

1. Applicant Identification: Development Authority of Polk County, 133 South Marble Street, Rockmart, Georgia 30153

2. Funding Requested

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested
 - i. \$500,000
 - ii. Not Applicable

3. Location

- a. City of Cedartown & City of Rockmart
- b. Polk County
- c. Georgia

4. Target Area and Priority Site/Property Information – Community-wide

Target Area: Polk County, Georgia (Census Tracts 13233010300, 13233010400, 13233010500, 13233010600, and 13233010700)

Priority Sites:

- Zartic Facility, 808 West Avenue, Cedartown, GA (Census Tract 13233010300)
- Standard Cotton Mill, 411 Cedar Hill Street, Cedartown, GA (Census Tract 13233010500)
- Lonnie Pope Property, Nathan Dean Bypass & Forrest Street, Rockmart, GA (Census Tract 13233010700)

5. Contacts

Project Director

Chris Thomas
President/CEO
Development Authority of Polk County
133 South Marble Street
Rockmart, Georgia 30153
Office: 770.684.5686
Cell: 770.324.6922
Email: chris@choosepolk.com

Chief Executive/Highest Ranking Elected Official

Chris Thomas
 President/CEO
 Development Authority of Polk County
 133 South Marble Street
 Rockmart, Georgia 30153
 Office: 770.684.5686
 Cell: 770.324.6922
 Email: chris@choosepolk.com

6. Population: Polk County – 42,853 (US Census, 2020)

7. Other Factors. If none of the Other Factors apply to your community/proposed project, please provide a statement to that effect.

Sample Format for Providing Information on the 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 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).	3
The priority site(s) is in a federally designated flood plain.	3
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.	3, 4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	4
30% or more 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.	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.	

8. Letter from the State or Tribal Environmental Authority: See attached

9. Releasing Copies of Applications

The applicant understands that the information included will be treated in accordance with [40 CFR §2.203](#). No passages are considered confidential.

October 30, 2023

Via Electronic Mail chris@choosepolk.com

Mr. Chris Thomas, President/CEO
Development Authority of Polk County
133 S Marble Street
Rockmart, GA 30153

RE: Development Authority of Polk County Community-Wide Assessment Grant Application

Dear Mr. Thomas:

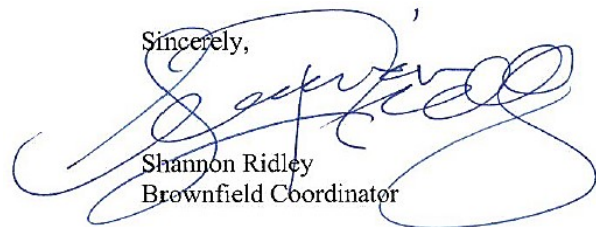
This letter serves as acknowledgement from the Georgia Environmental Protection Division (“GA EPD”) that the Development Authority of Polk County will be submitting an application to the U.S. Environmental Protection Agency (“EPA”) for funding assistance under the federal Community-Wide Assessment Grant Program to conduct assessment activities. GA EPD understands that the Development Authority is applying for \$500,000 for planning and assessment activities at the following target properties in Polk County:

- Former Zartic Facility, West Avenue, Cedartown, Polk County Tax ID# 024-015
- Former Standard Cotton Mill Site, 411 Cedar Hill St, Cedartown, Polk County Tax ID# C29-053D
- Vacant Rail Site, Nathan Dean Bypass, Rockmart, Polk County Tax ID# 054-142

EPD would like to take this opportunity to encourage EPA’s positive decision in making a grant award to the Development Authority of Polk County for such assessment and planning. A successful award would greatly assist this community in its redevelopment efforts. Thank you for your consideration.

If you have any questions, please contact me at 470-604-9456.

Sincerely,



Shannon Ridley
Brownfield Coordinator

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1. a.i. Overview of Brownfields Challenges and Description of Target Area: Polk County’s history of industrial mining as well as cotton farming evolved in the 1870s, with Goodyear and Julliard constructing mills where local cotton was loomed into thread and fabric. (*History of Polk County*. Polk County Georgia. (n.d.) <https://www.polkga.org/county-history>). With the decline of mining and mill closures between the 1980s and 1990s, Polk County’s industrial mainstays have dwindled, leaving behind numerous brownfield sites that scar the landscape and prevent revitalization through unknown environmental hazards and blighted conditions that deter economic investors, a difficult cycle to overcome. The Target Area is the disadvantaged census tracts surrounding priority sites in Cedartown and Rockmart, with additional sites in Polk County to be identified based on the community engagement plan described in section 2.b. Brownfield challenges in the Target Area include the lack of County and City funds and tax revenue to perform the many assessments, remediation, and abatement activities upon which to base revitalization plans. Polk County is classified as a Tier 1 county, defined by Georgia Department of Community Affairs Rules & Regulations 110-9-1-.02 as “Counties ranked and designated as the [...] least developed counties” in the state based on the unemployment rate, lowest per capita income, and highest percentage of residents with income below the poverty level. Brownfield revitalization activities are a sensible, replicable, and environmentally responsible first step to kick-start the county out of Tier 1 status and return local living-wage jobs to the area. The disadvantaged status of our communities presents significant challenges for funding brownfield assessment and revitalization activities, indicating overlapping metrics of poverty, minority status, incidence of disease, limited educational opportunities, transportation barriers, and sensitive populations in proximity to hazardous environmental conditions.

1.a.ii. Description of the Priority Brownfield Site(s): Priority sites were selected based on the potential for contamination, proximity to sensitive populations, and usable infrastructure, along with the potential to generate replicable future improvements for our residents, stakeholders, and visitors through assessment, remediation, and redevelopment, including high wage jobs, and expanded housing options.

Site #1: Zartic Facility (Target Area CT 13233010300), 808 West Avenue, Cedartown (9.41 acres): Referred to as Cedartown Industrial Park, the 409,900 square foot former poultry processing plant closed in 2008 with little warning, negatively impacting 158 employees. According to EPA’s Toxic Release Inventory (TRI), ammonia was disposed of on-site and released into the air with underground injection onsite to Class I-V wells. Based on the age of the building, there are concerns regarding asbestos and lead-based paint in the deteriorating building. Future potential uses, consistent with the property’s light industrial zoning, will be planned once the assessment is complete and there is a clearer picture of contaminants. According to CEJST this census tract is disadvantaged and is in the 88th percentile for low-income households where income is less than or equal to twice the federal poverty level.

Site #2: Standard Cotton Mill (Target Area CT 13233010500), 411 Cedar Hill St, Cedartown (11.9 acres): Opening in 1900, the mill specialized in the manufacturing of high-grade hosiery, underwear, and yarns. In 1902, the Standard Cotton Mill built a second mill to manufacture lower-grade cotton into coarser yarns. The addition of this second mill doubled the capacity of the Standard Cotton Mills. Standard Cotton Mills ceased operation in the 1930s, then supported various commercial and light manufacturing businesses until the early 2000s. Today, the Standard Cotton Mill is no longer standing, except for the smokestack and the adjacent mill village constructed for the mill workers. According to CEJST this census tract is disadvantaged and is in the 92nd percentile for low-income households where income is less than or equal to twice the federal poverty level. The adjoining mill village is in the 97th percentile in comparison to the state for potential lead-paint exposure, hazardous waste proximity, and underground storage tanks

(EJScreen). Despite numerous city citations and discussions with the current owner to improve conditions, the property is languishing and a hazard for the surrounding disadvantaged community. Potential contaminants include lead from lead-based paint on building debris, arsenic from cotton processing, and petroleum from underground storage tanks and other industrial equipment. The site is recognized as part of the West Georgia Textile Heritage Trail, a tourism initiative managed by the Center for Public History of the University of West Georgia's Department of History. The city hopes to repurpose the mill property for affordable housing while highlighting the site's history.

Site #3: Lonnie Pope Property (Target Area CT 13233010600), Nathan Dean Bypass, Rockmart (27.2 acres): The site has a vacant warehouse and is classified as industrial. Facing Nathan Dean Bypass, west of Brock Road, the site directly abuts a neighborhood on a census tract that is considered disadvantaged (CEJST). Based on its location near the railroad, the presence of heavy metals and petroleum from railroad operations is likely. Nathan Dean Highway is the arterial highway through Polk County. Public transit is lacking through Polk County. With the ideal location of this census tract along a main artery, this site could be a transit stop with parking for County EJ communities to carpool thereby reducing emissions while increasing access to jobs. Additional climate resiliency measures contemplated for this site include EV charging and storage for clean energy manufacturing operations being marketed by Polk County in the nearby industrial park. The *Polk County Comprehensive Transportation Plan, Section 3.204 –Transportation and Land Use Compatibility, Objective 3.204-B* is to “Provide citizens with adequate and appropriate access to the multi-modal transportation system while protecting residential areas from increased traffic.” The plan for this site would meet the Polk County comprehensive planning objectives. According to CEJST this census tract is disadvantaged and is in the 67th percentile for low-income households where income is less than or equal to twice the federal poverty level.

1.a.iii Identifying Additional Sites: Once the priority sites have been addressed, the remaining grant funds will be used on additional sites. DAPC will meet with the Brownfield Task Force consisting of one representative from community groups mentioned in Section 2.b.i and two representatives from Polk County to identify and prioritize additional sites for selection, based on consideration criteria that include the site's ability to create economic growth, and positive change for underserved and disadvantaged census tracts. These additional sites will be presented at regularly scheduled community meetings and ranked for future site selection based on the approved Community Involvement Plan (CIP). Community input from community engagement meetings and activities will inform the final Task Force ranking.

1. b. Revitalization of the Target Area

1. b.i. Reuse Strategy and Alignment with Revitalization Plans: The reuse strategy aligns with revitalization plans as outlined in the *Polk County Joint Comprehensive Plan 2022-2026*, which includes: encouraging the development or expansion of businesses and industries that provide quality employment opportunities close to home while minimizing the impact on our infrastructure and rural environment (all priority sites); and committing to alternative transportation and recreation (priority site 3). The comprehensive plan includes specific revitalization targets for Cedartown and Rockmart that align with the reuse strategy such as: encouraging the development and expansion of businesses and industries that provide quality employment and enhancing small-town character by developing alternative transportation. The Department of Community Affairs and Georgia Department of Economic Development designated Polk County's Cedartown as a rural zone for tax incentives that provide tax credits to individuals creating jobs and making qualifying investments within historic downtown areas. The Community Assessment grant would further efforts to bring investors to Polk County, in Cedartown and Rockmart specifically, by assessing and later remediating potential sites for businesses and providing connectivity to and from these businesses.

1.b.ii. Outcomes and Benefits of Reuse Strategy: Assessment and revitalization plans will

stimulate economic development, create new opportunities to attract businesses, and leverage existing and future business relationships. The redeveloped sites will make Polk County more attractive to residents, investors, and visitors alike while increasing revenue for Polk County by providing new jobs in Georgia’s burgeoning clean energy market, safe affordable housing, and transit opportunities.

Site #1: Zartic Facility (Target Area CT 13233010300), DAPC and the City of Cedartown identified this site as a prime candidate for invigorating business interest in the community. The property is situated at the entrance to the Cedartown Industrial Park with nearby expanding businesses expressing interest in the property. However, concerns over environmental liabilities have hindered progress in returning the property to productive reuse. Infrastructure already exists to support reusing the existing facility for light manufacturing or warehousing operations. This type of redevelopment aligns with the county's Comprehensive Plan intention to create local jobs, increase economic opportunity, and enhance the quality of life of residents through sustainable living wage jobs.

Site #2: Standard Cotton Mill (Target Area CT 13233010400), DAPC is supporting the City of Cedartown in efforts to ready this blighted property for redevelopment as affordable housing. Access to safe affordable housing options is a priority for the county and city as stated in the county comprehensive plan and the City of Cedartown Economic Development Strategic Assessment (2022-2027). The revitalization of this property would not only add valuable housing to a disadvantaged community but would also address likely contamination issues on a property that adjoins state waters (Dry Creek) and associated federally listed floodplains. New affordable housing developments in Georgia are managed by Georgia Department of Community Affairs (DCA) guidelines which require energy-efficient design. Incentives offered by DCA will ensure developer interest in this site. Energy efficient construction techniques are driven by city building codes and the Georgia Department of Community Affairs affordable housing guidelines. Additionally, civil infrastructure and stormwater management will improve the condition of runoff into the adjacent floodplain and associated State Water (Dry Creek).

Site #3: Lonnie Pope Property (Target Area CT 13233010600), DAPC and City of Rockmart identified the Lonnie Pope Property as a key property to support the expansion of clean energy manufacturing on the nearby Northwest Technical Park through product and material storage. The property has also been identified as a candidate to support community rideshare parking as it sits on Nathan Dean Highway, the main arterial roadway through the county. The County is contemplating the installation of EV charging stations in the rideshare area as an additional climate resiliency measures for the property. This combined use supports the county’s efforts to bolster clean energy manufacturing and provide the community with much-needed climate resiliency by providing additional transportation options for residents to commute between the two main economic centers of the county (Cedartown and Rockmart). The assessment, reuse, and ultimate cleanup of any discovered contaminants will also benefit the onsite state water and associated federally listed floodplain. This site will improve local climate adaptability by (1) increasing multi-modal transit choices in Polk County, and (2) supporting the development of clean energy manufacturing in the United States, reducing dependence on costly international trade.

Further, commercial and/or light industrial development will lead to the creation of living-wage jobs in the Target Area given the average brownfields redevelopment job creation benchmark of 10 jobs per acre (Howland, Marie, NCEE Working Paper 07-01, 2007). Enhanced public transportation options will also create access for disadvantaged community residents to jobs beyond the local area.

Displacement will not occur due to grant activities, but DAPC and its municipal partners have a plan in place should unforeseen displacement occur. We intend strong, early community engagement about the brownfields reuse process, so community input will lead to decisions that avoid displacement. Should any displacement occur due to unforeseen circumstances, those

displaced will be offered equivalent or improved living options through the affordable housing developed using DCA’s Low-Income Housing Tax Credit Programs. Additionally, a community benefits agreement (CBA) would incorporate residents’ needs and desires within the planning process and address how the community will benefit once the project moves from assessment to remediation/redevelopment.

1. c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: The grant will provide essential stimulus to kickstart additional funding for assessment, remediation, and reuse. Community partners are eligible for and have identified the following resources that will encourage the redevelopment and reuse of the priority sites and future sites identified by the community. Should any of the assessed sites require cleanup, then DAPC will apply for USEPA Brownfields Cleanup grants and leverage other funds mentioned below. Depending on property ownership, State of Georgia Brownfield tax credits can be applied to cleanup projects, recouping cleanup costs through property tax abatement.

Polk County is designated as a Tier 1 community through Georgia DCA’s Job Tax Credit program, offering \$4,000 per new job, for 5 years to employers in Polk County creating new jobs. The DAPC can further support redevelopment through several State of Georgia finance programs that can be used to finance industrial development on the sites once they are deemed ready. Key programs include the CDBG-funded Employee Incentive Program offering up to \$500,000 for publicly-owned infrastructure like rail spurs or roads or low-interest loans for eligible construction activities on an income-producing site that creates a significant number of jobs, or the Redevelopment Fund, which is used to clear slum and blighting conditions with up to \$500,000.

Polk County is also eligible for Appalachian Regional Commission grants that can fund workforce readiness and infrastructure projects. If either project includes an affordable housing component, Low-Income Housing Tax Credits can be added to the funding mix; however, much would depend on the extent of contamination, as residential uses require extensive remediation and monitoring for human habitation.

These resources will augment the outcomes of the proposed assessment projects in a manner that will enhance the County’s ability to further leverage funds necessary to move the priority sites closer to impactful redevelopment.

1.c.ii. Use of Existing Infrastructure: Work performed under this grant will facilitate the use of existing infrastructure like roadways and utilities (electrical power, water, and municipal sewer service) at the priority sites. The county encourages the use of existing infrastructure to create sustainable development opportunities within the project area. The priority sites have existing buildings, roadways, railways, and utilities, including broadband. The sites and others in the Target Area are supported with natural gas, water, wastewater, solid waste, and stormwater services. Through the grant activities, the DAPC seeks to determine the short- and long-term adequacy of public and private infrastructure serving the brownfield sites and to identify needed infrastructure improvements and priority investments in the Comprehensive Plan, such as mobility improvements. The planning activities described in Section 3 will facilitate needed improvements. Currently, the county is working with the Georgia Department of Transportation to fund road improvements in the Target Areas, such as improved transportation options and ADA-compliant ramps and sidewalks. Partnering with utility providers, the county, and state officials, the DAPC will coordinate utility siting, location, and workforce development needs. Should additional infrastructure be needed, such as for EV charging on the Lonnie Pope Property rideshare facility, DAPC will use planning dollars to complete utility evaluations.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2. a.i. The Community’s Need for Funding: This grant will meet the needs of the community that cannot draw on other initial sources of funding to carry out environmental assessments or remediation, planning activities, and subsequent reuse in the Polk County Target

Area because of its disadvantaged status (CEJST). According to the US Census, Polk County has a small population (42,852) with the main county seat of Cedartown only supporting 10,190 residents (US Census 2020). The Target Area’s population is also low-income and according to the CEJST, **all the census tracts in the Target Area are classified as disadvantaged, where income is less than or equal to twice the federal poverty level, and in the 81st percentile for unemployment.** This is further supported by the county's Tier 1 Status by Georgia DCA for counties with the highest unemployment rate, lowest per capita income, and highest percentage of residents with income below the poverty. Absent intervention, the building stock will struggle to transition into a valued community resource for jobs, safe affordable housing, and important tax base resources. The taxable values in the Target Area communities limit the ability to implement assessment, remediation, and reuse projects without this grant. EPA funding will enable the County to bring blighted properties back to productive reuse by conducting assessment activities and completing additional reuse planning that would not otherwise be possible.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: Target Area census tracts are considered disadvantaged communities, with low-income percentiles ranging from the 69th to the 93rd percentile. The residents are more likely to be unemployed (78% nationally, EJScreen), have a less than high school education (80% nationally, EJScreen), and have low life expectancy (90% nationally, EJScreen). The housing stock available to this population is aging and is in the 75% in the State of Georgia for lead paint (EJScreen). According to the Urban Institute, blight such as the brownfield conditions in the Target Area “create a climate of social and psychological disorder that attracts criminal activity and violence...These factors have been shown to have deleterious effects on area residents, including mental distress (e.g., depression, elevated rates of intentional injury); higher rates of chronic illness (e.g., cardiovascular disease)...and mass retreat of area residents into unhealthy eating and exercise habit (“Urban Blight and Public Health”, de Leon and Schilling, p.11, 2017). A 2019 Community Health Needs Assessment completed for Polk County identified mental health needs as the foremost health concern impacting Target Area residents along with high rates of treatable health conditions such as obesity (35% of adult population, Robert Wood Johnson Foundation, County Health Rankings & Roadmaps, 2019). These vulnerable populations are also experiencing the highest uninsured rates among residents at nearly 36%, almost twice the state uninsured rate of 19% (American Community Survey, 2019 5-year estimate). Compounding these issues, according to the Georgia Department of Health, Polk County is a Medically Underserved Area (MUA), which means Medically underserved areas or populations (MUA/Ps) are regions or groups of people that have a lack of primary care or health services and suffer from higher rates of issues like poverty, infant mortality, elderly population, or geographic location. Thus sensitive populations are disproportionately impacted by exposure to environmental contaminants.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Target Area CT 13233010300 (Zartic Facility) is a disadvantaged community as area residents suffer from greater than average incidences of adverse health conditions: 68th percentile for asthma; the 81st percentile for diabetes; and the 91st percentile for low life expectancy (CEJST). Target Area CT 13233010400 (Standard Cotton Mill) is also a disadvantaged community in the 75th percentile for asthma, the 85th percentile for diabetes, the 86th percentile for heart disease, and the 92nd percentile for low life expectancy. (CEJST) Target Area CT 13233010600 (Lonnie Pope Property) is a disadvantaged community in the 70th percentile for diabetes, 64th percentile for heart disease, and the 55th percentile for low life expectancy.

The prevalence of treatable conditions such as diabetes, mental health, and corresponding low life expectancy of Target Area residents will be improved by DAPC’s plan to use this grant to bring quality job-creating businesses and safe affordable housing to the area. Increasing the availability of employer-sponsored health insurance and residents' income will reduce the burden

of health care costs and allow residents the financial stability to actively address the treatable conditions that are driving the community's low life expectancy.

(3) Environmental Justice: (a) Identification of EJ Issues: Residents of disadvantaged communities are particularly vulnerable to the actual and perceived negative consequences of blight and contamination and are more likely to live near brownfields, be exposed to contamination, and not have adequate health care; these conditions define EJ issues. This is certainly true of the priority sites and the Polk County Target area as they are identified as disadvantaged by CEJST. In these CTs, members of sensitive populations are disproportionately affected by the blight of brownfields due to combined factors of low-income status, low life expectancy, transportation barriers, and lack of indoor plumbing. The most glaring environmental justice issues in Polk County shared by all priority sites are the proximity to hazardous waste sites, proximity to superfund sites, proximity to Risk Management Program facilities, the prevalence of lead paint and toxic releases to the air or poor air quality (CT 13233010300, CT 13233010400, CT 13233010600 Source: EJ Screen). **(b) Advancing EJ Issues:** The proposed projects will advance environmental justice issues by improving air quality through enhanced public transit options, improving public health through remediating environmental contaminants, and improving climate resiliency by increasing green transit options and adding public parking space at a priority site. Advancing EJ issues includes embracing input from community members, stakeholders, and residents without regard to race, income and employment status, disability status, age, or gender; by reducing negative impacts of environmental contamination to our sensitive populations while providing job training, living wage jobs, educational opportunities, and the ability to prosper and engage in a higher quality of life.

2. b. Community Engagement

2. b.i. Project Involvement and ii. Project Roles: Polk County has a Brownfield Task Force with strong support from several local organizations and community members actively engaged in downtown revitalization efforts, which are provided below.

Organization	Point of contact	Specific involvement in the project or assistance provided
Northwest Georgia Regional Commission	Julianne Meadows 706-295-6485	Redevelopment planning, economic impacts, business marketing needs
Georgia Dept. of Community Affairs	Patrick Vickers, Region 1 Rep. 404-695-2093	Redevelopment and economic planning
Georgia Dpt. of Economic Development	Lori Dowdy Region 1 Project Manager 404-387-3722	Redevelopment planning, economic impacts, business marketing needs
City of Cedartown	Edward Guzman City Manager 770-748-3220	Reuse planning, community outreach, target site identification, and offer ongoing input in decision-making.
City of Rockmart	Stacey Smith City Manager 770-684-2318	Reuse planning, community outreach, target site identification, and offer ongoing input in decision-making.
One Door Polk	Ronda Heuer Executive Director 770-748-1016	Community outreach to residents in Cedartown located in neighborhoods adjoining priority sites
Cedartown Performing Arts Center	Oscar Guzman 770-748-4168	Provide forums for community meetings and actively engage in public meetings
Polk County Chamber of Commerce	Marianne Wood 770-317-6380	Participate in public meetings and offer ongoing input in decision-making.

2.b.iii. Incorporating Community Input: DAPC and its community partners have successfully garnered participation with average attendance at community meetings ranging from 10-12

attendees. Building on this success, the DAPC plans a minimum of two public meetings per year to communicate information and solicit additional input specific to the brownfields program, additional brownfields inventory, and site reuse. Meetings will be advertised on DAPC and community partner web pages and social media platforms. Additional community engagement messaging strategies will be formalized in a community involvement plan developed upon award. The achievement of project milestones or the discovery of new information may warrant additional meetings. Meetings will also be conducted inclusive of Hispanic/Spanish-speaking community members.

From the award, the DAPC will seek public input and will develop a written Community Involvement Plan (CIP) to document and formalize the process to share information and formalize public input. All input from community meetings will inform DAPC’s decisions on priority sites, and additional site selection, and be considered to guide plans as appropriate. Written and verbal responses will be provided promptly. These meetings will be in person with a virtual option to keep the community informed of progress, answer resident questions about ongoing work, and obtain information about resident perceptions/concerns. A central printed repository of information will be established at the project office to allow those without computer access to view plans, voice concerns, and provide input toward redevelopment. Responses to community input will be provided at our public engagement meetings and on our social media platforms.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

Task/Activity 1: Programmatic Support
i. Project Implementation: To assist in managing the grant, DAPC will procure the services of a Qualified Environmental Professional (QEP) in accordance with 2 CFR Part 200 and Part 1500. EPA-funded activities for the priority site(s): cooperative agreement implementation and oversight; monthly team meetings; non-EPA grant resources contributed: in-kind resources: DAPC project team staff effort.
ii. Identifying Additional Sites: team meetings will allow for review of brownfield site inventory and discussion of additional sites proposed by community members.
iii. Anticipated Project Schedule: Months 1-48.
iv. Task/Activity Lead: Project Director with support from QEP and project staff.
v. Outputs: Decision on QEP, quarterly reports, ACRES data entry; notes from monthly team meetings.
Task/Activity 2: Community Engagement
i. Project Implementation: <i>EPA-funded activities for the priority sites</i> : securing site access; community engagement activities and meetings; site selection; Discussion of EPA-funded activities for non-priority sites, if applicable. Non-EPA grant resources contributed: in-kind resources—project team staff effort.
ii. Identifying Additional Sites: community meetings and program promotion efforts will provide opportunities for community members to nominate sites for assessment and planning.
iii. Anticipated Project Schedule: Months 2-44, first community meeting in the first 4 months.
iv. Task/Activity Leads: Project Director with support from QEP and project staff.
v. Outputs: Community Involvement Plan; community meeting summaries; community input for reuse plans.
Notes: Public meetings will include reuse and redevelopment planning components.
Task/Activity 3: Environmental Site Assessments
i. Project Implementation: <i>EPA-funded activities for the priority sites</i> : Phase I and Phase II Environmental Site Assessments (ESAs) for priority sites; EPA-funded activities for non-priority sites: Identical work will be completed at sites that are identified in the public engagement and brownfields inventory processes. Non-EPA grant resources contributed: in-kind

resources—staff time for oversight of the QEP.
ii. Identifying Additional Sites: The brownfields inventory will allow for the identification of additional sites within the first eight months of the project.
iii. Anticipated Project Schedule: Months 4-40 with assessment of priority sites within the first 6 months.
iv. Task/Activity Lead(s): QEP with oversight by the project director and technical coordinator
v. Outputs: GIS-based site inventory; 10 Phase I and 5 Phase II ESAs; Asbestos and Lead Based Paint surveys (as needed); Generic Quality Assurance Plan (QAPP) and site-specific QAPPs.
Notes: Given the age of the priority sites, it is anticipated that Asbestos and Lead surveys will be required to position some properties for reuse.
Task/Activity 4: Cleanup and Reuse Planning
i. Project Implementation: <i>EPA-funded activities for the priority sites:</i> cleanup planning at specific sites (4 Analysis of Brownfield Cleanup Alternative (ABCA) reports); and a brownfields revitalization plan for the Target Area and strategies/ new regulations pertaining to the redevelopment of the brownfield sites. GIS-based inventory of brownfields sites for future reuse (Development Opportunity Inventory). EPA-funded activities for non-priority sites: complete identical work at sites identified in the public engagement and brownfields inventory processes, if warranted and as funds allow. Non-EPA grant resources contribution: in-kind resources - planning department/economic development staff.
ii. Identifying Additional Sites: Additional sites identified through the inventory and community engagement will provide an opportunity to conduct cleanup or reuse plans for those sites where it is determined to be appropriate.
iii. Anticipated Project Schedule: Months 9 through 46.
iv. Task/Activity Lead(s): project director with assistance from QEP.
v. Outputs: Brownfields revitalization plan, ABCAs, site-specific land use assessments, site disposition strategies, reuse plans, and visual renderings for priority sites.
Notes: The DAPC has devoted 30% of the budget to planning efforts.

3. b. Cost Estimates: The following cost estimates are based on past project and grant management experiences and with consultation of EPA TAB resources. No administrative costs are included.

Project Budget Table					
Budget Categories	Project Tasks				Total
	1. Project Management	2. Community Engagement	3. Assessment	4. Planning	
Travel	\$5,000				\$5,000
Contractual	\$30,000	\$25,000	\$290,000	\$150,000	\$495,000
Total Budget	\$35,000	\$25,000	\$290,000	\$150,000	\$500,000

Task 1 – Program Management Travel: \$5,000 for 2 EPA National Brownfields conferences and/or regional brownfields events for 1 DAPC staff (\$800 in registration fees; \$2,000 for 8 nights @ \$250/night in the conference hotel, \$1,200 airfare for 2 round-trip tickets at \$600 per, \$400 ground transportation/parking and \$600 per diem expenses for 8 days (4 days X 2 persons) @ \$75 per day). The remaining travel funds would be applied to *local or regional travel/mileage to meetings* with property owners, and developers or to public meetings by DAPC staff. *If workshops are held virtually, the DAPC will apply any excess funds towards community engagement and assessment.* **Contractual: \$30,000** is budgeted for program support by a contracted QEP, which will provide 240 hours at \$125 per hour over the three-year project period. The DAPC, with support from the QEP, will complete EPA quarterly reports, MBE/WBE forms, & EPA ACRES database, and other programmatic support with contractor assistance while providing oversight and review of the programmatic grant elements.

Task 1 Total: \$35,000

Task 2 – Community Engagement: *Contractual:* QEP support is budgeted for developing a Community Involvement Plan (\$5,000) and approximately 160 hours (over three years) at \$125 per hour (\$20,000) for community-wide meetings, meeting planning, outreach, focus groups & visioning sessions as well as for meetings with site owners and potential developers. *DAPC is experienced in online virtual community engagement activities.* **Task 2 Total: \$25,000**

Task 3 – Assessment: *Contractual:* 10 ASTM-AAI compliant Phase I ESAs @ \$4,000 each = \$40,000; one Generic Quality Assurance Plan (QAPP) = \$5,000; five Site Specific QAPPs (@ \$5,000 each) = \$25,000 and five Phase II ESAs (approx. \$25,000-50,000 per site, *costs vary due to the complexity of sites*) = \$220,000. **Task 3 Total: \$290,000**

Task 4 – Planning: Develop site-appropriate remediation/ reuse plans to reduce health & environmental risks for selected sites. Community vision and input will continue to be considered in planning. *Contractual:* GIS-based brownfields opportunities inventory that can be used as a resource for additional site identification and by future developers, set fee of \$25,000; Five Analysis for Brownfields Cleanup Alternatives (ABCAs) @ \$5,000 each = \$25,000; Reuse planning and renderings for three priority sites, set fee, \$25,000; Brownfields Revitalization Strategy for Target Area, set fee= \$75,000. **Task 4 Total: \$150,000**

3. c. Measuring Environmental Results: The Project Director with support from key staff and the QEP will document, track, and evaluate the following outputs and outcomes continually through quarterly progress reports, annual disadvantaged business enterprise reporting, and monthly communication with the EPA Project Officer. The activities and outcomes will be tracked through our project management and invoice management system, EPA ACRES, and formalized in a final closeout report.

Outputs: Number of sites assessed (Phase I/II ESAs); Brownfield Development Opportunity Inventory; Number of ABCAs; Number of formal community meetings; Community Involvement Plan; ACRES entry.

Outcomes: Number of sites for which property title transfers are facilitated; acres of land redeveloped, and square footage of buildings positioned for adaptive reuse; the amount of private investment and other funding leveraged; jobs created or retained; increased property and sales tax revenue generated. The key overall gauge of success will be the creation of jobs and the improvement in environmental justice conditions. These successes will be tracked through the number of jobs created from brownfield sites, acres of land redeveloped, the number of affordable housing units added, the value of private investment and funding leveraged, and the growth of property and sales tax revenues captured in annual budgets for the Target Area. In the event the project is not being completed in an efficient manner, the DAPC has countermeasures in place to address this problem. The DAPC will make monthly calls to its EPA Project Officer, and if needed, will create a Corrective Action Plan. The project team will evaluate the project progress semi-annually against the goals in Section 3.a and, if goals are not being met or are off schedule, will meet with local stakeholders and the QEP to discuss the shortcomings and adjust the project approach and schedule, as needed.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i-iii Organizational Capacity, Organizational Structure, and Key Staff

DAPC will lead this project with support from community partners including Polk County, the City of Rockmart, and the City of Cedartown. Combined, the DAPC team has over 50 years of experience in property and economic development and possesses the technical, administrative, and financial requirements to successfully lead this project. For example, the DAPC team has successfully managed contractors and consultants on the acquisition and redevelopment efforts of 15 sites and 400 acres of land in the community.

Chris Thomas will serve as **Project Director**, and as a full-time employee of DAPC has the

capacity to successfully lead this project. Mr. Thomas is the President and CEO of DAPC and has 23 years of real estate redevelopment, municipal government, and economic development experience. Chris has obtained and managed over \$1 Million in grant funding under DAPC and previous municipal economic development roles.

Jeanie Stooksbury will serve as **Fiscal Manager** of the EPA funds. She is a full-time employee of the DAPC with 30 years of experience managing finance and operations for a variety of organizations. Ms. Stooksbury successfully closed out the DAPC’s 2018 EDGE Grant listed in 4.b.ii.

Jamie Morris Jr. is Chairman of the DAPC Board and will serve as the **Technical Coordinator** for this grant. He has served on the DAPC board since 2019 and on the Cedartown DAPC Board since 2016. Mr. Morris has over 35 years of experience managing Cedarstream Co., Inc., including the successful \$4.5 Million development of a new Cedarstream facility in Polk County.

DAPC will work with an experienced Brownfields QEP contractor to meet the required programmatic objectives. Mr. Thomas, the Project Director, will oversee day-to-day project operations and will be responsible for oversight of the contracted QEP. Mr. Morris, the Technical Coordinator, will support the Project Director in QEP oversight. Ms. Stooksbury, the Financial Coordinator, will be responsible for ASAP drawdowns and fiscal management. DAPC has mechanisms in place to replace lost staff and obtain additional contractor resources if needed. In the event of unforeseen employee turnover, the project team will assist the Project Director to ensure the project's success. The Project Director will work with the EPA Project Officer and QEP to implement countermeasures, such as evaluating management strategies to resume the project schedule and meet workplan milestones should delays or obstacles be encountered.

4.a.iv. Acquiring Additional Resources: To successfully administer this grant project and obtain the necessary brownfields expertise, the DAPC will secure the services of a professional and experienced Brownfield QEP through a fair and open bid process that complies with state and federal requirements (2 C.F.R. 200 and EPA rule 2 C.F.R. 1500) and emphasizes fair/strong labor practices and local hiring, as possible.

4.b. Past Performance and Accomplishments

4.b.ii. Has Not Received an EPA Brownfields Grant but has received other Federal/Non-Federal Assistance:

(1) Purpose and Accomplishments:

Successful Grant Awards	Award Amount	Purpose	Accomplishments
2018 EDGE Grant	\$850,000	Economic Development	Offset the cost of machinery and equipment for Meggitt; led to creation of 211 jobs
2013 One Georgia Equity Grant	\$200,000	Economic Development	Offset construction costs for industrial speculative building; led to 45 jobs

(2) Compliance with Grant Requirements: Project staff has a history of timely compliance with all federal/state grants. The DAPC closely monitors project progress and conducts annual audits. No adverse findings were reported about grant awards/financial assistance programs, internal controls or audits, compliance, or any other matter. All grant terms and conditions are met promptly and by set work schedules. Reports and financials have been submitted promptly to date, and applicable grants have been closed.

1. Applicant Eligibility

The lead applicant, the Development Authority of Polk County (DAPC), is a local unit of government (local public authority) as defined under 2 CFR § 200.64 pursuant to provisions in the Official Code of Georgia Annotated Section 36-62-1. In 2005, the Polk County Commission created the DAPC as an official local public authority of Polk County, Georgia.

Documentation attached of Polk County Commission resolution creating DAPC as a local public authority.

2. Community Involvement

DAPC acknowledges that broad-based support and community participation in the process of executing the Brownfields Assessment grant will be essential to ensure the overall acceptance and success of the Brownfield Program, and we recognize that it is essential to include community residents and stakeholder input throughout all phases of project planning, decision-making, and implementation. To guide this process, a formal Community Involvement Plan (CIP) will be drafted and adopted within 30 days of issuance of the Cooperative Agreement. This document will provide a formal communication strategy to solicit input from local residents of the target area. This process mirrors the community engagement process used to develop the Rome-Floyd County-Cave Spring Comprehensive Plan.

DAPC has been successful in garnering participation with average attendance at community meetings ranging from 15-18 attendees. As will be further detailed in the CIP, DAPC plans a minimum of two public meetings per year to communicate information and to solicit additional input specific to the brownfields program, additional brownfields inventory, and site reuse. The achievement of project milestones or the discovery of new information may warrant additional meetings. During work at priority sites, less formal information sessions will be held (1-2 times per site per year, depending on size and interest in pending reuse) to keep the community informed of progress, answer resident questions about ongoing work, and obtain information about resident perceptions/concerns. Public input and feedback will be sought on project planning, site selection and prioritization (for additional sites as funds permit), cleanup decisions (ABCAs) and reuse planning. DAPC is offering virtual meeting options (through Zoom and telephone conference calls) for those unable to travel and/or to provide program services and community meetings during any necessary lockdown measures. As we move through the project, the DAPC will consider other community tools, such as outdoor meetings, to engage a wider audience in a safe and responsible manner with respect to pandemic protocols. Meetings will also be conducted inclusive of Hispanic/Spanish-speaking community members.

A central printed repository of information will be established at the DAPC office to allow those without computer access to view plans, voice concerns, and provide input toward redevelopment. All information will be disseminated via the DAPC's webpage in addition to being produced in leaflet form and distributed at information repositories at the physical office location.

3. Named Contractors and Subrecipients

Not Applicable - no contractors or sub-recipients are named in this application. DAPC pledges full compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500 in the selection of all consultants and contractors.

4. Expenditure of Existing Grant Funds

DAPC does not have an open EPA Brownfields Community-wide Assessment or Multipurpose Grant.