

**APPLICATION INFORMATION SHEET**

R07-26-C-009

**(1) Applicant Identification**

City of Springfield  
840 Boonville Avenue  
Springfield MO, 65802

**(2) Website URL**

<https://www.springfieldmo.gov/139/Brownfields>

**(3) Funding Requested**

- a. Grant Type: Multiple Site Cleanup
- b. Federal Funds Requested: \$3,583,182

**(4) Location**

a) Springfield b) Greene c) Missouri

**(5) Property Information**

The 404 site: 404 N. Jefferson Ave. Springfield, MO 65806  
The 428 site: 428 N. Jefferson Ave. Springfield, MO 65806

**(6) Contacts**

- a. Project Director  
Matt Schaefer, Assistant Director Economic Vitality Department  
(417) 864-1100  
[mschaefer@springfieldmo.gov](mailto:mschaefer@springfieldmo.gov)  
840 N. Boonville Avenue Springfield, MO 65802
- b. Chief Executive/Highest-Ranking Elected Official  
Jeff Schrag, Mayor  
(417) 864-1651  
[jeff.schrag@springfieldmo.gov](mailto:jeff.schrag@springfieldmo.gov)  
840 N. Boonville Avenue Springfield, MO 65802

**(7) Population**

169,176 Source: 2020 Decennial Census

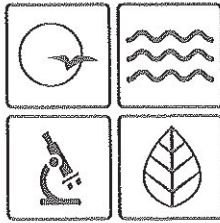
**(8) Other Factors**

<b>Information on the Other Factors</b>	<b>Page #</b>
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 proposed site(s) is impacted by mine-scarred land.	n/a
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.	3-4
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).	n/a
The proposed site(s) is in a federally designated flood plain.	1
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3

The reuse of the proposed site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	n/a

Clean Up Grant Application - Springfield, MO  
Renew Jordan Creek Phase II





**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

Mike Kehoe  
Governor

Kurt U. Schaefer  
Director

January 20, 2026

Cheri Hagler  
City of Springfield Economic Vitality Department  
840 N. Boonville Ave., 2nd Floor  
Springfield, MO 65803

RE: Small Business Liability Relief and Brownfields Revitalization Act Environmental Protection Agency (EPA) Grants

Dear Cheri Hagler:

Please allow this letter to confirm acknowledgment by the Missouri Department of Natural Resources of the intention to apply to EPA for funding by the City of Springfield authorized under the above-referenced Acts. I understand and acknowledge that the City of Springfield or any of its constituent agencies or agents intend to utilize such funds for eligible purposes pursuant to the above-referenced Acts if its grant application succeeds.

The City of Springfield is applying for a FY2026 US EPA Brownfields Cleanup Grant and requests \$3,600,000.

We expect the City of Springfield to enroll the cleanup site(s) in the Brownfields/Voluntary Cleanup Program (BVCP) and receive the program's benefits. Of course, we require that each site enroll separately in the BVCP. Nothing in this letter should be construed as automatic acceptance of the sites; standard enrollment procedures still apply.

Sincerely,

ENVIRONMENTAL REMEDIATION PROGRAM

Scott Huckstep  
Section Chief  
Brownfields/Voluntary Cleanup Program

SH:cr



**(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION Target Area and Brownfields** a. Overview of the Brownfield Challenges and Description of Target Area: Historically, **Jordan Creek (JC)** was the industrial spine of Springfield (SGF), Missouri providing the water necessary for early settlement, manufacturing, and industrial uses, including uses which relied on the Frisco Railway, located along JC. Sites of interest include **404 N. Jefferson (“404”)** and **428 N. Jefferson (“428”)**, totaling 3.83 acres of former commercial and heavy industrial used property and the linchpin for the larger corridor and are the target sites for this **EPA Cleanup Grant**. Beginning in the late 1800’s and continuing through mid-1950’s, uses for these sites included a feed mill, a carpentry shop, a train depot (passenger and freight), a coal yard and storage, grocery distribution, and a bulk oil company. Most recently, the properties served as a lumberyard and HVAC/refrigeration repair store, though only an abandoned building and concrete slab remains today. The **“404 and 428”** are both located in Greene County, Missouri, Census Tract 7 (CT7), with a current population of 4,511 and are surrounded by an estimated 146 brownfield sites. More specifically, the **“404 and 428”** surround and contain a **buried JC**. JC is tied to the foundation and growth of the City of SGF and is essential environmental, economic, and cultural asset for the city. JC flows through the city’s downtown core, linking to neighborhoods. It links to Wilson’s Creek, which drains into the larger Wilson’s Creek-James River watershed before flowing into Table Rock Lake and continuing downstream to **merge** with the Mississippi River. JC’s condition directly affects the water quality, flood protection, public safety, recreation, and economic vitality of our downtown and downstream communities. JC has historically posed significant flooding challenges downtown, and since the late nineteenth century, major floods have damaged property, displaced residents, and limited development. In 1930, the creek was enclosed in a concrete box culvert to reduce flood risk. While this provided short-term relief, it created long-term hydrologic issues that continue to worsen flooding, degrade water quality, and restrict ecological function. Property damage from flood events have ranged between **\$1M and \$15M** per occurrence but by addressing contamination, daylighting the creek and the implementation of nature-based solutions on the **“404 and 428”** sites, the city can realize a savings of up to \$1M annually while also protecting our critical downtown infrastructure, and preventing the mobilization of contaminants that risk the residents, businesses and waterways.<sup>1</sup> The **“404 and 428”** are within a FEMA-designated 100-year floodplain. Major flooding in 2021 highlighted the ongoing risks posed by the buried creek and prompted the adoption of the **Renew Jordan Creek (RJC) Master Plan**, aimed at reducing flooding, improving water quality, creating sustainable green spaces, enhancing pedestrian connectivity, and sparking economic revitalization. To date, the city has made significant progress through the RJC initiative. **Phase I** of RJC is underway, restoring key sections of the creek upstream and downstream of the downtown core. **RJC Phase II** includes the **“404 and 428”** and is essential to fully realize the overall RJC Master Plan’s flood mitigation and environmental restoration objectives. The focus of Phase II is the culverted segment at **404 N. Jefferson** and **428 N. Jefferson** in our city’s urban core. These sites are the final major bottleneck restricting water flow and reducing the effectiveness of previous restoration efforts. The **“404 and 428”** legacy uses correlate with the current site contamination. Environmental Site Assessments (ESAs) have identified hazardous substances, including polycyclic aromatic hydrocarbons (PAHs), asbestos, and lead-based paint (LBP) that exceed safety thresholds. Not only have these hazards been identified but this area has poverty rates 11.8% higher than the state average. The CDC lists this area as a community facing frequent health challenges linked to chronic illness that need interventions to improve quality of life and reduce long-term health risks. These hazardous substances pose a risk to our community’s health; they degrade water quality, limit ecological recovery, and create a barrier rather than an asset to redevelopment and revitalization opportunities. The presence of LPD and PAHs in a 100-year floodplain creates a risk of contaminant mobilization during flood events, directly threatening the health of the 4,511 residents in CT7. The **EPA Cleanup Grant** is the catalyst that will fund the remediation of hazardous substances that currently stall the RJC Phase II, transforming a public health liability into a 10-acre community asset. The city will confront the **“404 and 428”** legacy contamination challenges, leading to the daylighting of more than 1,100 linear feet of previously culverted creek and to the

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1 Smithsonian Magazine (2023): *"How 'Daylighting' Buried Waterways Is Revitalizing Cities Across America"*

2 U.S. Census Bureau. (2023). *Uses of Decennial Census Programs Data in Federal Funds Distribution: Fiscal Year 2021*

3 Centers for Disease Control and Prevention (CDC). (n.d.). *CDC – Centers for Disease Control and Prevention*.

creation of over 10 acres of high-performing greenspace for public recreation and trails in an area now ready for redevelopment. b. Description of the proposed Brownfield Site(s): The “404 and “428” are part of the RJC Master Plan, initiated by City Council as part of a Quality of Place initiative and adopted in 2021 to focus on flood mitigation and economic revitalization. The sites are **3.83** acres of contiguous city-owned property centrally located within an urban redevelopment area that is vacant and underutilized. Former uses include feed mill, carpentry shop, train depot, rail spurs, coal yard, coal storage, grocery distribution, bulk oil company, hardware and lumber yard, refrigeration repair and parts. The **404** includes a 28,309-square-foot brick building constructed in 1941 with confirmed asbestos and LBP and active rail lines directly south of the property. The **428** is a vacant corner lot with railroad right-of-way directly to the east. A **Limited Phase II Environmental Site Assessment was completed in January 2026** for the “404 and 428” that documented exceedances of Resource and Conservation and Recovery Act (RCRA) metals and PAHs in soils across the entirety of the sites. Due to the presence of concrete greater than 1 foot in thickness across most of the site, samples were only collected from the perimeter. Historical operations were more centrally located, so it is anticipated that levels of contamination are higher as you move inward. **Arsenic, cadmium, and lead** were measured at levels **exceeding** Missouri Risk-Based Corrective Action (MRBCA) standards, including LBP at 1,700 mg/kg which is grossly in exceedance of the MRBCA standard of 3.74 mg/kg. Benzo (a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, indeno(1,2,3-cs)pyrene, and naphthalene were all measured in exceedance of MRBCA standards (four of which are present in concentrations an order of magnitude over those standards), indicating a direct threat to human health and the environment. Daylighting of the creek will necessitate removal and disposal of this contaminated soil. The RJC Master Plan requires deep excavation for creek daylighting and the community will be directly exposed to these subsurface contaminants unless remediated through this grant. The combination of historic contamination, aging infrastructure, flood vulnerability, and subsurface conditions constitute a major barrier to reuse. **EPA Cleanup Grant** funding is critical to addressing these environmental conditions, reducing exposure risks for the community, and eliminating barriers to redevelopment. Cleanup activities, including hazardous material abatement, soil assessment, and remediation will protect public health, improve environmental quality, and enable safe reuse consistent with the RJC Master Plan and Pillars 1 and 3 of EPA’s “Powering the Great American Comeback” initiative. Cleanup of this site will catalyze reinvestment in a flood-prone urban area, support equitable revitalization, and contribute to long-term environmental and economic resilience. **Revitalization of the Target Area** c. Reuse Strategy and Alignment with Revitalization Plans: The **EPA Cleanup Grant** will transform the “404 and 428” into a vibrant public greenway with mixed-use public spaces. The project addresses soil and groundwater contamination and navigates complex floodplain regulations through brownfield remediation permits, floodplain approvals, and environmental impact assessments. The reuse strategy includes daylighting JC, restoring natural habitat, rehabilitating the historic building for mixed-use commercial purposes, and creating recreational and commercial spaces. It integrates green infrastructure, including open pools and bio retention areas, to manage stormwater, reduce flood risk, improve water quality and increase regional flood storage capacity. This project aligns with “*Forward SGF*” the City’s Comprehensive Plan, which was adopted in November 2022, supporting resilient infrastructure, expanding green space, and downtown revitalization. *Forward SGF* specifically calls out RJC as a catalyst project to ensure a recreational amenity for area employees and visitors and fosters pedestrian activity in this area. The city was awarded a \$50,000 grant at the National Brownfields Conference to be used for a redevelopment feasibility and implementation strategy for the “404 and 428”. The study will build on the existing momentum for daylighting JC and will include an assessment of market and redevelopment opportunities, potential adaptive reuse of the on-site structure, and public financing mechanisms, such as Tax Increment Financing (TIF), city incentives, and bonds, that can sustain long-term maintenance and community benefit. Extensive public engagement for the RJC Master Plan included an interactive project website and city-wide visioning survey that collected more than 600 responses. This input was then used for concept design with the RJC Stakeholder Team who included a diverse group of interests, including downtown businesses, property owners, developers, and agencies. These concepts were then presented to the community through two open houses and a virtual information session that gathered an additional 120 community comments. The public engagement shaped the project and led to support for pedestrian and bike connectivity, family-friendly recreation, local business expansion, and prioritized native habitat restoration over hardscape plazas. This feedback also directly resulted in the current design's emphasis on bio-retention and 10

acres of open green space. Public engagement and collaboration will continue through regularly scheduled Stakeholder Team meetings and a dedicated project portal, ensuring transparency as remediation and daylighting move into the construction stage of the “404 and 428” sites. By combining environmental remediation, innovative reuse, and stakeholder-driven design, the project advances local revitalization goals while delivering long-term environmental, social, and economic benefits. Removal of contaminated soils within the FEMA-designated floodplain, eliminates the risk of hazardous substances migrating into the creek during high-flow events and advances the city’s local revitalization goals delivering long-term environmental, social and economic benefit. d. Outcomes and Benefits of Reuse Strategy: The reuse strategy for the “404 and 428” transforms a high-risk industrial liability into a functional community asset by shifting from water "containment" to "accommodation." This strategy utilizes three pillars: **Daylighting as Flood Storage, Adaptive Blue-Green Infrastructure, and Integrated Brownfield Remediation**. By integrating remediation into the construction process, the city will remove the primary environmental and hydrologic bottleneck that currently renders adjacent downtown properties un-investable due to flood risk and perceived contamination migration. The project is a central component of *Forward SGF* and the RJC Master Plan. Cleanup of these sites is projected to catalyze over **\$100M in private investment** in the urban core. By stabilizing property values and mitigating flood zones, we can unlock development potential for nearly 70 properties currently stifled by FEMA flood designations. The project results in the **addition of 10 acres of high-performing green space** and **1,100 linear feet of day-lighted creek**. This new urban park reconnects a 2-mile regional trail gap, providing a recreational and transit connection for 4,511 residents and the student populations of Drury University, Missouri State University, and Ozark’s Technical Community College. The site is a central node for major job centers (Jordan Valley Innovation Center, Forvis Mazars) and healthcare hubs (Jordan Valley Community Health), ensuring the revitalized area supports commercial, lodging, and multi-family residential development. The project replaces failing 1930s concrete infrastructure with nature-based solutions to improve local resilience against flash flooding, historically causing **\$1M–\$15M in damage per occurrence**. Daylighting JC increases downtown flood storage capacity and uses bio retention, permeable pavement, and retention basins to improve water quality and protect the downstream watershed from contaminant runoff during extreme weather events. The adaptive reuse of the **28,309-square-foot historic brick structure** will prioritize energy efficient **LEED Silver Standards**, advancing environmental sustainability through green roofs, permeable pavement and other energy-efficient infrastructure. Public and partner involvement directly shaped this reuse strategy with extensive engagement, including a city-wide survey with **600+ responses** and two open houses with **120+ comments**, leading to a design that prioritizes native habitat restoration over hardscape plazas. The RJC Stakeholder Team, representing downtown businesses, developers, and residents, continues to guide the project through a dedicated portal and regularly scheduled meetings, ensuring the cleanup leads to equitable and transparent redevelopment. Strategy for Leveraging Resources e. Resources Needed for Site Characterizations/f. Resources Need for Site Remediation/g. Resources Needed for Site Reuse: As detailed in Table 1.1, the unsecured funding sources consist of voter-approved sales tax initiatives. These funds are allocated on a rolling basis, subject to City Council approval, and are dedicated to capital improvements and neighborhood enhancements. The proposed **EPA Cleanup Grant** directly complements these local initiatives, specifically the “404 and 428” projects and aligns with the broader goals of the *Forward SGF* comprehensive plan. While the 2026 Limited Phase II ESA identified significant contamination, additional exploration characterization is required beneath the 1-foot-thick concrete caps during the early stages of remediation. The city will use the existing **EPA Assessment Grant** to ensure full delineation of contamination before creek daylighting begins. The city has also secured a **\$50,000 KSU TAB award** for the redevelopment strategy of the sites and can access the **entitlement CDBG/HOME funds** to support affordable housing and small businesses to promote equitable revitalization. The 30% remedial design is already complete; the remaining 70% design and construction of the **RJC Phase II** will be funded through a combination of the **1/8-cent Transportation Sales Tax and Capital Improvement Projects (CIP)** funds. The requested **EPA Cleanup Grant** is anticipated to be sufficient to complete the primary remediation of hazardous substances (LBP, PAHs, and asbestos) at **404 and 428 N. Jefferson**.

Name of Resource	Is the Resource for (1.e) Assessment, (1.f) Remediation or (1.g) Reuse Activities	Is the Resource Secured or Unsecured?	Additional Details or Information about the Resources
EPA Brownfields Assessment Grant	Assessment	Secured	BF96723701 to assist with additional site characterization.
CIP – Capital Improvement Projects (CIP)	Reuse Activities	Unsecured	The CIP finances long-term infrastructure & public facility projects including new streets, parks, sewer systems, buildings, & programs such as sidewalk improvements and trail development. The CIP is primarily funded by a dedicated 1/4-cent sales tax and leveraging other funds.
KSU TAB	Reuse Activities	Secured	The Economic Vitality Brownfields Team was awarded \$50,000 in Redevelopment Feasibility & Implementation Strategy assistance at the 2025 National Brownfields Conference in the Perfect Pitch Competition.
City Level Property Tax	Reuse Activities	Unsecured	This voter approved tax funds major capital improvements and ongoing operational needs for stormwater infrastructure.
City 1/4-cent Capital Improvement Sales Tax	Reuse Activities	Unsecured	Voter approved Sales Tax funds infrastructure & community projects, including road/bridge/intersection improvements, sidewalks, traffic signals, stormwater management, park enhancements, public art, and neighborhood initiatives, ensuring long-term upgrades to public facilities and streets.
City 1/8-cent Transportation Sales Tax	Reuse Activities	Unsecured	Voter approved Sales Tax funds for safety and walkability projects such as sidewalks & bike routes as well as street improvements. Public input guides project selection & the tax provide stable funding for projects while leveraging other government funding.
City Environmental Services Green Infrastructure (GI) project funds	Reuse Activities	Unsecured	The GI program funds natural and built systems to manage stormwater, improve water quality & reduce sewer overflows through features such as rain gardens, bioswales, pervious pavement, and green roofs to absorb, filter, and slow runoff before it hits streams and lakes.
City HUD HOME & CDBG Funds	Reuse Activities	Secured	The City of SGF is an entitlement community where HOME Investment Partnerships Program and Community Development Block Grant (CDBG) funds are used to provide affordable housing and stimulate small business growth through the loan programs.
Technical Documentation and Remedial Design	Reuse Activities	Unsecured	Preliminary construction drawings (30%) have been completed as part of the RJC Master Plan. The remaining 70% will be a necessary remedial design resource that supports site reuse by translating the approved cleanup remedy into implementable engineering controls that ensure the site is protective for its anticipated future use.

h. Use of Existing Infrastructure: **The EPA Cleanup Grant** will maximize the utilities of existing urban infrastructure while facilitating essential upgrades. The project enables **adaptive reuse** of the historic brick building at **404 N. Jefferson** by remediating asbestos and LBP. Cleanup will also allow the “**404 and 428**” to safely utilize existing high-capacity water, sewer, and electric connections already in place. Its location adjacent to the **City Utilities Transit Center** and established downtown road networks ensure that the revitalized site is immediately accessible without requiring new road construction. To realize the reuse strategy, the city will upgrade the current sub-standard stormwater system. This includes replacing the failing 1930s concrete culvert with **1,100 linear feet of daylighted creek** and integrated bioswales and rain gardens. Additionally, streetscape improvements along Jefferson Avenue will include permeable paving and enhanced pedestrian lighting to safely link the site to the existing regional trail network. The city has identified and will seek a mix of relevant funding to implement these upgrades, as referenced in Table 1.1. Long-term maintenance will be funded through the **City’s Department of Environmental Services** and **Public Works** annual operating budgets, ensuring these infrastructure assets serve the community for decades. By addressing both existing infrastructure and targeted upgrades, the project demonstrates a clear, integrated approach to maximizing the utility of current assets while ensuring necessary improvements are funded and executed to support environmental and community goals.

h. Use of Existing Infrastructure: **The EPA Cleanup Grant** will maximize the utilities of existing urban

infrastructure while facilitating essential upgrades. The project enables **adaptive reuse** of the 28,309 sq. ft. historic brick building at **404 N. Jefferson** by remediating asbestos and lead. Cleanup will also allow the “**404 and 428**” to safely utilize existing high-capacity water, sewer, and electric connections already in place. Its location adjacent to the **City Utilities Transit Center** and established downtown road networks ensure that the revitalized site is immediately accessible without requiring new road construction. To realize the reuse strategy, the city will upgrade the current sub-standard stormwater system. This includes replacing the failing 1930s concrete culvert with **1,100 linear feet of daylighted creek** and integrated bioswales and rain gardens. Additionally, streetscape improvements along Jefferson Avenue will include permeable paving and enhanced pedestrian lighting to safely link the site to the existing regional trail network. The city has identified and will seek a mix of relevant funding to implement these upgrades, as referenced in Table 1.1. Long-term maintenance will be funded through the **City’s Department of Environmental Services and Public Works** annual operating budgets, ensuring these infrastructure assets serve the community for decades. By addressing both existing infrastructure and targeted upgrades, the project demonstrates a clear, integrated approach to maximizing the utility of current assets while ensuring necessary improvements are funded and executed to support environmental and community goals.

**(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT** **Community Need** a. The Community’s Need for Funding: In the City, sales tax revenues are a primary source of funding for city services. CT7 has a **severely low-income** (median household income \$17,580 which is 74% below the state median)<sup>1</sup> and **small resident population** (4,511 residents) which prevents the city from diverting funds to cover essential services. Although the “**404 and 428**,” located within CT7, is in a designated **Opportunity Zone**, the cleanup cost exceeds the current land value. Private developers cannot bridge this financial gap due to the low-income market surrounding the site, leaving the property in a cycle of blight. **The EPA Cleanup Grant** is the only viable funding mechanism to address these environmental hazards. Without this federal support, the site will remain a public health threat and a hydrologic bottleneck, as the community lacks the independent financial capacity to remediate and reuse this critical urban redevelopment area. b. Health or Welfare of Sensitive Populations: The “**404 and 428**” area contains several groups facing severe health disparities including unhoused populations, childcare centers, public/private schools and senior services for the residents. Additionally, unhoused populations are often concentrated in this area due to centralized resources in Downtown SGF (2025 Point in Time Count was 588 people). According to the Springfield-Greene County Health Department, CT7 experiences significantly higher rates of childhood asthma and emergency department visits for ischemic heart disease compared to the greater Ozarks region [1]. According to Missouri Department of Elementary and Secondary Education (DESE), over 80% of the children in this tract qualify for free or reduced lunch. [2] While the project aims for long-term safety and revitalization, it presents immediate health and safety risks to the unhoused population currently residing or seeking shelter near the creek. The combined impact of environmental toxins and downtown flooding increases the vulnerability of these individuals. According to the Springfield Community Health Needs Assessment, a root cause of poor health outcomes among SGF's unhoused population is exposure to environmental pollutants and respiratory illnesses that are aggravated by dust and toxins. The elderly and immunocompromised are vulnerable to **PAH-laden dust and sediments** that are frequently resuspended during flood events. This project removes the source of "toxic soup" the dangerous mixture of PAHs and LBP that is currently mobilized during SGF’s flash flooding events, thereby protecting vulnerable residents from contaminants that are resuspended and redistributed during these events. This **EPA Cleanup Grant** will directly address these issues by permanently removing hazardous building materials from a 28,309 sq. ft. Structure and remediation of contaminated soil. This effectively breaks the primary exposure pathways between source toxins and the sensitive populations that live and play nearby. The reuse strategy replaces 3.83 acres of heat-absorbing industrial concrete with a **daylighted greenway and 10 acres of vegetation**. This intervention is shown to lower ambient ground temperatures, reducing the environmental triggers for chronic respiratory and cardiovascular distress in the local population. By transforming a dormant

4 U.S. Census Bureau. (2023). *Uses of Decennial Census Programs Data in Federal Funds Distribution: Fiscal Year 2021*.

environmental "stressor" into a high-performing public greenway, the project provides a safe space for physical activity and mental well-being, directly addressing the chronic health challenges identified by the CDC for

CT7. c. Greater than normal incidence of disease of Adverse Health Conditions: Public health data confirm that residents of Track 7 suffer from a disproportionately high incidence of diseases linked to environmental exposure. City. **The EPA Cleanup Grant** will help offset these threats with the remediation of the 3.8-acre site, permanently eliminating a major local source of LBP, PAH's and asbestos. Furthermore, the community faces elevated PM2.5 and diesel emissions which the **reuse strategy of creek daylighting and greenway creation** will actively filter while also reducing high temperatures (Urban Heat Island) which worsen air quality contributing to the tract's higher-than-normal asthma and cardiovascular hospitalizations. The soil at the "404 & 428" sites contain PAHs at concentrations significantly above MRBCA standards. By remediating these soils, a direct source of carcinogenic particulate matter is eliminated which directly addresses the area's **elevated cancer rate, higher than the statewide average.**<sup>5</sup> This grant is not just a cleanup; it is a clinical intervention that replaces a documented environmental "stressor" with green infrastructure designed to lower the chronic disease burden of SGF's most vulnerable residents.

d. Economically Impoverished / Disproportionately Impacted Populations: Greene County CT7 exhibits extreme social vulnerability, ranking in the highest quartiles of the CDC/ATSDR Social Vulnerability Index (SVI, 2022)<sup>5</sup> for socioeconomic status and housing/transportation burdens. This community disproportionately bears the negative environmental consequences of century-long industrial and governmental policies, specifically the 1930s decision to enclose JC. This policy allowed industrial contaminants to accumulate in sediments while ignoring the recurrent flooding that routinely mobilizes these toxins. The EPA Cleanup Grant will directly address this disparity by removing the concrete cap that has historically masked subsurface hazards. The reuse strategy of daylighting the creek will transform a legacy environmental burden into a resilient buffer. By replacing an industrial heat island with a naturalized green corridor, the project will reduce the localized flood risks that have historically suppressed investment in Tract 7. Ultimately, this cleanup will reduce cumulative impacts by severing exposure pathways to legacy toxins, mitigating flood vulnerability and its associated insurance costs for residents, and restoring community mobility through a greenway that catalyzes new development. This intervention breaks the cycle of blight and contamination, effectively reducing the cumulative environmental threats to a population that has had the least capacity to self-fund remediation or adapt to extreme weather events.

<sup>5</sup> Center for Disease Control and Prevention (CDC). (2022). CDC/ASTDR Social Vulnerability Index (SVI) 2022 Database Missouri.

**Community Engagement e. Project Involvement/f. Project Roles**

Name of Organization Point of Contact	Project Involvement Assistance Provided
<b>Downtown Springfield Association (DSA)</b> TBD – Executive Director search is underway Phone: 417-831-6200	Coordination of new business development, attraction and retention. Community outreach with future and existing businesses.
<b>Ozark Greenways</b> Benjamin Tegeler - Executive Director ben.tegeler@ozarkgreenways.org	Review cleanup & reuse plans, outreach, leverage funds for trails in target areas, organize volunteers.
<b>Downtown Community Improvement District (CID)</b> Chris Ball – Chairman Cball@jbapc.com	Administer additional sales tax generated by the site to maintain a sustainable development (i.e. maintenance and marketing services of the site, safety and security services).
<b>Greene County Health Department</b> Katie Towns – Executive Director KTowns@springfieldmo.gov	Provide health monitoring. Provide information on hazards at brownfield sites. Provide input on cleanup/reuse plans. Ensure community health.
<b>Neighborhood Advisory Council (NAC)</b> Hanna Knopf – Senior Planner HKnopf@Springfieldmo.gov	Host community engagement sessions, facilitate communication with neighborhood associations, key stakeholders, and the Economic Vitality Brownfields Team.
<b>Multicultural Business Association</b> Earline Mabins – Executive Director mbasgf@gmail.com	Liaison for procurement and engagement of the local minority community.
<b>Workforce Development</b> Ericka Schmeeckle – Assistant Director Ericka.Schmeeckle@springfieldmo.gov	Advance employment opportunities brought about through grant activities. Attend NAC Meetings.
<b>Burlington Northern &amp; Santa Fe Railway (BNSF)</b> Kara Brockamp 913-551-4484	Provide access to adjacent right-of-way owned and maintained by BNSF. Coordinates cleanup and other project tasks that are located within the subject right-of-way.

<b>Missouri State University (MSU)</b> Kevin Cupka Head, RPA - Director KCupkaHead@MissouriState.edu	As an adjacent neighbor, MSU provides research, technical expertise, and archaeological/construction monitoring.
<b>Missouri Department of Natural Resources (MoDNR)</b> MissouriBrownfields@dnr.mo.gov	Provides grants and loans, supporting stormwater management, daylighting, and water quality improvements. MoDNR will review all cleanup plans.

g. **Incorporating Community Input:** The city will continue to ensure effective and appropriate communications to ensure residents directly affected by the “404 and 428” project, as well as involved organizations and stakeholders remain informed and influential throughout the project. Community engagement will include at least two (2) formal public meetings to discuss cleanup alternatives and actual cleanup progress, "pop-up's" at community events designed to reach residents where they are, quarterly surveys, workshops, charrettes, interviews, and open houses, providing multiple opportunities for meaningful input. All feedback will be systematically documented through meeting minutes, comment logs, and summary reports, ensuring transparency and alignment with EPA public participation guidelines. To provide alternatives to in-person engagement, the project website (renewjordancreek.com) will continue to serve as a central 24/7 hub for project updates-posted at least monthly, progress photos posted at least quarterly, project schedule updates posted at least quarterly, and additional engagement opportunity notices as needed. Residents will have the ability to submit comments via an online feedback portal and participate in virtual meetings and webinars. Additional updates will be distributed through newsletters, email lists, and social media, ensuring broad community access and inclusiveness. To bridge the digital divide for residents in CT7 and the community at large who may lack reliable internet access, the city will utilize project progress flyers at the local resource centers such as **Jordan Valley Community Health Center** and the **City Utilities Transit Center**. The project team commits to meaningfully soliciting, considering, and responding to all input. Feedback is reviewed and incorporated into project planning where feasible, with responses and resulting actions summarized and publicly posted. Additional surveys and engagement opportunities are planned at key project milestones, ensuring ongoing community involvement and continuous integration of local priorities throughout project implementation. This transparent feedback loop ensures that local priorities directly shape the project's evolution.

**(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS** a. **Proposed Cleanup Plan:** Phase II of the RJC project qualifies as a Brownfields site under CERCLA §101(39) due to contamination associated with historic industrial use. Environmental assessments identified PAHs in site soils, and existing structures contain asbestos-containing materials (ACM) and LBP. The proposed cleanup plan for Phase II is specifically designed to address legacy industrial contaminants while facilitating the hydrologic requirements of the RJC Master Plan. Given the proximity to the Jordan Valley watershed, cleanup plans will ensure no contaminated media enters the waterway during remediation. Based on Phase I/II findings and the draft ABCA, excavation and off-site disposal will be the primary method for addressing PAH-impacted soils. This will remove the source of contamination from the floodplain and prevent future downstream migration during flood events. Prior to redevelopment of the 28,309 sq. ft. structure, licensed contractors will perform comprehensive abatement of all friable and non-friable ACM using EPA-approved abatement methods with proper containment and disposal. LBP hazards will be addressed using EPA-approved lead-safe practices, including removal of deteriorated paint and stabilization or encapsulation of intact surfaces, followed by clearance testing. These actions will reduce risk, ensure compliance, and prepare the site for redevelopment. Outputs include PAH soil remediation to below regulatory thresholds, full abatement of ACM, mitigation of LBP hazards, confirmation sampling results, clearance reports, waste disposal documentation, and regulatory approvals. These actions will reduce risk, ensure compliance, and prepare the site for redevelopment. **Description of Tasks/Activities and Outputs** b. Project Implementation/c. Anticipated Project Schedule/d. Task/Activity Lead/ e. Outputs

<b>Task/Activity 1: Project Management and Reporting</b>
Project Implementation: EPA-funded tasks/activities: Quarterly Reporting, Financial Management, ACRES Updates, Travel & Training, Success Story Documentation
Anticipated Project Schedule: Q1 – Q16
Task/Activity Lead: Program Manager; Program Coordinator; City Purchasing Department; Finance staff; QEP
Outputs: Timely submission of four (4) progress reports p/year into ACRES to document milestones achieved; tracking expenditures/drawdowns; entered site data into ACRES; annual submission of FFRs; attendance at National Brownfields Conference

and other conferences by key staff; production of “Success Story” for program/EPA promotion; media releases; hiring a QEP through a competitive process; submission of the final Property Cleanup Completion form.
<b>Task/Activity 2: Community Involvement</b>
Project Implementation: EPA-funded tasks/activities: Community Involvement Plan (CIP), Public Meetings, Informational Materials & Repository, Public Comment Period Management, Stakeholder Partnerships
Anticipated Project Schedule: Q2 - Q16
Task/Activity Lead: QEP; Program Coordinator; Project Facilitator; Program Manager
Outputs: One (1) written CIP tailored to the target area; schedule of engagement milestones linked to the cleanup timeline; at least two (2) formal public meetings to discuss cleanup alternatives and actual cleanup progress; meeting minutes, sign-in sheets, and copies of presentation materials; project fact sheets, flyers, and social media updates; physical and/or digital administrative record; 30-day formal public comment period for the ABCA; documentation of comments received and responses; establishment of a Steering Committee.
<b>Task/Activity 3: Cleanup Planning &amp; Design</b>
Project Implementation: EPA-funded tasks/activities: Finalizing the Analysis of Brownfields Cleanup Alternatives (ABCA), Remedial Action Plan (RAP), Quality Assurance Project Plan (QAPP), State Program Enrollment, Section 106 Historic Preservation Compliance
Anticipated Project Schedule: Q5-Q16
Task/Activity Lead: QEP; Program Manager; Program Coordinator; Project Facilitator
Outputs: Updated and finalized ABCA; comprehensive RAP including site maps, excavation limits, and engineering controls; technical specifications for contractors; EPA-approved QAPP; standard operating procedures (SOPs) for field technicians; completed VCP enrollment application; official entry letter/agreement from the State environmental agency.
<b>Task/Activity 4: Cleanup and Closeout</b>
Project Implementation: EPA-funded tasks/activities: Physical Remediation: Excavation of contaminated soil, capping, or installing vapor mitigation systems, Hazardous Materials Abatement: Specifically listing asbestos, LBP, or PCB removal if applicable, Confirmation Sampling, Cleanup Completion Report, No Further Action letter.
Anticipated Project Schedule: Q8 - Q16
Task/Activity Lead: QEP; Principal Engineer; Professional Engineer; Program Manager
Outputs: Approximately 31,000 cubic yards of contaminated soil excavated & properly disposed of; 28,309 square feet of LBP/asbestos containing materials abated & properly disposed; confirmation sampling reports; data validation reports to verify lab results; one (1) final Cleanup Completion report; as-built drawing showing the exact location of any remaining; engineering controls; one (1) official NFA letter.

Below are the anticipated cost estimates based on past brownfield projects and costs for the city’s Comprehensive Plan *Forward SGF*. The budget includes personnel, travel, supplies, contractual, construction, and other (registration/conference fee) direct costs only. A total of 96% of the budget encompasses site cleanup and contractual project oversight with 80% spent on site-specific cleanup. Any other costs will be covered through the city’s general fund. **Task 1: Project Management and Reporting:** Personnel \$22,680 (Tracking expenditures & drawdowns [\$45 x 144 hrs.]; annual submission of FFRs [\$45 x 20 hrs.]; attendance at National Brownfields Conference and other conferences by key staff [\$45 x 240 hrs.]; production of “Success Story” for program and EPA promotion [\$45 x 20 hrs.]; media releases [\$45 x 20 hrs.]; hiring a QEP through a competitive process [\$45 x 40 hrs.]; submission of the final Property Cleanup Completion form [\$45 x 20 hrs.]). Travel: \$23,690 (4 staff to attend 2 National Brownfields Conference: Airfare \$2,800 [\$700 x 4 staff members]; hotel \$5,000 [\$250 p/night x 5 nights x 4 staff members]; parking/transportation \$500 [\$100 p/day x 5 days]; meals \$1,500 [\$75 p/day x 5 days x 4 staff members] x 2 conferences); (4 staff to attend 2 local trainings or conferences: Mileage \$290 [\$.725 x 200 miles x 2 conferences]; hotel \$2,400 [\$150 p/night x 4 nights x 4 staff members]; parking \$200 [\$50 p/day x 4 days]; meals \$1,200 [\$75 p/day x 4 days x 4 staff members]). Contractual: \$25,000 (Support city staff with ACRES, annual reporting, project management, and cooperative agreement compliance [\$180 x 101 hrs.] [\$191 x 36 hrs.]); Other: \$3,200 [\$400 p/conference registration x 4 staff members x 2 training/conferences]. **Task 2: Community Involvement:** Personnel: \$15,750 (Staff review of the CIP [\$45 x 40 hrs.]; community engagement scheduling; Staff attendance at two (2) public meetings [\$45 x 40 hrs.]; meeting minutes [\$45 x 30 hrs.]; preparation of presentation materials, fact sheets and flyers [\$45 x 30 hrs.]; social media updates [\$45 x 50 hrs.]; maintenance of the administrative record [\$45 x 60 hrs.]; public comments and responses documentation [\$45 x 40 hrs.]; Steering Committee meetings [\$40 x 60 hrs.]). Supplies: \$1,987 printed presentation materials \$63 [250 x 0.25 X 2 public meetings]; printed presentation materials \$75 [25 x 0.25 X 12 quarterly Steering Committee meetings] foam boards \$250 [50 x \$5]; \$999 iPad replacement for use at public & Steering Committee meetings [1 x \$999]; \$600 notebooks, paper, pens, other miscellaneous office supplies. Contractual: \$10,000 (Provide materials and summary information for public meetings and support the

development of website and physical outreach materials. Attend 2 public meetings [\$130 x 41 hrs.] [\$180 x 26 hrs.]). **Task 3: Cleanup Planning & Design: Personnel:** \$8,100 (Staff comments/review of finalized ABCA [\$45 x 40 hrs.]; Staff comments/review of RAP [\$45 x 40 hrs.]; Staff comments/review of QAP [\$45 x 40 hrs.]; Staff comments/review of SOPs [\$45 x 40 hrs.]; staff support for the VCP application [\$45 x 20 hrs.]). **Contractual** \$190,000 (Cleanup planning to include ABCA finalization, VCP enrollment document development, RAP and SSQAPP development, Section 106 compliance, delineation sampling as needed and bid specification development [\$180 x 550 hrs.] [\$26,000 analytical laboratory fees] [\$191 x 183 hrs.] [\$145 x 208 hrs.]). **Task 4: Cleanup and Closeout Personnel:** \$31,275 (Staff project oversight [\$45 x 655 hrs.]; staff comments/review of the final Cleanup Completion report [\$45 x 40 hrs.]). **Contractual:** \$365,000 (Oversee cleanup activities including contractor observation and clearance sampling for soils and hazardous materials, VCP close out activities including long term stewardship implementation such as environmental covenants as applicable) [\$163 x 615 hrs.] [\$180 x 555 hrs.] [\$203 x 492 hrs.] [\$65,000 analytical laboratory fees]; **Construction:** \$2,886,500 (\$77,100 LBP removal; \$20,000 ACM removal, \$706,500 contractor mobilization, soil excavation, hauling, and site restoration; \$202,900 concrete breaking and disposal; \$1,880,000 soil disposal tipping fees).

Budget Categories		Project Tasks				Total
		Project Management & Reporting	Community Involvement	Cleanup Planning & Design	Cleanup & Closeout	
Direct Costs	Personnel	\$22,680	\$15,750	\$8,100	\$31,275	\$77,805
	Fringe Benefits	\$-0-	\$-0-	\$-0-	\$-0-	\$-0-
	Travel	\$23,690	\$-0-	\$-0-	\$-0-	\$23,690
	Equipment	\$-0-	\$-0-	\$-0-	\$-0-	\$-0-
	Supplies	\$-0-	\$1,987	\$-0-	\$-0-	\$1,987
	Contractual	\$25,056	\$10,010	\$190,113	\$365,021	\$590,200
	Construction	\$-0-	\$-0-	\$-0-	\$2,886,500	\$2,886,500
	Other (training & conference fees)	\$3,200	\$-0-	\$-0-	\$-0-	\$3,200
Total Direct Costs		\$74,626	\$27,747	\$198,213	\$3,282,796	\$3,583,382
Indirect Costs		\$-0-	\$-0-	\$-0-	\$-0-	\$-0-
Total Budget		\$74,626	\$27,747	\$198,213	\$3,282,796	\$3,583,382

**g. Plan to Measure and Evaluate Environmental Progress and Results:** A Project Performance and Evaluation System will be implemented to ensure all activities correlate with the goals of the RJC Master Plan and community engagement for the “404 and “428” EPA Cleanup Grant project. The Economic Vitality (EV) Brownfields Team, Public Works staff and consultants will hold monthly meetings to review the project timeline and budget ensuring all expenditures remain reasonable and to ensure accurate quarterly reporting in ACRES. Progress will be measured by the timely completion of specific outputs such as community meetings, the finalized RAP, and the removal of contaminated soil. Success will be evaluated based on the outcomes specifically outlined in the Narrative including the increase in permeable surface area and acres of greenspace created on-site, leveraged funding for planned downtown redevelopment and jobs created. Quarterly reports will serve as a performance audit, comparing actual progress to the projected milestones. If a task such as the creek daylighting deviates from the schedule, the team will proactively develop a **Corrective Action Plan** with the EPA Project Officer. This system aligns with **Objective 6.1 of the EPA 2022-2026 Strategic Plan**, ensuring this project delivers the environmental justice and revitalization benefits promised to the community and ensuring transparency and accountability throughout the project period.

**(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE Programmatic Capability a. Organizational Structure b. Description of Key Staff:** SGF’s EV Brownfields Team provides a multi-disciplinary approach to ensure timely and compliant grant execution. Amanda Ohlensehlen, Director of EV (**Brownfields Administrator**) and Matthew Schaefer, Assistant Director, (**Brownfields Director**) provide over 20 years of combined expertise in federal program administration, resiliency planning, and project management; Loan Officer, Cheri Hagler, (**Program Manager**), has experience in project financing, management and monitoring for federal grants; Corey Stinson (**Program Coordinator**) and Patrick Ruiz, AICP (**Project Facilitator**) leverage backgrounds in urban planning, architecture, and construction to facilitate site-specific activities. Chris Dunnaway, PE and Kirkland Preston, PE (**Principal/Professional Engineers**) serve as the technical leads for

stormwater and creek daylighting, bringing direct experience from RJC Phase I to Phase II. The **Finance Team**, Monica Meador (Financial Analyst) and Glenda Troop (Accounting Technician), also have experience in federal grant management and compliance. The team is also supported by **City Leadership** and **City Council**.

c. Acquiring Additional Resources: To complete the activities under this **EPA Cleanup Grant**, the City will utilize its **three existing environmental consulting firms** currently under contract for other federal, state, and locally funded projects where the scope of work specifically included support for future Brownfields Grants. These firms were selected through a competitive process that complied with all federal procurement standards under **2 CFR 200**, ensuring merit-based selection and cost-reasonableness. While these consultants will provide technical oversight and project management, no cleanup contractor has been pre-selected for the physical remediation work. Upon receiving any awarded grant funds, the City will conduct a separate, **open competitive bidding process** to select a licensed cleanup contractor. This process will include clear technical specifications and will prioritize firms that demonstrate the capacity to meet federal Davis-Bacon Act requirements and incorporate the local workforce. The city will provide in-kind administrative support through the Departments of EV and Public Works. These staff hours are funded by the General Fund and will not be charged to the grant, maximizing the impact of federal dollars on the physical cleanup of the “**404 and 428**” site. Also, part of the EV Department is the SGF Workforce Development (WFD) Job Center that offers programs such as “Green for Greene.” This program is a free EPA-funded certification training in 13 environmental careers for unemployed or underemployed residents. The EV Brownfields Team will work with WFD to connect program graduates and job seekers to grant activities, promoting merit-based opportunities while providing lasting career skills. These strategies help the program drive sustainable economic revitalization and quality jobs. The city has a proven track record of acquiring additional resources and leveraging local, state, and federal funding as shown by RJC Phase I, which utilized City Level Property Tax, State ARPA funding, and an EPA Section 319 grant. This EPA grant will act as the critical anchor funding, providing the environmental certainty required to unlock private sector investment.

d. Currently has or Previously Received an EPA Brownfields Grant: Since 1999, the City of Springfield has successfully managed over **\$8M in EPA Brownfields funding, resulting in over 300 assessments** and nearly **100 cleanup and redevelopment projects**. The **2018 EPA Assessment Grant (07/01/2018-06/30/2021 BF 97764701)** achieved 100% of its workplan goals, delivering 37 Phase I ESAs, 20 Phase II ESAs, and 4 ABCAs. These efforts directly catalyzed the redevelopment of high-priority sites, creating **643 jobs** and leveraging more than **\$105M in private investment**. The city currently has **two open grants** including a \$500,000 **EPA Community-wide Assessment Grant (10/01/2025-09/30/2029 BF96723701)** and a \$1,000,000 in Supplemental RLF Grant. The Assessment Grant supported its first project with a Phase I completed in January 2026 and has a priority project pending site eligibility submissions in the queue that will result in an RLF loan. There is **\$439,680 remaining** for this grant. The **EPA Supplemental RLF Grant (10/01/2024-09/30/2029 4B96717701)** has a priority project pending site eligibility submission on the historic square with a loan anticipated for confirmed ACM and LBP abatement. There is **\$987,737.51 remaining to be spent on** this grant. All required reporting for the open grants is accurately reflected in the ACRES database as of the date of this submission. The city has an **RLF Grant in post-closeout (BF 98788001)**, which was identified in 2024 as being delinquent in quarterly reporting and ACRES updates after a staff member exit. The Department Head implemented immediate corrective measures by assigning new staff to clear the reporting/ACRES backlog while working closely with the EPA Project Officer. To ensure ongoing compliance, the city now utilizes a multi-staff oversight model and a tracking calendar with bi-weekly Department Head reviews. Since this transition, 100% of quarterly reports and ACRES updates have been submitted on or before the deadline. Springfield remains committed to compliance with EPA terms and conditions and is committed to ensuring that all quarterly performance reports, financial reports, and workplan deliverables are submitted on time and of high quality.

## Threshold Criteria Responses

### Narrative Attachment

**(1) Applicant Eligibility**

General Purpose Unit of Local Government.

- The City of Springfield Missouri affirms it is eligible to apply for EPA grant funding.
- The City of Springfield is not exempt from Federal taxation under section 501(c)(4) of the IRC.

**(2) Previously Awarded Cleanup Grants**

The City of Springfield affirms that the proposed site(s) has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

**(3) Expenditure of Existing Multipurpose Grant Funds**

The City of Springfield affirms it does not have an open EPA Brownfields Multipurpose Grant.

**(4) Site Ownership**

The City of Springfield affirms it owns the following properties through fee simple title.

- **404 N. Jefferson Ave.**, Springfield MO 65806
- **428 N. Jefferson Ave.**, Springfield MO 65806

**(5) Basic Site Information**

- a) The 404 b) **404 N. Jefferson Ave.** Springfield, MO 65806.
- a) The 428 b) **428 N. Jefferson Ave.** Springfield, MO 65806.

**(6) Status and History of Contamination at the Site**

**404 N. Jefferson Ave.**

- a) The site is contaminated by hazardous substances
- b) The property is currently vacant but has a one-story, brick building on the site. Previous uses for the site include a hardware and wood store, coal storage, grocery store, train depot, freight house and most recently a lumber yard.
- c) Environmental assessments have identified polycyclic aromatic hydrocarbons (PAHs) in site soils, and existing structures contain asbestos-containing materials (ACM) and lead-based paint.
- d) This target area has a history of intensive industrial and transportation-related uses (as stated above). These legacy uses are strongly associated with site contamination. The ABCA indicates that Arsenic, cadmium, and lead were measured at levels exceeding Missouri Risk-Based Corrective Action (MRBCA) standards. In addition, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, indeno(1,2,3-cs) pyrene, and naphthalene were all measured in exceedance of MRBCA standards.

**428 N. Jefferson Ave.**

- a) The site is contaminated by hazardous substances
- b) The property is currently vacant land. Previous uses for the site include rail-related storage, industrial, commercial warehousing and most recently an HVAC wholesale service and distribution company.
- c) Environmental assessments have identified polycyclic aromatic hydrocarbons (PAHs) in site soils.
- d) Located immediately adjacent to 404, the 428 Site has the same history of intensive industrial and transportation related uses. These legacy uses are strongly associated with

site contamination. The ABCA indicates that Arsenic, cadmium, and lead were measured at levels exceeding Missouri Risk-Based Corrective Action (MRBCA) standards. In addition, benzo (a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, indeno(1,2,3-cs) pyrene, and naphthalene were all measured in exceedance of MRBCA standards.

**(7) Brownfield Site Definition**

The City of Springfield affirms that:

**404 N. Jefferson Ave.**

- a) Is not listed or proposed for listing on the National Priorities List; and
- b) Is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA;
- c) Is not subject to the jurisdiction, custody, or control of the U.S. government.

**428 N. Jefferson Ave.**

- a) Is not listed or proposed for listing on the National Priorities List; and
- b) Is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA;
- c) Is not subject to the jurisdiction, custody, or control of the U.S. government.

**(8) Environmental Assessment Required for Cleanup Grant Applications**

**404 N. Jefferson Ave.**

- Phase I March 9, 2007
- Phase I June 8, 2018
- Phase I December 15, 2020
- Phase II July 30, 2021
- Draft ABCA January 13, 2026

**428 N. Jefferson Ave.**

- Phase 1 June 9, 2009
- Phase 1 September 11, 2020
- Phase II July 19, 2021
- Draft ABCA January 13, 2026

**(9) Site Characterization**

**404 N. Jefferson Ave.**

b.i. Attached is a letter signed by Scott Huckstep, Section Chief of the Brownfields Voluntary Cleanup Program for the Missouri Department of Natural Resources acknowledging our application for FY 2026 US EPA Brownfields Cleanup Grant funding and our intention to enroll the cleanup of the sites in the Brownfields/Voluntary Cleanup Program.

**428 N. Jefferson Ave.**

b.i. Attached is a letter signed by Scott Huckstep, Section Chief of the Brownfields Voluntary Cleanup Program for the Missouri Department of Natural Resources acknowledging our application for FY 2026 US EPA Brownfields Cleanup Grant funding and our intention to enroll the cleanup of the sites in the Brownfields/Voluntary Cleanup Program.

**(10) Enforcement or Other Actions**

**404 N. Jefferson Ave.**

The City of Springfield affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

**428 N. Jefferson Ave.**

The City of Springfield affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

**(11) Sites Requiring a Property-Specific Determination**

**404 N. Jefferson Ave.**

The City of Springfield affirms that the site does not need a Property-Specific Determination.

**428 N. Jefferson Ave.**

The City of Springfield affirms that the site does not need a Property-Specific Determination.

**(12) Threshold Criteria Related to CERCLA/Petroleum Liability**

a. Property Ownership Eligibility – Hazardous Substance Sites

**iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY**

(1) Bona Fide Prospective Purchaser Liability Protection

(a) Information on the Property Acquisition

(i) **404 N. Jefferson Ave.** acquired ownership through negotiated purchase from a private individual (ii) Acquired on April 26, 2021 (iii) Fee Simple (iv) Store Master Funding XV, LLC (v) No affiliation to prior owners or operators.

(i) **428 N. Jefferson Ave.** acquired ownership through negotiated purchase from a private individual (ii.) Acquired on October 21, 2021 (iii) Fee Simple (iv) Advocates for a Healthy Community, Inc. (v) No affiliation to prior owners or operators.

(b) Pre-Purchase Inquiry

**404 N. Jefferson Ave.**

(i) An ASTM E1527-13 Phase I dated December 15, 2020 was performed for the City of Springfield (ii) The City of Springfield affirms that the Phase I environmental site assessment was performed by an Environmental Professional and the required declaration by the Environmental Professional is included in the written report (iii) The City of Springfield affirms that we conducted the appropriate updates in the original assessment within 180 days prior to the date of acquisition of the property to take advantage of the bona fide prospective purchaser provision.

**428 N. Jefferson Ave.**

(i) An ASTM E1527-13 Phase I dated July 19, 2021, was performed for the City of Springfield (ii) The City of Springfield affirms that the Phase I environmental site assessment was performed by an Environmental Professional and the required declaration by the Environmental Professional is included in the written report (iii) N/A.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

**404 N. Jefferson Ave.:** No disposal of hazardous substances at the site occurred prior to acquisition and the City of Springfield did not cause or contribute to any release of

hazardous substances at the site. The City of Springfield affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

**428 N. Jefferson Ave.:** No disposal of hazardous substances at the site occurred prior to acquisition and the City of Springfield did not cause or contribute to any release of hazardous substances at the site. The City of Springfield affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses

**404 N. Jefferson Ave.** has been vacant since acquisition.

**428 N. Jefferson Ave.** has been vacant since acquisition.

(e) Continuing Obligations

**404 N. Jefferson Ave.**

(i) Even though the land is unrestricted, on a regular basis city staff has managed, monitored, and maintained the site to ensure no changes are or have been made and that the vacant building is secured in order to stop any continuing releases (ii) Even though the land is unrestricted, on a regular basis city staff has managed, monitored, and maintained the site to ensure no changes are or have been made and that the vacant building is secured in order to prevent the threat of future releases (iii) Even though the land is unrestricted, on a regular basis city staff has managed, monitored, and maintained the site to ensure no changes are or have been made and that the vacant building is secured in order to prevent or limit exposure to any previously released hazardous substance.

**428 N. Jefferson Ave.**

(i) Even though the land is unrestricted, on a regular basis city staff has managed, monitored, and maintained the site to ensure no changes are or have been made and that the vacant building is secured in order to stop any continuing releases (ii) Even though the land is unrestricted, on a regular basis city staff has managed, monitored, and maintained the site to ensure no changes are or have been made and that the vacant building is secured in order to prevent the threat of future releases (iii) Even though the land is unrestricted, on a regular basis city staff has managed, monitored, and maintained the site to ensure no changes are or have been made and that the vacant building is secured in order to prevent or limit exposure to any previously released hazardous substance.

The City of Springfield affirms that on both **404 N. Jefferson Ave.** and **428 N. Jefferson Ave.** we are (i) complying with any land use restrictions and not impeding the effectiveness or integrity of any institutional controls (ii) assisting and cooperating with those performing the cleanup and providing access the property (iii) complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and (iv) providing all legally required notices.

**iv. SITES WITH HAZARDOUS BUILDING MATERIAL THAT IS NOT RELEASED INTO THE ENVIRONMENT**

**404 N. Jefferson Ave.**

The City of Springfield affirms that there has been no release and that there is no threat of release of the hazardous substance(s) from building materials into the outdoor environment based on the site conditions.

#### **428 N. Jefferson Ave.**

The City of Springfield affirms that there has been no release and that there is no threat of release of the hazardous substance(s) from building materials into the outdoor environment based on the site conditions.

#### **(13) Cleanup Authority and Oversight Structure**

##### **404 N. Jefferson Ave. and 428 N. Jefferson Ave.**

a. The City of Springfield will ensure oversight of all cleanup activities through a multi-tiered management structure. The primary technical oversight will be provided by a Qualified Environmental Professional (QEP) who has been procured in accordance with federal regulation 2 CFR 200. The QEP will be responsible for Developing the Remedial Action Plan (RAP); preparing the Health and Safety Plan to protect site workers and the surrounding community; providing on-site supervision during soil excavation and remediation activities and managing the collection of confirmation samples to verify that cleanup goals have been met. The City of Springfield also affirms that the site will be enrolled in the Missouri Voluntary Cleanup Program (VCP) prior to beginning any cleanup activities. By enrolling in the VCP, we will work directly with a designated State Project Manager who will review and approve all cleanup plans and technical reports. This partnership ensures that the remediation meets both state and federal risk-based standards. Upon successful completion of the cleanup, we will seek a "No Further Action" (NFA) letter from the State, providing legal closure and certifying that the property is safe for reuse.

b. To ensure a comprehensive cleanup and verification process, The City of Springfield will develop a proactive strategy for securing off-site access should it be required for confirmation sampling, groundwater monitoring, or air quality buffering. Our plan includes early identification of any potential sampling gaps near the property boundaries by the QEP, obtaining formal access agreements after reaching out to adjacent property owners to explain the request as a proactive measure to ensure soil and air quality remain unaffected and retain all access agreement documents with the project file to ensure all cleanup data is legally defensible and comprehensive.

#### **(14) Community Notification**

The City of Springfield provided the community with notice of its intent to apply for an EPA Brownfields Cleanup Grant and allowed the community the opportunity to comment on the draft application and Analysis of Brownfield Cleanup Alternatives (ABCA).

##### **a. Draft Analysis of Brownfield Cleanup Alternatives**

The draft Analysis of Brownfield Cleanup Alternatives (ABCA) was posted on the City of Springfield Brownfields website on January 14, 2026, to allow the community an opportunity for comment. The draft ABCA has been submitted as part of the application.

##### **b. Community Notification Ad**

The community notification ad was first published on January 8, 2026, on the City of Springfield's brownfields website advising of the community meeting date and that the draft application and ABCA would be posted on that site on or before January 14, 2026. The website was updated with the draft documents on January 14, 2026, and a new Facebook notice was also posted. Public and Media Releases were made on the City of Springfield website detailing the public/virtual meetings that were being held, where to find the draft documents and where and when comments could be made. Reminders were also posted to Facebook on January 20 & 21, 2026. All ads advised of i. where the draft

application and ABCA could be found for public review and comment; ii. that comments could be made in person at the public meeting, at the virtual meeting, or emailed to a provided email address; iii. that the draft application was available on the City of Springfield Brownfield website with a link provided; and iv. the public meeting would be held in person on January 21, 2026, from 4:30-5:30 pm in the Busch Municipal Building 1<sup>st</sup> floor conference room or virtually on January 21, 2026, from 4:30-5:30 pm with a link to join the meeting on the website. All ad postings allow for access by community members with limited English proficiency and disabilities. All members of our community were provided with the opportunity to comment on the application.

**c. Public Meeting**

A public meeting was held both in person and virtually on January 21, 2026, and a i. summary of the comments received; ii. the City of Springfield's responses to those comments; iii. a summary of the public meeting(s); and iv. meeting sign-in sheet and participant list was produced.

**d. Submission of Community Notification Documents**

Attached to the application submission is

- A copy of the draft ABCA
- A copy of the advertisements demonstrating solicitation for comments on the application and that notification to the public occurred at least 14 calendar days before the application submission date of January 28, 2026.
- The summary of the comments received.
- The City of Springfield's response to the public comments.
- A summary from the public meetings.
- A meeting sign-in sheet/participant list.

**(15) Contractors and Named Subrecipients**

- **Contractors**  
Not applicable
- **Named Subrecipients**  
Not applicable