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Tara Johnson-Noem, Executive Director

## Narrative Information Sheet USPEA FY24 Brownfield Assessment Grant

- 1. Applicant Identification:** Northern Kentucky Area Development District  
22 Spiral Drive, Florence, KY 41042
  
- 2. Funding Requested:**
  - a.** Assessment Grant Type: Community-wide
  - b.** Federal Funds Requested: \$500,000
  
- 3. Location:** The Northern Kentucky Area Development District serves Boone, Kenton, Campbell, Grant, Gallatin, Owen, Pendleton, and Carroll counties. Location of the target areas:
  - a) City of Florence b) Boone County c) Kentucky
  - a) City of Williamstown b) Grant County c) Kentucky
  - a) City of Crittenden b) Grant County c) Kentucky
  - a) City of Fort Thomas b) Campbell County c) Kentucky
  
- 4. Target Area and Priority Site Information**
  - The Target areas are Florence, Boone County, KY; Williamstown, Crittenden, and Dry Ridge, Grant County, KY; and Fort Thomas, Campbell County, KY
  - 431 S Main St. Williamstown, KY
  - 307 North Main Street, Crittenden, KY
  - 8915 Dixie Highway, Williamstown, KY
  - 8430 Dixie Highway, Williamstown, KY
  - 220 Elliston Mt-Zion Road, Dry Ridge, KY
  - 665 Highland Avenue, Fort Thomas, KY
  - 8477 U.S. 42 Florence, KY
  - 8471 U.S. 42 Florence, KY
  
- 5. Contacts:**
  - a. Project Director**  
Alaina Hagenseker,  
Local Government Services Manager  
Northern Kentucky Area Development District  
22 Spiral Drive  
Florence, KY 41042  
Phone: (859) 283-1885  
E-mail: [alaina.hagenseker@nkadd.org](mailto:alaina.hagenseker@nkadd.org)



**b. Chief Executive**

Tara Johnson-Noem, Executive Director  
 Northern Kentucky Area Development  
 District 22 Spiral Drive  
 Florence, KY 41042  
 Phone: (859) 283-1885  
 E-mail: [tara.noem@nkadd.org](mailto:tara.noem@nkadd.org)

- 6. Population:** Florence, KY – 31,132 (target area)  
 Williamstown, KY – 3,962 (target area)  
 Fort Thomas, KY – 17,264 (target area)

**7. Other Factors Checklist:**

| Other Factors  | Page #  |
|--|---|
| Community population is 10,000 or less.  | Narrative Information Sheet, Page 4 (Section 2.a.i.) of Narrative               |
| The applicant is, or will assist, a federally recognized Indian tribe or United States territory.  | No  |
| The priority brownfield site(s) is impacted by mine-scarred land.  | No  |
| 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). | No  |
| The priority site(s) is in a federally designated flood plain.   | Page 1 (Section 1.a.ii) of Narrative  |
| The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.   | Page 3 (Section 1.b.ii) of Narrative  |
| The reuse of the priority site(s) will incorporate energy efficiency measures.   | Page 3 (Section 1.b.ii) of Narrative, Page 5 (Section 2.a.ii(3.a)) of Narrative |
| The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.  | Page 3 (Section 1.b.ii) of Narrative  |
| At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities.  | Page 8 (Section 3.b.) of Narrative  |



Tara Johnson-Noem, Executive Director

|   |  |
|---|--|
| 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.   | No   |
| <b>Additional Final Selection Considerations</b>  | <b>Page #</b>  |
| ≥20% of the population of the county where project is sited has been at or below the poverty level for 30 years (based on decennial censuses from 1990 and 2000 and most recent Small Area income and Poverty Estimates | No   |
| At least one target area within the project is or includes a disadvantaged census tract per <a href="#">CEJST</a> .   | Page 5 (Section 2.a.ii(3.a)) of Narrative, and Page 5 (Section 2.a.ii(3.b)) of Narrative |

**8. Letter from the State or Tribal Environmental Authority:** Attached.

**9. The application does not have confidential, privileged, or sensitive information.**

Thank you for your consideration of this grant application. NKADD is fully committed to restoring its communities to the safe, healthy, and vibrant areas they can be. We hope that the continued redevelopment of our Brownfield sites will lead to this success.

Sincerely,

Tara Johnson-Noem  
 Executive Director



**Andy Beshear**  
GOVERNOR

**ENERGY AND ENVIRONMENT CABINET**  
**DEPARTMENT FOR ENVIRONMENTAL PROTECTION**

300 Sower Boulevard  
Frankfort, Kentucky 40601  
Phone: (502) 564-2150  
Fax: 502-564-4245

**Rebecca Goodman**  
SECRETARY

**Anthony R. Hatton**  
COMMISSIONER

October 19, 2023

Tara Johnson-Noem  
Executive Director  
Northern Kentucky Area Development District  
22 Spriral Drive  
Florence, Kentucky 41042

Re: Letter of Support for a Brownfield Community-Wide Assessment Grant

Dear Mr. Haley:

The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of the Northern Kentucky Area Development District. DEP is the state agency charged by the legislature with the responsibility of implementing the Kentucky equivalent of the federal Superfund program, and as such, is an essential component of any attempt to systematically address brownfields redevelopment. We support your application for a Brownfield Community-wide Assessment Grant and look forward to continuing our work with your community on this important issue.

Sincerely,

Lynn True  
Brownfield Coordinator

Cc: Cliff Hall, Division of Waste Management  
Adam Fritsch, Division of Waste Management, Florence Regional Office  
Alaina Hagenseker, Northern Kentucky Area Development District



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

**1.a. Target Areas and Brownfields**

1.a.i. Overview of Brownfield Challenges and Description of Target Area:

The Northern Kentucky Area Development District (NKADD) was established in 1971 under state-enabling legislation as one of 15 development districts in the state of Kentucky and serves an eight-county region in the northernmost part of Kentucky. The NKADD is seeking assessment funding within their service area for a regional brownfields program in Boone, Grant, and Campbell Counties, and the municipalities contained therein, which will serve as the **Target Area** of this grant. Many of the brownfield properties are near US Highway 25, known much earlier as the Covington & Lexington Turnpike in northern Kentucky, which has played a crucial role in transportation from the Bluegrass Region of the state across the Ohio River at Cincinnati. As early as 1800, the road was the only north-south stagecoach route from Lexington to Covington. The Kentucky towns of Florence and Walton in Boone County and Crittenden, Dry Ridge, and Williamstown in Grant County flourished adjacent to the stagecoach route. Around 1870, many of these towns benefited from the railroad lines built along the turnpike as train depots connected each town and the turnpike to the railroad lines. In 1870, the Chesapeake and Ohio Railroad completed a bridge across the Ohio River, connecting Newport and Covington by railroad to Cincinnati, Lexington, and Louisville. The invention of the automobile breathed new life into the turnpike as individuals could travel long distances and the Covington & Lexington Turnpike transformed into US Highway 25, “The Dixie Highway,” a transportation corridor that stretched through northern Kentucky from Florida to Michigan. However, following World War II, urban flight took a toll on these northern Kentucky counties that was exacerbated by the construction of Interstate 75 which drew travelers away from the towns and businesses on US 25 to the newer transportation corridor, leaving behind brownfield sites associated with this transportation heritage such as fueling and repair stations.

1.a.ii. Description of the Priority Brownfield Site(s):

A preliminary inventory revealed a combined 60 brownfield sites in our three target areas that have suspected contamination because of age and/or prior use. The following ten priority sites were selected due to their prime locations, redevelopment potential, proximity to residents, and potential health impacts. **Priority Sites 9 and 10 are in a federally designated flood plain.** Additional brownfield properties will be identified and prioritized by the Brownfields Advisory Committee (BAC).

| Priority Sites & Description  | Uses:  | Suspected Contaminants   |
|---|--|--|
| <p><b>1. 431 S. Main St.<br/>Williamstown, KY 41097</b><br/>Built in 1928, one of the first things seen when driving into town.</p> | <p><b>Former:</b> Gas distribution center<br/><b>Current:</b> Truck storage<br/><b>Proposed:</b> Commercial, hotel, restaurant</p>       | <p>Petroleum and solvents</p>  |
| <p><b>2. 307 N. Main,<br/>Crittenden, KY 41030</b><br/>7.31 acres, first property when driving into town.</p>                       | <p><b>Former:</b> Concrete plant<br/><b>Current:</b> Construction material storage<br/><b>Proposed:</b> Park and multi-use buildings</p> | <p>Asbestos-containing materials (ACM), and lead-based paint (LBP), polychlorinated biphenyls (PCB), and petroleum</p> |



|   |  |   |
|---|--|---|
| <p>3. 8915 Dixie Highway,<br/>Williamstown, KY 41097<br/>Built late 1800s. Used as a school<br/>for 100+ years. Expansion in 1925.</p>            | <p><b>Former:</b> Elementary school<br/><b>Current:</b> Vacant/idle<br/><b>Proposed:</b> Apartments</p>  | <p>ACM, LBP, PCB,<br/>Polyaromatic<br/>hydrocarbons (PAH)</p> |
| <p>4. 8430 Dixie Highway<br/>Williamstown, KY 41097<br/>1.6 acres. Built in 1940. Located in<br/>the downtown area.</p>                           | <p><b>Former:</b> Variety store/6 room<br/>apartment upstairs<br/><b>Current:</b> Vacant/idle<br/><b>Proposed:</b> small<br/>store/apartments</p>                            | <p>ACM, LBP, PCB</p>  |
| <p>5. 220 Elliston-Mt. Zion Rd,<br/>Dry Ridge, KY 41035<br/>.50 acre, 650 SF building</p>   | <p><b>Former:</b> Grocery store<br/><b>Current:</b> Vacant/idle<br/><b>Proposed:</b> Commercial</p>  | <p>ACM, LBP, PCB</p>  |
| <p><b>6. 665 Highland Ave,<br/>Fort Thomas, KY 41075</b><br/>.43 acre. Corner lot into Main St</p>  | <p><b>Former:</b> Gas Station<br/><b>Current:</b> Vacant/idle<br/><b>Proposed:</b> Pocket park</p>   | <p>Petroleum and solvents</p>                                 |
| <p>7. 8477 U.S. 42,<br/>Florence, KY 41042<br/>14 acres. Located in the middle of<br/>newly developed and redeveloped<br/>areas</p>               | <p><b>Former:</b><br/>Warehouse/Trucking<br/>Company<br/><b>Current:</b> Truck and<br/>construction storage<br/><b>Proposed:</b> Affordable<br/>housing</p>                  | <p>ACM, LBP</p>   |
| <p>8. 8471 U.S. 42,<br/>Florence, KY 41042<br/>7.54 acres. Middle of jughandle<br/>intersection.</p>  | <p><b>Former:</b> Warehouse/farm<br/>equipment sales and service<br/><b>Current:</b> Truck and material<br/>storage<br/><b>Proposed:</b> Pocket park or<br/>small retail</p> | <p>ACM, LBP, PCB,<br/>petroleum, and solvents</p>             |
| <p>9. 170 Mt. Zion Rd,<br/>Florence, KY 41042<br/>16.59 acres, located adjacent to<br/>Kroger and other retail areas</p>                          | <p><b>Former:</b> Warehouse/<br/>construction<br/><b>Current:</b> Storage<br/><b>Proposed:</b> Affordable<br/>housing</p>  | <p>ACM, LBP</p>   |
| <p>10. 7777 Burlington Pike,<br/>Florence, KY 41042<br/>14.32 acres. Adjacent to the city<br/>building, located directly off the<br/>highway.</p> | <p><b>Former:</b> Fueling station<br/><b>Current:</b> Fueling station<br/><b>Proposed:</b> Multi-use business<br/>and housing with a pocket<br/>park</p>                     | <p>ACM, LBP, PCB,<br/>petroleum, and solvents</p>             |



### 1.a.iii. Identifying Additional Sites:

A preliminary inventory of the target area has already been conducted. Site selection will be made by the BAC, which will be composed of a broad spectrum of community members and stakeholders. The BAC will select sites for assessment consideration based on several factors, including: 1) eligibility based on EPA requirements; 2) locations in underserved communities; 3) redevelopment potential emphasizing job creation; 4) extent or perception of contamination; 5) availability of site access; and 6) public input.

### **1.b. Revitalization of the Target Areas:**

#### 1.b.i. Reuse Strategy & Alignment with Revitalization Plans:

Three high priority projects have been identified as catalyst sites because of the benefit adaptive reuse can play in promoting economic redevelopment in their communities and the region. The first project is located in Williamstown (Site 1). The former gas distribution/supplier was built in 1928, was unused for several years and is now used for truck storage. This blighted property sits on prime real estate within a few hundred yards of I-75 and US 25 at the entrance to Williamstown. With the city now attracting millions of visitors to the Ark Encounter each year, cleanup of the site would assist in downtown revitalization and beautification. The planned redevelopment as a hotel and restaurant capitalize on Ark tourism. The second project is located in Crittenden (Site 2). A former concrete plant that has been unused for several years, this blighted property is prime real estate at the entrance to the city. Clean up would assist in efforts to recruit small to medium light industry as well as spur downtown revitalization, economic prosperity, and beautification, which are priorities that align with the 2019 Boone County Plan and 2012 Williamstown Master Plan (currently undergoing update). The third project is located in Fort Thomas (Site 6). This former gas station has been vacant for many years and the city would like to turn it into a pocket park and green space, as mentioned in the Land Use portion of the 2018 Fort Thomas Comprehensive Plan and is listed as a community priority. All target areas will rely on the OKI Strategic Regional Policy Plan for regional vitality, sustainability, and competitiveness, focusing on the land use–transportation connection to assist in redevelopment plans and actions.

#### 1.b.ii. Outcomes & Benefits of Reuse Strategy:

The brownfield cleanup and the proposed redevelopment of the priority sites will stimulate the economies of their communities by making commercial and light industrial properties sites ready for reuse (Sites 1, 5, 7, 8). The grant will also assist in the creation of parks and green spaces (Sites 2, 6, 8, 10) and affordable housing (Sites 3, 4, 7, 9, 10) enhancing the livability of these communities. Redevelopment of commercial/industrial properties to green space will reduce the climate change risk by eliminating heat islands, regulating temperature, and lowering levels of air pollution by absorbing carbon dioxide. The affordable housing will incorporate renewable and energy efficiency measures, such as the installation of solar panels, energy efficient lighting, and low-flow toilets. The revitalization plans will not cause the displacement of any residents, housing, or existing businesses. The outcomes of brownfield redevelopment include: a reduction in blight and perceived contamination, the creation of new jobs (temporary construction, trade, and skilled labor) during the remediation and renovation phases, increased health for community members, increased occupational and property tax revenue, and spurring private investment. In addition, the grant will preserve undeveloped properties through the adaptive reuse of structurally sound but underutilized existing buildings and property.





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

### **1.c.i. Resources Needed for Site Reuse:**

To supplement EPA funding, the NKADD will be working closely with their economic development and real estate partners. Most notably, the Catalytic Fund, which is a private sector, not-for-profit organization that provides capital via a \$10 M investment fund to fill gaps between traditionally underwritten loans, developer's equity, and project costs. Their efforts are focused on transforming vacant and underutilized buildings in the cities along the Ohio River. The NKADD's Small Business Lending Program Revolving Loan Funds (RLF) is able to provide flexible financing capital for small businesses who are unable to obtain sufficient private financing for projects deemed of economic benefit to the area and its workforce. The NKADD is also able to provide funds for the remediation of brownfield sites through EPA Brownfield Cleanup RLF funds awarded to the NKADD in 2012. The RLF \$50K program income will be utilized by NKADD to fund additional remediation activities. The NKADD eight-county region has opportunity zones in both Boone and Grant counties for which investors can receive federal tax benefits by investing capital gains in qualified opportunity zones.

### **1.c.ii. Use of Existing Infrastructure:**

All priority sites are equipped with the necessary infrastructure, such as water, sewer, electricity, and access to transportation routes. Work performed under this grant will support the use of existing infrastructure by creating additional commercial customers, which will generate additional revenue to finance future maintenance and upgrades.

## **2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:**

### **2.a. Community Need:**

#### **2.a.i. The Community's Need for Funding:**

The NKADD is unable to draw on other sources of funding for brownfield assessments because, as a regional coordinating agency, they do not have the taxing authority to appropriate funds. NKADD's region has suffered economic decline as manufacturing jobs have left the area over the past two decades, lowering the unemployment rate from 4.1 in 2016 to 4.6 in 2020. While a surge in redevelopment has occurred along the Ohio River, investment is still not picking up and extending south into the core of these northern Kentucky counties, where the population of 390,736 in Kenton, Boone, and Campbell County combined compared to the 816,684 in the Cincinnati Metropolitan Area just across the Ohio River. Many vacant and blighted sites pose a threat to economic redevelopment and job creation. In Grant County alone, 49% of the population commutes more than 30 minutes each way to work (KY:30%; US:37%). Two of the three priority sites are located in communities that have small populations less than 5,000 and the median household incomes are below \$55,000, which is well below the median household income in the US of \$74,580. The median household income in KY is \$59,341 and \$74,580 in US. For Williamstown (population 3,894) the median household income is \$55,040, and in Crittenden (population 4,023), it is \$51,488.

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

##### **(1) Health or Welfare of Sensitive Populations:**

Brownfield contamination disproportionately affects sensitive populations in the Northern Kentucky Area Development District region, including senior citizens, young children, people living at or below the poverty line, and people of color. These populations are made vulnerable to health threats from brownfield contamination due to compromised immune systems and/or the





lack of access to adequate health care. The teen birth rate in Grant County is more than twice the national average (Grant: 40 per 1000; US: 19 per 1000) ([County Health Rankings](#)). The number of children living in single parent households is 36% compared to 25% nationally. The total number of snap recipients in Grant County are 13% of households, compared to the 11.3% of country wide recipients. The poverty rate of 12.7%, compared to a statewide 16.5%, and critical service gaps of medically underserved where 7% of the county resides without insurance are seen throughout the most sensitive populations of children and residents over 65 according to the census. The Brownfield Assessment grant will address the contaminations and reduce threats to these groups by setting up the communities to apply for further cleanup and remediation grants.

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

The Kentucky Cancer Registry identifies Grant County as having one of the highest rates in the state with 653 cases per 100K and 25,387 at risk for developing cancer in 2020 ([Cancer-Rates.com | Kentucky](#)). The premature death rate is 11,800 in Grant County, compared to 7,300 nationally, with the main causes being malignant neoplasms, heart disease, and accidents/injury deaths ([County Health Rankings](#)). Asthma rates in Kentucky were 11.8% in 2020, compared to the 8.3% countrywide, according to the Cabinet for Health and Family Services. Grant County residents are also at a 4.9% of stroke, higher than a median prevalence of 3.1% for the U.S.

**(3) Environmental Justice:**

**(3.a) Identification of EJ Issues:**

The Justice40 Initiative is an effort to ensure that Federal agencies work with states and local communities to deliver at least 40 percent of the overall benefits from Federal investments in clean energy and energy efficiency, affordable and sustainable housing, training and workforce development, remediation and reduction of legacy pollution and environmental hazards to disadvantaged communities. This grant application seeks to address geographic boundaries littered with former industrial buildings, historical structures with asbestos and lead-based paint concerns, and former commercial districts populated with dry cleaners and gasoline stations, along the US 25/Dixie Highway transportation corridor. The funds in this Community-wide Brownfields Assessment Grant will be used in alignment with Justice40 goals through the remediation and reduction of pollution in disadvantaged census tracts (21081920300, 21081920200, 21037051200, 21015070301, 21015070311) and the adaptive reuse plans for affordable and sustainable housing incorporating energy efficiency measures.

**(3.b) Advancing Environmental Justice:**

As stated, this Community-wide Brownfields Assessment Grant will advance environmental justice by encouraging the adaptive reuse of properties and mitigating the health concerns to foster positive impacts on economic/health goals through new jobs, affordable housing, and recreational green space in overburdened and underserved communities. Several sites targeted for assessment fall within disadvantaged census tracts (21081920300, 21081920200, 21037051200, 21015070301, 21015070311). Fundamentally this grant will address environmental injustice by ensuring that the underserved residents of these disadvantaged census tracts have a voice in prioritizing the assessment, the cleanup activities, and the redevelopment plans.

**2.b. Community Engagement:**

**2.b.i. Project Involvement & 2.b.ii. Project Roles:**

The NKADD's goal is to build an ongoing brownfields program within their region and the success of this grant is a step in that direction. The NKADD is aware that realizing their goal will



require brownfields education through widespread community outreach. The NKADD (2.b.ii) will form a BAC, composed of residents, community leaders, community-based organizations, regional planning commissions, local governments, EPA Region 4 TAB, and public and private stakeholders to lead community outreach efforts. The BAC will select sites for assessment consideration based on several factors, including: 1) eligibility based on EPA requirements; 2) locations in underserved communities; 3) redevelopment potential emphasizing job creation; 4) extent or perception of contamination; 5) availability of site access; and 6) public input. The BAC will gain input regarding the location, prioritization, and adaptive reuse of brownfield sites from all demographics with a strong focus on participatory community planning involving the vulnerable populations in the target area. This is in alignment with environmental justice goals that community members participate in and benefit from the decisions that shape their neighborhoods and region. The BAC will meet on a quarterly basis throughout the four-year project period to make sure project targets are being met. A number of open public meetings with a virtual attendance option will be held to help update the brownfield site inventory list and discuss the reuse of individual sites. Notices of these meetings will be advertised through newspapers, the NKADD website and newsletter, social media outlets, and flyers posted in community meeting areas and churches. An informational project brochure, along with the NKADD Brownfield Coordinator’s contact information and how to get involved, will also be distributed to stakeholder groups, neighborhood organizations, and available at various public spaces. To create transparency and build trust, all meeting minutes and project updates will be available to the public on the NKADD website. NKADD will also be working closely with partner agencies, developers, investors, and elected officials to bring awareness to the project and to help meet the region's brownfield goals of public brownfield education, property revitalization, and mitigation of environmental health risks.

**2.b.iii. Incorporating Community Input:**

The BAC will meet quarterly and invite project input from community stakeholders and neighborhood residents near the target brownfields in open public meetings with an option to attend virtually. Accommodations will be made for non-English speaking residents. The agenda will include reviews of the project status and time to provide feedback to administrators. BAC meetings will be a venue for making key decisions through the active solicitation and conscientious centering of community input in decision making. The frequency and content of these meetings will provide the communities in these historically underserved areas with confidence that their needs and interests are being prioritized, thus building a relationship of trust. In between quarterly meetings, BAC members will communicate via email or phone to ensure that all project activity timelines are adhered to without interruption. At least one meeting per year will be held in each target area community.

**3.TASK DESCRIPTION, COST ESTIMATES, AND MEASURING PROGRESS**

**3.a. Description of Tasks/Activities & Outputs, i., ii., iii., and iv.**

|  |
|--|
| <b>Task/Activity 1: Project Management / Cooperative Agreement Oversight</b>   |
| i. Project Implementation: Develop Work Plan, procure a Qualified Environmental Professional (QEP) in accordance with 2 CFR 200.317-200.326, oversee and ensure compliance with the cooperative agreement, complete quarterly reports, Disadvantaged Business Enterprise, annual reports, and ACRES database entries, finalize and prioritize brownfield inventory, and travel to regional and national conferences. |



|   |
|---|
| ii.. Anticipated Project Schedule: ACRES reporting begins in the 1 <sup>st</sup> Quarter and quarterly reporting begins in the 2 <sup>nd</sup> Quarter and continues throughout the project. Prioritized inventory by 3 <sup>rd</sup> Quarter. Annual reporting and forms will be created in the 5 <sup>th</sup> , 9 <sup>th</sup> , and 13 <sup>th</sup> Quarters and during final closeout. |
| iii.. Task/Activity Lead: NKADD Project Director with support from QEP  |
| iv. Outputs: Work plan, quarterly, DBE and close-out reports, ACRES entries, prioritized inventory  |
| <b>Task/Activity 2: Community Outreach</b>  |
| i. Project Implementation: Develop Community Involvement Plan. Convene community visioning and quarterly BAC meetings to provide brownfields education, project updates, and solicit input on site recommendations, suitable reuse and redevelopment of sites. Arrange community education meetings. Prepare and distribute brownfield educational brochures.                                 |
| ii. Anticipated Project Schedule: BAC meetings will begin 1 <sup>st</sup> Quarter. CIP by 2 <sup>nd</sup> Quarter. Community meetings 3 <sup>rd</sup> and 7 <sup>th</sup> Quarters. Brochures ready for the first community education meeting in the 3 <sup>rd</sup> Quarter.   |
| iii. Task/Activity Lead: Project Manager with support from QEP  |
| iv. Outputs: 1 CIP, 16 BAC meetings, 2 community meetings, brochures available for all communities served.  |
| <b>Task/Activity 3: Brownfield Site Identification and Environmental Assessments</b>  |
| i. Project Implementation: Phase I ESAs will be performed for prioritized sites. Phase II ESAs will be completed as needed based on Phase I results. Generic QAPP, Site Eligibility Determinations (SEDs) and SS-QAPPs will be developed prior to Phase II ESAs. Health monitoring conducted in accordance with EPA guidance.   |
| ii. Anticipated Project Schedule: Assessment activities to begin in the 2 <sup>nd</sup> Quarter and continue throughout the grant project.  |
| iii. Task/Activity Lead: QEP with oversight by the project manager and Health Department  |
| iv. Outputs: 15 Phase I ESAs; 8 Phase II ESAs; one Generic QAPP, 8 SEDs and 8 SSQAPPs.  |
| <b>Task/Activity 4: Remediation and Reuse Planning</b>  |
| i. Project Implementation: Based on the results of the Phase II ESAs, the QEP will prepare Analyses of Brownfield Cleanup Alternatives (ABCAs). Develop market study and reuse plans.   |
| ii. Anticipated Project Schedule: October 2025 – October 2029; first ABCA anticipated by 5 <sup>th</sup> Quarter.   |
| iii. Task/Activity Lead: QEP with direction from project manager  |
| iv. Outputs: 8 ABCAs, 3 market studies, 2 reuse plans   |



**3.b. Cost Estimates:**

| BUDGET CATEGORIES   | Task 1.         | Task 2.         | Task 3.          | Task 4.          | Total            |
|---------------------|-----------------|-----------------|------------------|------------------|------------------|
|                     | Management      | Outreach        | Assessments      | Planning         |                  |
| Personnel           | \$14,400        | \$9,600         | \$1,000          |                  | \$25,000         |
| Travel              | \$11,568        |                 |                  |                  | \$11,568         |
| Contractual         | \$20,000        | \$25,000        | \$268,000        | \$150,432        | \$463,432        |
| Total Direct Costs  | \$45,968        | \$34,600        | \$269,000        | \$150,432        | \$500,000        |
| <b>Total Budget</b> | <b>\$45,968</b> | <b>\$34,600</b> | <b>\$269,000</b> | <b>\$150,432</b> | <b>\$500,000</b> |

**NKADD has budgeted to allocated more than 30% of awarded funds to tasks related to reuse/area-wide planning activities.**

**Task 1 Project Management:** Personnel: NKADD Project Director est. 2 hours/ month for 4 years or 96 hours at \$50 per hour \$4,800. NKADD Project Manager est. 4 hours/ month for 4 years or 192 hours at \$50 per hour \$9,600. Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, DBE Forms, Programmatic Support for the 4-year grant period \$20,000. Travel: Two NKADD members to attend three conferences/events \$11,568. (flights at \$700, 3 nights in a hotel at \$300/night, incidentals and per diem at \$82/day [4 days] x 2 attendees x 3 events).

**Task 2 Community Involvement:** Personnel: NKADD Project Director est. 2 hour/ month for 4 years or 96 hours at \$50 per hour \$4,800. NKADD Project Manager est. 2 hours/ month for 4 years or 96 hours at \$50 per hour \$4,800. Contractual: Community Involvement Plan \$5,000; Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$10,000; 2 Community Education Meetings \$10,000.

**Task 3 Brownfield Site Assessment:** Personnel: NKADD Project Manager est. 20 hours at \$50 per hour \$1,000. Contractual: 15 Phase I ESAs \$5,000 each for a total of \$75,000; 1 Generic QAPP \$5,000; 8 SS-QAPPs at \$3,500 each for a total of \$28,000; 8 Phase II ESAs at \$20,000 each for a total of \$160,000.

**Task 4 Site-specific Cleanup and Reuse Planning:** Contractual: 8 ABCAs \$4,000 each for a total of \$32,000; 2 Site Reuse Plans at \$29,642 each for a total of 59,284; 3 Market Studies at \$19,716 each for a total of \$59,148.

**3.c. Plan to Measure and Evaluate Environmental Progress and Results:**

The Project Manager with Northern Kentucky Area Development District and the QEP are tasked with tracking, measuring, and evaluating progress on the Community-wide Brownfields Assessment Grant. To ensure the grant is on schedule, the BAC will meet with the QEP quarterly to track all outputs identified in 3.a., including the number of Phase I and Phase II environmental assessments, ABCAs generated, and cleanup redevelopment plans. Meetings will be utilized to: report progress in meeting goals and achieving scope of work objectives; to review project expenditures; and to share quarterly reports prepared for the EPA to ensure the grant project will be completed in the 4-year time frame. Specific information will be entered and tracked in the ACRES database for each site. Outcomes that will be tracked utilizing Microsoft Project include: the number of community meetings held by the BAC and number of attendees; informational materials distributed; acres ready for adaptive reuse; jobs created; and the amount of private investment and other funding leveraged for redevelopment. If necessary, the NKADD will create a Corrective Action Plan (CAP) to address identified shortcomings and help the Community-



wide Assessment project get back on schedule and/or budget. The NKADD will issue a final report of overall project results, and eventual project outcomes for each community.

#### **4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:**

##### **4.a. Programmatic Capability:**

##### **4.a.i. Organizational Capacity & 4.a.ii. Organizational Structure & 4.a.iii. Description of Key Staff:**

NKADD is the primary regional economic development entity for eight northern Kentucky counties. The organization possesses the capacity **(4.a.i.) to handle the programmatic, administrative, and financial management of the project on behalf of all grant funding recipients.** This includes overseeing community outreach; interface with environmental regulators; and coordination of schedules, timelines and budgets with community members and contractors. **A Description of Key Staff (4.a.iii)** includes the EPA Community-wide Brownfields Assessment Grant **Project Director, Tara Johnson-Noem**, NKADD's Executive Director, who holds a Masters in Community Planning. Ms. Johnson-Noem is actively leading an organization with an annual budget of more than \$24M and over 155 sources of funding from local, state, federal and private philanthropic sources. Specifically, she oversees Workforce Innovation and Opportunity Act (WIOA) contracts that originate from the US Department of Labor, Medicaid waiver contracts and other state and federal allocations through the Commonwealth of Kentucky for Aging and Disability Services, for which NKADD serves as local administrator, as well as a number of community development programs. Ms. Johnson-Noem oversees financial and programmatic administrative functions for grants including Community Development Block Grants (Kentucky Department of Local Government - HUD); Transportation, Safe Streets for All and Transit Planning grants (Kentucky Department of Transportation); Water and Sewer Planning (Kentucky Infrastructure Authority); Hazard Mitigation (Kentucky Emergency Management – FEMA); Brownfields (EPA); BRIC (Kentucky Energy and Environment Cabinet – FEMA); and government food commodities (Kentucky Department of Agriculture – USDA) grants and contracts that total \$1,148,311 for fiscal year 2024 alone. Currently she manages a combined \$370K in three types of Revolving Loan Funds (RLF) including: Coronavirus Aid, Relief, and Economic Security (CARES) ACT and Legacy RLF for small businesses as well as Brownfield RLF. This experience makes Ms. Johnson-Noem the best choice to manage the timely and accurate expenditure of EPA Community-wide Assessment Grant funding and manage the ASAP.gov draw-down system. Tara Johnson-Noem is fully qualified to ensure that all grant recipients adhere to the administrative and financial requirements of the EPA Community-wide Brownfields Assessment Grant. NKADD's administrative and finance management policies conform with 2 CFR 200. Ms. Johnson-Noem has professional experience working with community-based non-profits in her past role as Director of Government Relations for the United Way of Greater Cincinnati. The Community-wide Brownfields Assessment Grant **Project Manager, Alaina Hagenseker**, is NKADD's Local Government Manager, who will be responsible for managing the daily operations of the grant and providing support to Ms. Johnson-Noem when necessary. **Ms. Hagenseker** has a degree in Public Affairs with a Concentration in Public and Nonprofit Management and will also serve as the **Community Involvement Coordinator**, to ensure that all project stakeholders are afforded meaningful participation in grant activities. In response to a need for a clear **Organizational Structure (4.a.ii)** to govern the decision-making process about distribution of grant funds to projects in the target communities, NKADD will form a **Brownfield Advisory Committee (BAC)** composed of representatives from the target communities, the Project





Director, and the Project Manager because **collective governance ensures timely and successful grant performance**. Such collaboration and strong community partnerships are integral to success in addressing environmental injustices. The **Brownfield Advisory Committee** is tasked with prioritizing sites; communicating with and supporting target communities; using grant monies to fund assessment needs; and working with private, public, and nonprofit entities.

4.a.iv. Acquiring Additional Resources:

NKADD has policies and procedures in place to properly procure contracted assistance for the cleanup grant. NKADD will follow all appropriate procurement processes per EPA policy and associated provisions in EPA's Solicitation Clauses. NKADD is committed to economic development within the community and will provide careful consideration to local, small, minority, and woman-owned businesses (MBE/WBE) with expertise in related remedial management of the site. NKADD will consult with the Kentucky Brownfields Program staff and the EPA Region 4 TAB provider.

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

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

(1) Accomplishments:

The NKADD served as the lead on a 2010 Coalition Petroleum Assessment Grant which led to the completion of seven Phase I ESAs and five Phase II ESAs. The 2010 Grant was successfully closed out with all funds expended. In 2012 NKADD was awarded Brownfield Revolving Loan Fund (RLF), to clean up lead and asbestos in single family affordable homes for redevelopment for low-income families, which has been closed out with no remaining funds. NKADD continues to manage the programmatic funding currently around \$50K and plans to use this funding to supplement cleanup activities identified while managing the FY24 Brownfield Assessment Grant. The NKADD was awarded a Coalition Hazardous Assessment Grant that resulted in 43 Phase I, 18 Phase II, and six ABCAs being completed. The current NKADD FY20 EPA Brownfield Assessment Grant has zero dollars remaining and is in the process of being closed out. It accomplished 33 Phase I ESAs that resulted in no Recognized Environmental Conditions (RECs), and therefore were able to move immediately to redevelopment. The funding requested in this FY24 EPA Community-wide Brownfields Assessment Grant will allow NKADD the opportunity to serve the more rural communities and their district while also continuing to supplement the economic revitalization that was spurred from the FY20 successfully implemented Brownfield Assessment Grant.

(2) Compliance with Grant Requirements:

All grant agreement terms and conditions were met for the projects above, including financial reports, quarterly progress reports, and final reports. NKADD is fully compliant with all reporting, and performance protocols. All grants have been granted close-out status. Project files will be maintained according to EPA retention requirements.



**Attachment 2:  
Threshold Criteria**





**1. Applicant Eligibility:**

The Northern Kentucky Area Development District (NKADD) was established as a special purpose unit of government by the Kentucky General Assembly in 1972 with the enactment of Kentucky Revised Statute 147A.050. NKADD is a 501c(3) entity and, as such, is an eligible applicant. See Attachment 3 for supporting documentation.

**2. Community Involvement:**

The NKADD is committed to fostering a vibrant Brownfield program in its region through extensive community engagement and education. In pursuit of this objective, NKADD is establishing a dynamic Brownfield Advisory Committee (BAC), comprising residents, community leaders, and stakeholders. This committee will spearhead comprehensive outreach initiatives, aligning with the principles of Environmental Justice that emphasize community involvement and benefits derived from decisions shaping neighborhoods and regions.

To facilitate ongoing collaboration, the Advisory Board will convene quarterly over the four-year project duration. In order to keep the community informed and involved, a series of public meetings will be organized, offering a virtual attendance option. These gatherings will focus on updating the brownfield site inventory list and soliciting input on the potential reuse of individual sites. Notices for these meetings will be disseminated through various channels, including newspapers, the NKADD website, newsletters, social media platforms, and community bulletin boards.

In addition to engaging residents, NKADD is forging partnerships with key stakeholders, including agencies, developers, investors, and elected officials. This collaborative approach aims to raise awareness and garner support for the project, ensuring a broad and inclusive community involvement throughout the Brownfield program's implementation.

**3. Documentation of available balance on each open assessment grant and multipurpose grant, or a statement that the applicant does not have an open grant:**

NKADD does not have an open EPA Brownfields Assessment Grant with an available balance of \$0.00. This Grant is currently in the process of being closed out.

**4. Contractors and named subrecipients:**

N/A. A contractor has not been procured and there are no subrecipients included in this application.