, P.G., Team Leader
VCP Corrective Action Section
Remediation Division