APPLICANT INFORMATION SHEET

R07-26-C-007

1. **Applicant Identification:** City of Kansas City, Missouri
   414 E. 12th Street
   Kansas City, Missouri 64106

2. **Website URL:** https://www.kcmo.gov

3. **Funding Requested:**
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested $4,000,000

4. **Location:** a) City: Kansas City; b) County: Jackson County; c) State: Missouri

5. **Property Information:** Washington Wheatley Additional Vacant Lots Site
   (see attached map)

3020 E 19th Ter, Kansas City, MO 64127
3032 E 20th St, Kansas City, MO 64127
3310 E 20th St, Kansas City, MO 64127
3314 E 20th St, Kansas City, MO 64127
3330 E 20th St, Kansas City, MO 64127
2820 E 21st St, Kansas City, MO 64127
2906 E 21st St, Kansas City, MO 64127
2701 E 22nd St, Kansas City, MO 64127
2707 E 22nd St, Kansas City, MO 64127
2711 E 22nd St, Kansas City, MO 64127
3315 E 22nd St, Kansas City, MO 64127
3319 E 22nd St, Kansas City, MO 64127
3002 E 23rd St, Kansas City, MO 64127
3008 E 23rd St, Kansas City, MO 64127
3313 E 23rd St, Kansas City, MO 64127
3314 E 23rd St, Kansas City, MO 64127
3318 E 23rd St, Kansas City, MO 64127
3320 E 23rd St, Kansas City, MO 64127
2704 E 24th St, Kansas City, MO 64127
3201 E 24th St, Kansas City, MO 64127
3205 E 24th St, Kansas City, MO 64127
3207 E 24th St, Kansas City, MO 64127
3211 E 24th St, Kansas City, MO 64127
3215 E 24th St, Kansas City, MO 64127
3415 E 24th St, Kansas City, MO 64127
2623 E 24th Ter, Kansas City, MO 64127
3200 E 24th Ter, Kansas City, MO 64127
3202 E 24th Ter, Kansas City, MO 64127
3206 E 24th Ter, Kansas City, MO 64127
3208 E 24th Ter, Kansas City, MO 64127
3301 E 24th Ter, Kansas City, MO 64127
3303 E 24th Ter, Kansas City, MO 64127
3307 E 24th Ter, Kansas City, MO 64127
3517 E 24th Ter, Kansas City, MO 64127
2619 E 25th St, Kansas City, MO 64127
2701 E 25th St, Kansas City, MO 64127
2703 E 25th St, Kansas City, MO 64127
3201 E 25th St, Kansas City, MO 64127
3205 E 25th St, Kansas City, MO 64127
3214 E 25th St, Kansas City, MO 64127
3216 E 25th St, Kansas City, MO 64127
3220 E 25th St, Kansas City, MO 64127
3314 E 25th St, Kansas City, MO 64127
3316 E 25th St, Kansas City, MO 64127
2800 E 26th St, Kansas City, MO 64127
2802 E 26th St, Kansas City, MO 64127
2804 E 26th St, Kansas City, MO 64127
2806 E 26th St, Kansas City, MO 64127
2909 E 26th St, Kansas City, MO 64127
3200 E 26th St, Kansas City, MO 64127
3202 E 26th St, Kansas City, MO 64127
3206 E 26th St, Kansas City, MO 64127
3215 E 26th St, Kansas City, MO 64127
3224 E 26th St, Kansas City, MO 64127
3410 E 26th St, Kansas City, MO 64127
3508 E 26th St, Kansas City, MO 64127
2610 E 27th St, Kansas City, MO 64127
3706 E 27th St, Kansas City, MO 64127
2032 Agnes Ave, Kansas City, MO 64127
2034 Agnes Ave, Kansas City, MO 64127
2600 Agnes Ave, Kansas City, MO 64127
2602 Agnes Ave, Kansas City, MO 64127
2610 Agnes Ave, Kansas City, MO 64127
2632 Agnes Ave, Kansas City, MO 64127
2643 Agnes Ave, Kansas City, MO 64127
2440 Askew Ave, Kansas City, MO 64127
2442 Askew Ave, Kansas City, MO 64127
2450 Askew Ave, Kansas City, MO 64127

2531 Askew Ave, Kansas City, MO 64127
2605 Askew Ave, Kansas City, MO 64127
2623 Askew Ave, Kansas City, MO 64127
2634 Askew Ave, Kansas City, MO 64127
2409 Bales Ave, Kansas City, MO 64127
2411 Bales Ave, Kansas City, MO 64127
2417 Bales Ave, Kansas City, MO 64127
2500 Bales Ave, Kansas City, MO 64127
2506 Bales Ave, Kansas City, MO 64127
2540 Bales Ave, Kansas City, MO 64127
2542 Bales Ave, Kansas City, MO 64127
2544 Bales Ave, Kansas City, MO 64127
2606 Bales Ave, Kansas City, MO 64127
2611 Bales Ave, Kansas City, MO 64127
2327 Bellefontaine Ave, Kansas City, MO 64127
2536 Bellefontaine Ave, Kansas City, MO 64127
2630 Bellefontaine Ave, Kansas City, MO 64127
2000 Benton Blvd, Kansas City, MO 64127
2420 Benton Blvd, Kansas City, MO 64127
2424 Benton Blvd, Kansas City, MO 64127
2440 Benton Blvd, Kansas City, MO 64127
2446 Benton Blvd, Kansas City, MO 64127
2631 Benton Blvd, Kansas City, MO 64127
2400 Chestnut Ave, Kansas City, MO 64127
2404 Chestnut Ave, Kansas City, MO 64127
2406 Chestnut Ave, Kansas City, MO 64127
2408 Chestnut Ave, Kansas City, MO 64127
2410 Chestnut Ave, Kansas City, MO 64127
2414 Chestnut Ave, Kansas City, MO 64127
2450 Chestnut Ave, Kansas City, MO 64127
2452 Chestnut Ave, Kansas City, MO 64127
1911 College Ave, Kansas City, MO 64127
2117 College Ave, Kansas City, MO 64127
2201 College Ave, Kansas City, MO 64127
2215 College Ave, Kansas City, MO 64127
2307 College Ave, Kansas City, MO 64127
2401 College Ave, Kansas City, MO 64127
2424 College Ave, Kansas City, MO 64127
2426 College Ave, Kansas City, MO 64127
2500 College Ave, Kansas City, MO 64127
2502 College Ave, Kansas City, MO 64127
2012 Indiana Ave, Kansas City, MO 64127
2460 Indiana Ave, Kansas City, MO 64127
2610 Indiana Ave, Kansas City, MO 64127
2611 Indiana Ave, Kansas City, MO 64127
2613 Indiana Ave, Kansas City, MO 64127
2617 Indiana Ave, Kansas City, MO 64127
2617 A Indiana Ave, Kansas City, MO 64127
2619 Indiana Ave, Kansas City, MO 64127
2634 Indiana Ave, Kansas City, MO 64127
1818 Kansas Ave, Kansas City, MO 64127
2006 Kansas Ave, Kansas City, MO 64127
2014 Kansas Ave, Kansas City, MO 64127
2026 Kansas Ave, Kansas City, MO 64127
2635 Monroe Ave, Kansas City, MO 64127
2637 Monroe Ave, Kansas City, MO 64127
2109 Montgall Ave, Kansas City, MO 64127
2214 Montgall Ave, Kansas City, MO 64127
2408 Montgall Ave, Kansas City, MO 64127
2419 Montgall Ave, Kansas City, MO 64127
2428 Montgall Ave, Kansas City, MO 64127
2430 Montgall Ave, Kansas City, MO 64127
2505 Montgall Ave, Kansas City, MO 64127
2507 Montgall Ave, Kansas City, MO 64127
2516 Montgall Ave, Kansas City, MO 64127
2534 Montgall Ave, Kansas City, MO 64127
2538 Montgall Ave, Kansas City, MO 64127
2605 Montgall Ave, Kansas City, MO 64127
2607 Montgall Ave, Kansas City, MO 64127
2609 Montgall Ave, Kansas City, MO 64127
2612 Montgall Ave, Kansas City, MO 64127
2614 Montgall Ave, Kansas City, MO 64127
2616 Montgall Ave, Kansas City, MO 64127
2628 Montgall Ave, Kansas City, MO 64127
2638 Montgall Ave, Kansas City, MO 64127
3304 Moulton Ave, Kansas City, MO 64127
3310 Moulton Ave, Kansas City, MO 64127
1929 Prospect Ave, Kansas City, MO 64127
2125 Walrond Ave, Kansas City, MO 64127
2208 Walrond Ave, Kansas City, MO 64127
2214 Walrond Ave, Kansas City, MO 64127
2423 Walrond Ave, Kansas City, MO 64127
2445 Walrond Ave, Kansas City, MO 64127
2447 Walrond Ave, Kansas City, MO 64127
2449 Walrond Ave, Kansas City, MO 64127
2451 Walrond Ave, Kansas City, MO 64127
2453 Walrond Ave, Kansas City, MO 64127
2455 Walrond Ave, Kansas City, MO 64127
2463 Walrond Ave, Kansas City, MO 64127
2503 Walrond Ave, Kansas City, MO 64127
2533 Walrond Ave, Kansas City, MO 64127
2535 Walrond Ave, Kansas City, MO 64127
No Address, Kansas City, MO 64127
No Address, Kansas City, MO 64127

6. **Contacts:**

a. Project Director

Andrew Bracker, Brownfields Manager
Department of City Planning and Development
City of Kansas City, MO
414 E. 12th Street, 16th Floor
Kansas City, MO 64106
Phone: (816) 513-3002
Email: andrew.bracker@kcmo.org

b. Highest Ranking Elected Official:

Mayor Quinton D. Lucas
City of Kansas City, MO
414 E. 12th Street, 29th Floor
Kansas City, MO 64106
Phone: (816) 513-3500
Email: quinton.lucas@kcmo.org

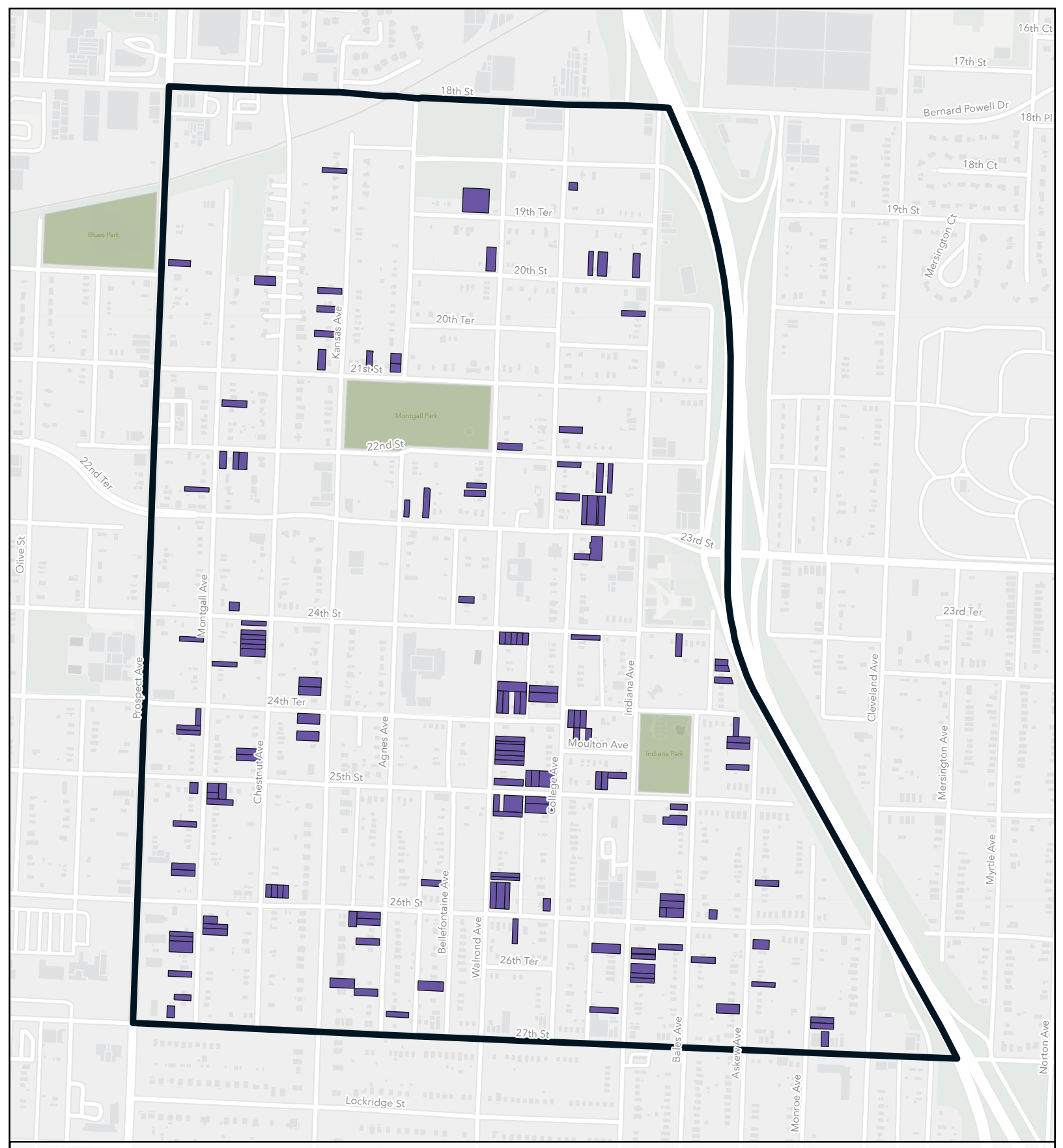
7. **Population:**

City of Kansas City, MO: 508,233

8. **Other Factors:**

Sample Format for Providing Information on the Other Factors	**Page #**
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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).	
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	2
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

9. **Releasing Copies of Applications:** Not Applicable.



Washington Wheatley Neighborhood Additional Vacant Lots Site

KANSAS CITY

0 250 500 1,000 Feet

N

EPA Grant Application Parcels

Neighborhood Boundary

APPLICATION NARRATIVE

(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

The Washington Wheatley Target Area is a mixed residential and light industrial neighborhood of 262 acres located three miles east of downtown Kansas City, Missouri. The neighborhood is overwhelmingly challenged by its **brownfield residential vacant lots.** Washington Wheatley was home to **11,697 residents** in 1940.[1] In the following decades, racial tensions, redlining, and block busting tactics caused the middle class to flee to suburban areas.[2] The construction of Interstate 70 in 1956 cut through the neighborhood's east side, subjecting residents to noise and pollution while further hastening the exit of those who had the means and opportunity to escape. As poverty increased, Washington Wheatley homes and businesses (many coated in lead paint) deteriorated. By 2022, **only 2,133**[3] neighborhood residents remained. Vacant structures piled up and led to mass demolitions. From 2003 to 2008, approximately **36% of all demolitions in Kansas City** occurred in Washington Wheatley.[4] Of the neighborhood's total properties in 2025, **43% are vacant**. The derelict buildings torn down left behind a toxic legacy. Three recent environmental assessments have identified widespread lead contamination. Among 217 lots tested, **60% exceed the federal screening level for lead in residential soil.** In addition, a former aluminum products manufacturer in Washington Wheatley contributed lead and other toxins to soil. Lead's many destructive outcomes are starkly evident in the neighborhood: poverty, poor health, violence and shortened life spans. Despite Kansas City's high demand for affordable housing, developers have avoided these lots, wary of lead, asbestos and buried foundations that may hide more contamination. Recent redevelopment efforts have stalled pending anticipated cleanup action. EPA funding will clean up dozens of vacant brownfields to attract new housing and other development, reduce the inventory of vacant land, and create safe places to live and grow the community.

b. Description of the Proposed Brownfield Site

The Washington Wheatley Additional Vacant Lots Site (Site) consists of 162 residential parcels distributed singly and in small clusters throughout the Target Area. The average lot size is 4,018 square feet (sf) and the total area is approximately 14.94 acres. Many lots contain illegal dumping and dense overgrowth. Phase I environmental site assessments (ESAs) in 2025 identified recognized environmental conditions (RECs) including lead-based paint (LBP), asbestos-containing materials (ACM); nearby industrial sites; and various historic automotive and drycleaner facilities. A Phase II ESA found **lead contamination on 48% of lots** above the EPA regional screening level (RSL) of 200 mg/kg and **a maximum concentration of 4,950 mg/kg**. Arsenic and polyaromatic hydrocarbons (PAHs) above state action levels were also identified. Historic Sanborn maps indicate that 160 lots contained former homes, and permit records suggest over 90% of those homes had basements. Experience with similar lots indicates a high probability that the basements remain buried on site. All structures were built prior to 1978, when ACM and LBP were commonly and legally used. Demolitions on approximately 122 lots occurred prior to 1998 city code provisions that require asbestos inspections, and may contain buried ACM, LBP and other hazardous wastes.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

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[1] Historic 1940 census records compiled by tracts by UMKC Urban Design Studio, 2008.
[2] Segregation in KC: How the school district helped create the Troost Divide, Martin City Telegraph, 7/19/20.
[3] 2018-2022 American Community Survey (ACS) 5-Year Estimates.
[4] Washington Wheatley Neighborhood Action Plan 2008 University of Missouri, Kansas City.

Based on area and neighborhood plans, the projected Site reuse is primarily mixed-income residential infill, with single and multi-family units in key locations, consistent with the existing character of the neighborhood. On major streets, reuse may include commercial or mixed uses, as permitted by zoning and supported by residents. The reuse strategy is the product of two recent planning efforts. The **Vacant Land Activation Initiative**, launched by the City Council in May 2025, is a comprehensive program to rethink, retool and coordinate efforts to address systemic land vacancy in Kansas City. Through surveys and meetings, community stakeholders, experts and city staff identified key barriers to reuse and proposed solutions. A strategic implementation plan is being developed with proposed policy changes and legislative actions. Plan elements include: identifying market conditions, developing a complete lot inventory, targeting acquisition and disposition areas, and maximizing funding opportunities through private and public partnerships. With neighborhood input and support, the Vacant Land Activation Initiative will be applied to Site properties as they become ready for reuse. The reuse strategy also aligns with the **Washington Wheatley Neighborhood Redevelopment Action Plan**. Developed in 2024 through workshops and meetings with residents, the plan focuses on barriers to infill development and assigns action items to overcome them. Where practicable, the reuse strategy will implement key plan recommendations including: 1) enhanced marketing of vacant lots to stimulate developer interest; 2) information about environmental clearances; 3) pre-approved building plans consistent with neighborhood design standards; 4) work to quiet land titles; and, 5) following the recent Prospect Corridor Equitable Transit Oriented Development Plan which is designed to promote density, community benefit, and economic activity within the ¼ mile "walkshed" of Prospect Ave. that forms the neighborhood's western boundary. Anchored by a bus rapid transit line with the city's highest ridership, the corridor plan embodies a clear blueprint and intent for future infill development.

d. Outcomes and Benefits of Reuse Strategy

Based on a strong response to a 2024 city request for proposals offering an initial group of vacant lots in Washington Wheatley, the sale and redevelopment of many Site properties is anticipated once they are determined to be clean and ready for reuse. Reuse is projected to have an impact of $24 to $32 million based on development of 125 lots, 0.75 to 1 housing units per lot, and an estimated value of $260,000 per unit. Assuming an occupancy of 2.12 per unit,[5] the project would add 200 to 265 residents, a 12% boost in population. Approximately 56 lots are within walking distance of three Prospect Ave. transit nodes. Infill near these nodes creates opportunities for new retail goods, services and employment. On lots not suited for immediate infill, green infrastructure, tree plantings, and urban agriculture uses will be pursued by applying Kansas City's **2014 Vacant Lot Task Force Recommendations**. Benefits include: 1) stormwater retention and reduced sewer overflow, 2) lower heat island effects, 3) improved property values, 4) enhanced climate resiliency, and 5) buffering of noise and pollution from state highway 71 on the neighborhood's eastern border.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

Funding has been identified for additional site assessment to fill data gaps and support cleanup decisions. Phase II ESA soil lead results on nine properties were slightly below the EPA Regional Screening Level (RSL) of 200 mg/kg. Retesting these properties using Incremental Sampling Methodology (ISM) will yield more definitive results. On another nine lots, hazardous

[5] Based on 2018-2022 ACS data for census blocks that comprise Washington Wheatley neighborhood.

substances were identified above action levels, and on 18 lots no data is available due to overgrowth. Total site characterization is estimated at $91,105, based on $2,115 per lot for ISM on 27 properties, $9,000 for clearing overgrowth, and $25,000 to assess other hazardous substances on nine lots. Identified resources include $788,757.70 in post-closure program income earned on Kansas City's closed RLF grant (No. BF-97700901), and uncommitted funds remaining in the Regional Coalition Assessment grant (No. BF-97782401), of which Kansas City is a non-lead member.

f. Resources Needed for Site Remediation

This project is designed to be completed with the $4 million of requested funds. City staff will help keep project costs within budget by working with neighborhood leaders and applicable planning documents to identify lots for green infrastructure, community agriculture, green space or other non-residential uses on a temporary or permanent basis. Of the 77 Site properties estimated to exceed the EPA RSL of 200 mg/kg, 23 are below the Missouri Risk-Based Target Level (RBTL) of 260 mg/kg and could be developed for many green uses without cleanup. In addition, Kansas City has identified the Target Area as a high priority and has dedicated $600,000 in Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD) in years 2024 and 2025 for slum and blight removal to directly support infill development of vacant lots in Washington Wheatley, and anticipates allocating more CDBG funds in 2026 and future years.[6] These CDBG funds can be used for additional cleanup, if needed.

g. Resources Needed for Site Reuse

CDBG funds committed to the Target Area (see Item (1)f., above) can also be used for infill development of Site properties, including: removal of structures and buried foundations, clearing title, and other pre-development costs. In addition, Kansas City offers grants and loans through the Central City Economic Development Sales Tax District[7], and the Kansas City Housing Trust Fund,[8] both of which support affordable housing and community development projects similar to those intended for Washington Wheatley. The neighborhood is located in an area eligible for both funds and developers of Site properties may apply to secure development funds for their projects.

h. Use of Existing Infrastructure

The project will reuse and improve the existing urban infrastructure grid serving the Target Area. Projects in excess of $5.7 million are planned or underway in Washington Wheatley to: fix sidewalks, replace water mains, resurface streets, install traffic calming features, improve parks, and restore historic monuments. This work will restore neighborhood infrastructure and help support infill development on Site properties. An unknown amount of additional infrastructure improvements will be needed for Site reuse. As infill needs are identified, funding for future improvements will be available through a 1% local sales tax that generates over $30 million annually for public infrastructure, and by water service fees and other city revenues.

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[6] In 2025, approximately $200,000 of CDBG funds were used for environmental assessment of another group of vacant lots in Washington Wheatley, leaving a balance of $400,000. Documents demonstrating the City's commitment of CDBG funds are attached to the Narrative.

[7] The Central City Economic Development District collects sales tax revenues to provide grants for economic development projects within a defined urban area that includes Washington Wheatley. For more information, see https://www.kcmo.gov/programs-initiatives/cced.

[8] The Kansas City Housing Trust Fund provides grants and loans for neighborhood revitalization, housing development, and preservation projects in accordance with the city's housing policy, with a focus on affordable housing. For more information, see: https://www.kcmo.gov/city-hall/housing/housing-trust-fund.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community's Need for Funding

Washington Wheatley has no significant resources for this cleanup project due to its small population and low income. The neighborhood association is a non-profit organization and lacks meaningful assets or revenue. The neighborhood cannot draw on other resources to fund cleanup or reuse of Site properties. The population of 2,133 cannot afford the tax levies that would be needed to create a neighborhood improvement district to fund the project.

b. Health or Welfare of Sensitive Populations

Children under five, a highly sensitive group for lead, make up 8.1% of Target Area residents. Women aged 15-49 who could be pregnant, another high risk group for lead, are 20.6% of the Target Area population. People over 65 years, who represent 13.4% of the Target Area population, are more sensitive to contamination and at further risk since **life-expectancy in the area is nearly 30 years lower than the City's maximum**.[9] Unhoused persons identified in the Target Area are vulnerable due to their chronic exposure to contaminants and environmental stressors. The grant will remove lead, arsenic, PAHs, and asbestos in the environment which threaten the health of these sensitive populations. The project will spur construction of new housing that eliminates the health risks of indoor lead dust and mold in older housing that impacts these vulnerable groups.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

The Target Area lies in a zip code (64127) which has the City's **highest number of lead-poisoned children under 6 years old** and the city's **6th highest lead poisoning rate (12.1%)**, nearly five times the national rate (2.5%).[10] In the census tract that includes the Target Area, **the asthma rate is 14.2%,**[11] compared to 9.4% in Missouri.[12] For the county in which the Target Area is located (Jackson), **the rate of myeloma is 53% higher for men and 40% higher for women** than for Missouri.[13] The grant will directly reduce the risk of child lead poisoning by removing lead from soils. The incidence of asthma cases will be reduced by building new housing.

d. Economically Impoverished/Disproportionately Impacted Populations

In Washington Wheatley, **the poverty rate is 21.8%, more than double** the 10.0% level of the Kansas City metropolitan statistical area. Lead contamination, found on over 60% of lots tested, is a significant contributing factor to this high rate of child lead poisoning. Lead in children under 6, even at levels below the blood lead reference level of 3.5 ug/dL set by the Centers for Disease Control and Prevention, has been linked by studies with lower IQ, school performance, and lifetime earnings, and increased risks of cardiovascular and neurodegenerative diseases, and criminal arrests as adults.[14] [15] Industrial operations in Washington Wheatley that released lead and other contaminants, commercial practices that sold lead in paints and gasoline without warnings, and government policies that allowed these operations and practices for decades, disproportionately

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[9] KC Community Health Assessment. https://storymaps.arcgis.com/stories/83947dae543e4e478b49e582dfe96c81.
[10] Ibid.
[11] Ibid.
[12] Asthma in Missouri 2021 fact sheet, Missouri Department of Health and Senior Services (DHSS).
[13] Missouri DHSS https://healthapps.dhss.mo.gov/MoPhims/MOPHIMSHome.
[14] Lead Poisoning, Lanphear et al., N Engl J Med 2024; 391:1621-1631.
[15] Association Of Prenatal and Childhood Blood Lead Concentrations With Criminal Arrests In Early Adulthood, Wright et al. Public Library of Science (PLOS) Medicine (2008).

impacted Target Area residents, as seen in their higher levels of poverty, lead poisoning and lower life-expectancies. The cleanup and reuse of Site properties will remove dangerous lead and other contaminants concentrated in Washington Wheatley. Site properties cleaned and ready for new homes will give future generations of children in this neighborhood the chance to reach their full potential, thus **breaking the cycle of lives damaged and shortened by lead poisoning.**

Community Engagement

e. Project Involvement & f. Project Roles

The following individuals and organizations will be involved in the proposed project.

Partner	Mission	Point of Contact	Project Roles
Washington Wheatley Neighborhood Assn.	Preserve neighborhood integrity by creating an equitable community	Kay White, President [redacted]	Input on cleanup and reuse; community liaison
Community Builders of Kansas City	Nonprofit urban core developer, transforming communities.	Emmet Pierson, CEO epierson@cb-kc.org	Development and project consultant
Seton Center	Social services (dental, food, rent, etc.) for families and seniors	Stacy Mayer, CEO stacy.mayer@setonkc.org	Resident and family support services
Economic Development Corporation of KC (EDC)	Promoting development, job creation and community investment	Daniel Moye, dmoye@edckc.com	Property tax abatement; incentives
KD Academy	24/7 childcare & learning center for alternative-shift workers	Myron McCant, [redacted]	Childcare/early learning services

The neighborhood association will be directly involved in shaping and approving Site reuse plans. Seton Center will work to meet the health and vital needs of current and future residents and will be available to host community meetings when renovations to its building are complete. Community Builders and EDC will assist Site developers with advice and incentives.

g. Incorporating Community Input

The City will communicate project progress to residents and community partners by: 1) providing brief, non-technical summaries of the project and work completed on a quarterly basis; 2) making in-depth materials and resources available to those who want a better understanding of the issues and options; 3) providing bilingual materials to those who need them; and, 4) utilizing the normal monthly neighborhood meeting times and places familiar to residents and partners. The City will provide a virtual hybrid meeting alternative for those who prefer not to attend in-person, and make recordings and meeting minutes available to those who cannot attend virtually.

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

a. Proposed Cleanup Plan

To align with the best available science on lead health risks, and enhance confidence in residential reuse options, a Site cleanup level of 200 mg/kg is proposed.[16] Based on Phase II ESA data, 68 properties (48% of those sampled) exceed this level and require cleanup. If the same percentage (48%) is applied to the 18 properties that could not be sampled due to overgrowth, 9 more lots will be cleaned up, for a total of 77. To facilitate efficient project management and oversight, the Site will be divided into four Operating Units (OUs) of 18 to 20 properties each and entered into the Missouri Brownfields Voluntary Cleanup Program (BVCP). Cleanup will be

[16] The Missouri Tier 1 Risk-Based Target Level for lead in residential soils is 260 ppm. The Missouri Department of Natural Resources (MDNR) has proposed a revised RBTL of 200 ppm. Although not yet in effect, MDNR has agreed to oversee Site cleanup to the proposed RBTL.

phased by OUs during the project period. A single Remedial Action Plan (RAP) approved by the BVCP will govern all Site properties. A Qualified Environmental Professional (QEP) and a geotechnical consultant will be hired in compliance with grant regulations to design the RAP and oversee excavation and backfill activities to ensure clean lots are ready for construction. Cleanup will remove contaminated surface soil to an average depth of 1 foot, and remove buried foundations and debris, which may include ACM and other hazardous wastes, to a further depth of up to 6 feet. Excavated materials will be sorted and managed as: (1) special waste containing lead, ACM, PAHs, etc. for disposal at a Subtitle D permitted landfill; (2) construction and demolition (C&D) waste for disposal at a C&D landfill; (3) concrete, limestone, etc. for on-site crushing and reuse to reduce landfill space consumption; (4) recoverable metals and architectural salvage for recycling; and, (5) municipal solid waste. Toxicity characteristic leaching procedure (TCLP) tests will be performed to verify that special wastes meet disposal facility criteria. Dust will be monitored and controlled with water spray. Air sampling will be performed for asbestos fibers and lead dust, as needed. Soil track-out will be controlled by decontaminating equipment and cleaning streets each workday.

Remediation activities will continue until confirmation samples verify that contaminants of concern meet Site cleanup levels and feasibly accessible buried debris is removed. Aggregate produced by on-site crushing will be used as backfill in accordance with the geotechnical consultant's specifications. Backfill will be tested to verify lead is below 100 ppm and compacted in lifts. Properties will be graded to 1' below surrounding grade, seeded and silt fencing installed in accordance with a Stormwater Pollution Prevention Plan and applicable permits. Site characterization will be completed by June 15, 2026 and may identify VOCs, PAHs or additional lead contamination that requires cleanup. The City has successfully implemented similar cleanup plans for the 63rd & Prospect Avenue Redevelopment Site and the Mattie Rhodes Art Center, both reported in the Assessment, Cleanup and Redevelopment Exchange System (ACRES).

Description of Tasks/Activities and Outputs

(Responses to Items (3)b. – (3)e. are presented in the table below)

Task 1: Community Engagement
b. Project Implementation • **EPA-funded activities:** 1. Develop Community Engagement Plan (CEP) 2. Host or attend quarterly public meetings at appropriate venues with virtual option. 3. Signage for 77 lots to inform residents of cleanup activities. 4. Progress reports, ACRES database, grant compliance, track outputs/outcomes. • **Non-EPA grant resources needed to carry out task/activity:** City staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
c. Anticipated Project Schedule (for EPA funded Activities Only): Begin quarterly public meetings 1st quarter (Q1). By end of Year 1 (Y1), develop and approve CEP plan. In Y2, Y3, and Y4 present progress and results of Site cleanup activities to community.
d. Task/Activity Lead: City of Kansas City is lead on Task 1.
e. Outputs: 16 public meetings; one CEP; 16 quarterly reports; 4 ACRES property profiles.
Task 2: Cleanup
b. Project Implementation • **EPA-funded activities:** 1. Mobilize equipment and secure areas for excavation, loading, crushing and stockpiling. 2. Excavate, transport and dispose of contaminated soils and C&D waste. 3. Sort, crush and reuse concrete, limestone, etc. to reduce landfill consumption and cost. 4. Control dust with water spray and prevent track-off by decontaminating tires and tracks.

5. Backfill with verified clean soils and crushed aggregate compacted in lifts. • **Non-EPA grant resources needed to carry out task/activity:** City staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
c. Anticipated Project Schedule (for EPA-funded Activities Only) Develop bid specifications by Y1-Q4. Bid cleanup Y2-Q1. Conduct phased cleanup (OU-1 to OU-4) over 18 mos. (Y2-Q2 to Y3-Q4). Closeout Y4-Q1.
d. Task/Activity Lead: City of Kansas City is lead on Task 2.
e. Outputs: 162 remediated and/or confirmed ready to reuse properties; approx. 15 acres.
Task 3: Design/Oversight
b. Project Implementation • **EPA-funded activities:** 1. Procure QEP, Enroll Site in Missouri Brownfields Voluntary Cleanup Program (BVCP). 2. Finalize RAP, develop Quality Assurance Project Plan, review work plans. 3. Air monitoring for asbestos, Pb; monitor excavation for ACM; TCLP tests for disposal. 4. Composite soil confirmation sampling to verify attainment of Site cleanup target levels. 5. Prepare closeout reports and liaison with BVCP on No Further Action letters. • **Non-EPA grant resources needed to carry out task/activity:** City staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
c. Anticipated Project Schedule (for EPA-funded Activities Only) Procure QEP in Y1-Q1. Enroll Site into BVCP by Y1-Q2. Bid specifications, final RAP and QAPP by Y1-Q4. Cleanup Oversight Y2-Q2 to Y3-Q4. OU Final reports, Y3 Q1-Q4. Facilitate No Further Action letters for OUs, Y3-Q2 to Y4-Q1.
d. Task/Activity Lead: City of Kansas City is lead on Task 3.
e. Outputs: One approved RAP; up to four NFA letters, one for each OU.
Task 4: Administrative Costs
b. Project Implementation • **EPA-funded activities for both Sites:** 1. Track and ensure compliance with grant terms and conditions. 2. Maintain financial management systems for grant activities and draw down grant funds. 3. Prepare modifications to budget, work plan, and cooperative agreement as needed. 4. Submit financial and closeout reports, other than final performance report. • **Non-EPA grant resources needed to carry out task/activity:** City staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
c. Anticipated Project Schedule: Y1-Q1 and continuing through end of term.
d. Task/Activity Lead: City of Kansas City is lead on Task 4.
e. Outputs: Four annual and one final financial report(s).

f. Cost Estimates *(rounded to nearest $)*

	Budget Categories	**Project Tasks ($)**				
		Task 1: Community Engagement	Task 2: Cleanup	Task 3: Design/ Oversight	Admin Costs	**Total**
Direct Costs	Personnel	9,304	121,750	57,418	20,170	**208,642**
	Fringe Benefits	4,351	56,832	26,455	8,940	**96,578**
	Travel	100				**100**
	Equipment					
	Supplies	2,872				**2,872**
	Contractual			323,950		**323,950**
	Construction		3,326,058			**3,326,058**

Other: VCP Fees, Ads	13,600		28,200		**41,800**
Total Direct Costs	30,227	3,504,640	436,023	29,110	**4,000,000**
Indirect Costs	0	0	0	0	0
Total Budget	**30,227**	**3,504,640**	**436,023**	**29,110**	**4,000,000**

Task 1, Community Engagement - $30,227

- **Personnel**: Brownfields Manager (BM) (plan/host meetings) 96 hrs[17] @ $52.61/hr = $5,051; Project Manager (PM) (progress updates, logistics) 96 hrs @ $35.65/hr = $3,422; Finance Manager (FM) (financial updates) 24 hrs @ $34.62/hr. = $831. Total = $9,304.
- **Fringe Benefit**s: (BM) 96 hrs @ $23.57hr = $2,263; (PM) 96 hrs @ $18.29/hr = $1,756; (FM) 24 hrs @ $13.85/hr. = $332. Total = $4,351.
- **Travel**: $100 for parking at meeting venues (if needed).
- **Supplies**: Signage for 77 lots @ $35/lot = $2,695 + meeting posters $177 = $2,872.
- **Other**: Ads, 4 meetings/yr x 4ys @ $425/ad x 2 local newspapers = $13,600.

Task 2, Cleanup - $3,504,640

- **Personnel**: (BM) (procurement, cleanup oversight, grant compliance) 768 hrs @ $52.61/hr = $40,404; (PM) (procurement, contract admin., project management) 1,536 hrs @ $35.65/hr = $54,758; (FM) (accounts payable, accounting & grant compliance) 768 hrs @ $34.62/hr. = $26,588. Total = $121,750.
- **Fringe Benefits**: (BM) 768 hrs @ $23.57/hr = $18,102; (PM) 1,536 hrs @ $18.29/hr = $28,093; (FM) 768 hrs @ $13.85/hr. = $10,637. Total = $56,832.
- **Construction**:
  - Part 1 - Soil remediation. 77 lots (see Section 3.a.) x 4,018 ave. square feet (sf)/lot x 1 foot (ft) depth = 309,386 cubic feet (cf) ÷ 27 cf/cubic yard (cy) = 11,458.74 cy x 1.4 tons/cy = 16,042.24 tons @ $108.81/ton (excavate, transport & disposal) = $1,745,556.
  - Part 2 - Basement removal. Est. 71 lots with basements (based on permit records); est. 53 basements with ACM (based on demolition dates); 53 lots x 144.44 ave. cy buried debris x 1.4 tons/cy = 10,717.45 tons @ $98.94/ton (ACM) = $1,060,384 Basement removal (no ACM): 18 lots x 144.44 cy x 1.4 tons/cy = 3,639.89 tons @ $83.88/ton (C&D) = $305,314. Subtotal = $1,365,698.
  - Part 3 – Backfill. 71 basements x 144.44 cy x 1.4 tons/cy = 14,357.34 tons to replace @ $31.88/ton (material, transport & placement of backfill) = $457,712.
  - Part 4 – Crushing. Stone and concrete reduced to minus 3" aggregate for on-site reuse as backfill. On-site crusher: 2 mos @ $35,000/mo + $5,000 mobilization = $75,000. Est. 25% of total basement excavation is crushed = 0.25 x 14,357.34 = 3,589.34 tons @ $26/ton (stockpile, crush, mix and place aggregate) = $93,323. Reduce disposal costs by 25% = 3,589.34 tons @ ($82.69/ton) (transport & disposal only) = ($296,803). Reduce backfill costs by 25% = 0.25 x $457,712 = ($114,428). Net savings: $75,000 + $93,323 + ($296,803) + ($114,428) = ($242,908).
  - Total Part 1 – 4 = $1,745,556 + $1,365,698 + $457,712 + ($242,908) = $3,326,058.

Task 3, Design/Oversight - $436,023

[17] Hours for Personnel and Fringe Benefits are estimated by task as whole or half hours per month over a 48 month grant period and are therefore expressed in multiples (or halves) of 48 (i.e., 1 hour per month).

- **Personnel**: (BM) (QEP/geotechnical services oversight, overall cleanup design) 768 hrs @ $52.61/hr = $40,404; Project Manager (contract & project management) 384 hrs @ $35.65/hr = $13,690. (FM) (accounts payable, accounting & grant compliance) 96 hrs @ $34.62/hr. = $3,324. Total = $57,418.
- **Fringe Benefits**: Coordinator 768 hrs @ $23.57/hr = $18,102; Project Manager 384 hrs @ $18.29/hr = $7,023; (FM) 96 hrs @ $13.85/hr. = $1,330. Total = $26,455.
- **Contractual**: QEP – 250 hrs/OU x 4 = 1,000 hrs @ $170/hr = $170,000; Confirmation sampling @ $1,000/lot x 77 lots = $77,000; Geotech consultant - 400 hrs @ $125/hr. = $50,000; Soil proctor tests for 77 lots @ $350/lot: $26,950. Total = $323,950.
- **Other**: BVCP - $200 enrollment fee + $7,000 oversight fees/OU x 4 = $28,200.

Task 4, Administrative Costs - $29,110

- **Personnel**: (BM) (work plan modifications, program management, grant closeout) 192 hrs @ $52.61/hr = $10,101; (PM) (training) 96 hrs @ $35.65/hr = $3,422; (FM) (draw downs, accounting, audits, training) 192 hrs @ $34.62/hr = $6,647. Total = $20,170.
- **Fringe Benefits**: (BM) 192 hrs @ $23.57/hr = $4,525; (PM) 96 hrs @ $18.29/hr = $1,756; 192 hrs @ $13.85/hr = $2,659. Total = $8,940.

Indirect Costs. Not Applicable.

g. <u>Plan to Measure and Evaluate Environmental Progress and Results</u>

Progress on outputs and outcomes will be tracked in quarterly reports and ACRES. Projects will be reviewed monthly by city staff and the QEP to identify and resolve any issues impeding performance. Outputs will be evaluated annually against work plan goals for the 4-year period.

Output	**Measure**	**Goal**
Community Meetings	Numbers of meeting minutes prepared	16 meeting notes
Land Cleaned	Acres of cleanups completed	Approx. 15 acres
Properties Ready for Reuse	Number of "No Further Action" Letters	77 letters

Outcome	**Measure**	**Goal**
Properties Sold to Developers	Number of properties sold	125 properties
Building Permits Issued	Number of permits issued	62 permits
Redevelopment Leveraged	Amount of Public/Private funds leveraged	$24,000,000

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. <u>Organizational Structure & b. Description of Key Staff:</u>

Grant funds and activities will be managed by three full-time staff members in the Brownfields Office within the Department of City Planning & Development. Brownfields Manager, Andrew Bracker, will oversee the Office to ensure all grant funds are appropriately spent, all work plan objectives are met, and compliance is verified with all grant terms and conditions. Mr. Bracker has 28 years of experience in this role and has successfully managed over $34 million of EPA Brownfields and other federal grants. Scott Levin, Brownfields Development Specialist, will manage cleanup and design tasks and contracts on a day-to-day basis. He has 29 years of professional environmental experience, including three years in project management, contract administration, and ACRES reporting for the Brownfields Office. Brownfields Grants/Financial Manager, Gregory Jones, has 30+ years of experience in federal grants administration and financial management, including 12 years with the Federal Emergency Management Agency. He will

provide grant accounting services and ensure compliance with all grant financial and administrative requirements. The city's financial system (Oracle PeopleSoft) will be used to appropriate, encumber and track grant funds, purchase orders, accounts payable/receivable, and fund draws.

c. Acquiring Additional Resources:

All contracts for this project will be obtained through the Procurement Division of the General Services Department (GSD) using the city's established competitive solicitation policies and procedures. No subawards will be made. The city will contract for Qualified Environmental Professional (QEP) and geotechnical consultant services to help design and oversee all site cleanup activities. For professional service contracts, the Brownfields Office will provide GSD a Request for Proposals including a scope of work and grant terms and conditions. For contractor cleanup services, the Brownfields Office and QEP will develop bid specifications consistent with the RAP and grant terms and conditions, and GSD will conduct a formal sealed bidding process. The Department of Civil Rights and Equal Opportunity will ensure compliance with applicable wage and 40 CFR Part 33 requirements. The "six good faith efforts" of Part 33 to offer opportunities to disadvantaged businesses will be employed and documented.

Past Performance and Accomplishments

d. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

City accomplishments under its current/most recent EPA Brownfield grants (No. BF-97782201 (Coalition RLF), No. 4B-9778101 (RLF), and No. 4B-97794401 (Community-wide Assessment)) include: nine sites assessed, three RLF loans closed, one site cleaned up (awaiting state "no further action" letter), one site redeveloped, $44,000,000 of redevelopment funds leveraged, and 25 jobs created. Not all of these outputs are reflected in ACRES. The City plans to update accomplishments in ACRES by the end of 2nd quarter 2026.

(2) Compliance with Grant Requirements

For open grants, substantial and timely progress has been made and reported towards meeting or exceeding most work plan goals, with the exception of a site-specific assessment grant (No. 4B-97794301) which was inactive for 18 months while EPA and HUD resolved an eligibility issue. All quarterly reports have been submitted when due or within an agreed time extension. Financial status and MBE/WBE reports have not always been submitted on time but have been submitted when requested. Corrective measures taken include hiring a Brownfields Development Specialist in 2023 and hiring a Grants/Financial Manager in 2026 to increase institutional capacity. In 2025, Kansas City was randomly selected by EPA for a limited scope review of Brownfields grants. In response to the review's findings, the City submitted a corrective action plan including: 1) procedures to document suspension and debarment verifications prior to awarding contracts; and, 2) enhanced internal controls to reconcile payroll entries for grant eligible staff costs on a monthly basis. Open grants include: 1) Community-Wide Assessment (4B-97794401), 10/1/22 to 9/30/26; 2) Site-Specific Assessment (4B-97794301), 10/1/22 to 9/30/26; 3) Coalition RLF (BF-97782201), 9/1/20 to 8/31/26; 4) Supplemental RLF (4B-97798101), 10/1/22 to 9/30/30; 5) Supplemental Coalition RLF (4B-97798201), 10/1/22 to 9/30/30; and 6) Cleanup (4B-96723101), 10/1/25 – 9/30/29. Funds remain on all open grants, which funds the City plans to expend by: 1) completing loans, subgrants and assessments under commitments to existing projects; 2) finalizing anticipated commitments to pipeline projects that have requested assistance; and, 3) eligible programmatic and administrative expenses. Total unspent funds on 17 closed grants = $128,489 out of $9,173,826 awarded. $109,998 unspent ARRA RLF funds were due to a lack of eligible petroleum projects.

THRESHOLD CRITERIA RESPONSES

Item 1 – Applicant Eligibility

Item 2 – Previously Awarded Cleanup Grants

Item 3 – Expenditure of Existing Multipurpose Grant Funds

Item 4 – Site Ownership

Item 5 – Basic Site Information

Item 6 – Status of History of Contamination at the Sites

Item 7 – Brownfield Site Definition

Item 8 – Environmental Assessment Required for Cleanup Grant Applications

Item 9 – Site Characterization

Item 10 – Enforcement or Other Actions

Item 11 – Sites Requiring a Property-Specific Determination

Item 12 – Threshold Criteria Related to CERCLA/Petroleum Liability

Item 13 – Cleanup Authority and Oversight Structure

Item 14 – Community Notification

Item 15 – Contractors and Named Subrecipients

ITEM 1

(1) Applicant Eligibility

a. Applicant Type and Information on Eligibility

The City of Kansas City, Missouri (Kansas City), as applicant, is a general purpose unit of local government and thus is an eligible entity for a Brownfields Cleanup Grant.

b. 501(c)(4) Tax Exempt Organization

Kansas City is not an organization exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code (IRC).

ITEM 2

(2) Previously Awarded Cleanup Grant

Kansas City affirms that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

ITEM 3

(3) Expenditure of Existing Multipurpose Grant Funds

Kansas City currently does not have an open EPA Brownfields Multipurpose Grant.

ITEM 4

(4) Site Ownership

The applicant, Kansas City, is the current owner of all 162 properties that comprise the Washington Wheatley Additional Vacant Lots Site (Site). Kansas City owns the subject properties through its instrumentality, the Land Bank of Kansas City, Missouri (Land Bank), an entity funded, staffed and governed by Kansas City for the purpose of managing and disposing of tax foreclosed properties that are not sold at public sale.

ITEM 5

(5) Basic Site Information

Presented on the following page is a table of the properties which comprise the Washington Wheatley Additional Vacant Lots Site (Site). All 162 properties listed are located in Kansas City, MO 64127.

Numbers 1 through 165 were assigned to properties by the Phase II ESA (Toeroek, July 2025). Appendix A to the Phase II ESA report presents summaries of identified conditions organized by assigned number. Continuity with this numbering system will facilitate coordination of subsequent site characterization and remediation activities for each property. The list intentionally omits numbers 73, 93 and 112 which correspond to three properties sold by Land Bank to private individuals. These properties are therefore not eligible for the Brownfield cleanup grant, and are therefore excluded from the Site for this application.

#	ADDRESS	#	ADDRESS	#	ADDRESS	#	ADDRESS
1	3020 E 19th Ter	42	3220 E 25th St	84	2327 Bellefontaine Ave	127	2637 Monroe Ave
2	3032 E 20th St	43	3314 E 25th St	85	2536 Bellefontaine Ave	128	2109 Montgall Ave
3	3310 E 20th St	44	3316 E 25th St	86	2630 Bellefontaine Ave	129	2214 Montgall Ave
4	3314 E 20th St	45	2800 E 26th St	87	2000 Benton Blvd	130	2408 Montgall Ave
5	3330 E 20th St	46	2802 E 26th St	88	2420 Benton Blvd	131	2419 Montgall Ave
6	2820 E 21st St	47	2804 E 26th St	89	2424 Benton Blvd	132	2428 Montgall Ave
7	2906 E 21st St	48	2806 E 26th St	90	2440 Benton Blvd	133	2430 Montgall Ave
8	2701 E 22nd St	49	2909 E 26th St	91	2446 Benton Blvd	134	2505 Montgall Ave
9	2707 E 22nd St	50	3200 E 26th St	92	2631 Benton Blvd	135	2507 Montgall Ave
10	2711 E 22nd St	51	3202 E 26th St	94	2400 Chestnut Ave	136	2516 Montgall Ave
11	3315 E 22nd St	52	3206 E 26th St	95	2404 Chestnut Ave	137	2534 Montgall Ave
12	3319 E 22nd St	53	3215 E 26th St	96	2406 Chestnut Ave	138	2538 Montgall Ave
13	3002 E 23rd St	54	3224 E 26th St	97	2408 Chestnut Ave	139	2605 Montgall Ave
14	3008 E 23rd St	55	3410 E 26th St	98	2410 Chestnut Ave	140	2607 Montgall Ave
15	3313 E 23rd St	56	3508 E 26th St	99	2414 Chestnut Ave	141	2609 Montgall Ave
16	3314 E 23rd St	57	2610 E 27th St	100	2450 Chestnut Ave	142	2612 Montgall Ave
17	3318 E 23rd St	58	3706 E 27th St	101	2452 Chestnut Ave	143	2614 Montgall Ave
18	3320 E 23rd St	59	2032 Agnes Ave	102	1911 College Ave	144	2616 Montgall Ave
19	2704 E 24th St	60	2034 Agnes Ave	103	2117 College Ave	145	2628 Montgall Ave
20	3201 E 24th St	61	2600 Agnes Ave	104	2201 College Ave	146	2638 Montgall Ave
21	3205 E 24th St	62	2602 Agnes Ave	105	2215 College Ave	147	3304 Moulton Ave
22	3207 E 24th St	63	2610 Agnes Ave	106	2307 College Ave	148	3310 Moulton Ave
23	3211 E 24th St	64	2632 Agnes Ave	107	2401 College Ave	149	1929 Prospect Ave
24	3215 E 24th St	65	2643 Agnes Ave	108	2424 College Ave	150	2125 Walrond Ave
25	3415 E 24th St	66	2440 Askew Ave	109	2426 College Ave	151	2208 Walrond Ave
26	2623 E 24th Ter	67	2442 Askew Ave	110	2500 College Ave	152	2214 Walrond Ave
27	3200 E 24th Ter	68	2450 Askew Ave	111	2502 College Ave	153	2423 Walrond Ave
28	3202 E 24th Ter	69	2531 Askew Ave	113	2012 Indiana Ave	154	2445 Walrond Ave
29	3206 E 24th Ter	70	2605 Askew Ave	114	2460 Indiana Ave	155	2447 Walrond Ave
30	3208 E 24th Ter	71	2623 Askew Ave	115	2610 Indiana Ave	156	2449 Walrond Ave
31	3301 E 24th Ter	72	2634 Askew Ave	116	2611 Indiana Ave	157	2451 Walrond Ave
32	3303 E 24th Ter	74	2409 Bales Ave	117	2613 Indiana Ave	158	2453 Walrond Ave
33	3307 E 24th Ter	75	2411 Bales Ave	118	2617 Indiana Ave	159	2455 Walrond Ave
34	3517 E 24th Ter	76	2417 Bales Ave	119	2617 A Indiana Ave	160	2463 Walrond Ave
35	2619 E 25th St	77	2500 Bales Ave	120	2619 Indiana Ave	161	2503 Walrond Ave
36	2701 E 25th St	78	2506 Bales Ave	121	2634 Indiana Ave	162	2533 Walrond Ave
37	2703 E 25th St	79	2540 Bales Ave	122	1818 Kansas Ave	163	2535 Walrond Ave
38	3201 E 25th St	80	2542 Bales Ave	123	2006 Kansas Ave	164	No Address
39	3205 E 25th St	81	2544 Bales Ave	124	2014 Kansas Ave	165	No Address
40	3214 E 25th St	82	2606 Bales Ave	125	2026 Kansas Ave		
41	3216 E 25th St	83	2611 Bales Ave	126	2635 Monroe Ave		

ITEM 6

(6) Status of History of Contamination at the Site

a) Type of Contamination

The Washington Wheatley Additional Vacant Lots Site (Site) is contaminated by primarily by hazardous substances. Petroleum contaminants have been identified below applicable federal and state screening levels.

b) Operational History and Current Use(s) of the Site

The following information is based on a Phase I environmental site assessment (ESA) prepared by Toeroek dated 7/2/2025.

Starting in 1896, most of the Site properties were developed as residential and the remainder were vacant land. Additional residential dwellings were added to the Site by 1909. All subject properties have been used as residential properties since at least 1936, with the following exceptions noted in a review of Sanborn fire insurance maps of the area:

3706 East 27th Street - laundry and storefront (1951)
2640 Askew Avenue - auto storage garage (1951)
2617 2619 Indiana Avenue – tin shop (1951)
3200 East 23rd Street – storefront (1951)
2446 Benton Blvd – church (1963)

By 2009 the properties appear as vacant. At present, the Site properties are vacant and have no current land use.

c) Environmental Concerns

Recognized environmental concerns (RECs) on the Site noted by the Toeroek Phase I ESA report include:

- Based on years during construction of the former subject property structures (pre-1950s), lead-based paint (LBP) was likely used on building materials during initial construction. Soil on subject property parcels may contain lead in debris or runoff from painted surfaces. The possible presence of lead in soil derived from LBP is a REC.

- Based on years during construction of the former subject property structures (pre-1950s), polychlorinated biphenyl (PCB)-containing caulking may have been used in building materials during initial construction. Soil on subject property parcels

may contain PCBs in debris. The possible presence of PCBs in soil derived from building materials is a REC.

- The property to the north and adjacent to the subject property (north of East 19th Street) was occupied by the former Benson Manufacturing Company (also known as the Granville Woods site), which manufactured aluminum aircraft parts and barrels from as early as 1940 until at least 1970. The property was occupied by industrial structures until at least 1979. A 2024 Limited Phase II ESA conducted at the former Benson Manufacturing Company/Granville Woods site found semi-volatile organic compounds (SVOCs) in surface soil at concentrations that exceeded non-residential Risk-Based Target Levels at the boundary between the former Benson Manufacturing Company/Granville Woods site and the subject property. This contamination was likely from airborne deposition from industrial activities at the former Benson Manufacturing Company/Granville Woods site and was likely also deposited on the subject property. Aluminum metal manufacturing operations on this property, the possible historical use of hazardous materials, and known airborne deposition of contaminants pose a REC for the north half of the subject property parcels.

- A total of 85 drycleaner-related RECs were identified within 0.1-mile of, located upgradient to, adjacent to, and/or on at least one subject property parcel. The potential presence or migration of contaminants related to drycleaning from these facilities to the subject property is considered a REC to select subject property parcels.

- A total of 33 auto repair-related RECs were identified within 0.1-mile of, located upgradient to, and/or adjacent to at least one subject property parcel. The potential presence or migration of metal and petroleum contamination from these facilities to the subject property is considered a REC to select subject property parcels.

- A total of 15 petroleum-related RECs were identified within 0.1-mile of, located upgradient to, and/or adjacent to at least one subject property parcel. The potential presence or migration of petroleum contamination from these facilities to the subject property is considered a REC to select subject property parcels.

- Pesticide-related RECs were identified at Enviro Science Technologies, Inc., a pesticide producing company located at 3060 East 24th Street, and at Antoine's Industries, Inc. (also listed as Ben's Phillip 66 Service Station), a pest control service located at 2301 Benton Boulevard. The potential presence or migration of pesticide-related contamination from these facilities to the subject property is considered a REC to select subject property parcels.

- Superior Metal Treating and Equipment Co., a metal treating company, is located within the southeast portion of the Target Area at 2540 Indiana Avenue. This facility constitutes a REC to subject property parcels due to the potential presence

or migration of heavy metal-related contamination from the facility to select subject property parcels.

- Brown Industries, Inc., a machine shop and machine production facility, is located within the northeast portion of the Target Area at 2307 Indiana Avenue. This facility is listed in the Spills database and was reported on June 11, 1997, to have improperly managed drums of industrial waste. No information was provided regarding the cleanup of these industrial waste drums. Due to potential presence or migration of industrial waste from this facility to the subject property, this facility constitutes a REC to select subject property parcels.

The following properties were identified in city directories but not listed in the environmental database report generated for the Phase I ESA. These properties pose RECs relative to select subject property parcels.

- 2814 East 23rd Street – Cosmopolitan Cleaners;
- 2815 East 23rd Street – Standard Oil Co. Fill Station, Watson Standard Service Fill Station, and Standard Service Station;
- 2904 East 23rd Street – 2904 06 Economy Garage, Fred Blunt Garage, and Economy Garage;
- 2906 East 23rd Street – 2904 06 Economy Garage;
- 3416 East 23rd Street – Aluminum Fabricators, Aluminum Fabricators Industry, and Aluminum Fabricators, Inc.;
- 2300 Benton Boulevard – Standard Oil Co. No 95, Watson Randall J Fill Station, Standard Oil Co. Fill Station, and Standard Service;
- 2301 Benton Boulevard – Monarch Filling Station and Independent Oil & Gas Co. No 16;
- 2201 Indiana Avenue – Highway Trailer Sales Co. Parts and Service;
- 2307 Indiana Avenue – Givens Machine and Manufacturing Co. and Brown Industries, Inc. Machine Shop;
- 2312 Indiana Avenue – Mulvany Chemical Laboratory & Battery Service and Brown Industries, Inc. Machine Shop;
- 2321 Indiana Avenue – Gray's Auto Repair;
- 2323 Indiana Avenue – Doeher & Westerhold Garage;
- 2420 Indiana Avenue – Big Ron's Autobody Repair; and
- 2407 Montgall Avenue – Cameron Cleaning Service.

Vapor Encroachment Conditions (VECs) were identified, including:

- A total of 84 dry-cleaning facilities were identified as VECs for select subject property parcels.

- A total of 14 petroleum-related VECs were identified for select subject property parcels.

- A total of 32 auto repair shop facilities were identified as VECs for select subject property parcels.

- Brown Industries, Inc. was identified as an industrial waste VEC for select subject property parcels. The type of industrial waste at this facility is unknown.

- The former Benson Manufacturing Company north of East 19th Street poses a VEC for select subject property parcels based on contamination of soil with trichloroethylene.

A Business Environmental Risk (BER) was identified:

Based on years during construction of the former subject property structures (pre-1950s), asbestos may have been used in building materials during initial construction. Soil on subject property parcels may contain ACM in debris. The possible presence of ACM in soil derived from building materials is an environmental concern.

d) How the Site Became Contaminated and the Nature and Extent of the Contamination

Based on the findings of the Phase I ESA report, a Site Specific Sampling and Analysis Plan (SSSAP) was developed and approved by EPA for the Phase II ESA. The following summarizes the scope and results of the Phase II ESA.

Surface Soil Samples

Composite surface soil samples were collected to evaluate the presence of metals in the 0- to 6-inch soil interval. Additionally, 10% of composite surface soil samples were evaluated for the presence of polyaromatic hydrocarbons (PAHs) and polychlorinated biphenyls (PCBs). A total of 162 composite surface soil samples were collected, 17 of which were duplicate samples. One composite surface soil sample, each comprised of five discrete samples spread across the parcel, was collected from each parcel from 0 to 6 inches below ground surface (bgs). Each composite surface soil sample was thoroughly mixed and then a sufficient quantity was withdrawn to fill the laboratory-provided sample containers.

Metals

A review of the data indicates that lead contamination above USGS average background concentrations for Jackson County is widespread; only one sample did not exceed the USGS average background concentration for Jackson County for lead. A total of 76 composite surface soil samples exceeded the EPA RSL of 200 mg/kg and 50 composite surface soil samples exceeded the Missouri RBTL of 260 mg/kg. The highest concentrations of lead included 1,280 mg/kg and 4,950 mg/kg on separate properties located in the southeast portion of the Site.

Arsenic detections ranged from 4.4 mg/kg to 67.2 mg/kg, and samples at five properties exceeded the EPA RSL, Missouri RBTL, and USGS average background concentration for Jackson County. Cadmium detections ranged from 0.48 mg/kg to 12.8 mg/kg, with two samples exceeding the EPA RSL. Chromium detections ranged from 8.9 mg/kg to 31.2 mg/kg, with all

samples exceeding the EPA RSL. Mercury detections ranged from 0.047 mg/kg to 0.43 mg/kg, with all detections exceeding the USGS average background concentration for Jackson County.

Polycyclic Aromatic Hydrocarbons (PAHs)

Benzo(a)anthracene detections ranged from 0.0647 mg/kg to 0.669 mg/kg, with one sample exceeding the EPA RSL. Benzo(a)pyrene detections ranged from 0.0604 mg/kg to 1.15 mg/kg, with 12 samples exceeding the EPA RSL. Benzo(b)fluoranthene detections ranged from 0.101 mg/kg to 1.37 mg/kg, with three samples exceeding the EPA RSL. Dibenz(a,h)anthracene detections ranged from 0.0116 mg/kg to 0.453 mg/kg, with four samples exceeding the EPA RSL. Naphthalene detections ranged from 0.0161 mg/kg to 0.761 mg/kg, with one sample exceeding the Missouri LDTL.

Subsurface Soil Samples

A total of 194 subsurface soil samples were collected, 19 of which were duplicate samples. One subsurface soil sample was collected within the 3- to 5-foot bgs interval, one subsurface soil sample was collected in the interval the photoionization detector (PID) indicated has the highest contamination, and one subsurface soil sample was collected within the bottom 3 feet of the boring. Select subsurface soil samples were collected from the 0- to 2-foot bgs interval at the discretion of the consultant due to high PID readings.

Metals

For lead, the EPA RSL of 200 mg/kg was exceeded by eight subsurface soil samples and the MRBCA RBTL of 260 mg/kg was exceeded by six subsurface soil samples. Arsenic was detected in exceedance of the EPA RSL of 0.68 mg/kg in all subsurface soil samples with arsenic detections; however, only six subsurface soil samples exceeded the USGS average background concentration for Jackson County of 16.60 mg/kg. Chromium detections in all subsurface soil samples exceede the EPA RSL of 0.95 mg/kg. Mercury detections in all samples exceeded the USGS average background concentration for Jackson County of 0.016 mg/kg. Selenium was detected in one sample at a concentration of 2.7 mg/kg, which exceeded the USGS average background concentration for Jackson County of 0.499 mg/kg.

SVOCs

For semi-volatile organic compounds (SVOCs), benzo(a)anthracene was detected in one sample at a concentration of 3.11 mg/kg, which exceeded the EPA RSL. Benzo(a)pyrene was detected in one sample at a concentration of 2.68 mg/kg, which exceeded the EPA RSL and Missouri RBTL. Benzo(b)fluoranthene was detected in one sample at a concentration of 3.87 mg/kg, which exceeded the EPA RSL. Butylbenzyl-phthalate was detected in one sample at a concentration of 369 mg/kg, which exceeded the EPA RSL. Naphthalene was detected in one sample at a concentration of 0.614 mg/kg, which exceeded the Missouri LDTL. No other SVOC detections exceeded screening levels in subsurface soil samples.

VOCs

For volatile organic compounds (VOCs), all detections were below applicable screening levels. For total petroleum hydrocarbons (TPH), TPH for diesel range organics (TPH-DRO) was detected in one sample at a concentration of 281 mg/kg which exceeded the EPA RSL. All other TPH detections were below applicable screening levels.

Groundwater

A total of five groundwater samples were collected, one of which was a duplicate sample. One gallon of water was purged and allowed to recharge in the well before sampling. Groundwater samples were collected to evaluate the presence of metals (total and dissolved), SVOCs, VOCs, and TPH.

Metals

Total arsenic was detected in all groundwater samples at concentrations ranging from 0.0182 mg/L to 0.318 mg/L, all exceeding the EPA RSL and Missouri RBTL. Total barium was detected in all groundwater samples at concentrations ranging from 3.85 mg/L to 12.8 mg/L, all exceeding the EPA RSL and Missouri RBTL. Total cadmium was detected in ground water three samples at concentrations ranging from 0.0051 mg/L to 0.0068 mg/L. The total cadmium concentrations in these samples exceeded the Missouri RBTL. Total chromium was detected in all groundwater samples at concentrations ranging from 0.237 mg/L to 0.760 mg/L, all exceeding the EPA RSL and Missouri RBTL. Total lead was detected in groundwater samples at concentrations ranging from 0.260 mg/L to 0.387 mg/L, all exceeding the EPA RSL and Missouri RBTL. Total mercury was detected in all groundwater samples at concentrations ranging from 0.00022 mg/L to 0.0036 mg/L. The EPA RSL for mercury was exceeded in three samples. For the analysis of metals dissolved in groundwater, no applicable screening levels were exceeded with the exception of arsenic in one sample.

SVOCs

No groundwater samples had detections of SVOCs.

VOCs

Chloroform was detected in two samples from the same property at concentrations of 0.0012 mg/L and 0.0011 mg/L, respectively. These samples exceeded the EPA RSL. No other VOC was detected in groundwater.

Total Petroleum Hydrocarbons (TPH)

No groundwater samples had detections of TPH.

Soil Gas

A total of 66 soil gas samples were collected, seven of which were duplicate samples. Soil gas samples were collected at 59 parcels co-located with subsurface soil samples. Each sample was collected from approximately 6 feet bgs. Soil gas samples were collected to evaluate the presence of VOCs. 1,3-Butadiene was detected in 21 samples at concentrations of 4.45 µg/m3 to 47.6 µg/m3, all exceeding the EPA VISL. 1,4-Dioxane was detected in three samples at concentrations ranging from 2.65 µg/m3 to 23.2 µg/m3 with one sample exceeding the EPA VISL. Benzene was detected in all soil gas samples, except for two samples at concentrations ranging from 0.805 µg/m3 to 143 µg/m3. The EPA VISL for benzene was exceeded in five samples. No other VOC detections exceeded applicable screening levels. With respect to detections of 1,3-butadiene the consultant found that they are likely sampling artifacts, possibly due to off-gassing from the DPT drill rig's "O" rings as they are heated during drilling.

Although the EPA RSL was exceeded in these samples, the detections and exceedances of 1,3-butadiene are considered to be a result of sampling rather than historical operations at the Site .

Nature and Extent of Contamination

The Phase II ESA consultant summarized the data collected and presented the following findings. Results from this Phase II ESA indicate widespread contamination of arsenic, lead, chromium, and mercury in surface soils across the Site, in select subsurface soil samples, and in groundwater samples. Additionally, benzene exceeded applicable standards in soil gas samples at four properties all of which were identified as properties with an auto-repair related REC. TPH-DRO was detected in exceedance of applicable screening levels in subsurface soil sample at one property also identified to have an auto repair REC. These results indicate that these parcels and the Site were likely affected by auto repair operations. In addition, a total of 15 petroleum-related RECs were identified within 0.1 mile of, located upgradient to, and/or adjacent to at least one property parcel at the Site. TPH-DRO was detected in exceedance of applicable screening levels in one subsurface soil sample. Although the affected parcel was not identified as having a petroleum-related REC, it may have been affected by petroleum related operations. TPH products were not detected in any groundwater sample and no other soil sample had exceedances of a TPH product. These results indicate that the Site was not impacted by petroleum related operations, with the exception of one property.

Lead based paint in soil from former structures on the Site was identified as a potential REC. Elevated levels of lead in surface and subsurface soils across the Site confirm the REC related to lead-based paint. PCBs from former Site structure debris in soils was identified as a potential REC. PCBs were not detected in any surface soil sample, indicating the Site was not impacted by PCB-related operations.

Potential Sources of Contamination

Regarding the potential sources of the contamination, the Phase II ESA report reviewed collected data with respect to certain RECs identified in the Phase I ESA. The following are the consultant's findings.

The former Benson Manufacturing Facility, on the northern portion of the Target Area, manufactured aluminum aircraft parts and barrels from at least as early as 1940 until at least 1970, and was then occupied by industrial buildings until at least 1979. A 2024 Limited Phase II ESA conducted at the Benson Manufacturing/Granville Woods site detected SVOCs in surface soils, likely from airborne deposition from industrial activities. Results from this Phase II ESA indicate the presence of metals in surface soils/soil boring soils/groundwater, PAHs in surface soil, SVOCs in soil boring soils (3 to 5 ft bgs), and VOCs in soil gas above applicable standards. The results obtained from this Phase II ESA cannot be directly linked to Benson Manufacturing activities due to limited information about Benson operations, but Benson Manufacturing cannot be excluded as a possible source of contamination at the Site.

Superior Metal Treating and Equipment Co., a metal treating company located within the southeast portion of the Target Area, was identified as a potential source of heavy metals-related contamination. Results from this Phase II ESA indicate widespread contamination of arsenic, lead, and mercury in surface soils across the Site, in select subsurface soil samples, and in

groundwater samples. These results cannot be directly linked to Superior Metal Treating and Equipment Co. due to limited information about operations, but Superior Metal Treating and Equipment Co. cannot be excluded as a possible source of contamination at the Site.

Brown Industries Inc., a machine shop and machine production facility located within the northeastern portion of the Target Area, is listed in the Spills database and was reported to have improperly managed drums of industrial waste. Results from this Phase II ESA indicate widespread contamination of arsenic, lead, and mercury in surface soils across the Site, in select subsurface soil samples, and in groundwater samples, PAH contamination in surface soil, SVOC contamination in soil boring soils, and VOCs in soil gas above applicable standards. These results cannot be directly linked to Brown Industries Inc. due to limited information about operations, but Brown Industries Inc. cannot be excluded as a possible source of contamination at the Site.

A total of 85 drycleaners were identified within 0.1 mile of, located upgradient to, adjacent to, and/or on at least one Site parcel. A total of 33 auto repair-related RECs were identified within 0.1 mile of, located upgradient to, and/or adjacent to at least one property parcel at the Site. Soil gas samples at four properties had benzene exceedances of applicable standards. Additionally, groundwater at one property had chloroform exceedances of applicable standards. Three of these five parcels had a drycleaner identified as a REC. These results indicate that these parcels were likely affected by drycleaning operations.

Summary of Results

The results of composite surface soil sampling for metals identified lead concentrations on 46 of 145 properties sampled (32%) that exceeded the State of Missouri RBTL for residential use of 260 mg/kg. An additional 23 properties (50%) exceeded the USEPA Regional Screening Level (RSL) for lead in residential soil of 200 mg/kg. There were also 20 properties that could not be sampled due to overgrowth or encroachment. Due to the high percentage of properties found to exceed screening levels, none of the unsampled properties can be ruled out as not contaminated at this time.

In addition, there is some uncertainty as to how accurately the EPA Phase II ESA results represent actual Site conditions for lead in surface soils. It is generally recognized that lead is among a certain type of contaminants that are highly variable and heterogenous in soil. (Interstate Technology Regulatory Council, Incremental Sampling Methodology Update, 2020). Lead concentrations measured in soil can be quite different even in samples collected in close proximity to each other. Incremental Sampling Methodology (ISM) is a composite sampling and processing system designed to reduce data variability and improve the reliability of assessments of heterogenous contaminants, such as lead in soil.

ISM sampling for lead in surface soils was conducted in the Target Area in the 4th quarter of 2025 on a group of 28 vacant lot properties. The assessment used HUD Community Development Block Grant (CDBG) funds. Each property was divided into two decision units (DUs) of approximately 2,000 square feet each and ISM samples composed of 30 increments of soil from 0” – 6” bgs were collected in triplicate from each DU. The samples were then processed and analyzed in accordance with published ISM guidance.

The CDBG Phase II ESA found significantly higher rates of properties in exceedance of state and federal levels of lead in surface soils (60% and 80% respectively) than the EPA Phase II ESA. Moreover, three properties were analyzed by both studies (2424 Benton Ave., 2502 College Ave., and 3310 Moulton Ave.) For all three, surface lead concentrations identified by the CDBG study using ISM were significantly higher than those of the EPA study using 5-point composite sampling. For a DU on one property (2502 College Ave.), the lead concentration identified by the CDBG study (306 ppm) exceeded the Missouri RBTL (260 ppm) and EPA RSL (200 ppm), whereas the composite soil lead concentration found by the EPA study for the same property (119 ppm) was significantly below the state and federal levels.

In addition to widespread lead contamination, other significant contamination was identified on 11 additional properties that may require further evaluation and potential remediation. Conditions identified on these properties include lead in shallow subsurface soils (3' – 5'below ground surface (bgs)) above the RSL, arsenic in surface soils above the Missouri RBTL and average regional background level, chloroform in groundwater above the EPA RSL, benzene in soil gas above the EPA RSL, and polyaromatic hydrocarbons (PAHs) above Missouri RBTLs for residential use in surface soils and shallow subsurface soils.

Given all these results, further evaluation of the data, in collaboration with a Qualified Environmental Professional (to be procured by Kansas City) and the Missouri Brownfields Voluntary Cleanup Program, will be needed to make a determination as to whether or not any further investigation or remediation is necessary for each property.

ITEM 7

(7) Brownfield Site Definition

Kansas City affirms that the Washington Wheatley Additional Vacant Lots Sites, and all the properties that comprise the Site, are:

a) not listed or proposed for listing on the National Priorities List;

b) 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; and

c) not subject to the jurisdiction, custody, or control of the U.S. government.

ITEM 8

(8) Environmental Assessment Required for Cleanup Grant Applications

The following assessments were conducted on the Washington Wheatley Additional Vacant Lots Site:

1. Draft Phase I ESA, KCMO II Site – Washington Wheatley Neighborhood, Kansas City, Jackson County, Missouri, Targeted Brownfields Assessment (Toeroek Associates, Inc.)

   Report Date: July 2, 2025

The Draft Phase I ESA was performed in accordance with ASTM International (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E1527-21) (ASTM 2021), and otherwise in compliance with EPA's "All Appropriate Inquiries" Rule (40 Code of Federal Regulations [CFR] Part 312).

2. Draft Phase II ESA, KCMO Site – Washington Wheatley Neighborhood, Kansas City, Jackson County, Missouri, Targeted Brownfields Assessment (Toeroek, Associates, Inc.)

   Report Date: November 21, 2025.

The Draft Phase II ESA Report was prepared consistent with ASTM International (ASTM) Standard E1903-19 for Phase II ESAs (ASTM 2019).

ITEM 9

(9) Site Characterization

Attached is a current letter from the Missouri Department of Natural Resources regarding the Site proposed by Kansas City.

In addition, Kansas City affirms that additional assessment is needed to sufficiently characterize the Site for remediation work to begin and Kansas City additionally affirms that there will be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2026, for the remediation work to begin on the Site.

ITEM 10

(10) Enforcement or Other Actions

Kansas City affirms that there are no known ongoing or anticipated environmental enforcement or other actions related to the Site for which Brownfields Grant funding is sought.

ITEM 11

(11) Sites Requiring a Property-Specific Determination

Kansas City affirms that no property specific determination is required for the Site for which Brownfields Grant funding is sought.

ITEM 12

(12) Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

(a) Circumstances Under Which the Property Was Acquired

All properties were acquired by either tax delinquency or by intergovernmental transfers through uniquely governmental functions. See below and attached table.

(b) Date on Which the Property Was Acquired

See below and attached table.

(c) Disposal of Hazardous Substances at the Site Occurred Before Acquisition

Kansas City affirms as to all properties of the Additional Vacant Lots Site that the disposal of hazardous substances occurred prior to the city's acquisition of the properties.

(d) Cause or Contribute to the Release of Hazardous Substances

Kansas City affirms as to all properties of the Additional Vacant Lots Site that the city did not cause or contribute to the release of hazardous substances on the properties. For some of the properties, the city cited a former structure on the property as a "dangerous building" and removed the building in accordance with city code provisions. Such removal of dangerous buildings by the city was an obligatory exercise of its police powers to protect public health and safety, and therefore are not actions that caused or contributed to the release of hazardous substances.

(e) Arranged for the Disposal of Hazardous Substances or Transported Hazardous Substances to the Site

Kansas City affirms as to all properties of the Additional Vacant Lots Site that the city did not arrange for the disposal of hazardous substances on the properties or transport hazardous substances to the properties.

Additional Facts Concerning Ownership

Each of the 162 properties that comprise the Additional Vacant Lots Site is owned in the name of the Land Bank of Kansas City, Missouri (Land Bank). As discussed below, Land Bank is an instrumentality of the applicant City of Kansas City, Missouri.

Land Bank of Kansas City, Missouri

In 2012 the Missouri Legislature passed House Bill Nos. 1659 and 1116 in 2012, which legislation authorized the City of Kansas City to pass an ordinance to create the Land Bank with respect to properties within the Jackson County portion of Kansas City. The City Council through Committee Substitute for Ordinance No. 120779, passed on September 20, 2012, created the Land Bank.

Land Bank accepts properties that are offered through the tax sale in Jackson County, and are not purchased by third parties at the yearly delinquent tax sale. Under Municipal Code Section 74-73, the Land Bank is governed by a Board of Commissioners consisting of five members. All must be residents of Kansas City. One is appointed by Jackson County, one is appointed by Kansas City Public Schools, and three are appointed by the Mayor. The Land Bank office is located in City Hall and its staff are employees of Kansas City. A majority of the Land Bank operating budget is provided by the City.

Prior to the creation of Land Bank in 2012, the Land Trust of Jackson County, Missouri (Land Trust) performed functions similar to those of Land Bank, including the involuntary acquisition of unsold properties foreclosed upon by Jackson County for nonpayment of general taxes. Beginning on April 9, 2013 and periodically thereafter, Land Trust conveyed to Land Bank certain properties acquired involuntarily as intergovernmental transfers. Subject properties acquired by Land Bank in this manner are noted on the attached table, below. Beginning in 2014, Land Bank acquired most of its properties directly from the Circuit Court of Jackson County, MO by court administrator deed as unsold tax foreclosed property.

Table of Vacant Site Properties

The attached table provides information concerning the date, method and circumstances of acquisition for each of the 162 properties in the Additional Vacant Lots Site.

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Mike Kehoe
Governor

Kurt U. Schaefer
Director

January 21, 2026

Andrew Bracker
Long Range Planning and Preservation Division
City of Kansas City, Missouri City Hall
414 East 12th Street, 16th Floor Suite 1605
Kansas City, MO 65106

Dear Andrew Bracker:

The Missouri Department of Natural Resources Brownfields/Voluntary Cleanup Program (BVCP) acknowledges that the City of Kansas City, Missouri plans to conduct the cleanup of brownfield sites and is applying for an FY26 EPA Brownfields Cleanup Grant.

The City of Kansas City, Missouri (the "City") has developed an application requesting the Washington Wheatley Additional Vacant Lots Site (the "Additional Lots Site" or "Site") consisting of up to 165 vacant properties owned by the Land Bank of Kansas City, Missouri (Land Bank) and the Kansas City Missouri Homesteading Authority (KCMHA) that are eligible for the Housing Accelerator Program. The properties are located in small groups or singly within an area of approximately 300 acres generally bounded by 20th St. to 27th St. and Montgall Ave. to I-70 and Monroe Ave.

This letter affirms that:

a. The City will request MDNR oversight for the site (Washington Wheatley Additional Vacant Lots Site) by enrolling into the Brownfields\Voluntary Cleanup Program (BVCP).
b. The Site is eligible for the BVCP.
c. Based on assessments performed to date and information provided by the City, the City affirms that additional assessment is needed to sufficiently characterize the Site for the remediation work to begin.
d. There will be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2026, for the remediation work to begin on the site.

For any questions regarding this letter, please contact the BVCP at 573-526-8913.

Sincerely,

ENVIRONMENTAL REMEDIATION PROGRAM

Scott Huckstep, Chief
Brownfields/Voluntary Cleanup Program

SH:cr