

**PROPOSAL FOR USEPA’S COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT
 RFP NO. EPA-OLEM-OBLR-23-12/ CFDA NO. 66.818
 Section IV.D. – Narrative Information Sheet
 November 13, 2023**

1. Applicant Identification

Town of Pulaski, Virginia
 42 First Street Northwest
 PO Box 67
 Pulaski, Virginia 24301-5602

2. Funding Requested

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested: \$500,000

3. Location: Incorporated Town of Pulaski, Pulaski County, Virginia

4. Target Area and Priority Site/Property Information:

- Target Area and Census Tract/Town/City of Target Area

<u>Target Area</u>	<u>Census Tract / Town / State</u>
Town of Pulaski	Census Tract: 51155210201, Pulaski, Virginia
	Census Tract: 51155210300, Pulaski, Virginia
	Census Tract: 51155210401, Pulaski, Virginia

- Addresses of Priority Site(s)

1. Pulaski Furniture Corporation, 100-300 blocks of Third Street, Pulaski, VA 24301
2. Washington Avenue Oil Company Site, 40 Washington Avenue, Pulaski, VA 24301
3. Former U-Fill-Em, 320 E Main Street, Pulaski, VA 24301

5. Contacts

a. Project Director / AOR

Darlene Burcham, Town Manager
42 First Street, NW
Pulaski, VA 24301
Phone: 540-944-8601
Email: dburcham@pulaskitown.org

b. Chief Executive/Highest Ranking Elected Official

Shannon Collins, Mayor
42 First Street, NW
Pulaski, VA 24301
Phone: 540-944-8600
Email: scollins@pulaskitown.org

6. Population

US Census Bureau, 2020:
Town of Pulaski: 8,985

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1,2
The priority site(s) is in a federally designated flood plain.	1,2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	N/A
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B. , for priority site(s) within the target area(s).	8
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	N/A

8. Letter from the State Environmental Authority: Attached

9. Releasing Copies of Applications: N/A



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Travis A. Voyles
Acting Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4000

November 8, 2023

Darlene Bucham, Town Manager
Town of Pulaski
42 First Street, NW
Pulaski, VA 24301

VIA ELECTRONIC MAIL

Subject: Acknowledgement and Support – Town of Pulaski
FY 2024 Community-Wide Assessment Grant
EPA-OLEM-OBLR-23-12

Dear Ms. Burcham:

The Virginia Department of Environmental Quality (DEQ) is in receipt of your request for support to the above referenced Brownfields Grant application. The request will be for an EPA Community-Wide Assessment Grant for the Town of Pulaski. This grant, if awarded, will allow the Town to build on existing accomplishments from three prior EPA Assessment Grant award efforts.

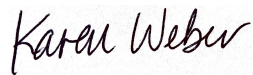
It is our understanding that the Town of Pulaski has identified new and existing target areas and at least three priority sites. Target areas include gateway corridors leading into downtown Pulaski that present opportunities for commercial and small industrial development while downtown areas benefit opportunities for mixed use development. This grant request includes focus areas and priority sites that will promote continued economic development opportunities including job creation, renewed community investment, and addressing areas of blight.

The DEQ Brownfields Program is pleased to provide our support for this grant proposal and feels that if successful the grant funds will play a vital role in continuing the revitalization and redevelopment efforts. It is our sincere hope that this EPA proposal will be successful, and

that the Town will be able to continue leveraging funds to stimulate economic development and revitalization within the target areas.

If we can be of further assistance, please don’t hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "Karen Weber". The signature is written in a cursive, flowing style.

Karen Weber, CPG
Brownfields Coordinator

cc: Meade Anderson, CPG, DEQ-CO
Lucas Hamelman, CPG, DEQ-CO
Nichole Herschler – DEQ-BRRO

TOWN OF PULASKI, VIRGINIA
PROPOSAL FOR USEPA'S COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT
Section IV.E – Narrative Proposal / Evaluation Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Unless noted, references are latest publicly available and reflect the most current information.

1.a Target Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area: Town of Pulaski (Town), Virginia, the county seat of Pulaski County, is located in the New River Valley of Southwest Virginia. Situated conveniently near major transportation routes, Interstate I-81 passes southeast of town and US-11 runs through the downtown commercial district. Incorporated in 1886, the Town of Pulaski boasts a rich industrial history rooted in mineral processing, textiles, and furniture manufacturing. The town experienced an economic boom in the late nineteenth century, as it became a center of mineral processing and smelting. Commercial development began north and south of Peak Creek to support the burgeoning community. The transition from mineral processing to a new industrial base of textiles and furniture began in the early decades of the twentieth century. However, the local manufacturing base began to contract in the 1980s with the closure of two textile companies and the consolidation of Coleman Furniture with Pulaski Furniture. With the closure of Pulaski Furniture in 2007, the Town began the process of redefinition and reinvestment. Not to be deterred, however, **Pulaski is resilient**. The redevelopment of blighted and underused areas through the utilization of their current and previous USEPA Brownfields Assessment Grant and leveraging of private sector investments has enabled the community to revitalize brownfield sites by building upon the Town's greatest assets: natural beauty, history, culture, recreational opportunities, and an active citizenry. **Although revitalization efforts are evident within the downtown core, poverty persists and brownfield challenges continue within the Town - visible blighted areas remain, affecting the economic outlook and quality of life of adjoining residential neighborhoods.**

This grant will focus on the Town's gateway entrances within two Target Areas: The **Eastern Gateway into Downtown (Census Tract 2102.01)** along East Main Street (Rte. 99), from Bob White Boulevard to Washington Avenue, and the **US Highway 11 Corridor Entrances to Downtown** from the north and the south (**Census Tracts 2103 & 2104.01**). These **Justice40 disadvantaged** areas clearly reflect the town's decline, but each also offers steps toward renewal. These two major corridors present opportunities for commercial/small industrial development, and the downtown area contains opportunities for mixed use development. Revitalization of these corridors will provide economic development opportunities such as job creation and renewed community investment, while also addressing areas of blight and environmental injustices.

1.a.ii. Description of the Priority Brownfield Site(s): Priority Site 1 (Eastern Gateway - Census Tract 2102.01): The 14-acre former **Pulaski Furniture Corporation** site, occupying 3 blocks on 3rd Street NE, the primary entrance to the downtown business district, **paints a stark, dilapidated, unwelcoming gateway to the Town**. Founded in Pulaski in 1955, the business once employed 260 employees until closing its doors in 2007. Since then, the shuttered plant buildings have been partially used for warehousing. The property is covered with a mix of former office, manufacturing, finishing, maintenance, and storage buildings, including a five-story storage warehouse. Many of these buildings have been allowed to deteriorate, creating a large eyesore and unhealthy conditions for citizens and visitors. The buildings likely contain asbestos containing material (ACM), lead-based paint (LBP), and other hazardous substances, including contamination from petroleum, metals, PCBs, and chlorinated solvents. This site is also a potential polluter to the adjacent **Sproules Run**, a tributary to the impacted **Peak Creek**, located just to the south. Most of the property is located **within a FEMA regulatory flood zone (AE)**. **Impacts to soil, groundwater and vapor are also likely, serving as a significant hindrance to its redevelopment, which when occurs will likely attract a diversity of commercial and institutional enterprises, providing substantial job opportunities to its citizens and improve tax revenue.** The current owner of the site has been receptive to the Town performing necessary environmental assessments and has expressed their intent to be a financial partner in a mixed-use redevelopment of the site. If awarded, grant money would be used towards assessments, remediation planning and conceptual redevelopment planning.

Priority Site 2 (Eastern Gateway - Census Tract 2102.01): This approximately 3.25-acre parcel is a large corner lot

on the south side of E Main Street, **the eastern entrance to downtown**. The lot is home to a blighted former gas station and former auto dealership. Both buildings are shuttered and have been for some time. An additional large automotive service building previously sat between the two remaining buildings but was removed. The site's entire south property line abuts the impacted **Peak Creek** and sits **within the FEMA regulatory flood zone (AE)**. Petroleum and chlorinated solvent-impacted soil and groundwater are a concern and, due to the age of the buildings, ACM and LBP are likely to be present. Grant funds would be utilized to perform Phase I and Phase II ESAs, including an ACM and LBP survey and a geophysical investigation to determine the presence of any lingering underground storage tanks or old hydraulic lift vaults that could house PCBs. ***With targeted redevelopment towards outdoor recreation building on the Town's popular mountain bike trails and skatepark, this riverfront property along the eastern edge of downtown has the potential to be transformative to the Town's economy and tourism by utilizing the natural beauty of Peak Creek.***

Priority Site 3 (US Highway 11 Gateway - Census Tracts 2103 & 2104.01): The **Premier Service Center**, located at 40 S Washington Avenue (US-11), is an abandoned gas station at **the southern entrance to downtown within a designated Justice40 disadvantaged census tract (2104.01)**. Similar to Priority Site 2, Pulaski visitors are forced to travel by this blighted property as they enter downtown from the south. US-11 is the only entrance into Pulaski from the south, making this an important gateway to the community. This former gas station, constructed in the 1960s, is a source of blight in addition to the potential petroleum, ACM, LBP, chlorinated solvents, and other hazardous substances that could plague the site. **Located adjacent to Valley Branch and within a FEMA regulatory flood zone (AE)**, this site may also be a source of pollution to the impacted Peak Creek located immediately north. This corner property is on the same block as the Jefferson School, **a former brownfields site that has received necessary assessments and is under active redevelopment**. The Town hopes to build on the success of the Jefferson School while eliminating this gateway eyesore by returning this parcel to beneficial use. The Town envisions the property reused as a support facility for the Jefferson Site, which is being redeveloped as a vertical growth laboratory in conjunction with Virginia Tech (VT). One of Virginia's largest institutional employers, VT is located less than 25 miles from Pulaski, whose exceptional pace of growth is spurring spillover economic and bedroom community growth in Pulaski. **All three priority sites are unsecured, allowing free access for sensitive populations to come in unhealthy and dangerous contact with these identified potential health hazards.**

1.a.iii. Identifying Additional Sites: In addition to the priority sites, the Town has a large list of other target brownfields sites identified previously, especially focused in the vicinity of the 3 gateway, priority sites. Pulaski will continue to seek brownfield site selection and prioritization input from its Qualified Environmental Professional (QEP) and Economic Development Board (EDB) who also serve as the brownfields task force for the Town, and comprised of volunteer community members (See Section 2.b). The Town and QEP meet monthly with the EDB to discuss brownfield issues impacting their communities and to identify potential candidate sites for assessment. Pulaski's site prioritization ranking process involves the consideration of many factors, including redevelopment potential, community input, perceived contamination, and **environmental justice**.

1.b Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans: The Town of Pulaski has demonstrated community readiness and capacity through various community planning efforts and focused public and private investments downtown. Through several recent planning processes, the community has established a cohesive and collaborative vision for the future of downtown. The Town of Pulaski Comprehensive Plan supports downtown revitalization by establishing specific goals and strategies to help eliminate blighting conditions, build on its strengths as a tourism destination, and improve overall community aesthetics through the enhancement of public spaces and properties.. The Pulaski Redevelopment and Renewal Plan, the Pulaski Peak Creek Corridor Study, and the Pulaski Downtown Revitalization Master Plan (DRMP) serve as valuable tools for pursuing revitalization activities within the target corridors by engaging private investors and public partners. The DRMP set goals to **"eliminate slums and blight through the rehabilitation and adaptive reuse of existing downtown structures** and develop public amenities and other infrastructure to **improve the visitor and retail traffic and general economic atmosphere in downtown Pulaski"**. The Pulaski Strategic Plan and Vision provides a comprehensive set of strategies to support economic development in the town, including an ongoing small business recruitment and retention program, strategies for **adaptive reuse and**

redevelopment of vacant properties, development of recreation and public amenities, an update to the tourism plan, and **implementation of improvements to town entry corridors**. Environmental assessments and redevelopment planning of priority and candidate target area sites will fulfill several of the goals outlined in these plans. Revitalization of the blighted former **Pulaski Furniture Corporation** site is a priority for the town, whose footprint is large enough to support a mixed-use development that includes housing, retail, health services, and restaurants—identified needs within the planning documents. Such a large development, spanning three blocks, would reshape downtown Pulaski and has the potential to be transformative in numerous other ways. This EPA Grant would provide the seed money to give the project momentum towards achieving these stated goals.

1.b.ii. Outcomes and Benefits of Reuse Strategy: Positive outcomes allow Pulaski to continue to focus on enhancing economic potential within the Target Area. By revitalizing the priority sites, multiple outcomes will be achieved, including the following: 1) removal of legacy pollutants, improving health outcomes for sensitive populations 2) reuse of historical structures 3) business growth and additional redevelopment within the Target Areas 4) increased property values 5) local job creation and 6) green building upgrades. The benefits of these outcomes will have a major impact on Target Area residents and the surrounding communities, including the following: 1) increased mental and physical health, especially to disadvantaged communities 2) stronger community ties 3) updated buildings through use of energy efficient windows, appliances, lighting, and water fixtures and reduced stress on electrical grids and treatment facilities 4) improvement of past environmental injustices towards disadvantaged communities, and 5) decreased poverty levels due to increased economic opportunities.

Planning efforts funded under this grant provide an opportunity for Pulaski to focus on climate resiliency by incorporating climate friendly best management practices (BMPs) into brownfield site reuse concepts. This includes methods to: reduce total energy use and increase the percentage of energy from renewable resources; reduce air pollutants and greenhouse gas emissions; reduce water use and preserve water quality; conserve material resources and reduce waste; and protect land and ecosystems such as Peak Creek. **Priority Sites 1-3 will particularly benefit from climate-focused redevelopment planning, as each are adjacent to waterbodies and within designated flood prone areas. By prioritizing BMPs, Low Impact Development, and Green Infrastructure for stormwater management in site reuse plans, Pulaski will build and strengthen community flood resiliency to the effects of climate change and provide equitable development to its disadvantaged communities.**

1.c Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: As documented in Section 2.a, the Town of Pulaski does not have sufficient resources to enact meaningful change toward revitalization without outside assistance. Since 2012, the Town of Pulaski has successfully leveraged ten (10) Virginia Brownfields Restoration and Economic Redevelopment Assistance Fund (VBAF) grants, utilizing their EPA Assessment Grant funds as the required funding match, to complete additional brownfield site assessment work and remediation totaling **\$667,150**. The former General Chemical Company Foundry (GCC) site located adjacent to Peak Creek on the east end of downtown was the beneficiary of a VBAF Planning Grant of \$50,000, as well as a Remediation Grant of \$240,000, to facilitate assessments, conceptual planning, demolition, soils remediation, and enrollment in the Commonwealth's Voluntary Remediation Program. Local matched funds (beyond the EPA leveraged funds) have totaled over \$300,000, for a total leveraged project(s) value of over **\$1.3 million**. In the fall of 2021, ***the former foundry site remediation was completed, transforming this community health liability into a safe and bustling outdoor skate park and basketball court facility.*** A focus of the Town's current EPA grant is to build upon the GCC's success, with the McCarthy Building redevelopment project slated to leverage close to an additional million dollars in grants as well as private investment towards the Town's first brew-pub. The Town has partnered with a local brewer to renovate the former foundry office building adjacent to the new recreational facility and has solicited additional capital from the Virginia Department of Housing and Community Development (VDHCD) Industrial Revitalization Fund (**\$750,000**), the Pulaski Redevelopment and Housing Authority, and the VDHCD Community Development Block Grant program. Pulaski is eligible for numerous state and federal grants, but may also tap into non-grant assistance sources such the Brownfields Technical Assistance Programs. Since the Pulaski Brownfields program began in 2008, over **\$10,000,000** of economic development capital investments have been recorded by companies moving into old properties, tourism developments (e.g. Jackson Park Inn and Conference Center, AI's on First restaurant),

and community improvements (e.g. Peak Creek Promenade). In addition, these investments have directly led to the generation of nearly 100 jobs.

1.c.ii. Use of Existing Infrastructure: The utilization of existing utility connections (water, sewer, gas, electricity, and telecommunications), rail access, and roadways were used as important prioritization criteria when evaluating the Priority Sites for assessments and redevelopment potential. No key infrastructure needs are anticipated for priority site revitalization plans. Sufficient utility capacity and infrastructure are currently available for most commercial-industrial development, however, the Town will facilitate upgrades collaboratively if needed for a specific site reuse.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a Community Need

2.a.i. The Community’s Need for Funding: Per the 2020 decennial census, the town of Pulaski’s population is 8,985. There has been a continual decreasing trend in Pulaski’s population, totaling a 16.5% decline since its peak manufacturing days in the 1960s¹. Census.gov 2021 ACS 5-yr estimates indicate Pulaski’s poverty rate in Census Tract (CT) 2104.01 is 29.2%, which is more than double that of the county (12.8%) and nearly triple the state rate (9.9%). **Pulaski has endured persistent poverty**, with a rate greater than 20% demonstrated in the 2000 (21.8%), 2010 (22.0%), and 2020 (21.8%) censuses. The population of CT2102.01 is also largely reliant on public food assistance, as 34.5% of its residents depend on these services compared to the state average of 8.0%. **The southern gateway to Pulaski, CT2104.01, is a designated Justice40 disadvantaged community due to low-income status.** Pulaski’s economic indicators are staggeringly different than those of average Virginians, as the current Median Household Income (MHI) for those in CT2102.01 is less than 60% of state MHI. Additionally, CT2104.01’s Median House Value (MHV) is only 30% of the state’s MHV, correlating to reduced tax revenue. Current trends indicate Pulaski’s senior population will likely double in the next 20 years, while the under-25 demographic is declining. This will lead to increased demand for services to support older citizens, yet a smaller tax base will exist to fund these services². Town resources are stretched thin in maintaining basic services, addressing current community issues, and funding critical infrastructure. The economic and demographic conditions in Pulaski’s Target Areas clearly demonstrate the need for outside funding.

2.a.ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: Nearly 25% of Pulaski’s population lives below the poverty level, compared to 10.0% statewide. More strikingly, an estimated **36.4% of children under 5 live in poverty** compared to 13.9% statewide. The southern gateway corridor (**Priority Site #3 – CT2104.01**) contains approximately double the minority population as the surrounding area. To compound the issue, when Pulaskians do get sick, they are unable to find the healthcare they need. According to the New River Community Health Digest (NRCHD), Pulaski lies within a designated medically underserved area of Virginia³. Additionally, Virginia Department of Health, Health Opportunity Index⁴ (VDH HOI) rankings note the local health district as having very low wellness, economic, and health opportunities, indicating gaps in medical care access, quality, and affordability. These factors all lead to poorer health outcomes. The priority site assessments proposed under this grant will help identify health hazards within the Target Area left behind by the noted former industries. If necessary, brownfield sites will receive remediation planning to strategize the best way to facilitate removal of the hazards, or implementation of site controls, to limit sensitive populations’ exposure to COCs. The table below highlights selected sensitive groups within the Target Area and how they compare disparagingly to the surrounding region.

Demographic	Virginia	Pulaski County	Town of Pulaski	Priority Corridor Sites (Census Tract)
Minority	38.5%	9.9%	17.1%	(CT2104.01) 19.2%
% Total Population with Disability	12.7%	11.8%	24.8%	(CT2104.01) 33.8%
Poverty Rate	10.0%	13.5%	24.5%	(CT2102.01) 29.0%
% Single Female head of household with children in Poverty	30.3%	37.2%	40.1%	(CT2102.01) 78.4%
% Utilizing Food Stamps	7.9%	12.0%	24.9%	(CT2102.01) 33.6%
Over 65yrs old in Poverty	7.5%	9.8%	14.7%	(CT2104.01) 23.9%
Under 5yrs old in Poverty	13.9%	12.9%	21.8%	(CT2102.01) 36.4%

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Local health data is unavailable for the Target Area, however regional data for Pulaski County details greater than normal incidence of disease and

adverse health conditions. Within the New River Valley (NRV) Livability Initiative study area (five counties), **Pulaski County was ranked highest** in teen births per1000 females, % low birth rate, % children in single parent household, % age 25+ without a high school diploma, and % **children between the ages of 5 and 18** in The NRCHD ranks Pulaski County deaths per 100,000 among the top two counties in heart disease, stroke, diabetes septicemia, pneumonia, and suicide, in addition to having the highest rate of sudden death from opioid use (**five times the state rate**). The **EPA EJScreen** health indicator rankings for 2023 presented in the table below document how Pulaski residents are subject to greater than normal adverse health outcomes when compared to state and national levels.

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	26%	20%	94	20%	93
Heart Disease	8.3	5.5	89	6.1	87
Asthma	10.6	9.6	80	10	71
Cancer	7.8	6.1	86	6.1	86
Persons with Disabilities	27.6%	12.6%	97	13.4%	97

Elevated blood lead levels have been documented in Pulaski County children under 36 months and 0-15 years at double the corresponding state rates. This correlates to the EPA's EJScreen ranking of CT 2104.01 within the **92nd percentile of LBP presence**. The blighted and vacant industrial/petroleum priority sites presented in Section 1.a.ii. are unsecured, allowing community members to freely contact asthma-inducing and carcinogenic COCs attributed to their former use. The sensitive populations surrounding these legacy brownfield sites are at high risk due to the presence of older residences and commercial buildings that tend to contain higher LBP and ACM levels. Additionally, this increases exposure risk for children, which is linked to low birth weight, asthma, and mesothelioma cancer. The priority site assessments proposed under this grant will help identify and plan for cleanup of unknown hazards within the Target Area, resulting in reduced contact with the COCs contributing to these greater than normal adverse health outcomes.

(3) Environmental Justice: 3.a Identification of Environmental Justice Issues: **EJScreen** mapping for 2023 ranks Pulaski residents within the **87th percentile for low-income earners** and the **92nd percentile for proximity to hazardous wastes sites** in addition to the abnormally high health indicator percentiles presented above. The VDH HOI report notes that the Town ranks near the bottom of Virginia's health districts for wellness disparity. The wellness disparity metric combines a segregation index, which ranks community diversity and racial/ethnic separation, with ease of access to care. In addition, the VDH Health Equity Report identified Virginia's African American children were 3.1 times more likely to live in poverty than their White counterparts and accounted for 40.5% of all children living in poverty statewide¹. The report concluded that, to reduce the equity gap, Virginia needs to invest in community building and urban renewal to reduce poverty among African American families. **The southern gateway to Pulaski, CT2104.01, is a designated Justice40 disadvantaged community** and contains the majority of Pulaski's minority residents. This Target Area was chosen to prioritize identification and assessment of environmental justice issues within this community.

3.b Advancing Environmental Justice: Under the Town's current EPA grant, funding for assessments and reuse planning were prioritized for the Historic African American Calfee Community and Cultural Center (CCCC) to include a Phase I ESA, ACM and LBP survey, Structural Evaluation, and Historical Designation assistance for reuse tax credits. Among many other benefits, the CCCC project will provide office space and technology-equipped multipurpose rooms for community use, day care facilities so mothers can go to work, employer specific workforce training, and a museum celebrating the rich African American history of Pulaski. The Town will continue to search for ways to utilize their grant funds for meaningful advancement of environmental justice throughout their minority and underserved communities. This grant will assist in evaluating priority and other brownfield sites within the target areas, determine current site conditions, which will not only remove the disproportionate share of environmental

¹ <https://www.census.gov/quickfacts/pulaskitownvirginia>

² <https://www.vdh.virginia.gov/health-equity/virginia-health-equity-report/>

³ <http://nrvlivability.org/resources/livability-plan-reports/>

⁴ <https://www.vdh.virginia.gov/content/uploads/sites/123/2016/12/NRHD-Comm-Health-Digest.pdf>

⁵ <https://apps.vdh.virginia.gov/omhhe/hoi/dashboards/counties>

consequences to the Justice40 disadvantaged population, but also improve the communities through increased services and property values. The anticipated site reuses envisioned for the priority sites will provide housing and services currently lacking in the Target Area and will not compete with existing Pulaski businesses or contribute to the displacement of residents.

2.b. Community Engagement

2.b.i / 2.b.ii Project Involvement and Project Roles: The Town’s **Economic Development Board (EDB)** has a successful record of community engagement, having served as its **Brownfields Task Force (BTF)** through the Town’s previous grant cycles. The BTF meets monthly along with their QEP and is comprised of a diverse group of voluntary civic leaders from business, banking, construction, engineering, utilities, healthcare, insurance, the media, clergy, local (Town and County) government, and grassroots community-based organizations. Community-based organization members such as Jill Williams, Executive Director of the Calfee Community and Cultural Center, and Cathy Hanks, President of the 501(c)(3) organization Friends of Peak Creek, can reach a wider audience than the BTF to disseminate information regarding the brownfields program and solicit participation. The Town provides meeting space and has held community engagement sessions at the Town Hall and historic Pulaski train depot. Under its current EPA grant, **the BTF, led and informed by Town Staff**, are responsible for identifying and ranking candidate sites, establishing milestones, and ensuring that the proposed activities are completed within the grant period. The BTF will continue to advance a sustainable brownfields redevelopment program and will serve as ambassadors, advisors and a steering committee throughout the project, bringing their community vision and expertise as sites are prioritized to identify their reuse potential. The Town will continue to utilize these successful partnerships and roles, if selected for a FY2024 EPA Grant, to promote engagement of the community.

2.b.iii. Incorporating Community Input: Since the beginning of their Brownfields Redevelopment Program, the Town has worked with citizens and community leaders to develop the vision and plans to create successful brownfields redevelopment. The BTF has solicited input from the larger community, particularly business representatives in the Pulaski Target Area. Representatives involved in the initial outreach, including the partners listed above, will remain involved in the project and BTF upon award and will continue to guide the program, providing direct community input into the brownfields initiative. The BTF will meet quarterly at a minimum to assist Town staff with site selection and cleanup/reuse planning. Staff will update citizens of brownfields activities through social media, periodic Council meeting updates, and direct meetings with those directly affected by the project. The BTF and Town will involve neighborhood representatives directly impacted by proposed redevelopment projects and provide intentional updates and responses in a way to best facilitate communication. Outreach efforts conducted throughout the Target Area may include educational seminars/workshops and design charrettes in order to garner input on existing assets and redevelopment needs. Virtual or in-person meeting announcements will be distributed/posted throughout the target community and emailed to appropriate parties, and gatherings will be publicly advertised via local print and electronic media. BTF member Jill Williams, organizer of the historical African American Calfee School Project Citizen Steering Committee, will be a liaison to and representative for the minority communities to communicate their needs and disseminate information, which will benefit constituents with limited internet and/or phone access. Town Staff will make final reuse decisions, factoring in the community vision of the BTF and input garnered during the community engagement activities described herein.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs (Sections 3.a.i.-v. outlined under each task)

Task 1 – Program Administration / Community Engagement	
i.	Project Implementation: Cooperative Agreement Oversight includes program and financial management to ensure compliance with grant requirements; oversee data input to EPA’s ACRES database; attend brownfield-related training and conferences; and submit quarterly, annual, and final performance reports. If specific, eligible, and appropriate activities beyond the priority sites are needed, the same process described herein will be followed. Community Engagement includes coordinating and conducting meetings and developing materials. Grant-funded direct costs: Travel expenses (registration, airfare, lodging, and meals), supplies, and contractual costs for assistance with reporting and maintaining interactions with stakeholders. Non-EPA funded activities: In-kind Town Staff oversight for administration, monitoring, reporting, and community engagement activities and attending

training conferences.
ii. Anticipated Project Schedule: Procure Qualified Environmental Professional (QEP) (4.a.iii): Q1; ACRES and quarterly reports: Quarterly and as needed; Annual and closeout reports: Q4, Q8, Q12, Q16; BTF meeting: Q2 and quarterly thereafter; Other activities: Ongoing and as needed.
iii. Task / Activity Lead: Town Staff led by AOR (See Section 4.a) with input/assistance from QEP and BTF.
iv. Outputs: RFP/QEP Contract (1); Quarterly Reports (16 Total - 4/Year); Annual Reports (3); Closeout Report (1); Property Profile Forms/ACRES Site Entries (18); BTF Meetings (16); Community Meetings (8); Conferences (3); Brochures (3); Media Releases (6); Web Page Content (3); Advertisement, printing, and supplies (5 events).
Task 2 – Site Inventory and Prioritization
i. Project Implementation: The Town will add to the existing GIS brownfields site inventory and database for the priority and target area sites described in Section 1.a.ii and include sites in underserved communities within the geographic area. These properties will be compiled, mapped, characterized, and prioritized by the BTF and Town based on community vision, redevelopment potential, and community needs. A pool of sites will be selected for assessment from the target areas. If grant funds remain after addressing the priority sites, the most current EJ Screening Tool will be used to identify additional sites in underserved communities within the geographic area. When sites have been identified, they will be selected using the same criteria. No assessments will be conducted prior to confirming eligibility with EPA and DEQ, if applicable, for petroleum sites using Property Approval Questionnaires (PAQs). Grant-funded activities: Contractual costs to update, maintain inventory/database and prepare PAQs. Non-EPA funded activities: In-kind Town Staff oversight, site prioritization, and property owner access coordination.
ii. Anticipated Project Schedule: Site inventory and database, prioritization, selection: Q2 – Q3, update monthly; Other activities: Ongoing and as needed.
iii. Task / Activity Lead: QEP will prepare/maintain inventory and PAQs with Town Staff/AOR oversight assistance with access coordination and work product review/approval. BTF will provide site selection and prioritization input.
iv. Outputs: Inventory/Database (1); Prioritization Matrix (1); New and/or updated PAQs (18)
Task 3 – Environmental Site Assessments (ESAs)
i. Project Implementation: Upon receiving eligibility approval and access from property owners, approximately 12 Phase I ESAs will be conducted, beginning with priority sites. Phase I ESA time and costs are contingent upon property size, existing improvements, past uses, and extent of known or suspected Recognized Environmental Conditions (RECs). Based on Phase I ESA results, approximately 3 sites will be addressed through Phase II ESAs, which include (a) project work plans (i.e. generic Quality Assurance Project Plan (QAPP), Quality Management Plan (QMP), site specific Health and Safety Plans (HASPs), and Field Sampling Plans (FSPs)); (b) soil, groundwater and/or air sampling; (c) lab analyses and data validation; and (d) summary reports with recommendations for further action, if warranted. Grant-funded activities: Contractual costs for assessments, work plans, and reports. Non-EPA funded activities: In-kind Town Staff oversight, coordination with property owners, and review of work products prior to EPA submittal.
ii. Anticipated Project Schedule: Phase I ESAs: Q3 – Q15 (after updating inventory database and priority list); Phase II ESAs: Q3 – Q15 (following Phase I review and priority list)
iii. Task / Activity Lead: QEP with Town Staff/AOR oversight, assistance with property owner coordination and community input, and work product review/approval.
iv. Outputs: Phase I ESA Reports (12); Phase II ESA Reports 3); Phase II ESA Planning Documents (8 Total): Generic QAPP (1), QMP (1), HASPs (3), and FSPs (3)
Task 4 – Preliminary Planning for Remediation and/or Redevelopment
i. Project Implementation: For some sites addressed through Phase II ESAs, preliminary remediation plans (Analyses of Brownfields Cleanup Alternatives or ABCAs) and associated cost estimates will be prepared to review alternatives for further environmental investigation and/or remediation, if warranted. Town staff and QEP will also work with stakeholders to conduct preliminary redevelopment planning for selected target areas and/or sites to explore best reuse and economic potential. This may include reuse plans, marketing/feasibility studies, master plans, infrastructure evaluations, and conceptual development plans. Grant-funded activities: QEP costs for remediation and redevelopment plans. Non-EPA funded activities: In-kind Town Staff/AOR oversight,

coordination with property owners and community partners to prepare plans, and review/approve work products.
ii. Anticipated Schedule: Q3 – Q15
iii. Task / Activity Lead: QEP with Town Staff/AOR oversight, assistance with property owner coordination and community input, and work product review/approval.
iv. Outputs: Site-Specific ABCAs (2); Site-Specific Redevelopment Plans / Studies for priority sites (4); Area-Wide Revitalization Plans / Studies for target areas (2)

3.b. Cost Estimates

The **Project Budget Tables** below provide direct costs to the defined tasks and cost types, including cost estimates for each task, the cost development based on reasonable and realistic unit costs, and cost application to task activities. Cost estimates include an allocation of **43%** of funds towards site-specific assessments and **40%** of funds towards reuse/area-wide planning activities. The remaining 17% will be used towards grant administration, community engagement, and site inventory/prioritization. **The Town will not charge indirect costs.**

Budget Categories		Task 1 Grant Admin / Grant Reporting/ Com. Engagement	Task 2 Site Inventory / Prioritization	Task 3 Environmental Site Assessments	Task 4 Remediation / Redevelopment Planning	Total
Direct Costs	Travel	\$10,000	\$0	\$0	\$0	\$10,000
	Supplies	\$3,000	\$0	\$0	\$0	\$3,000
	Contractual	\$39,200	\$35,000	\$212,800	\$200,000	\$487,000
TOTAL BUDGET		\$52,200	\$35,000	\$212,800	\$200,000	\$500,000

Task 1 – Grant Reporting / Community Engagement – \$52,200 Total – Direct & Contractual	
(a)	Travel – \$10,000 Total (Direct Expense) – Attendance of 2 national conferences for 1 person and 3 state conferences for 2 people assuming the following unit costs (national/state): Conference registration: \$255/\$190; Transportation: \$1000/\$205; Hotel: \$200 per night for 3 nights/\$175 per night for 2 nights; Meals: \$70 per day for 4 days/\$70 per day for 3 days
(b)	Supplies – \$3,000 Total (Direct Expense) – Advertisement, printing, supplies and promotional materials for 6 community-wide and/or site-specific events estimated @ \$500 per event.
(c)	Contractual – \$39,200 Total – QEP assistance for reporting/grant reporting: \$1,200/quarter (\$4,800/year, \$19,200 Total); and QEP assistance for community engagement activities/BTF meetings, including development of communication materials: \$1,250/quarter (\$5,000/year, \$20,000 Total)
Task 2 – Site Inventory and Prioritization – \$35,000 Contractual	
(a)	Develop and maintain a GIS brownfields site inventory mapping / database and site prioritization matrix estimated: \$15,000 Total
(b)	Site access coord. assistance, preparation, and submittal of PAQs: \$1,250/quarter (\$5,000/year, \$20,000 Total)
Task 3 – Environmental Site Assessments (ESAs)* – \$212,800 Total – Contractual	
(a)	Phase I ESAs – Twelve (12) @ \$5,500 average – \$66,000 Total
(b)	Phase II ESAs – Three (3) @ \$40,000 average – \$120,000 Total
(c)	Project Work Plans – Eight (8) plans – \$26,800 Total, as follows: <ul style="list-style-type: none"> • Generic Quality Assurance Project Plan – 1 @ \$6,000 Total • Quality Management Plan – 1 @ \$2,800 Total • Site-Specific Health & Safety Plans (HASPs)** – 3 @ \$1,000 average – \$3,000 Total • Site-Specific Sampling & Analysis Plans (SAPs)** – 3 @ \$5,000 average – \$15,000 Total
Task 4 – Remediation / Redevelopment Plans – \$200,000 Total – Contractual	
Based on site conditions following assessment, Pulaski anticipates completing approximately nine (9) planning documents estimated as follows:	
(a)	Preliminary Site Remediation Plans (ABCAs) – 2 @ \$15,000 average – \$30,000 Total
(b)	Site-Specific Redevelopment/Reuse Plans/Studies – 4 @ \$27,500 average – \$110,000 Total

(c) Area-Wide Redevelopment Plans/Studies – 3 @ \$ 20,000 average – \$60,000 Total

* Unit costs for ESAs are estimates and may change depending on site-specific conditions.

** HASPs and FSPs will be combined into single report submittal.

3.c. Plan to Measure and Evaluate Environmental Progress and Results: To maintain steady progress throughout the grant, the QEP will update the **Town and BTF** by attending *monthly meetings* and will prepare *monthly reports* in compliance with the approved **EPA Cooperative Agreement Work Plan**, which will summarize activities (e.g. milestones achieved, issues encountered, and budget and schedule updates). Progress will be measured by the outputs defined in Section 3.a.iv. and evaluated against the schedule in Section 3.a.ii. and costs defined in Section 3.b. Significant deviations will be discussed with the EPA Project Officer to develop corrective actions. Updates will be reported upon implementation and completion of each site-related task in **EPA’s ACRES database**, and Pulaski will provide ongoing (quarterly, at a minimum) and post-grant information describing outcomes and benefits of the funding, including additional funds leveraged, jobs created, acres made ready for redevelopment, and private investment and tax revenue generated by the program.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a Programmatic Capability

4.a.i. / 4.a.ii. / 4.a.iii. Organizational Capacity, Organizational Structure, and Description of Key Staff: The table provides the future brownfields program’s organizational structure and describes key staff experience and qualifications. Given their education and professional experience, including their current position with the Town, the key staff fulfill roles that provide the technical, administrative, and financial capacity to provide oversight, management, and administration of the grant. If additional staff or resources are required, the Town will seek in-house staff to fulfill the need.

AUTHORIZED ORGANIZATIONAL REPRESENTATIVE (AOR): Darlene Burcham, Town Manager
Darlene Burcham came to the Town of Pulaski in an interim role in July of 2020 and was quickly selected to be the permanent Town Manager. Ms. Burcham brought with her over forty years of experience in local government leadership, including management of the localities of Clifton Forge, Roanoke, and Norfolk. She combines strong administrative and communication skills and economic development expertise with her institutional knowledge of the community to ensure the ongoing success of the Town’s Brownfields Program.
FINANCIAL: Jackie Morris, Finance Director
The Town’s Finance Director since 2021 and positioned within the Town of Pulaski’s Finance Office since 2015, Jackie’s job is to oversee and facilitate annual budgeting, accounts receivable and payable, payroll, general ledger accounting, financial reporting, and investment management. She successfully manages the ongoing EPA grant including ASAP drawdowns.
PLANNING: Summer Bork, Town Planner
Summer Bork has been the Town of Pulaski’s Planner/Zoning Administrator since May 2023. She worked as an Economic Recovery Planner with the New River Valley Regional Commission before working for Pulaski Town. She earned a Master’s Degree in Urban and Regional Planning from Virginia Tech and a Bachelor of Arts in History from James Madison University. She serves as the Secretary for several town boards, including the Planning Commission, Board of Zoning Appeals, and the Architectural Review Board.
TECHNICAL: Scott Aust, Project Engineer
Before joining the Town of Pulaski’s Engineering Department in 2022, Scott Aust spent fifteen years as an Engineer at the Virginia Tech Transportation Institute. He previously worked as a Design Engineer as well as in Engineering Support and Product Development. Scott’s professional experience, combined with a degree in Instrumentation and Electronics, give him a broad range of knowledge and skills that are valuable to the Town.

4.a.iv. Acquiring Additional Resources: Pulaski will rely on a **Qualified Environmental Professional (QEP)** contractor with appropriate expertise and resources to carry out the technical aspects of its Brownfields Redevelopment Program. For contractor selection and procurement, the Town will follow its competitive negotiation policies and procedures to obtain high quality professional services at reasonable cost, which will be conducted in a fair and impartial manner in compliance with Federal Code 40 CFR 31.36 and the Virginia Public Procurement Act (VA Code, Chapter 43, Title 2.2). Beginning with advertisement of a request for qualifications and proposals for professional services, followed by interviews with top candidates if needed, staff will score applicants and make recommendations to the Town Council for approval to negotiate a contract with a qualified candidate. Applicable EPA solicitation clauses will be incorporated into the Town’s solicitation and final contract executed with the selected QEP.

4.b. Past Performance and Accomplishments

4.b.i. Pulaski has previously received EPA Brownfields Grants and has an ongoing Grant.

(1) Accomplishments:

2020 EPA Brownfields Community-Wide Assessment Grant Recipient – Ongoing, Closeout by Sept 2024
The Town has utilized 78.6% of its current grant funding towards six (6) Phase I ESAs, three (3) Phase II ESAs, three (3) Property Transaction Screens, two (2) structural surveys, one (1) mold survey, four (4) ACM and LBP surveys, two (2) historical designations for redevelopment tax credits, and two (2) redevelopment planning activities. In addition, monthly BFT meetings have been held to update project partners and solicit site selection, prioritization, and reuse input from the target area community.

Associated Accolades and Awards: In addition to the above accomplishments, Pulaski was selected to present a panel discussion on the success of their 2009 grant at the National Brownfields Conference in Philadelphia in April 2011. The Town’s program, entitled ***How to Eat an Elephant: Steps to Developing a Community-Led Brownfields Redevelopment Program***, focused on the Town’s success in fostering citizen involvement to net tremendous community and political support for their brownfields program. The Town was selected for a second presentation at the 2017 National Conference in Pittsburgh, entitled ***Sparks Igniting Sustainable Community Revitalization***. In April 2018, Pulaski hosted the Virginia DEQ State Brownfields Conference at a former brownfields site, now Jackson Park Inn and Conference Center, with over 130 in attendance. Additionally, in March 2019, Pulaski received a state Community Economic Development Award (CEDA) from the Virginia Economic Development Association for its successful brownfields program, which was followed by a regional CEDA in August at the Southern Economic Development Council meeting in New Orleans.

(2) Compliance with Grant Requirements: The Town has demonstrated it is fully capable of successfully completing all work phases under the cooperative agreement. The Town is familiar with and understands the necessity of developing work plans, creating and maintaining schedules, and assuring adherence to project terms and conditions. All required documentation was submitted in a timely manner and approved by EPA. Final site packages were submitted through ACRES and approved for all program sites assessed. In their 4th quarter report for FFY23 under their current EPA grant, the Town reported a **78.6%** draw down of their \$300K grant. For all four of its EPA Brownfields Grants, Pulaski has complied with all requirements established in their respective Cooperative Agreements with EPA, including community engagement activities, administrative reporting, and technical commitments. All applicable site information was input to EPA’s ACRES reporting system, all required administrative reports were submitted in a timely manner and approved by EPA, and final project closeout was completed on time for the 2008, 2014, and 2017 awards. EPA granted a one-year extension to the current 2020 award due to delays with the McCarthy Building project discussed in Section 1.c.i. The project was prolonged due to a delay in acquiring leveraged funding from VDEQ, pushing out the timeline for completion. Now that the project is back on track, the Town fully expects to expend all grant funds by the new performance date of September 2024, if not before.

TOWN OF PULASKI, VIRGINIA
PROPOSAL FOR USEPA'S COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT
RFP NO. EPA-OLEM-OBLR-23-12 / CFDA NO. 66.818
Section III.B. – Threshold Criteria
November 13, 2023

1. Applicant Eligibility

- a. The Town of Pulaski (Town), located in Pulaski County, Virginia, was incorporated in 1886. As a chartered political subdivision of the Commonwealth of Virginia, Pulaski is considered a **General Purpose Unit of Local Government** and an eligible applicant for funding under EPA guidelines having rights to conduct associated activities within the Town's incorporated limits under the EPA Cooperative Agreement.
- b. The Town of Pulaski does not meet 501(c)(4) status.

2. Community Involvement

The Town will continue to engage its existing **Economic Development Board (EDB)**, a citizen board made up of members from the community, to participate in its program as the **Pulaski Brownfields Task Force (BTF)**. Since 2008, this group of dedicated citizens has coordinated with elected officials and staff to advance a sustainable brownfields redevelopment program for the Town and will continue to serve as brownfields ambassadors, advisors and a steering committee throughout the project, bringing their community vision and expertise in business, construction, health care, and real estate. The community involvement and communications component of the proposed brownfields assessment program, which is described in greater detail in the Town's narrative proposal **Section IV.E.2.b. – Community Engagement**, includes (1) monthly EDB/BTF team meetings, (2) project updates at advertised public meetings, particularly at meetings and work sessions of the Town Council, (3) maintaining a brownfields project information section on the Town's website, (4) preparing printed materials, e.g., program brochures, and media releases to disseminate project updates and program success stories.

The Town will also continue to extend its outreach efforts to citizens directly impacted in target areas. This effort will afford opportunities to review project deliverables, especially remediation and redevelopment plans, through presentations to local business and civic organizations and through small group and neighborhood meetings, open house events and planning charrettes, facilitated by the EDB/BTF, staff and consultants, to allow a broad range of community perspectives. Pulaski will use a hybrid approach to communicate project progress and receive and incorporate feedback from the local community in consideration of current COVID-19 levels and the community's capabilities and limitations. If needed, all forms of media and meetings can be offered with bilingual options to better reach and serve all communities.

3. Expenditure of Assessment Grant Funds

See attached ASAP Report, next page, and Section 4.b of the Narrative Proposal. The Town of Pulaski affirms it has drawn over 70% of their current \$300,000 EPA Assessment Grant (# BF-96377501-0) as of October 16, 2022. In their 4th quarter report for FFY23 under their current EPA grant, the Town reported a 78.6% draw down of their \$300K grant.

4. Contractors and Named Sub-recipients

Not applicable – the applicant has not identified a procurement contractor nor sub-recipient to conduct work proposed in this application.