



R04-24-A-016

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1. Applicant Identification: City of Perry, 1211 Washington Street, P.O. Box 2030, Perry, GA 31069
2. Funding Requested
  - a) Assessment Grant Type: Community-wide
  - b) Federal Funds Requested: \$500,000
3. Location
  - a) City of Perry
  - b) Houston County
  - c) Georgia
4. Target Area and Priority Site/Property Information

Target Area: Census Tract 13153021300 (Houston County)

Priority site addresses:

  - 1515 Sam Nunn Boulevard, Perry
  - 801 Valley Drive, Perry
  - 401 Larry Walker Parkway, Perry
5. Contacts
  - a. Project Director:
    - Robert Smith
    - 478-988-2757
    - robert.smith@perry-ga.gov
    - 1211 Washington Street, P.O. Box 2030, Perry, GA 31069
  - b. Chief Executive/Highest Ranking Elected Official:
    - Mayor Randall Walker
    - 478-988-2700
    - randall.walker@perry-ga.gov
    - 1211 Washington Street, P.O. Box 2030, Perry, GA 31069
6. Population: 23,538



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7. Other Factors.

<b>Sample Format for Providing Information on the Other Factors</b>	<b>Page #</b>
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.	
<b>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).</b>	<b>1, 2, 4</b>
<b>The priority site(s) is in a federally designated flood plain.</b>	<b>1</b>
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy	
<b>The reuse of the priority site(s) will incorporate energy efficiency measures.</b>	<b>2, 4, 9</b>
<b>The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures.</b>	<b>2, 3</b>
<b>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in <a href="#">Section I.A.</a>, for priority site(s) within the target area.</b>	<b>2, 8, 9</b>
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. 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.



**Jeffrey W. Cown, Director**

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**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** [robert.smith@perry-ga.gov](mailto:robert.smith@perry-ga.gov)

Mr. Robert Smith  
City of Perry  
Assistant City Manager  
1211 Washington Street  
P.O. Box 2030  
Perry, GA 31069

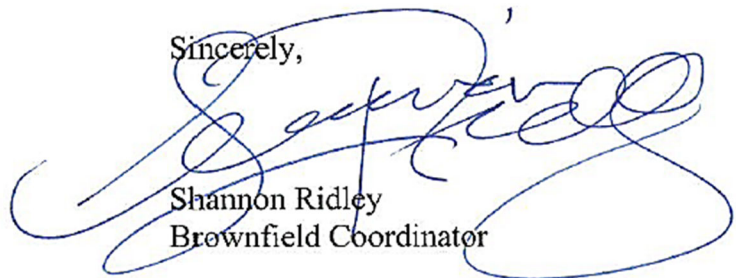
RE: State Acknowledgement Letter – Brownfield Community-Wide Assessment Grant Application  
City of Perry

Dear Mr. Smith:

This letter serves as acknowledgement from the Georgia Environmental Protection Division (“GA EPD”) that the City of Perry 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.

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

Sincerely,



Shannon Ridley  
Brownfield Coordinator

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

## **1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION**

### **1.a. Target Area & Brownfields**

**1. a. i. Overview of Brownfield Challenges and Description of Target Area:** The City of Perry, the seat of Houston County, is sometimes called the "Crossroads of Georgia" because the Interstate 75 and U.S. Highway 41 corridors run north-south and U.S. Highway 341 runs northwest-southeast through the City. Perry is the county seat of Houston County, Georgia, and its geographic boundaries cover 27 square miles (US Census (USC), 2021). The City seeks brownfield funding to assess and develop cleanup and reuse plans for potentially contaminated underutilized sites within the Target Area, the city limits within Census Tract 13153021300, a **disadvantaged census tract** as indicated by CEJST. Said Target Area is the eastern half of Census Tract 13153021300 and the southern commercial gateway to the City from Interstate 75. This Target Area runs along Sam Nunn Boulevard and General Courtney Hodges Boulevard, a former bustling commercial and manufacturing corridor traversing one of Perry's most disadvantaged areas. Industrial and commercial business closures prevalent in the Target Area since prior to the 1990s have led to decay along major commercial thoroughfares from the Interstate into the heart of the City. The decline of these corridors further limits the convenient opportunities for employment and services to an area of Perry with a population that ranks above the 70<sup>th</sup> percentile in People of Color, Unemployment, and Less than a High School Education in EJSscreen indices (percentile in State & USA). Empty, overgrown lots, vacant industrial parks, rough concrete or asphalt pads that were the foundations of bustling factories with full parking lots welcome travelers from the Interstate exits. This underutilized landscape is not an enticing vision for motorists or investment-minded visitors to the City. Due to this location, the Target Area represents a high potential for the creation of jobs and services through redevelopment. Without EPA funding, these proposed activities for assessment and planning in the Target Area will not be possible in the foreseeable future. Addressing the stigma, blight, and health issues created by Target Area Brownfields is the essential first step in enabling economic revitalization strategies (see section 1.b.i.) and creating new opportunities for our most disadvantaged residents.

**1.a.ii. Description of the Priority Brownfield Sites:** City staff estimate a minimum of 200+ acres of potential brownfields, including former gas stations, repair shops, and manufacturing sites, lie in varying stages of decay in the Target Area (disadvantaged Census Tract **13153021300** per CEJST). Specific priority target sites include:

1) **1515 Sam Nunn Boulevard (.75 acre):** The site of a former filling station and auto repair center that sits less than one hundred yards from the off-ramp of I-75. The remnants of the station, demolished in 2011, sit more than a dozen years later, as patches of grass and crumbled concrete intermingled with blowing dust at this unsecured site. The site lies immediately next to a trailer park, an empty strip mall, and a single-story motel. Concerns are justified given the likelihood of leaking underground storage tanks (USTs) and the use of petroleum, lubricants, and degreasers associated with the auto repair.

2) **801 Valley Drive (177 acres):** The last use of this site was as a warehousing and storage facility. Historically, the site housed a carpet manufacturing plant, then served as a small engine production plant. The site contains 30 acres of a patchwork of unsecured structures built between the 1960s and late 1980s. Aging structures like these can contain asbestos, lead, and mold. **Bay Creek** meanders through the site, bisected by a cargo rail line, which presents additional concerns, including petroleum, dioxin, and heavy metal contamination from heavy rail traffic from a time when the site was at full production. The potential exists for leaking USTs and per- and poly-fluoroalkyl substances (PFAS) from carpet manufacturing; this is a particular concern as part of the site lies in a FEMA AE flood zone. Further, the prevalence of woodlands on and surrounding the site, its location proximate to major transportation corridors, its current vacant status, and its partially obstructed view from the frontage to the main roadway make the site a

haven for the homeless and illicit activity. Further, wildlife and humans easily traverse the site and are exposed to and can transport contaminants off-site.

**3) 401 Larry Walker Parkway (37 acres):** This former agricultural acreage was once the state agricultural exposition center. What remains is a dusty, unsecured site with drainage ditches that pesticides, herbicides, and fertilizers have likely impacted. It is possible that this location held cattle dip vats (historically contained arsenic) and that heavy machinery like tractors were stored and used on the land, which increases the likelihood of the presence of fuel/petroleum and lead impacts.

As noted in section 1.a.i., the priority sites have been selected for assessment because of the potential threats from contamination and the pervasive blight affecting the EJ communities in the subject disadvantaged census tract. Additionally, these sites have great potential for redevelopment that will, in turn, benefit these communities by providing living-wage jobs, essential services, and workforce housing options.

**1.a.iii. Identifying Additional Sites:** If any grant funds remain after addressing the priority sites, the City will meet with representatives from the community groups mentioned in Section 2.b.i. and the City of Perry's Brownfield Advisory Board to identify and prioritize additional sites for assessment. Consideration criteria will include the site's ability to create economic growth and positive change for the underserved populations of the disadvantaged census tract. Additional sites will go before residents at community meetings for ranking as future site selections based on the approved Community Involvement Plan (CIP). Community input gathered at community engagement meetings and activities will inform the final ranking.

#### **1.b. Revitalization of the Target Area**

**1.b.i. Reuse Strategy & Alignment with Revitalization Plans:** The City of Perry partnered in the development of the *Houston County 2022 Joint Comprehensive Plan* (Plan), which focuses on both regional and city-focused strategies, partnerships, and solutions to strengthen and diversify the economic competitiveness and quality of life in the county and The City of Perry. Keys to developing a robust and diverse economy include addressing blight, focusing on nodal and smart growth commercial redevelopment along gateway corridors instead of new structures on undeveloped land, and supporting the growth of industrial corridors near railroads and I-75.

**1515 Sam Nunn Boulevard:** The City identified potential reuses for this priority site as light industrial or professional/medical services, given the frontage on this gateway corridor. If redeveloped, the site, classified as C-1, Commercial, would lead to local jobs in alignment with the Joint Comprehensive Plan's intention to create economic opportunity and enhance the quality of life of residents through sustainable living wage jobs.

**801 Valley Drive:** The site, zoned as M-1, includes wholesale and light industrial uses. The City sees the site as a critical parcel for attracting redevelopment opportunities in the manufacturing and warehouse industry, given access to railroad lines and Interstate 75. We want to work with the property owner to complete assessment activities and a site disposition strategy plan with these proposed planning funds. These tools will allow us to determine the best possible end use that benefits residents and meets the goals of the Joint Comprehensive Plan.

**401 Larry Walker Parkway:** This site is extensive, on a main thoroughfare, and near I-75, making it a prime location for a multi-modal transportation hub that could improve public transportation opportunities within the City and county. Houston County encompasses 375.54 square miles; it is the 67th largest county in Georgia in landmass. Since The City of Perry is a significant population center in the county, the need for public transportation stunts regional movement. Developing transportation solutions and policies that support growth in the area will establish a strong connection between transportation networks in the region. The proposed development would align with the Comprehensive Plan Rules of the Georgia Department of Community Affairs (Chapter 110-12-1-.03, Section (7)) that require a transportation element in

the comprehensive plan for Houston County and Perry. The City believes that reusing this site as a transportation hub would contribute to transportation solutions and climate change prevention/adaptation measures, as called for in this element of the plan. It would also benefit the residents of this disadvantaged census tract. The Joint Comprehensive Plan also calls for EV charging stations, which is considered an energy efficiency measure by EPA. As a part of development as appropriate, the City will use planning dollars to determine if sites in the Target Area are suitable for supporting EV charging with infrastructure evaluation activities.

**1.b.ii. Outcomes & Benefits of Reuse Strategy:** The grant will fund the creation of a comprehensive reuse strategy for the priority sites and the Target Area. Accordingly, the City intends to use **30% of the project budget for cleanup and reuse planning**. The findings of environmental assessments, community input, and data gathered through redevelopment planning will further refine and develop plans for the Target Area. This grant will provide the funding necessary to collect the critical data and community input needed to facilitate the outcome of returning these blighted properties to productive reuse. The benefits to the community align with the City's comprehensive plans to attractively highlight gateways into Perry and improve environmental conditions by integrating a multi-modal transportation hub that serves to reduce climate change-related impacts.

Given that the Valley Drive site also contains woodlands and wetlands/streams, we will work with the Army Corps of Engineers and developers to ensure that these elements are protected and enhanced, improving the character of the site by providing nature-based solutions to reducing particulate matter from the nearby Interstate and protect downstream water quality. Ensuring downstream water quality also underscores the City's commitment to maintaining the WaterFirst Community designation. Further, commercial or light industrial development will lead to the creation of living-wage jobs in the Target Area, given the average brownfield 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.

### **1.c. Strategy for Leveraging Resources**

**1.c.i. Resources Needed for Site Reuse:** Perry has a history of successfully applying for and utilizing State or County funds for redevelopment projects. The City will use results from the assessment and reuse planning tools created to leverage this EPA grant to approach the following funding sources for grants or loans that will lead to site reuse.

Locally, the Target Areas are eligible for infrastructure improvements via Special Purpose Local Option Sales Tax (SPLOST) funds. The Development Authority of Houston County has several local incentives at its disposal to help attract businesses and developers, including revenue bond financing for improvements. The Middle Georgia Regional Commission has an EDA-sponsored revolving loan program that also can assist businesses in accessing capital.

Finally, several sources of state and federal funds are available through the Georgia Department of Community Affairs (DCA), such as Military Zone tax credit incentives, annual competitions, and special economic development programs like the Redevelopment Fund, Employment Incentive Program, and Revolving Loan Program. Other resources include the Georgia Department of Transportation (GDOT) and US DOT funding for transportation projects. As a non-entitlement city, Perry has already competed for and won three state Community Development Block Grant (CDBG) funding awards through the DCA for infrastructure, development, and blight elimination. Most recently, the City received over \$900,000 in the 2023 CDBG awards cycle to continue redevelopment efforts in the target area. USDA grant and loan programs (Rural Business Development, Community Facilities) would also be applicable programs for redevelopment.

Perry also is “conditionally eligible” for state One Georgia funding for regional projects in partnership with a joint development authority. The grant will facilitate identifying contaminant concerns and support entry into the Georgia Brownfield program for state incentives that encourage redevelopment and help control risk. Buyers can qualify for a 10-year property tax abatement and a limitation of liability to protect prospective purchasers of contaminated properties from third-party claims arising from past releases and groundwater cleanup if they continue monitoring soil conditions. If cleanup is necessary for priority sites, the City will consider applying for EPA Brownfields Cleanup funding.

**1.c.ii. Use of Existing Infrastructure:** The City 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 City of Perry offers natural gas, water, wastewater, solid waste, and stormwater services to these sites and others in the Target Area. Through the grant activities, the City of Perry 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 plan, such as mobility improvements. The planning activities described in Section 3 will facilitate essential improvements that will increase the quality of life for all residents. Currently, Perry is working with GDOT to fund road improvements in the Target Areas, such as multi-modal transportation options. The City will coordinate utility siting, location, and workforce development needs through partnerships with utility providers, development authorities, and state officials. Should additional infrastructure be required, such as for EV charging, the City will use planning dollars to complete utility evaluations.

**2. COMMUNITY NEED & COMMUNITY ENGAGEMENT**

**2.a. Community Need**

**2.a.i. The Community’s Need for Funding:** While The City of Perry is growing, it still needs to address specific challenges like lower property values due to blight in certain neighborhoods, high building and housing vacancy rates, and a dwindling tax base. The City needs more funding than local taxes can provide to support normal government operations. The lack of transportation options in the City creates barriers for low-income residents to access goods, services, and jobs. Absent intervention, the building stock may fail to transition into valuable community resources for job creation, to improve community aesthetics, and to become critical tax base resources. The City's taxable values limit the ability to implement assessment, remediation, and reuse projects without this grant. EPA funding will enable the City to conduct assessment activities and complete additional reuse planning that would not otherwise be possible. Ultimately, the grant will fund efforts to dismiss unwarranted environmental stigma and measure environmental burdens, decreasing the uncertainty and risk of rehabilitating brownfield sites. Telling demographic factors are noted in the table below for the target disadvantaged CT.

Metric	Poverty Percentile <sup>1</sup>	Unemployment Percentile <sup>1</sup>	Transportation Barriers <sup>1</sup>	Population	Median Household Income	Medium Home Value
Target Area	52	95	81	5,658	\$42,768 (compared to \$69,021 in US)	\$154,800 (compared to \$204,900 in US)

Sources: US Census, ACS 2021 five-year estimates; <sup>1</sup>CEJST

**2.a.ii. Threats to Sensitive Populations**

(1) Health or Welfare of Sensitive Populations: The Target Area is home to several sensitive populations, as demonstrated in the following table.

Metric	Children under 18	Minority (other than White alone)	Women of childbearing ages	Residents aged 65 and over
<b>Target Area</b> Census Tract 13153021300	18.7%	56.2%	32.2%	29.7%
Source: US Census, ACS 2021 five-year estimates				

Environmental hazards from blight directly affect EJ communities: this Target Area has multiple groups of sensitive populations that are more susceptible to the risks of exposure to environmental contamination. For example, soils contaminated with heavy metals may infiltrate neighboring properties via dust or stormwater runoff. Stormwater runoff with potential contaminants such as PFAS can enter nearby streams, particularly Bay Creek at the Valley Drive priority site, that flow into the Ocmulgee River. This runoff would affect not only the adjoining EJ community but over 120 communities downstream that rely on the river for drinking water.

Safety and living conditions are concerns for Target Area residents because the Brownfield properties are either unfenced or exist in such a state of blight that efforts to keep trespassers and criminal activity out are futile. In the City, 45.3% of housing was built prior to the year 2000, and 11.2% was constructed prior to 1960, thus increasing the likelihood that children and women of childbearing ages can be exposed to lead-based paint and lead in water pipes. Unsafe, abandoned structures are havens for vagrancy, drug-related crimes, and other illicit activity, contributing to Perry having a 17% higher crime rate than the entire State of Georgia (*FBI, 2020*). Redeveloping the priority sites in the Target Areas will clean up the known and potential environmental dangers that affect public health, remove potential crime havens, and provide jobs and tax revenues to increase the quality of life for sensitive populations.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:

Metric	Asthma <sup>2</sup>	Cancer among Adults <sup>2</sup>	Diabetes <sup>1</sup>	Heart Disease <sup>2</sup>	Low Life Expectancy <sup>2</sup>
<b>Target Area</b>	61	78	89	88	65
Sources <sup>1</sup> CEJST; <sup>2</sup> EPA EJScreen					

The data above indicates that residents in the Target Area are negatively affected by adverse health conditions and disease at a greater-than-average rate. Given that the majority of these residents are from sensitive populations (as detailed in the previous section), the risks to these residents reflect environmental justice issues in the Target Area.

Additional health incidences in Houston County (city-level data not available) are as follows: 14.4% of children under six years tests asthma affects; 15.4% of adults (6.5% higher than Georgia) and 9.5% of children, and another 10% have COPD (2020 Community Health Needs Assessment). The annual average death rate per 100,000 persons for Chronic Lung Disease was significantly higher than in the state and US: 57.2 for Houston to 46.4 in Georgia and 40.4 in the US (2020 CHNA). The annual average death rate per 100,000 persons in Houston with lung cancer is 42.6 vs. 39.0 statewide and 36.6 nationally (2021 Houston County Community Health Needs Assessment). Nationally, the CDC recognizes that the COVID-19 pandemic affects Perry's 36% African American population more than other demographic groups. Exposure to environmental contaminants in the air where these groups live and work only exacerbates the situation. **The proposed project would directly address these concerns**, identify and eliminate contaminants that contribute to elevated rates of cancers and other environmentally influenced health conditions, and improve living conditions and employment opportunities.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues: Key environmental indicators within the Target Area are demonstrated in the following table:



Metric	Air Toxics Respiratory	Air Toxins Cancer Risk	Traffic Proximity	Lead Paint <sup>2</sup>	Underground Storage Tanks	Low Income	People of Color
<b>Target Area</b>	71	66	<b>77</b>	<b>95</b>	<b>87</b>	<b>96</b>	<b>89</b>
EPA EJScreen							

As shown on the EPA EJ Screen, disadvantaged residents living near the priority sites (**all three priority sites are within a disadvantaged census tract according to CJEST**) and in the surrounding vicinity are in areas with greater exposure or environmental risk for air toxins, leaking USTs, and lead paint, as compared to the rest of the country. This information is a significant environmental justice concern for our community, which recorded 59 children with blood lead levels above 3.5 µg/dL, 5% of the tested population (higher than the state percentage)<sup>a</sup>. This grant affords the community vital information to improve public health, especially for vulnerable populations impacted by lead and petroleum exposure.

**(b) Advancing Environmental Justice:** Because resources are limited, we need help to achieve this goal through strategies like infill development, which is a priority in our Comprehensive Plan. Doing so will attract new commercial and workforce residential development, create local jobs, improve the local environment, and improve transportation, especially for the current members of these communities. Specifically, redeveloping the priority sites will eliminate blight and exposure pathways from potentially harmful contaminants such as asbestos building materials and petroleum that directly impact sensitive EJ communities. Redeveloping a large industrial property creates the potential for living-wage jobs in a high-trafficked corridor and will catalyze smart nodal commercial growth and commercial services to surrounding impoverished neighborhoods.

**2.b. Community Engagement; 2.b.i. Project Involvement; 2.b.ii. Project Roles**

Community-Based Organization	Contact Information	Role
Central Georgia Technical College	Andrea Griner, VP for ED agriner@centralgatech.edu	Workforce Training Partner
Perry Chamber of Commerce	Maggie Schuyler, President maggie@perrygachamber.com	Moving into the project area, Meeting Space & Engagement
Perry Downtown Development Authority	Alicia Hartley, Downtown Manager (Interim ED Director) alicia.hartley@perry-ga.gov	Marketing, outreach, and information dissemination to the Downtown District. Steering Committee Service.
Faith Bible Fellowship	Willie King, Pastor & Councilmember Willie.king@perry-ga.gov	Outreach to New Hope and Oldfield communities, Provide Meeting Space, and Steering Committee Service.
Boys and Girls Clubs of Central GA	Phillip Bryant, CEO; 478-743-4153	The City will work with the BGCCG to identify potential sites for redevelopment as a local club for children in our community.
Go Fish Education Center	Marion Baker, site coordinator 478-988-6701 marion.baker@dnr.ga.gov	Will participate in water quality and brownfield education component of one community engagement meeting; will host a community engagement meeting where site information and nomination forms will be distributed.
Development Authority of Houston County	Angie Gheesling, Executive Director (478) 923-5470	Conduit in working with local industries and could assist in site redevelopment.

<sup>a</sup>, according to Georgia Childhood Lead Poisoning Prevention Program 2022 data

The reuse and redevelopment efforts to be funded by this brownfield assessment project will require both public and private investment. The City’s Economic Development Department will work with local and regional developers to identify suitable partners to ensure that purposeful redevelopment and reuse are achieved.

**2.b.iii. Incorporating Community Input:** The City acknowledges the value of broad-based support and community participation as essential to the acceptance and success of the Brownfield program and recognizes the importance of resident and stakeholder input in project planning, decision-making, and implementation. Brownfield program planning began in December 2015 with a series of public workshops and continued during the implementation of the City's closed FY2018 Community-Wide Assessment grant. Planning has since restarted in association with the application process for its FY2023 EPA Brownfield Cleanup Grant.

Further, we established a formal Brownfield Steering Committee with seven critical community partners, including members of the Target Area, to foster community involvement and guide engagement. We will adopt a formal Community Involvement Plan within 30 days of the cooperative grant agreement. A minimum of four public meetings will solicit input from Target Area residents as to secondary sites beyond the priority sites to be assessed and be a platform for communicating project progress. Public meeting notices will follow the City’s process. To increase participation, when conditions do not allow in-person attendance, meetings will be virtual. The City has also invested in an online community engagement platform (Engage Perry) that enables us to repost content, like recorded meetings, ancillary information, and presentations related to the projects, allowing residents to comment and make suggestions.

Further, we plan to host outdoor community engagement activities, including Brownfields presentations at Target Area community events. We will seek public input on project planning, site selection and prioritization (for additional sites as funds permit), cleanup decisions (Analysis of Brownfield Cleanup Alternatives), and reuse planning. Those without computer access can view plans, voice concerns, and provide input through a central printed information repository in the target communities and the Engage Perry website. The project team will consider community concerns at their monthly meetings and respond to any questions and concerns raised in a timely manner. Updates provided on the website (quarterly) and at community engagement meetings will keep residents current on project developments and how their input fits within the scope of work.

**3. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS:**

**3.a. Description of Tasks/Activities & Outputs**

<b>Task/Activity 1: Programmatic Support</b>
i. Project Implementation: EPA-funded activities for the priority site(s): cooperative agreement implementation and oversight; monthly team meetings; non-EPA grant resources contributed: in-kind resources: City 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: quarterly reports, ACRES data entry; notes from monthly team meetings.
<b>Task/Activity 2: Community Engagement</b>
i. Project Implementation: EPA-funded activities for the priority sites: 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 notes; community input for reuse plans.
Notes: Public meetings will include reuse and redevelopment planning components.
<b>Task/Activity 3: Environmental Site Assessments</b>
i. Project Implementation: EPA-funded activities for the priority sites: Phase I and Phase II Environmental Site Assessments (ESAs) for priority sites; inventory of brownfields sites for future reuse 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 4 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.
<b>Task/Activity 4: Cleanup and Reuse Planning</b>
i. Project Implementation: EPA-funded activities for the priority sites: cleanup planning at specific sites (6 ABCAs); and a brownfields revitalization plan for the Target Area and strategies/ new regulations pertaining to the redevelopment of the brownfield sites. 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: <b>The City has devoted 30% of the budget to planning efforts.</b>

**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.

**Task 1 Programmatic Support:** \$5,000 for 2 EPA National Brownfields conferences or regional brownfields events for 1 city staff (\$800 in registration fees; \$2,000 for 8 nights @ \$250/night in the conference hotel, \$1,200 airfare for 2 round-trip tickets, \$400 ground transportation/parking and \$600 per diem expenses for 8 days @ \$75 per day). Remaining funds for city staff to meet with developers or property owners. \$25,000 contractual support for the QEP to support city staff in drafting reports, updating EPA ACRES, meetings, and project management (\$125 per hour for 200 hours over the four-year period) **Total: \$25,000**

**Task 2 Community Engagement:** Community Involvement Plan (CIP) at a set fee of \$5,000; community engagement and property owner meetings, planning, and delivery at \$20,000 (\$125 per hour for 160 hours of work over the four-year period). **Total: \$25,000**

**Task 3 Environmental Site Assessment:** Estimated set fees: 1 GIS-Based Development Opportunities Inventory (total \$15,000) for site identification in the Target Area/city; 10 ASTM-AAI compliant Phase I ESAs at \$4,500 each (total \$45,000). One Generic Quality Assurance Project Plan at \$5,000; 4 Site Specific Quality Assurance Project Plans (QAPPs) at \$5,000 (total

\$20,000); 4 Phase IIs total \$210,000 (based on complexity and range \$25,000 to \$80,000), average cost at \$52,500. **Total: \$295,000**

**Task 4 Cleanup and Reuse Planning:** Estimated set fees: 1 Target Area-wide Brownfields Redevelopment Plan, \$60,000; 4 ABCAs at \$6,000 each (total \$24,000); Utility Infrastructure Evaluation for EV charging sites, \$26,000; 2 site-specific reuse plans with renderings for public engagement at \$10,000 each (total \$20,000); and one site disposition strategy, \$20,000. **Total: \$150,000** (30% of the budget is focused on planning efforts)

Project Budget Table					
Budget Categories	Project Tasks				
	1. Project Management	2. Community Engagement	3. Assessment	4. Planning	Total
Personnel					\$0
Travel	\$5,000				\$5,000
Contractual	\$25,000	\$25,000	\$295,000	\$150,000	\$495,000
<b>Total Budget</b>	\$30,000	\$25,000	\$295,000	\$150,000	\$500,000

**3.c. Plan to Measure and Evaluate Environmental Progress and Results:** The Project Director, with support from key staff and the environmental consultant, will document, track, and evaluate the following outputs and outcomes continually through quarterly progress reports, annual disadvantaged business enterprise reporting, and monthly calls with the EPA Project Officer. We track activities and outcomes through an Excel project management spreadsheet, invoice management system, EPA ACRES, and document them in a final closeout report.

**Outputs:** 10 (minimum) sites assessed (Phase I/II ESAs); 4 ABCAs with concept level reuse plans; 4-5 community meetings (and CIP development/revision); city-wide GIS development opportunity inventory, Target Area brownfields redevelopment planning activities; Utility Infrastructure Evaluation for EV charging sites; 2 site-specific reuse plans with renderings for public engagement; and one site disposition strategy; number of public meeting participants.

**Outcomes:** Number of sites with property title transfers; acres of land redeveloped, adaptive reuse building square footage; value of private investment and funding leveraged; jobs created or retained; property and sales tax revenue generated. Job creation and environmental justice improvements are the key success measures. The improved lives of residents in the disadvantaged Target Area will also gauge the overall success of the project.

**4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE**

**4.a. Programmatic Capability**

**4.a.i. Organizational Capacity ii. Organizational Structure and iii. Description of Key Staff** The City of Perry has the internal capability and prior EPA grant experience to manage this grant’s technical, administrative, and financial aspects, which will result in the timely and successful expenditure of funds. **Assistant City Manager Robert Smith** will serve as **Project Director and Financial Manager**. Mr. Smith has 12 years of experience in municipal government and holds a master’s degree in public administration. He has successfully administered a wide array of local, state, and federal grants, including CDBG, EDA, and DNR grants. Most importantly, Mr. Smith also managed the City's successful FY2018 EPA Community-wide Brownfield Assessment Grant. As Assistant City Manager, Robert works with the Mayor and Council and provides oversight of the Perry Main Street Advisory Board and the associated Perry Downtown Development Authority. These groups will support the reuse and redevelopment of priority sites and other identified sites. **Holly Wharton, the Economic Development Director for the City of Perry**, has extensive relationships within the business community. She is actively promoting the City on a national scale, and she has a well-established presence within the local community. Holly came to

Perry from the Middle Georgia Regional Commission, underscoring her broad knowledge base in the field. She is pursuing on-demand transportation options for the City to increase residents' access to goods, services, and jobs in the greater Houston County area. Holly will be a vital part of connecting this project to the business sector, working to identify entities that best fit the priority sites' features. **Emily Carson, the Community Planner for the City of Perry**, is a recent graduate of Georgetown University with a Master's in Urban & Regional Planning. Her background in community relations informs her people-centered approach to planning, and she has quickly jumped into projects that center disadvantaged communities within The City of Perry. Emily will assist in identifying potential community-based partners, conducting educational and engagement activities, and managing the online engagement website that houses project information. The City also has mechanisms in place to replace lost staff and obtain additional contractor resources if needed. In the event of unforeseen employee turnover, the Assistant City Manager and the Finance Officer will assist the project team to ensure the project successfully continues until replacements are hired. The City has a robust procurement process that adheres to state and federal regulations.

#### **4.a.iv. Acquiring Additional Resources**

The City will hire an experienced, Qualified Environmental Professional and multi-faceted consulting firm for the grant's technical aspects to ensure the highest caliber of technical expertise and resources to meet state and federal procurement requirements. The City will proactively begin procurement through a fair and open bidding process in mid-2024 to be ready to proceed before executing the cooperative agreement, and this process will promote strong labor practices. The procurement process will comply with Federal Procurement guidelines 2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500. The City of Perry is experienced in the procurement process and has been successful in managing this process in its prior federal and state grant projects, as seen in the Certificate of Excellence in Financial Reporting from the Government Finance Officers Association of the United States and Canada (GFOA). The City has consistently won this award for the past several years.

#### **4.b. Past Performance & Accomplishments**

##### **4.b.i. Currently Has or Previously Received an EPA Brownfields Grant**

###### **(1) Accomplishments**

The City received an FY2018 EPA Assessment Grant for \$300,000 and accomplished 8 Phase I ESAs, marketing materials; 8 asbestos surveys, one wetland assessment, and 9 Phase II ESAs. 9.44 acres were made ready for reuse. The City returned \$508.17 that had been designated for travel that was not completed due to COVID-19 travel restrictions. The City was able to leverage \$191,000 for cleanup activities as a result of this grant. The project team that achieved these results remains the same. The City received an FY2023 EPA Brownfields Cleanup grant award of \$500,000 to clean up a 1.4-acre site that was previously a furniture store, dry-cleaning facility, and a gas station. As the cooperative agreement was issued on 10/19/23 for the FY2023 Cleanup grant and QEP procurement is pending, there have yet to be major accomplishments to date. The proposed assessment grant will build on the momentum of the City's established brownfields program.

###### **(2) Compliance with Grant Requirements**

The City complied with the terms and conditions, work plans, and schedules for the FY2018 Assessment grant. Quarterly reports and deliverables were submitted to EPA and entered in ACRES in a timely fashion. All terms/conditions were met, all funds were drawn down, and the grant was closed.



Where Georgia comes together.

**City of Perry, GA  
Community-wide Assessment  
Threshold Criteria**

**1. Applicant Eligibility**

The City of Perry, Georgia is a general-purpose unit of local government and therefore an eligible entity as defined under 2 CFR § 200.64 pursuant.

**2. Community Involvement**

The City acknowledges the value of broad-based support and community participation as essential to the acceptance and success of the Brownfield program and recognizes the importance of resident and stakeholder input in project planning, decision-making, and implementation. Brownfield program planning began in December 2015 with a series of public workshops. We established a formal Brownfield Steering Committee with seven critical community partners, including members of the target area EJ community, to foster community involvement and guide engagement.

We will adopt a formal Community Involvement Plan within 30 days of the cooperative grant agreement. A minimum of four public meetings will solicit input from target area residents and be a platform for communicating project progress. Public meeting notices will follow the city's process. If the community experiences a public health outbreak, meetings will be virtual. Further, we plan outdoor community engagement activities, including Brownfields presentations at target area community events. We will seek public input on project planning, site selection, and prioritization (for additional sites as funds permit), cleanup decisions (ABCAs), and reuse planning. Those without computer access can view plans, voice concerns, and provide input through a central printed information repository in the target communities.

**3. Expenditure of Existing Grant Funds**

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

**4. Named Contractors and Subrecipients**

Not Applicable - no contractors or sub-recipients have been selected for this proposed project. The City 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.