

Chattanooga Area Regional Council of Governments Southeast Tennessee Development District

R04-24-A-039

November 13, 2023

Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington D.C.

Subject: **FY 2024 EPA Community-Wide Assessment Grant Proposal-Southeast Tennessee Development District/
Chattanooga Area Regional Council of Governments, Tennessee**

Dear sir or madam,

The Southeast Tennessee Development District is applying for a \$500,000 Community-Wide assessment grant. This Southeast Tennessee Development District/ Chattanooga Area Regional Council of Governments Brownfield Project in 17 counties in the region (Catoosa, Chattooga, Dade, Gordon, Murray, Whitfield, and Walker Counties in Georgia) (Bledsoe County, Bradley County, Grundy County, Hamilton County, Meigs County, Polk County, Marion County, McMinn County, Rhea County, and Sequatchie County). We thank you for considering our application for brownfield assessment funding and look forward to working with EPA in the future.

GRANT SPECIFICS

- 1) **Application Identification:**
Southeast Tennessee Development District/ Chattanooga Area Regional Council of Governments
1000 Riverfront Parkway
P.O. Box 4757
Chattanooga, TN 37405
- 2) **Funding Requested:**
 - a) **Grant Type: Community-Wide Assessment Grant**
 - b) **Federal Funds Requested**
 - i. \$500,000
 - ii. Not Applicable
- 3) **Location: SETDD Project will serve 17 counties in southeast Tennessee and North Georgia, including: (Catoosa, Chattooga, Dade, Murray, Gordon, Whitfield, and Walker Counties in Georgia) (Bledsoe County, Bradley County, Grundy County, Hamilton County, Marion County, Meigs County, Polk County McMinn County, Rhea County, and Sequatchie County).**
- 4) **Target Area and Priority Site/ Property Information**
 - **Community-Wide Assessment Grant, other than tribes**
 - **Target Area**

The SETDD Brownfield Consortium is led by the Southeast Tennessee Development District (SETDD). The Consortium Partners are divided up into three target areas: These three distinct target areas include the: 1) Tennessee River Valley (Hamilton, Meigs, Rhea (TN), and Catoosa County, Chattooga County and Walker County, GA). 2) Sequatchie Valley (Marion, Sequatchie, Bledsoe, & Grundy (TN) and Dade (GA) Counties, and the 3) Interstate-75 Corridor (Bradley, McMinn, Polk (TN) Counties) and Whitfield, Gordon, and Murray County, GA.
 - **Addresses of the Priority Sites**
 - a) **Old Crystal Springs Bleachery Site**
301 West 10th Street
Chickamauga, GA 30707
 - b) **Old Ridgedale R.L. Stowe Mercerizing Mill**
1101 South Watkins Street
Chattanooga, TN 37404
 - c) **Old Galaxy Carpet Mills**
180 Jaycee Drive
South Pittsburg, TN 37380
 - d) **Old Penn-Dixie Cement Plant**
100 Irondale Road
South Pittsburg, TN 37380

- e) **South Cleveland Brownfield Redevelopment Area**
599 Church Street, S.E.
Cleveland, TN, 37311
- f) **Athens-Jackson Street Brownfield Corridor**
901 North Jackson Street
Athens, TN 37303
- 5) **Contacts:**
- i) **Project Director:** Sam Saieed
Director of Community and Economic Development
Southeast Tennessee Development District
P.O. Box 4757
Chattanooga, TN 37405-4757
Phone: (423) 424-4269/ Fax: (423) 267-7705
ssaieed@sedev.org
- ii) **Chief Executive:** Chuck Hammonds
Executive Director
Southeast Tennessee Development District
P.O. Box 4757
Chattanooga, TN 37405-4757
Phone: (423) 424-4264/ Fax: (423) 267-7705
bjones@sedev.org
- 6) **Population: Consortium Partners**-Catoosa County, GA:67,580, Dade County, GA:16,166, Chattooga County, GA-24,965, Gordon County, GA-57,544, Murray County, GA-39,973, Whitfield County, GA-102,848, Walker County, GA-67,654 Bledsoe County, TN:15,064, Bradley County, TN:108,110, Grundy County, TN:13,427, Hamilton County, TN:367,804, Marion County, TN:28,907, Meigs County, TN:12,422 McMinn County, TN:53,794, Polk County, TN:16,832, Rhea County, TN:31,809, Sequatchie County, TN:14,112.
- 7) **Special Considerations Checklist:** Find attached in Appendix.
- 8) **Letter from State or Tribal Authority:** See attached letters from State of Georgia and State of Tennessee
- 9) **Releasing Copies of Application:** N/A

Best regards,



Chuck Hammonds
Executive Director

OTHER FACTORS CHECKLIST

Other Factors	Page #
Community population is 10,000 or less.	No
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.	No
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	No
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	No



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION
DIVISION OF REMEDIATION
WILLIAM R. SNODGRASS TENNESSEE TOWER
312 ROSA L. PARKS AVENUE, 14TH FLOOR
NASHVILLE, TENNESSEE 37243

October 30, 2023

Sam Saieed
Assistant Director of Community Development
Southeast Tennessee Development District
1000 Riverfront Parkway
Chattanooga, TN 37402

Re: State Letter of Acknowledgement for the Southeast Tennessee Development District
Brownfields Assessment Coalition Grant Application

Dear Mr. Saieed,

The Tennessee Department of Environment and Conservation (TDEC) is pleased to acknowledge your efforts to apply for a \$1,500,000 US Environmental Protection Agency (EPA) Brownfields Assessment Coalition Grant for Phase I and Phase II Assessments for both hazardous substances and petroleum in ten counties in the Tennessee portion of your region (Bledsoe, Bradley, Grundy, Hamilton, Marion, McMinn, Meigs, Polk, Rhea, and Sequatchie), in addition to the ten counties in the Southeast Industrial Development Association Region in Georgia (Walker, Catoosa, Dade, Cattooga, Whitfield, Murray, Fannin, Union, Towns, and Gordon).

Since many brownfields are abandoned, underutilized, and/or contaminated, TDEC is expressly interested in seeing areas in our state take the initiative to return these sites to productive uses. This effort is also consistent with our mission to enhance the quality of life for citizens of Tennessee and to be stewards of our natural environment. In cooperation with Region 4 EPA, the TDEC brownfields staff will provide technical support and oversight for your grant.

We greatly appreciate your efforts to address brownfields in 10 counties in Tennessee and 10 counties in neighboring Georgia!

Sincerely,

Paula Middlebrooks

Paula Middlebrooks
State of Tennessee Brownfields Redevelopment Program
Tennessee Department of Environment and Conservation



Jeffrey W. Cown, Director

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

October 30, 2023

VIA ELECTRONIC MAIL to ssaieed@sedev.org

Mr. Sam Saieed
Assistant Director of Community Development
Southeast Tennessee Development District
P.O. Box 4757
Chattanooga, TN 37405

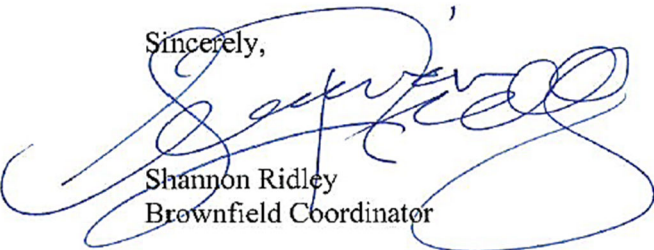
RE: State Acknowledgement Letter – Brownfield Assessment Grant Application
Southeast Tennessee Development District/Chattanooga Area Regional Council of Governments

Dear Mr. Saieed:

This letter serves as acknowledgement from the Georgia Environmental Protection Division (“GA EPD”) that the Southeast Tennessee Development District/Chattanooga Area Regional Council of Governments, hereinafter the Coalition, 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 Coalition is applying for \$1.5 million to conduct Phase I and Phase II Assessments for both hazardous substances and petroleum in for Dade, Walker, Chattooga, Catoosa, Whitfield, Gordon, Murray, Fanin, Union, and Towns Counties in Georgia (to go along with the ten counties in southeast Tennessee). These 10 counties are members of the Southeast Industrial Development Association.

EPD would like to take this opportunity to encourage EPA’s positive decision in making a grant award to the Coalition for such assessment. A successful award would greatly assist these communities in their redevelopment efforts. Thank you for your consideration.

Sincerely,



Shannon Ridley
Brownfield Coordinator

cc: Paula Middlebrooks, Tennessee Department of Environmental Conservation

File: FFY 2024 EPA Grant Applicants, Southeast Tennessee Development District/Chattanooga Regional Council of Governments-Assessment

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Targeted Area and Brownfields

i) Overview of Brownfield Challenges and Description of Target Area-The Southeast Tennessee Development District/ Chattanooga Area Regional Council of Governments (<https://www.sedev.org/>), headquartered in Chattanooga, Tennessee) is requesting \$500,000 in funding for an EPA Brownfields Community-Wide Assessment Grant for Hazardous Substances sites. The region's economic development initiatives are housed at the Southeast Industrial Development Association, which is a subsidiary of the SETDD. SEIDA is a regional economic development entity that is funded by regional and local power providers. This project area encompasses a seventeen county area in southeast Tennessee and North Georgia and covers 17 counties that are members of the Southeast Industrial Development Association (<https://www.seida.info/regional-profiles/>). The SETDD/SEIDA Brownfield Consortium is led by the Southeast Tennessee Development District (SETDD).

The SETDD/ SEIDA Brownfield Consortium Partners are divided up into three target areas: These three distinct target areas include the: 1) Tennessee River Valley (Hamilton, Meigs, Rhea (TN), and, Walker, Chattooga and Catoosa Counties, GA), 2) Sequatchie Valley (Marion, Sequatchie, Bledsoe, & Grundy (TN) and Dade (GA) Counties, and the 3) Interstate-75 Corridor (Bradley, McMinn, Polk (TN) Counties and Whitfield, Gordon, and Murray Counties, GA). The project goals include the assessment of approximately 16 brownfield sites, comprehensive brownfield redevelopment planning, and public outreach effort that reaches out to all citizens in the region. The consortium partners encompass three distinct geographic areas in the region. These three areas have their own distinct geography, development patterns, and industrial history.

Consortium Target Area 1: The TN River Valley (Hamilton, Meigs, Rhea, Catoosa, Chattooga & Walker counties) target area is the most densely populated of the three target areas. Starting in the 1870's the TN River Valley saw vast population and industrial growth. In this area, Chattanooga, Rossville, Dayton, Decatur, Fort Oglethorpe, Summerville, and Chickamauga are the main employment centers. The area became an attractive destination for manufacturers, due to an abundant water supply (TN River and tributaries), rail access, fuel from nearby natural coal deposits, and a centralized location to other large industrial centers (Nashville, Knoxville, Birmingham, and Atlanta). The Chattanooga Coke and Chemical Company, the Crystal Springs Bleachery, Chattanooga Ross-Meehan Foundry were the largest industrial employers in the area. As the national economy slid into recession during the 1970's, so too did the economic fortunes of the area. **Approximately 15,000 industrial jobs were lost in this target area between the 1970's and 1990's in the area, and there were massive layoffs, cut-backs, and company closings.** These layoffs include major job losses at the Combustion Engineering (6,000 jobs losses), Peerless Mills (1,200 jobs lost), Wheeland Foundry (1,130 job losses), Dayton Coal and Iron (500) (U.S. Pipe 345 job losses), Chattanooga Coke and Chemical Company (700 job losses), Ross-Meehan Foundry (500 job losses), Scholze Tannery (400 job losses), Velsicol (450 job losses), and Chris-Craft Boat Company (425 job losses). Many of the residents lost jobs and many of the homeowners (who were aging) lacked the means to maintain their homes. In addition, environmental issues surfaced (associated with the previous manufacturing) left environmental justice concerns, with the negative environmental conditions disproportionately affecting the majority African American population centers of East Chattanooga, South Chattanooga, North Rossville, and West Dayton. These negative environmental and economic impacts severely crippled the once-thriving neighborhoods. These closures devastated the population, causing a severe uptick in poverty and unemployment and created an affordable housing crisis. These shuttered factories also brought negative environmental consequences to the area.

Target Area 2: The Sequatchie Valley (Marion, Sequatchie, Bledsoe, Grundy, and Dade) is the most geographically and culturally isolated of the target areas in the SETDD-SEIDA region. It is also one of the most topographically unique areas in the country, which has played a large part in its industrial and economic history. The Sequatchie Valley is one of only two Great Rift Valleys in the world and the history of the valley is uniquely intertwined with the Coal Industry. The narrow valley is located between the Great Smoky Mountains to the east and the Cumberland Plateau to the west, and the mountains surrounding the valley are full of coal and iron deposits. The Sequatchie Valley experienced booming growth during the late 19th and early 20th century, when the coal business was at its apex. The Sewanee Furnace Company, the Tennessee Coal Iron & Railroad Company, the Chattanooga Coal and Iron Company, the Penn-Dixie Cement Plant, the Battle Creek Coal and Iron Company and the Lodge Foundry all were major industrial plants that processed the area's coal and iron deposits. The area saw industrial growth that continued until the early 1970's, when worldwide economic trends and environmental concerns led to the closure of most of the coal and iron processing industries located in the area. **Approximately 25,000 industrial jobs were lost in this area between the 1970's and 2000's in the area, and there were massive layoffs, cut-backs, and company**

closings. These layoffs include major job losses at Tennessee Coal and Iron (20,000 jobs lost), Chattanooga Coal and Iron (3,000 jobs lost), Penn-Dixie Cement Plant (1,300 job losses), Battle Creek Coal and Iron Company (700 jobs lost).

Target Area 3: The I-75 Corridor (Bradley, McMinn, Polk, Whitfield, Gordon, Murray) is the most rapidly expanding sub-region in the SETDD-SEIDA region. The area is less mountainous and better planting soil than the other 2 sub-regions. Most of this area has remained agrarian, but the City of Cleveland (Bradley County), Athens (McMinn County), Calhoun (Gordon County), and Dalton (Whitfield County) had the most extensive industrialization in this area. The areas specialized in Furniture Manufacturing and Textile Manufacturing. By the 1880's, the area had the Hardwick Stove Company, the Hardwick Woolen Mills, the Cleveland Chair Company and many other manufacturers. Athens had a similar industrialization that centered around the downtown Jackson Street Corridor that featured many furniture manufacturers, textile mills, and flour mills. As the national economy slid into recession during the 1970's, so did the I-75 Corridor's economy. **Approximately 15,000 industrial jobs were lost in this area between the 1970's and 2000's in the area, and there were massive layoffs, cut-backs, and company closings.** These layoffs include major job losses at Shaw Industries in Calhoun and Dalton (5,000 jobs lost), Mohawk Industries in Calhoun and Dalton (4,000 jobs lost), Hardwick Woolen Mills in Cleveland (3,000 jobs lost), Cleveland Chair Company (2,000 jobs lost), Athens Furniture Company (1,000 jobs lost). Many of the residents lost jobs and many of the homeowners (who were aging) lacked the means to maintain their homes (thus the subsequently described need for affordable housing adaptive reuse for these brownfield sites). In addition, environmental issues surfaced associated with the previous manufacturing left environmental justice concerns, with the negative environmental conditions disproportionately affecting the majority African American population centers of North Athens and South Cleveland and the Hispanic population centers of East Dalton. These negative environmental and economic impacts severely crippled the once-thriving neighborhood. These closures devastated the population, causing a severe uptick in poverty and unemployment. These shuttered factories also brought negative environmental consequences to the area.

ii. Description of the Priority Brownfield Sites

TN River Valley Priority Sites (Hamilton, Rhea, Meigs, Walker, Chattooga, and Catoosa Counties)

1) The Old Crystal Springs Bleachery (Chickamauga, GA) was in operation from 1909 until 2013. The bleachery produced printed cotton fabric and bleached bag goods. The City of Chickamauga was originally established as a company town, centered around the 100,000 square foot bleachery. The bleachery employed thousands of workers during its peak of operation. Nestled at the foot of the Chattanooga Valley, the former mill is located in a predominantly Low to Moderate income neighborhood, (below \$16,000 Per Capita Income, over 30% poverty) (US Census Bureau) with a high concentration of minority residents (40%+). Based on site reconnaissance and local/state environmental inspection, the site contains VOCs, PVCs, and metals. However, Phase I & II ESAs are necessary to learn the full extent of the contamination, in order to develop a cleanup plan. The site's best adaptive re-use would be first-floor light-industrial or retail, along with upper-floor residential development.

2) The Old Ridgedale R.L. Stowe Mercerizing Mill (Hamilton County, TN) in the Ridgedale neighborhood of Chattanooga, served as one of the largest employers in the city from the 1920's until the factory's closure in 2003. The site is located in the Ridgedale neighborhood which is 86% Low-Income and 68% minority (per EPA EJ Mapper). Grassroot community developers have purchased the property, but are in need of a Phase II assessment, in order to secure additional financing. The Phase I ESA identified Recognized Environmental Conditions, including documented groundwater impact from Solvent-Based Compounds and the documented presence of shallow foundry fill sand. The prospective developers have drafted plans for the redevelopment of the facility that will have approximately 50 housing units with first floor commercial opportunities.

Sequatchie Valley Priority Sites (Marion, Sequatchie, Bledsoe, Grundy and Dade Counties)

3) The Old Galaxy Carpet Mill in South Pittsburg (Marion County, Tennessee) was an active flooring/ carpet mill from the 1940's until 2003. The site is located in South Pittsburg, which is 67% Low-Income (per EPA EJ Mapper). Prospective developers are in negotiations but are in need of a Phase I & II assessment, in order to secure additional financing. Based on site reconnaissance and local/state environmental inspection, the sites contain VOCs, PVCs, and metals. However, Phase I & II ESAs are necessary to learn the full extent of the contamination, in order to develop a cleanup plan. The prospective developers have drafted plans for the redevelopment of the facility that will have approximately 28 Senior Affordable Housing units, which are badly needed, due to the aging citizens and aging housing stock for median to low income residents in South Pittsburg.

4) The Old Penn-Dixie Cement Plant in South Pittsburg (Marion County, Tennessee) was an active cement plant from the early 1900's until the plant's closure in 1980. At one time, the plant was the largest cement manufacturing plant in the United

States. The nearby coal deposits were needed in order to keep the labor and heat-intensive manufacturing process going with coal-fired kilns. The plant closed in 1980, and 1,300 jobs were lost at that time. The even more unfortunate legacy of the site was the prevalence of heavy metals (Iron, Copper, Mercury, etc.) near the Richard City neighborhood of South Pittsburg. The site is in need of Phase I and II ESAs, in order to lead to the remediation necessary for the construction of affordable single-family housing in the Richard City section of South Pittsburg.

I-75 Corridor Priority Sites (Bradley, Polk, McMinn, Whitfield, Gordon, Murray Counties)

5) The South Cleveland Brownfield Redevelopment Area (Bradley County, TN) is one of the most important redevelopment corridors in the SETDD/SEIDA region. The redevelopment area stretches over an 11 block long, 4 block wide section of Cleveland, and it serves as the buffer district between the central business district and the Blythe-Bower Neighborhood (a predominantly LMI area, (over 40% below poverty line, per 2013 US Census-American Community Survey Census figures) with a high-concentration of minority residents (50%+). The priority sites within the redevelopment are the old Cleveland Chair Company, the old Cooke Manufacturing Building, and the Old Magic Chef Plant #2. Based on site reconnaissance and local/state environmental records, the sites contain VOCs, PVCs, and metals. However, Phase I & II ESAs are necessary to learn the full extent of the contamination, in order to develop a cleanup plan. The Old Hardwick Woolen Mills operated in this corridor from the 1880's until 1974. Local South Cleveland residents have historically referred to the South Mouse Creek running through this as "Dye Creek" referring to the dyes that ran freely from the mill into the creek. The site's best adaptive re-use would be first-floor retail, along with upper-floor residential development.

6) The North Athens-Jackson Street Brownfield Corridor (McMinn County, TN) is one of the largest and most important brownfield Corridors in Athens (McMinn Co., TN). The corridor was home to several former furniture manufacturing sites that began operations in the 1930's and ceased operations in the 1990's, including Athens Furniture Company and Jackson Street Furniture and McKeehan Chair. Based on site reconnaissance and local/state environmental inspection, the sites contain VOCs, PVCs, and metals. However, Phase I & II ESAs are necessary to learn the full extent of the contamination, in order to develop a cleanup plan. The Jackson Street Brownfield Corridor is adjacent to important community facilities and low-income neighborhoods in Athens (Athens City Hall, Tennessee Wesleyan College, North City Elementary, over 100 Athens Housing Authority units, and the North Athens neighborhood). The redevelopment area stretches over a 5-block long, 4-block wide section of Athens, and it serves as the buffer district between the central business district and the North Athens (a predominantly LMI area, (over 60% below poverty line, per 2021 US Census-American Community Survey Census figures) with a high-concentration of minority residents (40%+). Based on the Athens/ McMinn County Comprehensive Plan, the neighboring community has identified this Jackson Street Brownfield Corridor as an ideal location for Multifamily Affordable Housing. The results of the Phase I and Phase II ESAs and Cleanup Planning will dictate whether the existing buildings are an ideal fit for an Adaptive Reuse Affordable Housing Project.

iii. Identifying Additional Sites-The SETD-SEIDA Brownfield Advisory Committee (made up of professionals, elected officials, citizens, and other stakeholders) has prioritized the top 6 sites for immediate assessment work once the project commences. Also, there are 11 other sites that the SETD-SEIDA Brownfield Advisory Committee has identified as the second grouping of sites, beyond the six priority sites. Beyond those 16 sites, the SETD-SEIDA Brownfield Advisory Committee will be open to community suggestions to review other sites.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

<u>Site Location</u>	<u>Consortium Target Area</u>	<u>Site Name</u>	<u>Site Description</u>	<u>Problem/ Reuse and Redevelopment</u>	<u>Revitalization Planning and the accompanying Reuse Strategy</u>
<u>1) City of Chickamauga, GA</u>	<u>TN River Valley</u>	<u>Old Crystal Springs Bleachery</u>	100,000 sq. ft. Former Textile Mill	-Suspected VOCs, PCBs, metals -Large site; commercial, residential reuse possible	<u>Revitalization Planning</u> -The site has been identified as the top brownfield redevelopment mixed-use planning site in the <i>City of Chickamauga Comprehensive Plan</i> , the <i>Northwest Georgia Regional Commission Comprehensive Economic Development Strategy</i> , and the <i>University of Georgia-Carl Vinson Institute Urban Design Studio Study of Site Redevelopment</i> <u>Reuse Strategy</u> : Property Owners are proposing 30 affordable housing units and 5 retail locations (approximately 100 jobs created).
<u>2) Hamilton County, TN</u>	<u>TN River Valley</u>	<u>Old R.L. Stowe Mercerizing Plant-Ridgedale</u>	Old Mercerizing Plant	-Suspected VOCs, Metals -Proposed commercial & housing reuse	<u>Revitalization Planning</u> : The redevelopment of this property has been identified as a short-term goal for a brownfield redevelopment project in both the <i>City of Chattanooga Comprehensive Land-Use Plan 2030-Renewing Our Vision</i> and the <i>Area 3 Plan-River to Ridge</i> (sub-area plan for neighborhood).

					Reuse Strategy: Property Owners are proposing 50 affordable housing units and 10 retail locations (approximately 500 jobs created), and 5 rent-controlled spaces for community non-profits. Prospective developers have begun working with housing planning consultants to develop site plans, cost estimates and a funding strategy for the site's affordable housing redevelopment.
3) <u>Marion County, TN</u>	<u>Sequatchie Valley</u>	<u>Old South Pittsburg Galaxy Plant</u>	Old Flooring Mill	- Suspected VOCs, metals -Senior Affordable residential reuse possible	Revitalization Planning: The site has been identified as one of the top two brownfield redevelopment mixed-use planning site in the <i>Marion County Comprehensive Plan</i> , the <i>Southeast Tennessee Development District's Comprehensive Economic Development Strategy</i> . Reuse Strategy: Property Owners are proposing 28 Affordable Senior Living Apartments
4) <u>Marion County, TN</u>	<u>Sequatchie Valley</u>	<u>Old Penn-Dixie Cement Plant</u>	Old Cement Plant/ Kiln	- Suspected VOCs, metals -Affordable Single-Family Housing reuse possible	Revitalization Planning: The site has been identified as one of the top two brownfield redevelopment mixed-use planning sites in the <i>Marion County Comprehensive Plan</i> , the <i>Southeast Tennessee Development District's Comprehensive Economic Development Strategy</i> . Reuse Strategy: Property Owners are proposing developing approximately 40 affordable, single-family detached homes, with HUD-backed financing.
5) <u>Bradley County, TN</u>	<u>I-75 Corridor</u>	<u>South Cleveland Brownfield Redevelopment Area</u>	Various sites	-Suspected VOCs -Large site; commercial; residential reuse possible	Revitalization Planning: The site has been identified as one of the top two brownfield redevelopment mixed-use planning site in the <i>City of Cleveland Comprehensive Plan</i> , in the <i>City of Cleveland Land Use Plan</i> , and in <i>University of Tennessee South Cleveland Master Brownfield Redevelopment Study</i> . Reuse Strategy: Site developers will utilize New Market Tax Credits and conventional financing for construction of affordable housing units and commercial/ office space. Developers will also use Historic Tax Credits and available Brownfield Tax Credits.
6) <u>McMinn County, TN</u>	<u>I-75 Corridor</u>	<u>North Athens-Jackson Street Brownfield Corridor</u>	Old Furniture Manufacturing Facilities	- Suspected VOCs, metals -Large site; commercial; residential reuse possible	Revitalization Planning: The site has been identified as one of the top two brownfield redevelopment mixed-use planning site in the <i>City of Athens Comprehensive Plan</i> and in the <i>City of Athens Land Use Plan</i> Reuse Strategy: Site developers will utilize New Market Tax Credits and conventional financing for construction of affordable housing units and commercial/ office space. Developers will also use Historic Tax Credits and available Brownfield Tax Credits.

ii. **Outcomes and Benefits of the Reuse Strategy**

<u>SETDD/ SEIDA Brownfield Consortium Member/ Brownfield Site</u>	<u>Reuse Strategy</u>	<u>Outcomes & Benefits of Reuse Strategy</u>
1) <u>City of Chickamauga, GA- Old Crystal Springs Bleachery</u>	The City of Chickamauga has been working with THRIVE 2055-Thriving Communities Partnership, a regional planning initiative for city-wide visioning and redevelopment. Also, the city is working with the University of Georgia-Carl Vinson Institute of Government/ Urban LEED-Certified Design Studio on Visioning Redevelopment Scenarios and Planning on a site-specific basis at the mill. The Plans for redevelopment are an outgrowth of this planning process.	Addition of 30 Affordable Housing Units ; Potential generation of \$10,000,000 in sales & property tax ; Potential Creation of 250 jobs ; Elimination of blight; Increased Property Values
2) <u>Hamilton Co., TN- Ridgedale R.L. Stowe Yarns Mercerizing Plant</u>	Property Owners are proposing 50 affordable housing units and 10 retail locations (approximately 200 jobs created), and 5 rent-controlled spaces for community non-profits. Prospective developers have begun working with housing planning consultants to develop site plans, cost estimates and a funding strategy for the site's affordable housing redevelopment.	Addition of 50 Affordable Housing Units ; Potential generation of \$25,000,000 in sales & property tax ; Potential Creation of 200 jobs ; Elimination of blight; Increased Property Values
3) <u>Marion County (South Pittsburg)-Old Galaxy Carpet Mills</u>	Marion County and the City of South Pittsburg have started a county-wide community development initiative, where abandoned and environmentally degraded sites are addressed in a proactive manner. This brownfield was identified through a public input process. Developers will ensure site has LEED Platinum redevelopment status.	Addition of 28 Senior Affordable Housing Units ; Potential generation of \$2,000,000 in property tax ; Elimination of blight; Increased Property Values
4) <u>Marion County-Old Penn-Dixie Cement Plant</u>	Marion County and the City of South Pittsburg has started a county-wide community development initiative, where abandoned and environmentally degraded sites are addressed in a proactive manner. This brownfield was identified through a public input process. Developers will ensure the site has LEED Platinum redevelopment status.	Addition of 30 single-family detached housing units ; Potential generation of \$3,000,000 in property tax ; Elimination of blight; Increased Property Values
5) <u>Bradley County-South Cleveland Brownfield Redevelopment Area</u>	Have started Brownfield Redevelopment Planning through a grant with University of Tennessee; Implemented City/ County Comprehensive Planning Process, which identified brownfield target area for housing commercial redevelopment. Developers will ensure the site has LEED Platinum redevelopment status.	Addition of 200 Affordable Housing Units ; Potential generation of \$30,000,000 in sales & property tax ; Potential Creation of 200 jobs ; Elimination of blight; Increased Property Values

6) McMinn Co., TN-North Athens-Jackson St. Brownfield Corridor	The City of Athens has started a city-wide cleanup plan, where abandoned and environmentally degraded sites are addressed in a proactive manner. This brownfield corridor was identified through a public input process.	Addition of 30 Affordable Housing Units ; Potential generation of \$5,000,000 in sales & property tax ; Potential Creation of 50 jobs ; Elimination of blight; Increased Property Values
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c. Strategy for Leveraging Resources-i. Resources Needed for Site Reuse

1) The Old Crystal Springs Bleachery-Prospective developers will use State of Georgia CDBG money for the Assessment work. The developers will work with project architects to develop cost estimates for the construction of affordable townhomes and commercial restaurant space. The project lead planning team will put out a highly structured RFP to prospective developers, which will encapsulate a commercial/ residential design, with livability, walkability, and green elements being required. Developers will also use Historic Tax Credits.

2) Old Ridgedale R.L. Stowe Yarns Mercerizing Plant-Prospective developers will use the City of Chattanooga Brownfield RLF for the cost of remediation. Then, the developers will utilize New Market Tax Credits funding from a qualified lending institution for the construction of 50 affordable housing units and commercial/ office space. Developers will also use Historic Tax Credits.

3) Old South Pittsburg Galaxy Carpet Mill- Prospective developers will use the State of TN CDBG for the cost of remediation. Then, the developers will utilize Federal Home Loan Bank, Tennessee Housing Development Agency, HUD financing, and traditional financing for the construction of 28 senior affordable housing units and commercial/ office space.

4) Old Penn-Dixie Cement Plant- Prospective developers will use the State of TN CDBG for the cost of remediation. Then, they will utilize HUD financing and traditional financing for the development of affordable single-family detached housing.

5) South Cleveland Brownfield Redevelopment Area-Prospective developers will use HUD-CDBG for the cost of remediation. Then, the developers will utilize New Market Tax Credits funding from a qualified lending institution for the construction of 200 affordable housing units and commercial/ office space. Developers will also use Historic Tax Credits.

6) North Athens-Jackson St. Brownfield Corridor-Prospective developers will use HUD-CDBG for the cost of remediation. Then, the developers will utilize New Market Tax Credits funding from a qualified lending institution for the construction of 30 affordable housing units and commercial/ office space. Developers will also use Historic Tax Credits.

ii. Use of Existing Infrastructure

All 6 of these priority sites will use existing infrastructure including water, sewer, roadways, and multimodal transportation networks. In situations where the old development may need to be upgraded, reuse can be a catalyst for upgrading sites to meet current infrastructure codes (i.e., improved stormwater retention and water quality efforts). Beyond infrastructure upgrades, no additional infrastructure needs to be installed for these priority sites to be redeveloped. All six sites are served from a public transportation and multimodal transportation perspective, which incorporates both the existing sidewalks and bike lane networks. With the heavy emphasis on housing and commercial redevelopment, it was important for the region to prioritize sites with adequate public and multimodal transportation infrastructure, so that non-automobile users would have equal access to the affordable housing options created by the brownfield redevelopment.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need-i. The Community's Need for Funding

As evidenced in the charts below, the 3 SETD-SEIDA Brownfield sub-areas lag well behind the State of Tennessee, the State of Georgia, and the United States in many socio-economic health categories including poverty rate for persons under 18, median household income, residents in poor physical health, hypertension amongst the population, adult obesity, children in poverty, and percentage of low-birth-weight births:

Demographic	TN River Valley sub-area	Sequatchie Valley sub-area	I-75 Corridor sub area	State of TN	State of GA	United States
Population	573,348	89,356	447,677	6,910,840	10,711,908	331,449,281
Poverty Rate % of Persons Under 18	26%	28%	20.5	19.3%	18.5	16.1%
Median Household Income	\$45,527	\$35,740	\$42,100	\$53,320	\$58,700	\$67,521
Residents with Poor Physical Health	14%	16%	14%	12%	11%	7%
Hypertension	45%	51%	44%	39.3%	34.8%	32%
Adult Obesity	49%	53%	44%	40%	34%	36.5%
Children in Poverty	26%	30%	28%	20%	19%	17%
Low Birth Weight %	16%	15%	14%	9.3%	10.1%	8.3%

Sources: U.S. Census Bureau, Bureau of Labor Statistics, Center for Disease Control; United Health Foundation Rankings; State of TN & GA

The SETDD-SEIDA Brownfield Consortium area lags behind the rest of the state, region, and nation considerably in terms of wealth. The statistics for the consortium area highlight the result of decades of industrial decline, which have resulted lagging per capita incomes. The consortium area has suffered from disinvestment for decades, making the financial viability of redevelopment

challenging. Property values are significantly depressed, and rental projections are not high enough to provide a sufficient return on investment for new construction. SETDD-SEIDA Consortium members are improving the real estate fundamentals through investments in infrastructure and redevelopment incentives, however, the costs/challenges of addressing legacy contamination make many brownfield projects financially difficult to execute. The consortium will take a lead role in providing assistance in overcoming environmental conditions to catalyze revitalization, however, the local governments lack the resources to fund the assessment/planning activities requested in this application's funding. \$500,000 of EPA funding will provide community stakeholders with access to critical funding they would otherwise not have capacity to apply for or manage on their own and will serve as the foundation for initiating a collaborative effort to restore brownfields throughout the region. The SETDD-SEIDA Brownfield Consortium and its partners are not in the position to fund the full cost of the assessments, due to several factors that have decimated the city and county budgets in the past five years. The State of Tennessee has recently eliminated several taxes, such as the Hall Tax and Inheritance Tax. Due to these financial factors, there has been a 23% decrease in State Aid, from 2015 until 2020. Also, the State of Tennessee has no state income tax, so there are no additional avenues for increased state revenues. The State of Georgia has also changed the state tax structure to a flat tax, which has decreased the money available to Georgia municipalities by 17% in 2021. All of these factors have hampered the cities and counties' ability to fund the costs of the necessary Environmental Site Assessments. The region has experienced economic fluctuations resulting in multiple abandoned and under-utilized sites in the area. Due to the region's revenue problems, their municipal and county budgets are only able to pay for a bare minimum of services. Unfortunately, the region's municipalities have no budgeted dollars for assessment and remediation of environmentally contaminated projects.

ii. Threats to Sensitive Populations

1) Health or Welfare of Sensitive Populations- The hazardous substances in the priority Brownfield sites pose an immediate risk to the brownfield target areas, and this grant's assessments will lead to the reduction of health threats posed by the environmental contamination of the priority Brownfield sites. The Old Crystal Springs Bleachery site is in the 81st percentile for children under 5, 92nd percentile for low income, 38th percentile for seniors, and 91st for infant mortality rate. The South Pittsburg-Old Galaxy Carpet Mills site and the Penn-Dixie Cement Plant Site are in the 80th percentile for children under 5, 80th percentile for low income, 64th percentile for seniors, and 65th for infant mortality rate. The South Cleveland Brownfield Corridor is 68th percentile for children under 5, 98th percentile for low income, 87th percentile for seniors, and 85th for infant mortality rate. The Old Ridgedale Dixie Mercerizing Plant site is in the 90th percentile for children under 5, 98th percentile for low income, 91st percentile for seniors, and 94th for infant mortality rate. The Athens Jackson Street Brownfield Corridor is in the 74th percentile for children under 5, 97th percentile for low income, 38th percentile for seniors, and 91st for infant mortality rate.

2) Greater than Normal Incidence of Disease and Adverse Health Conditions- Per the EPA Environmental Justice Mapper, the combined priority area census tracts are in the 93rd percentile for cancer risk, 92nd percentile for air toxics respiratory hazards causing asthma, 93rd percentile for lead paint indicators, and 94th percentile for Superfund site proximity. The EPA EJ-Viewer also shows that women of child-bearing age in these same census tracts, are at an elevated risk for low-birth-weight infants (who go on to have a lifetime of increased risk of health problems), and for increased infant mortality and other birth defects. Given the types of industrial activities that occurred at the priority and other brownfield sites in the SETDD-SEIDA Brownfield Target Areas, polychlorinated biphenyls (PCBs), chlorinated solvents, coal tars, polycyclic aromatic hydrocarbons (PAHs), heavy metals, and volatile organic compounds are present in and around the sites. These hazardous substances increase the incidence of disease and adverse health conditions in the target areas. For instance, the National Toxicology Program has concluded that PCBs are likely to cause cancer in humans, based on studies that have found increased rates of various cancers in people exposed directly to high levels of PCBs, either via the skin, by consumption, or in the air. The census block group containing the Old Crystal Springs Bleachery is in the 90th percentile for Superfund proximity. Also, the area has a 38th percentile minority population and is in the 89th percentile Low-Income population. The census block group is in the 81st percentile for Cancer Risk, 63rd percentile for Respiratory Hazard Index and the 78th percentile for Lead Paint Indicators (per *EPA's Environmental Justice EJMapper*). The census block group containing the Old Galaxy Carpet Mills and the Old Penn-Dixie Cement Plant in South Pittsburg is in the 61st percentile for Superfund proximity. Also, the area has a 45th percentile minority population and is in the 80th percentile Low-Income population. The census block group is in the 62nd percentile for Cancer Risk, 61st percentile for Respiratory Hazard Index and the 48th percentile for Lead Paint Indicators (per *EPA's Environmental Justice EJMapper*). The census block group containing the Cleveland Brownfield Corridor is in the 67th percentile for minority population and is in the 98th percentile for Low-Income population. The census block group is in the 96th percentile for Cancer Risk, 89th percentile for Respiratory Hazard Index and the 84th percentile for Lead Paint Indicators (per *EPA's Environmental Justice EJMapper*). The census block group containing the Old RL Stowe Woolen Mills in Chattanooga is in the 96th percentile for Superfund proximity. Also, the area has a 92nd percentile minority population and is in the 98th percentile Low-Income population. The census block group is in the 96th percentile for Cancer Risk, 90th percentile for Respiratory Hazard Index and the 78th percentile for Lead Paint Indicators (per *EPA's Environmental Justice EJMapper*). The census block group containing the Athens-Jackson Street Brownfield Corridor is in the 51st percentile for minority population and is in the 97th percentile for Low-Income population. The

census block group is in the 86th percentile for Cancer Risk, 80th percentile for Respiratory Hazard Index and the 91st percentile for Lead Paint (per EPA's *Environmental Justice EJMapper*). This proposed EPA Assessment Grant project will begin to help to reverse the environmental problems of the Brownfield Target Areas, by assessing and ultimately remediating the priority brownfield sites that are causing health and environmental detriments to the SETDD-SEIDA Brownfield Target Areas.

3) Promoting Environmental Justice-a) Identification of Environmental Justice Issues-Economic data published by the Appalachian Regional Commission (ARC) documents the unemployment and poverty within the Consortium counties: the average unemployment rate for the twelve counties of 7.4% is nearly 25% higher than the national average (2020-21 Bureau of Labor Statistics). Also, the average per capita income for the Consortium counties of \$19,550 is nearly 40% lower than the national average of \$32,560, based on 2020 Census data. In addition to the income disparity, eighty-five (85%) of the municipalities represented in this project have a population under 10,000, and therefore are considered rural municipalities. According to the Appalachian Regional Commission, two of the twelve counties are classified as 'Distressed' (Grundy and Bledsoe).

b) Advancing Environmental Justice-Due to the abundance of Superfund and Brownfield sites that are located in the SETDD region, these residents have faced a cumulative negative environmental impact and disinvestment in their communities. This disinvestment also has caused decreased property values and continued legacy environmental contamination. **Specifically, this assessment project will lead to the eventual cleanup of 628.50 acres of brownfield properties that are heavily impacted with hazardous substances, such as polycyclic aromatic hydrocarbons, polychlorinated biphenyls, lead, arsenic, and many other various substances that are a danger to the health outcomes of the surrounding neighborhoods. The elimination of this hazardous health threat will begin to lessen the negative environmental conditions that have disproportionately impacted the health of citizens in the region.**

b. Community Engagement

i. Project Involvement & ii. Project Roles SETDD-SEIDA understands the importance of engaging the consortium communities, sharing information, soliciting public input, and incorporating public input, as demonstrated in the SETDD's brownfield planning processes. SETDD Brownfields Program will look for opportunities to tie into existing Consortium partner meetings, which will help to encourage greater stakeholder attendance and participation. SETDD staff will continue to speak in public forums, actively seek input on site selection and planning, and are available via phone, email or in person to share and seek information. The SETDD-SEIDA Consortium will have brownfield partner groups that are both internal to the consortium and purely external partner agencies:

List of Project Partners

<u>Partner Name</u>	<u>Point of Contact (name, email, & phone)</u>	<u>Specific Role in the Project</u>
Southeast Tennessee Development District/ Chattanooga Area Regional Council of Governments (Grantee/ Lead Project Partner)	Sam Saieed ssaieed@sedev.org 423-827-7825	Lead applicant, grantee, and main convener for all project activities
Southeast Industrial Development Association (Economic Development Partner)	Jonathon Connell jconnell@sedev.org 423-424-4243	Economic Develop entity that will work with developer and redevelopment financing experts to further redevelopment
Southeast Tennessee Brownfield Task Force (Brownfield Subject Area Expert Partner)	Troy Keith, Troy.Keith@tn.gov 423-634-5755	The SE TN Brownfields task force exists to provide the city with citizen/ stakeholder input on development, monitoring, and updating of the city's Brownfield program which affect Low to Moderate Income residents in the region's Brownfield target areas.
City/ County Governments-Consortium Partners	Various County and City Mayors	City and Counties Consortium Government partners will apply for CDBG funding for remediation of the subject brownfield properties. Also, city council and county commission members will have input into redevelopment process (along with the public) and will be the forum where SETDD staff members communicate project progress to the public.
City/ County Government Planning Commissions-Consortium Partner Local Government	Various County and City Planning Commission Members	City and Counties Planning Commissions for Consortium government partners will focus on redevelopment rezonings, and proper planning principles being utilized in brownfield redevelopment planning.
City/ County Neighborhood Association Meetings	Various Neighborhood Associations in SETDD Brownfield Consortium partner areas	All potential brownfield environmental site assessments and potential brownfield redevelopment projects have been and will be presented at neighborhood meetings, in order to get neighborhood input.
CityFields (City of Cleveland Community Redevelopment Partner)	Dustin Tommey contact@cityfieldscdcc.com 423-472-9876	CityFields is a Community Development Corporation that will specifically work on the Cleveland Brownfield area redevelopment, especially related to Housing Redevelopment.
Statewide Organizing for Community Empowerment (SOCM) (Environmental Justice Partner)	Linda Cowan linda@socm.org 865-249-7488	SOCM will work with SETDD on Environmental Justice Issues dealing with Environmental Outcomes and Redevelopment Decisions for Minorities and Low to Moderate Income individuals.
State of TN-Department of Health (Public Health Monitoring Partner)	Glenn Czarnecki Glenn.Czarnecki@tn.gov 423-634-5745	TDOH will assist SETDD on Health Monitoring and other Public Health issues related to Brownfields.
WeCare of Rhea County (Housing Redevelopment Partner)	Alton Steen asteen@wecaredayton.org	WeCare will assist SETDD will housing redevelopment outcomes.

ii. Incorporating Community Input- SETDD commits to successfully incorporate public and community input in this brownfield project. SETDD will hold quarterly public meetings with all Consortium Partners to inform residents of the project's progress. SETDD will implement a successful public engagement strategy and will work to ensure that there are available communicators for persons that experience Limited English Proficiency. Over the course of the grant SETDD will complete: a community outreach and education plan, meeting materials and project update newsletters, presentations of the EPA Brownfield grant program to the public, potential developers, lending institutions, neighborhood and community groups, and other affected parties. SETDD will also prepare brochures and other printed materials in order to encourage community involvement and private investment. Many of the region's elderly and low-income residents lack the necessary broadband, internet-compatible devices, and technological know-how to use Zoom or other platforms, due to the digital divide that affects low-income citizens. Therefore, to be fair to all, SETDD will have the option of remote and in-person meetings.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks and Activities

Task 1: Inventory of Additional Sites/ Community Outreach					
i) Project Implementation: For identified sites, expenditures would cover only eligible programmatic activities such as: the completion of a community outreach and education plan, the preparation of meeting materials and project update newsletters, the set-up and public notice of Brownfield public meetings, the presentation of the EPA Brownfield grant program to the public, potential developers, lending institutions, neighborhood and community groups, and other stakeholders.					
iii) Anticipated Project Schedule: Activities will be ongoing during 3-year Cooperative Agreement Period; Quarters 1-2- Brownfield Inventory Finalized; Quarters 1-2- Community Outreach Plan Finalized; Quarters 3-12- Public Outreach continues throughout the life of the grant.					
iv) Task Lead: Southeast Tennessee Development District					
v) Outputs: 1 Brownfield Inventory; Attending 12 community meetings; Having at least 4 meeting presentations and making flyers available on the SETDD website and at each meeting. This also includes the travel of 2 staff to EPA National Brownfield Conference.					
Task/Activity 2: EPA Cooperative Agreement Reporting					
i) Project Implementation: This task includes all EPA Cooperative Agreement Compliance Reporting, which includes completing 12 Quarterly Reports, 1 MBE-WBE Reporting, 12 ACRES Reporting Periods, Community Engagement Plan, 1 Final Report and 1 Closeout Documentation. This Program Development and Management activity will be overseen by SETDD. ii) Identifying Additional Sites-addressed in Task 1.					
iii) Anticipated Project Schedule: Activities will be ongoing during 3-year Cooperative Agreement Period					
iv) Task Lead: Southeast Tennessee Development District					
v) Outputs: 12 Quarterly Reports, 1 MBE-WBE Reporting, 12 ACRES Reporting Periods, Community Engagement Plan, 1 Final Report and 1 Closeout Documentation.					
Task 3-Phase I and Phase II Assessments					
i) Project Implementation: SETDD will use the services of an environmental engineering firm to conduct 16 Phase I Site Assessments. All phase I Site Assessments will be conducted to meet the All Appropriate Inquiries requirement, as well the ASTM E 1527-13 standards. All Phase II's will be conducted in accordance with ASTM E1903-11. 16 Phase II Assessments will be conducted. These costs were based on previous experience by the procured contractor working with brownfields in the area. All phase II site Assessments will be conducted in accordance with an EPA approved Quality Assurance Project Plan. Because the cost of Phase I environment site assessments vary according to size and number of sites and the cost of Phase II assessments vary as to size, number of sites, and extent of site contamination, the project budgeting may be adjusted depending on sites selected. Phase I and II Site Assessment will be performed in cooperation with TDEC and the various county Health Departments. The forthcoming figures represent the total expenditures (by category) for activities in this task. ii) Identifying Additional Sites-addressed in Task 1.					
iii) Anticipated Project Schedule: Quarter 1: Finalize contract with Qualified Environmental Contractor (QEC), Generic Quality Assurance Project Plan (QAPP) submitted to EPA for review/ approval (by selected QEC); Quarter 2: Eligibility Determinations requested & site access obtained/confirmed (by Consortium); Phase I ESAs begin; Quarter 3: QAPP approval & Phase II ESAs begin (QAPP approved by EPA, Phase II ESAs by QEC); Quarter 11: All Phase I and II ESAs completed, and final contractor invoices received (by QEC)					
iv) Task Lead: Selected Qualified Environmental Contractor (QEC)					
v) Outputs: Quality Assurance Project Plan; Success Measure: QAPP approval within one month of Cooperative Agreement approval					
Outputs: Phase I and Phase II ESAs; Success Measure: # of ESAs performed					
Outputs: ABCAs and RAPs; Success Measure: # of ABCAs and RAPs completed					
Task 4-Redevelopment and Remediation Planning					
i) Project Implementation: The Redevelopment and Remediation Planning task will include the preparation of a Brownfield Redevelopment Plan for the Consortium's priority sites. This plan (which will be performed in accordance with state law (TCA 13-20-202)), will primarily focus on the redevelopment outcomes and objectives for the brownfield properties assessed in the project. The two primary redevelopment focus areas include housing and commercial retail development.					
ii) Identifying Additional Sites-addressed in Task 1.					
iii) Anticipated Project Schedule: Activities will be ongoing during 3-year Cooperative Agreement Period					
iv) Task Lead: Southeast Tennessee Development District					
v) Outputs: Redevelopment and Remediation Plans; Success Measure: # of Redevelopment and Remediation Plans					

b. Cost Estimates and Outputs

Budget Categories	Project Tasks				
(programmatic costs only)	Task 1-Inventory of Sites/ Community Outreach	Task 2-EPA Cooperative Agreement Reporting	Task 3 -Phase I and Phase II Environmental Assessments	Task 4-Redevelopment and Remediation Planning	Total
Personnel	\$20,000	\$30,000	\$30,000	\$20,000	\$100,000
Fringe Benefits	\$0	\$0	\$0	\$0	\$0

Travel	\$7,000	\$1,000	\$4,000	\$4,000	\$16,000
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0
Contractual	\$0	\$0	\$364,000	\$20,000	\$384,000
Total Direct Costs	\$27,000	\$31,000	\$398,000	\$44,000	\$500,000
Total Indirect Costs	\$0	\$0	\$0	\$0	\$0
Total	\$27,000	\$31,000	\$398,000	\$44,000	\$500,000

Task 1- Inventory of Additional Sites/ Community Outreach-\$27,000 total

Personnel Costs- costs include \$20,000 (400 staff hours×\$50/hour) for staff time related to community outreach events.

Travel- costs include \$3,000 for staff travel costs for intra-region travel to brownfield sites, meetings, and for inventory purposes (within the target areas) and \$4,000 travel to National Brownfields Conference (2 staff members x \$2,000 per person=\$4,000)

Task 2-EPA Cooperative Agreement and Reporting-\$31,000 total

Personnel Costs- costs include \$30,000 (600 staff hours×\$50/hour) for staff time related to Program Management and Development.

Travel-Travel costs include travel (\$1,000) costs for Program Development and Program Management

Task 3 -Phase I and Phase II Environmental Site Assessments-\$398,000 total

Personnel Costs- costs include \$30,000 (600 staff hours×\$50/hour) for staff time related oversight on Phase I & Phase IIs

Travel- costs include \$4,000 for staff travel costs to local brownfield meetings related to Phase I/ II ESAs.

Contractual- cost include 16 projected Phase I ESAs at an average of \$6,250 (16 x \$6,250 =\$100,000) and 16 projected Phase II ESAs at average of \$16,500 (16 x \$16,500=\$264,000). Total Line-Item cost is \$364,000.

Task 4-Redevelopment and Remediation Planning Activities-\$44,000

Personnel Costs- costs include \$20,000 (400 staff hours×\$50/hour) for staff time related to Redevelopment and Remediation Planning Activities.

Travel- costs include \$4,000 for staff travel costs to local brownfield meetings and events related to Redevelopment and Remediation Planning Activities.

Contractual- costs include \$20,000 (400 staff hours×\$50/hour) for a Planning and Housing firm to perform Redevelopment and Remediation Planning Activities.

c. Measuring Environmental Results

The grant manager will continuously review grant progress to ensure that important projects milestones and outputs are on track for completion. Corrective measures will be taken immediately to correct any measures and metrics which are not being met. The project lead will initiate monthly project progress meetings with the SETDD team and its external Qualified Environmental Contractors working on the project. SETDD will track, measure, and evaluate projects progress in achieving desired outcomes as follows:

<u>Task 1: Inventory of Sites and Community Outreach</u>
Output(s): 1 Final Inventory of Phase I and Phase II Sites for Grant; 12 community meetings; meeting presentations and flyers available on the community outreach website and at each meeting; Outcomes: List of brownfield sites with highest redevelopment potential and informed, engaged community; Tracking Methods: Excel Documents for Inventory, sign-in sheets; # of community members present per meeting.
<u>Task 2-Cooperative Agreement and Project Management</u>
Output(s): 12 Quarterly Reports, 1 MBE-WBE Reporting, 12 ACRES Reporting Periods, Community Engagement Plan, 1 Final Report and 1 Closeout Documentation; Outcomes: Successful Grant Compliance; Tracking Methods: Evaluate Progress against Work Plan, in order to assure progress is being made and deadlines being met.
<u>Task 3: Phase I and Phase II Environmental Assessments</u>
Outputs: 16 Phase I ESA's, 16 Phase II ESA's and ACRES reporting; Outcomes: Phase I and Phase II ESA's that will characterize Brownfield sites' environmental history and environmental contamination; Tracking Methods: SETDD will track Phase I and Phase II progress from Engineering Consultant; SETDD will provide copy of deliverable to EPA; grant administration tasks tracked on internal report, tracking progress of uploading ESAs to ACRES.
<u>Task 4: Redevelopment and Remediation Planning</u>
Output(s): 6 Redevelopment and Remediation Plans for top 6 Priority Sites; Outcomes: Redevelopment Plans, that have cost estimates and strategies for reuse, in order to pursue other remediation and redevelopment funding; Tracking Methods: SETDD will track progress of Redevelopment/ Remediation Planning Consultants, in order to ensure goals are met.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability-i. Organizational Capacity/ ii.-Organizational Structure/ iii.-Description of Key Staff-A highly competent and experienced staff is in place at the SETDD to implement and manage the proposed project. In addition, the project team will include an environmental engineering consultant that will be selected by a competitive procurement process, to assist with the assessment work. There are 2 key individuals employed by the SETDD to provide the expertise necessary for the implementation and management of all grant functions and activities:

Mr. Sam Saieed, SETDD- Director of Community Development/ Brownfield Director-Mr. Saieed will serve as the Brownfield Coordinator for the project. He has administered more than 150 economic and community development projects and programs. He will be charged with the implementation and management of the Brownfield grant project activities and tasks.

Mr. Chuck Hammonds, Executive Director-Mr. Hammonds will provide assistance as it relates to long-range planning and development opportunities for the communities being served by the Brownfield project. He would also step up to be the Brownfield Program Manager, if the Program Manager were to leave.

iv. Acquiring Additional Resources-SETDD will procure an Environmental Consultant (per federal procurement requirements to perform all Phase I and Phase II ESAs to current ASTM standards.

b. Past Performance and Accomplishments-i. Has Previously Received an EPA Brownfield Grant

1. Accomplishments- The 2015 SETDD/CARCOG EPA Brownfield Coalition Grant successfully assessed over 20 properties for Phase I & Phase II ESAs. SETDD was able to clear many properties of perceived contamination, thus putting them back into productive re-use. For the properties that were contaminated and needed Phase IIs and remediation, SETDD was able to perform the Phase II and identify the sources of remediation funding. SETDD will be responsible for all quarterly and annual reports and the submission of invoices to the US EPA, as required under the cooperative agreement. The selected consultant will be tasked with accomplishing the Phase I and II assessments, as well as all required technical reports for the selected sites. The project director will monitor the selected consultants' progress towards meeting program deadlines and requirements to ensure the project is completed in a timely fashion and within budget. The project director will work closely with the selected consultant to ensure that all assessment activities are following the applicable ASTM standards. SETDD has already initiated discussions with both public and private brownfield site owners to address site access and has already gained permission for access to all publicly owned sites and for many privately-owned sites as well. SETDD has developed an initial site selection of roughly 40 sites. Other sites can still be added to the inventory once they are discovered, and project activities are initiated.

2. Compliance with Grant Requirements- SETDD/ CARCOG has complied with all workplans, schedules, and terms/conditions on all their previous closed-out EPA Brownfield Grant.

THRESHOLD CRITERIA

1) Applicant Eligibility

The Executive Order and Charter of Incorporation creating all of the Development Districts in the State of Tennessee and the Southeast Tennessee Development District are attached. Additionally, a legal opinion finding this documentation sufficient is also attached.

2) Community Involvement: Section 2 of the grant narrative (Community Need and Community Engagement) fully demonstrates the SETDD/ CARCOG Coalition's plan for Community Involvement as a vital part of the project. SETDD/ CARCOG will inform and involve the community and other stakeholders during the planning, implementation and other brownfield assessment activities.

3) Named Contractor or Subrecipients-no procurement has occurred yet. However, all procurement will take place after the grant award and will comply with 2 CFR § 200.319(b) requirements

4) Expenditure of Assessment Grant Funds: The Southeast Tennessee Development District/ Chattanooga Area Regional Council of Governments does not have any active EPA Brownfield Assessment Grants or Multipurpose Grant and are therefore not a current EPA Brownfield Assessment Grant or Multipurpose Grant recipient.