

#### **Narrative Information Sheet**

# 1. Applicant Identification

The City of South Fulton 5440 Fulton Industrial Blvd. SW South Fulton, GA 30336

## 2. Funding Requested

a. <u>Assessment Grant Type</u> Community-wide

b. Federal Funds Requested \$500,000

- 3. Location The City of South Fulton, Fulton County, Georgia.
- 4. Target Area and Priority Site/Property Information
  - Target Area:
    - o Red Oak District CT 1312011306 and
    - o Old National Highway District CT13121010603 and
    - o Old National Highway District CT 13121010507
  - Priority Site 1: Camelot Condominiums 5655 Old National Highway
  - Priority Site 2: Old National Park 2400 Pleasant Hill Road SW
  - Priority Site 3: Historic Fire House 4800 Miller Road
- 5. Contacts
- a. Project Director

Artie Jones, III

Director of Economic Development

5440 Fulton Industrial Blvd. SW, South Fulton, GA 30336

Telephone: (470) 716-4904

Email artie.jones@cityofsouthfultonga.gov

#### b. Chief Executive/Highest Ranking Elected Official

khalid kamau

Mayor

5440 Fulton Industrial Blvd. SW, South Fulton, GA 30336

Telephone: (470) 809-7710

Email khalid.kamau@cityofsouthfultonga.gov

6. Population City of South Fulton, Georgia 108,575 (2021 US Census)

November 13, 2023



# 7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
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).	
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy	
The reuse of the priority site(s) will incorporate energy efficiency measures.	4, 6, 7
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	
At least 30% of the overall project budget will be spent on eligible reuse/ area-wide	9
planning activities for priority site(s) within the target area.	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	

8. <u>Letter from the State or Tribal Environmental Authority</u> Attached.

9. <u>Releasing Copies of Applications</u> Not Applicable.



## Jeffrey W. Cown, Director

#### **Land Protection Branch**

2 Martin Luther King, Jr. Drive Suite 1054, East Tower Atlanta, Georgia 30334 404-656-4713

October 30, 2023

# VIA ELECTRONIC Mail artie.jones@cityofsouthfultonga.gov

Mr. Artie Jones, III Director of Economic Development City of South Fulton 6385 Old National Highway Suite 210 South Fulton GA 30349

RE: State Acknowledgement Letter – Brownfield Community-Wide Assessment Grant Application City of South Fulton

Dear Mr. Jones:

This letter serves as acknowledgement from the Georgia Environmental Protection Division ("GA EPD") that the City of South Fulton will be submitting an application to the U.S. Environmental Protection Agency ("EPA") for funding assistance under the federal Community-Wide Assessment Grant Program to conduct assessment and planning activities. GA EPD understands that the City is applying for \$500,000 for the assessment of hazardous substances and petroleum in the Old National Highway and Red Oak Districts.

EPD would like to take this opportunity to encourage EPA's positive decision in making a grant award to the City of South Fulton for such assessment . A successful award would greatly assist this community in its redevelopment efforts. Thank you for your consideration.

Shannon Ridley

Brownfield Coordinator

File: FFY 2024, EPA Grant Applicants, City of South Fulton-Assessment

# 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

## a. Target Area and Brownfields

Overview of Brownfield Challenges and Description of Target Area Just southwest of the World's busiest airport, Hartsfield-Jackson International Airport (Airport), lies the young City of South Fulton (the "City"), which encompasses 86.25 sq. miles and has a resident population of 108,575 (US Census 2022). The City was incorporated on May 1, 2017, following the robust 'Cityhood Movement' which swept through Metro Atlanta between 2005 and 2015. Spurred by a desire to retain tax contributions and reject Fulton County's (County's) political control, many wealthier, unincorporated areas of the County chose to establish themselves as individual cities. Unfortunately, this quick and vast removal of key tax base from the County's revenue hurt many of the other areas of still unincorporated Fulton County, especially areas with higher levels of poverty and minority population. The future City of South Fulton was one of these impacted areas. Before its incorporation, the community was comprised of the largest population of lowincome residents within the County. The County, which had lost a significant tax base from the incorporation of wealthier areas, began to shrink services and support to low-income areas, like South Fulton. Simultaneously, the City was dealing with the fast-paced growth of the nearby airport and subsequent issues associated with its expansion, including the relocation of wealthier residents away from the nuisance and towards the new centers of population growth. Many businesses followed suit, creating a wealth vacuum effect, which eroded imported revenues and left former commercial corridors vacant. With a desire to have more control over resources, budget, and other aspects of their community, the City incorporated and has been moving towards reinstating the success that many areas in South Fulton once held. Considerable obstacles are being faced after decades of disinvestment. Brownfield properties (30%) of land in the target area) complicate redevelopment efforts. High crime, significant poverty, and lack of business interest exacerbate the struggle.

The **geographic boundary** of the application is the City. Proposed grant activities will be focused on the **target** area (TA), which includes the contiguous Old National Highway and Red Oak Districts (2.27 square miles combined) This TA is the priority corridors of the City's Main Street Programs and the focus of recent Livable City Initiative (LCI) planning studies. Geographically, this area is defined by the City's eastern boundary, Jonesboro Rd to the south, Ben Hill Rd and I-85 to the west, and Will Lee Rd to the north. Old National Highway is a commercial corridor located immediately south of Interstates 85/285, on the eastern edge of the City with the highest population density. Once touted as being the premier shopping destination in the south metro-Atlanta area, Old National Highway is now suffering from high vacancy rates, blighted neighborhoods, increased crime, drug manufacturing and distribution, and general disinvestment. This district is a key focus area identified for redevelopment by the City. The corridor is ideally located along key transportation routes, accessible to established residential developments, and in close proximity to the Hartsfield-Jackson International Airport, a crucial economic driving force for the City. The **Red** Oak District runs perpendicular to the Old National District, directly west of Interstate 285 and north of U.S Route 29. Developed as a railroad community in the late 1850s, this corridor historically serviced the commercial and industrial needs of rail passengers and rail cargo. Currently, the area suffers from high rates of air toxins (95th-100th percentile in the USA), continued environmental, social, and physical issues due to the areas high proximity to traffic (86<sup>th</sup> percentile in the USA), and a low-income (46%) population (EPA EJScreen, 2022). This is just one example of the brownfield challenges faced by the target area.

Serious environmental justice issues (brownfield challenge), such as the proliferation of contaminants such as drug manufacturing compounds; and solvents and petroleum products from illegal dumping and numerous gas stations/automotive repair facilities, friable asbestos-containing materials (ACMs); lead-based paint (LBP); PFAS, an EPA emerging contaminate from firefighting foams; have plagued the target area and its citizens resulting in increased disinvestment in the area. This disinvestment has perpetuated and worsened the living conditions of the minority-led community. Old National Highway has become a center for illicit drug activity and a decaying, built environment, resulting in high crime rates, lack of affordable and safe housing (especially for seniors), scarcity of recreational and/or park facilities, and a number of other socio-economic issues. Historically, Old National Highway was a popular commercial corridor. Only in recent decades has this designation dissipated due to a damaging cycle of real and perceived crime causing and worsening disinvestment. To restore Old National Highway as a premier commercial corridor, reduction of brownfields, crime, and drugs, along with a significantly sized project are required to catalyze reinvestment in the area and disrupt the damaging cycle. This grant will directly support the inventory, assessment and planning for reduction of brownfield properties, as well as plan for economically-viable solutions with reuse planning.

November 13, 2023

ii. Description of the Priority Brownfield Site(s) Brownfields are commonplace throughout the target area, with an estimated 30% of the target area being considered brownfields. The proximity of the Airport, three highways, and a rail line, made the target area historically desirous for the manufacturing of goods, with easy distribution throughout the country. The exodus of these business (see 1.a.i.) has left a litany of abandoned properties. An active quarry is centrally located within the target area, which provides construction materials for metro Atlanta, while reducing air quality and risking heavy metal contamination within the target area. Common contaminants of concern include asbestos-containing materials (ACMs); lead-based paint (LBP); PFAS; drug manufacturing compounds; solvents and petroleum exist in a number of identified brownfield properties and the priority sites listed below.

The following sites were **prioritized for reuse** based on their identification as focus areas in the Economic Development Strategic Plan (completed 2020) and/or meeting the goals laid out in the City's recently updated Comprehensive Plan, discussed in Section 1.b.i. Focus areas and goals were developed based on community engagement input. Sites were **prioritized for assessment** due to perceived contamination impeding reuse.

- Site 1, Camelot Condominiums, is identified as a focus area and catalyst site in the Strategic Plan. Citizens unanimously prioritized the 41.6-acre site, known to be a top crime-hub of the City, during Strategic Plan engagement sessions. Built in the '70s, it was a homeownership opportunity for primarily minority, lower-income residents. It was a family-oriented community with a playground, tennis courts, and club house. A corrupt HOA led to Camelot's demise. Today, residents live interspersed between condemned buildings. Used needles can be found in the parking area outside the dilapidated playground, a health concern for children and parents. Entire buildings have been overtaken by drug manufacturing and distribution of meth and fentanyl. Fires are commonplace, with charred remains of entire buildings throughout the development. Fire sources are two-fold, drug manufacturing and squatters illegally stealing electric from other units. Illegal dumping is rampant, with overflowing dumpsters, dismantled cars, gas cans, and more. Environmental concerns include ammonia, ether, acetone, and controlled substances from drug manufacturing; solvents and petroleum products from illegal dumping and solvents and petroleum products from illegal dumping; LBP, friable ACMs; and PFAS (an EPA emerging contaminate from firefighting foams). Beyond the drug lords, Camelot is home to seniors and families with young children, with nowhere else to go. This site is **proposed to be** redeveloped as a mixed-use, mixed-income development with 192,931 ft<sup>2</sup> of retail space and 849,400 ft<sup>2</sup> of residential space, in the form of 661 multifamily units and 114 townhomes (SHAPE, Old National Park Concepts). The redevelopment will be constructed in phases to minimize displacement. Phase I will replace condemned buildings with new, safe, and affordable senior housing for ownership. This will provide an opportunity for senior residents of Camelot to relocate within their neighborhood with minimal disruption. Phase II will include the remaining residential units, as well as implementation of retail/commercial space connecting to Phase I.
- Site 2, Old National Park, Like Site 1, this 43-acre assemblage was recognized as a focus area and catalyst site in the Strategic Plan, and prioritized by stakeholders during engagement efforts. The Site is largely hidden from view from Old National Highway, but upon closer inspection, the potential environmental issues are very apparent. Nonconforming uses are abundant. Concerns include solvents and petroleum from illegal dumping and abandoned cars dispersed throughout the Park. Additionally, an abandoned, non-permitted air conditioner repair business (with a yard full of old, decaying condenser units) poses concerns from ozone-depleting refrigerants. This parcel lies adjacent to an active day care center. The assemblage adjoins Old National Park, a 22-acre athletic facility park. Old National Park and the day care center provide opportunities for the target area's youth to be impacted by the potential contaminants and storage tanks illegally dumped in this partially wooded, partially industrial area. As part of the reuse strategy, the City intends to preserve 18 acres of the wooded portions (where illegal dumping is most prevalent) into greenways and park expansions. Appropriate lighting and activity generation would deter dumping activities and curb illicit activities known to occur here. Recreational opportunities will be suited to the community, such as playgrounds, trails, outdoor gathering spaces (including home to the weekly Old National Farmer's Market), and elder-appropriate recreational equipment. As an economic driver into the community, plans include an outdoor competition swimming pool and water playground. 25 acres of the former industrial uses will be transformed into medium density mixed-use space (420,000 ft2 commercial; 1,450 residential units) and 100 townhomes.
- Site 3, Historic Fire House: This 1-acre parcel contains one of the last structures with historic character existing in the City. The structure is dilapidated and vacant, historically used as a fire station. Now outdated, the site features two bays for vehicles maintenance and storage, along with antiquated broadcast communication equipment. Environmental concerns include potential contamination for VOCs and petroleum product from maintenance, PCBs and mercury electrical equipment for the broadcast system, ACMs and LBP in building materials, and PFAS from

firefighting foams. Most concerning is the site is located in what is now a residential neighborhood and is a frequent site for trespassers. The site is planned to be acquired by South Fulton in December 2023 or early 2024 as part of a package of properties the City is working with the County to obtain. The Site will be a **community asset**, dually serving as a **community art studio and job incubation space**. The site will be home to the **Red Oak Farmer's Market**. These uses were prioritized by residents in the Comprehensive Plan Update community engagement.

iii. Identifying Additional Sites The City will turn the existing inventory of brownfield sites a GIS based brownfield inventory early in the grant period. The Inventory will depict storage tasks, hazardous waste sites, sites with perceived contamination, vacant properties, redevelopment opportunities, transit stops, and other layers as desired by Target Area residents/stakeholders. The Inventory will be presented at bi-annual meetings and updated per resident/stakeholder input. Site prioritization will occur with the Site Inventory, with sites given weight-based rankings on end use to meet community needs, perceived environmental issues, safety considerations, and catalyst potential. Although the inventory will focus on the target area, as informed and prioritized by City planning efforts to focus brownfield redevelopment within the most underserved and disadvantaged portion of the community, sites within the entire geographic boundary (City limits) will be considered. Prioritization of additional, inventoried brownfield sites will be incorporated into the engagement process and ranked by stakeholders. Meetings will be used to solicit input regarding additional site selection, site cleanup, and reuse planning through open conversations, and electronic and paper surveys. Contact information for the City's Brownfield Coordinator, Ms. Karaey Davis, will be readily available on the City's brownfield website and brochure for residents and stakeholders to reach out on additional site selection and input. Sites will be prioritized by the Brownfields Steering Committee based on secured site access, community feedback, need for environmental assessment, and potential redevelopment of end uses that meet the needs of the community including housing, jobs, and recreation.

#### b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans Recent planning efforts formed the basis of both the selection of the priority brownfield sites and the proposed reuse strategies. In June 2020, the City published our Economic Development Strategic Plan which included an assessment of demographic and economic conditions, a discussion of special opportunity areas, results of extensive community input (surveys, focus groups, SWOT analysis sessions, and stakeholder interviews), and finally, a five-year action plan. Overall, the Old National and Red Oak Historic Districts (target area) were identified as key economic development opportunities and led to formation of the Main Street Programs recently established for the target area. Community input, the initial step of the Plan found crime, quickly followed by lack of retail and restaurant options, as the City's two most significant challenges. Priority Site 1, the hub of crime for the City, and Priority Site 2, prime opportunity for commercial use, were identified as key focus areas along Old National Highway.

Following, the Economic Development Strategic Plan's identification of Priority Sites 1 & 2, the City completed an **Old National Highway Analysis** in September 2020. The Analysis included initial conceptual plans of the Sites. As discussed in 1.a.ii., Site 1, has been envisioned as a mixed-use, mixed-income development with nearly 200,000 ft2 of retail space and 661 multifamily units and 114 townhomes. Site 2 has been envisioned with three primary uses: recreation in the primary forms of a swimming facility and greenways; commercial space (420,000 ft2); and residential (1,450 multifamily units and 100 townhomes).

In 2021, the City completed their first **Comprehensive Plan Update**, which expanded their existing Plan to address the desires, needs, and opportunities identified in the above-mentioned planning efforts. At the time the Update was completed, the City not yet identified locations for some of the action items identified below. When the City was presented with the opportunity to include Priority Site 3 in a purchase agreement with Fulton County, the City knew the historic structure and surrounding land would be the perfect location for a business incubator, art studio, and the Red Oak Famer's Market to meet and advance Comprehensive Plan goals. The following action items were identified in the Plan Update as Implementation Actions to Build an Equitable South Fulton and ALL are incorporated through the proposed Brownfield project:

Implementation Actions	Priority Site Reuse Strategy Alignment
Create a brownfield/greyfield program	will support the assessment and reuse of Priority Sites
Promote homeownership opportunities	Sites 1 & 2 will include attainable home ownership opportunities
Develop Farmers Markets in Red Oak and Old	Sites 2 and 3 will be homes to their respective districts' farmers' markets
National Areas or within Community Parks	-
Develop business incubator space	The historic fire station building of Site 3 will house the incubator space

Partner with organizations to promote arts and placemaking	The City will partner with Fulton County Arts & Culture (project partner identified in Section 2.b.) to setup a community art center at Site 3. Reuse of Site 3 is key to placemaking in the target area.
Ensure Stable Housing for All	Sites 1 & 2 will provide a variety of housing types, for various income levels. There will be ownership and rental opportunities.
Creating an Economic Engine for the South Side	Sites 1 & 2 will be economic engines for the target area with the creation of mixed-use space. The swimming facility proposed for Site 2 is geared to be an economic driver, bringing swimming competitions, along with consumers, into the target area

ii. Outcomes and Benefits of Reuse Strategy The revitalization plans for the focus area emphasize mixed-use, mixed-income development and reinvestment in recreational and green spaces – all of which will contribute significantly to the economic enrichment of the City. The Camelot Condominiums site has contributed to the serious issues of real and perceived safety which has plagued the City since its incorporation, resulting in decreased business and higher vacancy rates, disinvestment, and reduced property values and tax revenues (many properties reduced by 50% since the early 2000s – City Property Records). Outcomes – This development proposes 192,931 ft² of retail space and 849,400 ft² of residential space, in the form of 661 affordable, energy efficient multifamily units and 114 townhomes that will reduce both housing and utility cost burdens on low income residents. With the redevelopment of this priority site, the City hopes to decrease dangerous crime activities and recreate the area in a more aesthetic and functional manner attracting visitors, residents, and future businesses to the area. Economic benefits include reductions to policing and code enforcement costs, improved taxable values and lower energy costs to residents (identified as CEJST energy cost burdened) without the displacement of target area residents. Additionally, current seniors will be made aware of Fulton County's homestead property tax exemption for seniors and how to enroll.

The revitalization plans for Old National Park encourage smart and green infill development and expand neighborhood services near existing residential development. **Outcomes** – 29± acres of highly demanded and safe recreational/park space (including an aquatic facility), over 1,000 residential units, including affordable and multigenerational housing options, critical civic spaces, and small-scale neighborhood retail/commercial uses. **Economic Benefits** – By revitalizing and adding to the area's recreational facilities, the City hopes to increase the demand to live, work, and play within the TA, attract new business, enhance existing business, and support the City in its economic, physical, and social growth, without resident displacement. The Historic Fire House's reuse strategy is to enhance the downtown corridor. The inclusion of a historic site encourages a stronger sense of place, history, and culture. **Outcomes** – Restoration of a historic structure for civic use. **Benefits** – The revitalization of this historically significant structure into an improved community venue, will push similar development in the area, growing sense of place and therefore consumer desire and increased tax revenue for the City. Site 1 will need to be demolished to provide for safer housing opportunities. To proactively counteract this, attainable housing opportunities at Site 2 are planned to be completed prior to displacement of residents of Camelot. Site 1 reuse will be phased, with Phase I of construction being affordable senior housing to minimize disturbances to the senior residents. Site 2 largely consists of vacant businesses. If a business is displaced, the City will aid in relocation to minimize displacement.

#### c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse As a city, South Fulton is eligible to access and implement a variety of monetary funding sources, including grants, loans, taxes, and more. This project will build off recent investments in the target area including a \$200,000 2022 Livable Communities Initiative Grant from the Atlanta Regional Commission to advance recent plans along Old National Highway. The City has received and dedicated American Rescue Plan (ARP) funds to the following activities that will support reuse of brownfields in the target area: \$1,050,000 for a Master Stormwater Plan; \$1,700,000 Stormwater infrastructure improvements; \$1,300,000 for broadband and Wi-Fi improvements; and \$130,000 for economic development planning. The Old National Highway corridor is currently undergoing federally funded resurfacing equating to \$3,808,397.71 (GDOT, 10/14/22). The development partner on Site 3 is seeking a State Apartment Incentive Loan which provides low-interest loans to support affordable housing projects. This grant will provide critical pre-development funds for assessment and reuse planning for community selected, priority sites that are otherwise unfunded and provide leverage for the following identified funding opportunities:

South Fulton	The Target Area is covered by a Tax Allocation District (TAD). Funding from the TAD can be	Assessment,
TAD	used to facilitate use. The amount of funding available depends upon the amount of new	cleanup, and
	development taking place and will vary with the Priority Sites.	reuse

EPA	Eligible site owners will apply for Brownfields Cleanup Grants	Cleanup
Green & Healthy	The City is in the process of establishing itself as a Green and Healthy Homes site, which will	Cleanup
<b>Homes Initiative</b>	enable the area to receive funding for lead remediation and abatement work	
U.S. Dept. of	The City has an estimated \$500,000 annually as a Community Development Block Grant that	Cleanup and
Housing (HUD)	can support cleanup and reuse of brownfield properties through funding items such as	reuse
	demolition, sidewalk repair, and sewer replacement.	
Georgia EPD	Site assessment and cleanup costs incurred while in GA EPD brownfield program can be	Cleanup
	recouped through property taxes for up to 10 years (max amount determined by GAEPD.	
Georgia DOT	Transportation Alternative Program (TAP) grants to fund non-traditional transportation such as	Reuse
	sidewalks, bike paths, and streetscapes (Up to \$1M)	
Georgia DCA	CDBG funding for demolition of blight, housing, public facilities, and economic development	Reuse
	for low- and moderate-income persons. (Up to \$500K)	
SPLOST	The City is eligible to implement Special-purpose Local-Option Sales Tax (SPLOST) to	Reuse
	finance the building of facilities, which may be used for the swimming facility proposed for	
	Site 2, estimated to pay for itself in 10 years	
Atlanta Regional	The City was awarded a 2022 LCI Grant for Old National Highway. The City will seek a	Reuse
Commission	\$200,000 2023 LCI Grant to plan for the Red Oak District and how to better connect the target	
	area.	
Georgia Dept. of	Grants will be sought through the Recreational Trails and Georgia Outdoor Stewardship	Reuse
Natural	Programs for engineering and construction of the greenways and park spaces for Site 2. Up to	
Resources	\$3,000,000.	

ii. <u>Use of Existing Infrastructure</u> The priority sites identified are all supported by existing infrastructure including utilities (gas, water, and electric), existing broadband, roads, and sidewalks (majority). Additionally, public transit infrastructure is extensive along Old National Highway (23 transit stops between Godby Rd and Flat Shoals Road i.e., the focus area), allowing existing and future citizens to access the area through multi-modal transportation options (MARTA, itsmarta.com; Accessed: October 2022). As discussed in Section 1.c.i., the City is using ARP funds to identify if infrastructure upgrades are needed for the target area and priority sites. If improvements are needed, \$3,000,000 in ARP are set aside for stormwater and broadband upgrades.

#### 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. The Community's Need for Funding The City of South Fulton is one of the newest cities in Georgia (5 years old) and incorporated to control their own future and outflow of money/support from the area. This has not been a cheap endeavor, and funds to support assessment, remediation, and reuse in the target are constrained by the target area's low-income population (47%), a limited tax base, and burdensome costs for basic municipal services: fire, police, and public works. City officials are working to increase tax revenues through Local Option Sales Tax (LOST), which currently accounts for 20% of the City's budget. However, these funds are in jeopardy and may be eliminated in January 2024. The City is an area of persistent poverty (>20 percent poverty > 30 years) and a CEJST identified disadvantaged community (see2.a.ii). The City's limited budget is constrained by high crime, high unemployment, heavy reliance on public services, poor health outcomes and low educational attainment, all of which are symptoms and causes for this continued plight. Requested funding will assist with redevelopment efforts in a disadvantaged community, as defined by Justice40. South Fulton lacks the ability to draw on other initial funding sources to conduct assessments required prior to redevelopment. This grant will provide critical pre-development funds for assessment and reuse planning for community selected, priority sites that are otherwise unfunded.

# ii.Threats to Sensitive Populations

(1) <u>Health or Welfare of Sensitive Populations</u> Sensitive populations for the target area include minorities (98%), the impoverished (47%), impoverished children (32%), youth (35%), and seniors (14%). As the airport expanded, surrounding areas, including the target area, were impacted by noise, traffic and reductions in air quality. Furthermore, and as a direct result of the expansion, wealthier residents relocated away from the nuisance and towards the new centers of population growth. Many businesses followed suit, creating a wealth vacuum effect. Once very successful commercial and mixed-use corridors, the Old National and Red Oak districts suffered from disinvestment in infrastructure and housing, increased crime rates, and high vacancy rates due to the fast-paced, urban sprawl development pattern. Illegal dumping, unsafe pedestrian opportunities, and illicit drug activity caused the target area to encounter continued disinvestment for businesses and homeowners alike. This pattern continues to spiral to this day, worsening the City's high crime rate to a dangerous statistic of 48 per one thousand residents, a crime rate higher than 94% of other communities in Georgia (Neighborhood Scout).

Demographic	Population	Minority	Poverty	Poverty of	Population under	Poverty of
Data		Population		Children	18 years	Seniors
Target Area	5,620	98%	47% low-income	32%	35%	Unavailable
South Fulton	108,575	96.5%	16.8%	32.4%	28.1%	14%
Georgia	10,297,484	39.0%	16.0%	22.9%	24.3%	10%
United States	322,903,030	24.5%	14.1%	19.5%	22.8%	10.3%
Source: American Community Survey, 2020, 2021; EPA EJScreen Report						

**CEJST Identified Disadvantaged Community** 

Toward Assoc	Disadvantaged Community Thresholds Exceeded				
Target Area	Energy	Housing	Health	Transportation	
Red Oak District CT 1312011306	Energy costs 95 <sup>th</sup> percentile and low income 84 <sup>th</sup> percentile	Housing cost 96 <sup>th</sup> percentile and low income 84 <sup>th</sup> percentile		Transportation Barriers 91 <sup>st</sup> percentile and low income 84 <sup>th</sup> percentile	
Old National Highway District CT 13121010603 &	Energy costs 92 <sup>nd</sup> percentile and low income 81 <sup>st</sup> percentile	Housing cost 95 <sup>th</sup> percentile and low income 82 <sup>nd</sup> percentile	Low Life Expectancy 93 <sup>rd</sup> and low income 82 <sup>nd</sup> percentile		
CT 13121010603 & CT 13121010507	Workforce Development  Unemployment 92 <sup>nd</sup> percentile and Hig Education 14% < HS diploma				

Source: https://screeningtool.geoplatform.gov/en/#12.58/33.64128/-84.50503

As exhibited above, the target area is identified as a disadvantaged community across multiple categories, including energy, housing, health, workforce development and transportation. With a 98% minority population base, the target area is challenged by the discrimination, a stigma of danger, and disinvestment that often accompanies communities with high minority populations. The reuse strategy proposed for our target area includes projects specific to the needs of the minority population - safe, affordable, senior housing at Sites 1 & 2 and safe, accessible recreation areas at Old National Park. The City also contains high concentrations of poverty for sensitive population, including childhood poverty (32%) being 9.1% higher than the state average and senior poverty (14%) being 4% over the state average. Further, the target area has a high unemployment rate (92nd percentile, CEJST, 2023). Provision of senior housing options is critical in the target area. Additionally, by increasing recreational opportunities in the TA, children may have an increased space to participate in positive activities for their physical and mental health. This grant will facilitate the inventory and identification of threats, while providing for the reduction of threats through cleanup planning.

(2) <u>Greater Than Normal Incidence of Disease and Adverse Health Conditions</u> Disease incidence could only be obtained at the County level. However, CEJST data places the TA in the 93<sup>rd</sup> percentile for low life expectancy. Even in the County (where health outcomes are far better than within the target area) the population exhibits higher incidence rates of several environmentally influenced health and welfare risks, including low weight births, cancer (breast and prostate), and heavy alcohol usage. Some case factors associated with low weight births include poor maternal nutrition and poor access to health care for the mother, (web.stanford.edu; Svechkina, et al., "Environmental risk factors associated with low birth weight," 2018) all seen in the target population. EJScreen (see 2.a.ii.3(b)) places the TA in the 70<sup>th</sup> percentile for PM2.5, within a food desert, and within a medically underserved area. The target area's Air Toxics Cancer Risk, between 95-100<sup>th</sup> percentile in the USA further displays the population's need for significant environmental reform. The identification and subsequent removal of contaminants from the target area, **enabled by these grant funds**, would lessen these environmentally influenced risks and help to improve health outcomes in the community.

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Incidence of Health Risks and Issues	Fulton County	Georgia	United States	
Percentage of Low Weight Births <sup>1</sup>	10.9%	9.5%	8.0%	
Breast Cancer Incidence Rate <sup>2 (oer 100K population)</sup>	135.0	123.5	123.0	
Prostate Cancer Incidence Rate <sup>3 (oer 100K population)</sup>	188.4	150.1	131.7	
Lifetime Asthma Incidence Rate <sup>3</sup>	13.2%	13.5%	12.9%	
Heavy Alcohol Usage <sup>4</sup>	17%	10.5%	14.6%	
	4. 1 44		2	

Health data is unavailable at the city level for South Fulton. <sup>1</sup>Health Resources Services Administration, 2014, <sup>2</sup>CDC 2010, <sup>3</sup>CDC 2011, <sup>4</sup>Robert Wood Johnson Foundation, County Health Rankings, 2014

(3) <u>a. Identification of Environmental Justice Issues</u> Environmental justice issues have been an unfortunate part of history and development within the Atlanta Metropolitan Area (including the target area). Accelerated population growth, high traffic (heavy automobile reliance), and historic, racist land practices all have contributed. Practices such as redlining, occurring between 1938 and 1968, heavily impacted the growth and land use patterns of Atlanta metro, particularly in the target area. The Mapping Inequality application, highlighting historic redlining maps on current

aerials, display these detrimental practices extending all the way through the Airport corridor, including our target area. Field notes indicate a Level D "hazardous" area (worst grade) with heavy vehicular traffic, traversed by main railroad and highway lines, and poor repair conditions of many properties (Mapping Inequality, Accessed November 2022). These designations heavily impact current living conditions of Southern Metro Atlanta (includes target area). In fact, a 2018 study shows that 74% of neighborhoods labeled as 'hazardous' in the redlining maps, are low-to-moderate income and 64% are minority neighborhoods today (Redlining in Atlanta | What it is and what impact it left | 11alive.com). Disinvestment in residential properties and infrastructure and issues related to employment are some impacts worsened by redlining practices, that we see today in the City. As shown in the CEJEST table in 2.a.i (1) and the EJSCREEN table below, the target area is burdened by a disproportionate share of environmental impacts, is disadvantaged, and ranks in the upper quartile for the indices and benchmarks measured.

(3) b. Advancing Environmental Justice This grant will support the implementation of our reuse strategy to alleviate

Selected Variables	State	USA
	Percentile	Percentile
EJ Index for Particulate Matter 2.5	89	92
EJ Index for Ozone	92	84
EJ Index for Diesel Particulate Matter*	91	93
EJ Index for Air Toxics Cancer Risk*	91	96
EJ Index for Air Toxics Respiratory	89	96
EJ Index for Traffic Proximity	95	95
EJ Index for Lead Paint	89	82
EJ Index for Superfund Proximity	91	83
EJ Index for RMP Facility Proximity	94	95
EJ Index for Hazardous Waste	91	79
EJ Index for Underground Storage	86	89

environmental injustices, including reinvesting in decaying residential areas and historic/culturally significant structures in favor of safe and attainable residential areas and increased opportunities for business growth and employment and prioritization of infill development with increased recreational/ greenspaces. Phased redevelopment of inclusive end uses will ensure that resident displacement is minimized. New homes with modern construction practices will lower energy bills, provide local employment (reduce cost traveling to work; more jobs; reduce transportation barriers by close proximity to residents.) and safe recreational areas to improve health in this majority black community.

b. Community Engagement i. Project Involvement and ii. Project Roles Since its incorporation in 2017, the City has worked diligently to understand the community's existing partnerships and potential for new partnerships to aid economic development and revitalization of the community. Historically, the City has partnered with organizations such as the Atlanta Aerotropolis Alliance, who have been able to assist and provide resources for small businesses, a primary challenge for the City's business owners (BAE, 2019). These efforts will be continued and expanded under the execution of the City's Brownfield Program. The table below highlights the City's project partners that have committed to being a part of the City's new Brownfield Committee, who will be responsible for decision making in respect to site selection, cleanup, and future reuse of brownfield sites. The Committee will set criteria for sites to be approved for assessment and eligible activities.

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Name of organization	Point of contact	Specific Project Role			
Fulton County Arts and	David Manuel; 404-612-5780;	Partner organization to promote art and placemaking within			
Culture	d.manuel@fcac.org	the target area. They will assist in setup of a community art			
		center at Site 3.			
Aerotropolis Atlanta	Shannon James; 404-349-2211;	Aerotropolis is active in community engagement in the target			
Alliance	s.james@aeroatl.org	area and will assist in brownfield outreach activities. They will			
		assist in placing businesses that pay livable wages within the			
		target area to aid residents obtaining higher paying jobs.			
Old National Merchants	Emmanuel Rainey, (404) 246-9159	As a voice for businesses located along the corridor, the			
Association		Association will solicit input from local businesses and work			
		with the City to include in reuse plans.			
South Fulton HOA	Marvin Arrington, (404) 349-2330	The Alliance will solicit input from target area residents and			
Alliance	admin@arringtonphillips.com	work with the City to incorporate input into reuse plans.			
Habitat for Humanity	Jason Meriwether, (404) 525-2114	This nonprofit will partner with the City on home rental to			
	jason.meriwether@atlantahabitat.org	ownership opportunities within the target area on Site 2.			
Housing Authority of	Lolita Grant, (404) 588-4950;	The Authority will assist in affordable housing opportunities			
Fulton County	Lolita.grant@hafc.gov	within the target area, particularly for Site 1 (senior			
		affordable).			
Red Oak Main Street	Caitlin King, (470) 898-7374	These Programs consists of local businesses within the Red			
Program	caitlin.king@cityofsouthfultonga.gov	Oak and Old National Highway districts (the target area) that			

Old National	Teresa Parhams, (470) 249-9460	are committed to the area's growth and vitality. They will	
Redevelopment Program	teresa.parhams@cityofsouthfultonga.gov	$\underline{\mathbf{v}}$ assist with site prioritization and reuse planning to help crea	
		vibrant target area.	
Old National Area	Joyce Armster, (678) 886-3886	Resident group that will help advertise the City's new	
Residents United		Brownfields Program and will aid in ranking community	
		priorities to provide weight-based ranking criteria for future	

ii. Incorporating Community Input The City has adopted a Citizen Participation Plan to provide for and encourage citizen participation in its grant funded programs. This Plan will inform the development of a Community Involvement Plan in Q1 of the project period. South Fulton will collaborate with project partners, local residents, and other stakeholders to gather quarterly and real-time feedback on site selection, assessment activities, reuse, and proposed cleanup planning. Formal bi-annual or project specific meetings will be held at various spaces in the target area, in a hybrid format (in-person and virtually), to expand accessibility to all stakeholders. To the extent possible, meetings will "piggyback" on other community events to maximize attendance drawn from the target area and promotion of the brownfield program. Flyers and social media posts will be used to advertise. The City's project team will solicit community comment/questions/concerns through the above methods and maintain a repository of all verbal and written (social-media or emailed) questions along with the response sent or given in reply. Meetings will be provided with hard copies and/or emailed copies of questions and answers received/provided during the quarter. All deliverables (Phase I/IIs, QAPPs, HASPs, ABCAs, Q&A docs, site eligibility forms, etc.) will be maintained online by the City and placed at a central repository within the target area for ease of access. The target area is predominantly English-speaking. Where needed,, the City will make translation services available at meetings and provide translated materials.

#### 3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

#### Task 1 – Programmatic Support

- **i. Project Implementation.** *EPA-funded:* Grant setup and kickoff; quarterly reporting; MBE/WBE and annual financial forms; EPA ACRES database updates; *Non-EPA-funded:* contractor procurement; Work Plan development; staff time to implement project and oversee cooperative agreement
- ii. Anticipated Project Schedule: Pre-Award Contractor/QEP procurement: Spring 2023; Work Plan: June 2023; Quarterly, annual and programmatic reporting months 4-48; ACRES updates: month 1 after grant closure.
- **iii.** Task/Activity Lead(s): Artie Jones, Project Director, will be responsible for overseeing programmatic activities and compliance with the Work Plan and schedule. The QEP will complete quarterly/annual reporting and ACRES updates.
- iv. Output(s): 1 kickoff meeting, 1 set of forms (site access, nomination, and prioritization forms), 16 quarterly reports, 1 close-out report, ACRES updates

#### Task 2 - Outreach

- i. Project Implementation. EPA-funded: Conference attendance/travel for 1 staff member; Community Involvement Plan (CIP); brownfields brochure specific for the City; bi-annual brownfields meetings; and priority site meetings Non-EPA-funded: staff time to coordinate, oversee, and attend outreach events/activities; brownfield website development; supplies and printing for brochures and outreach events
- ii. Anticipated Project Schedule: CIP & brochure: pre-award month 2; Brownfield meetings bi-annual (virtual, outdoors, or inside) throughout project period; priority site meetings in year 1.
- **iii.** Task/Activity Lead(s): The selected QEP, directed by Mr. Jones (Director) and Ms. Davis (Coordinator), will prepare the CIP. Ms. Davis will oversee the CIP and outreach activities. She will also oversee social media updates and coordinate bi-annual and priority site meetings.
- iv. Output(s): 1 attendee at 6 brownfield conferences (2 National and 4 EPA Region IV), 1 Community Involvement Plan;
   1 brownfields brochure and social media updates/outreach, 8 bi-annual brownfields meetings, and 3 priority site meetings.

#### Task 3 - Site Assessment

- i. Project Implementation. *EPA-funded:* Generic Quality Assurance Project Plan (QAPP); 6 Phase I and 5 Phase II ESAs with Site Specific QAPPs and Health and Safety Plans (3 of the Phase I & II ESAs at Priority Sites); 1 Site Inventory; *Non-EPA-funded:* staff time to secure site access, review reports, and assistance with the Site Inventory and prioritization
- ii. Anticipated Project Schedule: Generic QAPP: pre-award; Phase 1 ESAs: pre-award month 40 (Priority Sites pre-award month 12); Site-specific QAPPS, H&S plans, & Phase II ESAs: months 6–42.
- iii. Task/Activity Lead(s): All tasks will be overseen by the Brownfields Project Director, Mr. Jones. City staff will secure site access and approve assessment activities, as needed. The selected QEP will complete the Generic QAPP and site assessment activities in accordance with current ASTM standards and All Appropriate Inquiry. The QEP will complete the GIS Inventory. The Brownfields Steering Committee will prioritize sites.
- iv. Output(s): 1 Generic Quality Assurance Project Plan (QAPP); 6 Phase I ESAs with site access agreements; 5 Phase II

ESAs with Site-Specific QAPPs and Health and Safety Plans; 1 GIS-based Site Inventory.

#### Task 4 – Cleanup/ Reuse Planning

- i. Project Implementation. EPA-funded: Analysis of Brownfields Cleanup Alternatives (ABCAs) and reuse/concept plans; A Brownfields Reuse Roadmap (funding matrix) will be completed to assist the City in identification of additional leveraged fund opportunities. Non-EPA-funded: staff time to review reports, reuse plans, and Reuse Roadmap
- ii. Anticipated Project Schedule: Cleanup/reuse planning: months 6-40.
- iii. Task/Activity Lead(s): The QEP will compete cleanup planning. Planners and market analysists will complete the reuse plans, which include market analyses for Sites 1 & 2. Ms. Davis, Brownfield Coordinator, will oversee all work.
- iv. Output(s): 4 ABCAs; 4 Brownfields Reuse Plans (Sites 1 & 2 include market analyses), and 1 Brownfields Resource Roadmap.
- **b.** Cost Estimates The City of South Fulton will consider staff time and supplies as an in-kind leveraged resource. Lump sum contractual rates based on average rates of \$125-175/hour for a QEP or planner. \$261,600 (52.3%) of funds are directly associated with site-specific assessment and cleanup planning. \$158,000 (31.6%) is budgeted for site-specific reuse planning work. Together, with the addition of site-specific outreach events, \$419,600 or 83.9% of grant funds are allocated to site-specific work.
- Task 1 Programmatic Support: \$25,000 Contractual Costs \$25,000: 16 quarterly reports at \$1,250 each for a total of \$20,000; a closeout report at \$3,500; and \$1,500 for grant kick-off items overview of cooperative agreement with EPA and QEP and site access, nomination, and prioritization forms. Task 2 Outreach: \$40,400 Travel: \$7,500 Attendance at 6 National or Regional brownfields conferences at average cost of \$1,250 (\$2,400 for 6 conference registrations, \$2,400 for 12 hotel nights, \$1,800 for flights and transportation, and \$900 per diem (\$50/day for 18 days)); Contractual Costs \$32,900: Community Involvement Plan for \$5,000; creation of a brownfields brochure at \$2,900; 8 bi-annual meetings at a cost of \$10,000 (8 @ \$1,250 /meeting); and priority site meetings at \$15,000 (\$5,000 per Site). Task 3 Site Assessments: \$261,600 Contractual Costs \$261,600: A Generic QAPP at \$4,600; 6 Phase I ESAs at \$30,000 (6 @ \$5,000); 5 Phase II ESAs for \$177,000 (5 @ avg. cost of \$35,400); 5 Site Specific QAPPs and Health & Safety Plans \$20,000 (5 @ \$4,000); 1 Site Inventory at \$30,000. Task 4 Cleanup and Reuse Planning: \$173,000 Contractual Costs \$173,000: 4 ABCAs for \$20,000 (4 @ \$5,000), 4 Site Reuse/Concept Plans at a total of \$138,000 (\$50,000 each for Sites 1 & 2 which include market analyses, \$25,000 Site 3, \$13,000 for a fourth site); 1 Brownfields Resource Roadmap for \$15,000.

Budget Table (Note: Personnel and Supply budgets absorbed by the applicant and are therefore not shown in table)

Budget Categories	Task 1. Programmatic Support	Task 2. Outreach	Task 3. Site Assessments	Task 4. Cleanup & Reuse Planning	Total
Travel	\$0	\$7,500	\$0	\$0	\$7,500
Contractual	\$25,000	\$32,900	\$261,600	\$173,000	\$492,500
Total (%)	<b>\$25,000</b> (5%)	<b>\$40,400</b> (8.1%)	<b>\$261,600</b> (52.3%)	<b>\$173,000</b> (34.6%)	\$500,000

(Note: Personnel, Equipment, Supplies, Other (subawards) and Indirect Costs not shown as amounts are zero.)

c. Measuring Environmental Results South Fulton's Brownfields Project Director will be responsible for tracking, measuring, and evaluating progress. A spreadsheet of expected outputs and outcomes will be maintained and updated quarterly. Anticipated outputs: the number of sites added to the site inventory; community meetings/charrettes held; ACRES entries Phase I and II ESAs completed; ABCAs completed; and Site Reuse (Planning) Assessments created. Reports to EPA, MBE/WBE forms, and closeout reporting will also be outputs. Anticipated outcomes: the number of attendees at community meetings/events; sites and acres able to be marketed with an understanding of environmental conditions; sites made available for reuse; jobs created; dollars leveraged; contaminant concentrations reduced; acres of green space created; and sites redeveloped. Qualitative measures of long-term community education and overall improvement of quality of life will be monitored through surveys. Progress will be measured against meeting anticipated deadlines and community satisfaction. The Project Director will meet with the EPA Project Officer to institute appropriate countermeasures if the project milestones/schedules deviate from the approved work plan.

# 4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. <u>Organizational Capacity</u> and ii. <u>Organizational Structure</u>. South Fulton has sufficient capacity to carry out and manage the programmatic, administrative, and financial requirements of the proposed grant project. The City is governed by a Mayor and a seven-member City Council. Additionally, the City has two City Boards (Code Enforcement and Zoning) and two City Commissions (Planning and Historic & Cultural Landmarks). The City Manager serves the Council and the City to oversee 15 City Departments. The City's multi-

department management approach will ensure the timely and successful expenditure of funds and completion of all technical, administrative, and financial requirements of the grant project. This grant will be administered by the Economic Development Department with oversight from the Assistant City Manager and Finance Department. As noted below, the City's team of capable professionals have substantial experience with federal grant management, including the USEPA Brownfield Program specifically. iii. Description of Kev Staff The City's brownfield program will be managed by Project Director Artie Jones. Mr. Jones was previously the Economic Development Director at the City of College Park, where he managed the City's EPA Brownfields Program. During his time at College Park, Mr. Jones oversaw more than \$2,400,000 in property transactions within their Brownfield Program. He has extensive experience with real estate development, due diligence, community/stakeholder engagement, and managing grants (including three Brownfields Assessment Grants, a Multi-Purpose Grant and two Brownfields Cleanup Grants). Brownfield Coordinator Karaey Davis will assist Mr. Jones. Ms. Davis is the Special Projects Coordinator for the City and oversees projects with redevelopment programming. She has a master's degree in public administration. Domin Ochei will serve as Financial Director. Mr. Ochei holds an MBA in Finance and has over 15 years of experience in municipal finance and has managed a wide range of grants (including US HUD CDBG and other large federal grant awards). Mr. Ochei is well versed in federal accounting requirements and standards.

**iv.** Acquiring Additional Resources The City has internal staffing procedures in place to replace critical individuals and has procurement procedures to seek additional contracting help should it be necessary. The City published a Request for Proposals (RFP) #23-37 for Environmental Consulting Firms to provide services associated with this project on July 26, 2023. The solicitation was posted on the procurement page of the City's website and distributed through bidnet direct. The City provided a pre-bid conference, an open question period for interested parties and a 41-day response period, with proposals due on September 5, 2023. Three (3) responses were received. The City selected the highest ranked consultant that incorporated the inclusion of local and disadvantaged firms on October 12, 2023. If needed, additional contractors can be procured following similar procurement methods. The procurement was conducted in full compliance with federal fair and open bid requirements (2 CFR Part 200 and 2 CFR Part 1500).

## b. Past Performance and Accomplishments

- ii. <u>Has Not Received an EPA Brownfields Grant but has Received Other Assistance Agreements</u> The City of South Fulton currently manages a citywide grants portfolio of \$32.4 million dollars in federal, state, county, and local funding. Although the City has not previously received an EPA Brownfield Grant, it has been fortunate to receive other federally and non-federally funded resources. The following summary highlights three of the City's recent awards that are most similar and relevant (in target area) to the proposed project.
- a. <u>Purpose and Accomplishments</u> **Grant Program**: Local Maintenance & Improvement Grant (LMIG) from Georgia Department of Transportation (GDOT) for \$1,027,771.30. Purpose & Accomplishments: The funding was used to resurface Demooney Road, East Stubbs Road, and Cascade Palmetto Highway. All three roadways service the target area and were in a significant state of disrepair.

Grant Program: Blight Reduction and Neighborhood Revitalization Funding Amount: \$125,000 Purpose & Accomplishments: The Code Enforcement used these funds to shore up unmet funding needs and address twidespread blight within the target area. Activities conducted under this award included: acquire lawn maintenance equipment to assist with our Code Cares Initiative (\$10,000), which assists homeowners with code violations due to an inability to complete/afford necessary yard maintenance; secure blighted and nuisance properties (boarding and fencing) within the City (\$20,000); contractor services to demolish properties deemed to be a health and safety risk to the community (\$55,000); funded the implementation of preventative measures regarding education, skip tracing, and estate planning to help prevent properties from falling into uninhabitable conditions (\$20,000); neighborhood cleanup and revitalization efforts including additional curbside pickups for large items and illegal dumpsite cleanups (\$20,000).

**Grant Program**: Public Facilities, Facility Improvements, and Public Infrastructure **Amount**: \$223,126 **Purpose & Accomplishments**: The City's Public Works Department utilized these funds to provide sidewalk repair/extension and lighting within the target area: \$120,000 for sidewalk development & improvements (repairs to existing sidewalks and extension of existing sidewalks to eliminate gaps); \$103,126 for public lighting enhancements to provide pedestrian friendly access.

b. <u>Compliance with Grant Requirements</u> The City was in full compliance with the workplan, schedule, and terms and conditions under the above assistance agreements, and maintained a history of timely and acceptable reporting, as required by the awarding agencies. All projects were completed on time and within budget. The City achieved the expected results of each agreement within each of the respective project periods.



# The City of South Fulton, Georgia FY2024 US EPA Brownfields Assessment Grant

#### **Threshold Criteria**

# 1. Applicant Eligibility

The City of South Fulton is an eligible entity as a city, defined under 2 CFR § 200.64.

# 2. Community Involvement

The City has adopted a Citizen Participation Plan to provide for and encourage citizen participation in its grant funded programs. This Plan will inform the development of a Community Involvement Plan in Q1 of the project period. South Fulton will collaborate with project partners, local residents, and other stakeholders to gather quarterly and real-time feedback on site selection, assessment activities, reuse, and proposed cleanup planning. Formal bi-annual or project specific meetings will be held at various spaces in the target area, in a hybrid format (in-person and virtually), to allow for wider accessibility to residents. To the extent possible, meetings will "piggyback" on other community events to maximize attendance drawn from the target area and promotion of the brownfield program. Flyers and social media posts will be used to advertise. The City's project team will solicit community comment/questions/concerns through the above methods and maintain a repository of all verbal and written (social-media or emailed) questions along with the response sent or given in reply. Meetings will be provided with hard copies and/or emailed copies of questions and answers received/provided during the quarter. All deliverables (Phase I/IIs, QAPPs, HASPs, ABCAs, Q&A docs, site eligibility forms, etc.) will be maintained online by the City and placed at a central repository within the target area for ease of access. The target area is predominantly English-speaking. Should the need arise, the City will make translation services available at meetings and provide translated materials.

#### 3. Expenditure of Existing Grant Funds

The City of South Fulton affirms that it does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

#### 4. Contractors and Named Subrecipients

Consulting Firms to provide services associated with this project on July 26, 2023. The solicitation was posted on the procurement page of the City's website and distributed through bidnet direct. The City provided a pre-bid conference, an open question period for interested parties and a 41-day response period, with proposals due on September 5, 2023. Three (3) responses were received. The City selected the highest ranked consultant that incorporated the inclusion of local and disadvantaged firms on October 12, 2023. If needed, additional contractors can be procured following similar procurement methods. The procurement was conducted in full compliance with federal fair and open bid requirements (2 CFR Part 200 and 2 CFR Part 1500).

**Named Subrecipients** Not applicable. The City has not named any subrecipients in this application for Brownfields Grant funding.

November 13, 2023