



Kentucky River

AREA
DEVELOPMENT
DISTRICT

941 NORTH MAIN STREET • HAZARD, KENTUCKY 41701 • PHONE 606-436-3158

Narrative Information Sheet

1. Applicant Identification

Kentucky River Area Development District
941 North Main Street
Hazard, KY 41701

2. Funding Requested

- a) Assessment Grant Type: Assessment Coalition
- b) Federal Funds Requested: \$1,500,000

3. Location

Non-lead: a) City of Jackson b) Breathitt County c) Kentucky

Non-lead: a) City of Whitesburg b) Letcher County c) Kentucky

Geographic boundary:

- a) Cities of Jackson, Hindman, Pippa Passes, Beattyville, Hyden, Blackey, Fleming-Neon, Jenkins, Whitesburg, Booneville, Buckhorn, Hazard, Vicco, and Campton.
- b) Breathitt, Knott, Lee, Leslie, Letcher, Owsley, Perry, and Wolfe Counties
- c) Kentucky

4. Coalition Members' Target Areas and Priority Site Information

Lead: Kentucky River Area Development District

Target Area: City of Beattyville

Non-lead: East Kentucky Heritage Foundation dba Pine Mountain Partnership

Target Area: City of Whitesburg

Non-lead: City of Jackson

Target Area: City of Jackson

Target Area City	Priority Site Address:
Beattyville	224 Main St.
Beattyville	116 Main St.
Beattyville	185 Broadway
Beattyville	227 Main St.
Jackson	1010 College St.
Jackson	1001 College St.
Jackson	331 Broadway
Jackson	Hwy 3094
Jackson	1439 Hwy 15 S
Whitesburg	59 Madison St.
Whitesburg	255 E. Main St.
Whitesburg	57 East Main St.
Whitesburg	1406 Jenkins Rd.

5. Contacts

a. Project Director

Tabitha Haddix, Economic Development Coordinator, 606-436-3158

tabitha@kradd.org

941 North Main Street, Hazard, KY 41701

b. Chief Executive/Highest Ranking Elected Official

Michelle Allen, Executive Director, 606-436-3158

michelle@kradd.org

941 North Main Street, Hazard, KY 41701

6. Population

Population of Target Areas:

City of Beattyville: 1,824

City of Jackson: 2,217

City of Whitesburg: 2,222

(Source: epa.gov/ejscreen)

7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	2
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority site(s) is impacted by mine-scarred land.	3
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).	1
The priority site(s) is in a federally designated flood plain.	1-2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	

The reuse of the priority site(s) will incorporate energy efficiency measures.	5
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	5
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority sites within the target areas.	10
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

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

9. Releasing Copies of Applications: Not Applicable



Andy Beshear
GOVERNOR

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

300 Sower Boulevard
Frankfort, Kentucky 40601
Phone: (502) 564-2150
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Rebecca Goodman
SECRETARY

Anthony R. Hatton
COMMISSIONER

September 29, 2023

Michelle Allen
Executive Director
Kentucky River Area Development District
941 North Main Street
Hazard, Kentucky 41701

Re: Letter of Support for a Brownfield Assessment Coalition Grant

Dear Ms. Allen:

The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of the coalition formed by the Kentucky River Area Development Grant, the City of Jackson, and the East Kentucky Heritage Foundation to identify and address brownfield sites in the community. 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 Assessment Coalition Grant and look forward to continuing our work with your community on this important issue.

Sincerely,

A handwritten signature in cursive script that reads "Lynn True".

Lynn True
Brownfield Coordinator

Cc: Cliff Hall, Division of Waste Management
Alex Sandlin, Division of Waste Management, Hazard Regional Office
Tabitha Haddix, KRADD

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Coalition Members, Target Areas, and Brownfields

i. Coalition Members

The lead-entity for this project will be Kentucky River Area Development District (KRADD), which is a regional planning council created by state statute. KRADD is joined by two non-lead entities to create a powerful coalition for transformative change in the most distressed parts of Eastern Kentucky. KRADD has included these partners due to their strong community ties, proven track record in their representative jurisdictions and prior experience in working collaboratively with KRADD.

- **Kentucky River Area Development District (Lead Entity)**

KRADD is located in the Appalachian Eastern Kentucky Coal Field Region. KRADD serves Breathitt, Knott, Lee, Leslie, Letcher, Owsley, Perry, and Wolfe Counties, and the municipalities therein. KRADD has successfully completed two previous EPA Brownfield Assessment grants. KRADD's mission is to serve each of its eight counties by providing a wide range of services including Aging Programs, Water and Wastewater Management, Community and Economic Development and Transportation Planning.

- **City of Jackson, Kentucky (Non-lead Entity)**

The City of Jackson is a small, municipal local government in Breathitt County. Jackson's economy has been primarily driven by the coal industry and is in the process of an economic transformation. Like many Eastern Kentucky towns, extensive flooding, associated with climate change has created a need for the movement of both business and homes to safer, higher ground. The mission of the city staff is to evaluate underutilized Brownfields for both new housing and commercial use. Flat ground is nearly nonexistent in many parts of Jackson. With a population of only 2,127 residents, the city does not have the staff or experience to manage a Brownfield grant.

- **East Kentucky (EKY) Heritage Foundation (Non-lead Entity)**

EKY Heritage Foundation is an IRS designated 501(c)(3) community based **nonprofit organization**. Based in the City of Whitesburg, EKY Heritage Foundation's mission is to help create housing, expand tourism and economic development opportunities in Letcher County. EKY has purchased property that will be developed into affordable housing, but lacks the staff and experience to apply and manage Brownfield grants.

ii. Overview of Brownfield Challenges and Description of Target Areas

The Coalition application's **geographic boundary** consists of KRADD's eight-county service area, which includes the communities of the City of Jackson, the City of Whitesburg and the City of Beattyville.

KRADD's target area will be the City of Beattyville which encompasses 2.3 square miles and lies near the center of KRADD's geographic footprint. Beattyville continues to suffer from the decline of multiple industries including 1) coal, 2) petroleum, 3) timber and 4) the transportation of these commodities along the Kentucky River. Compounding industry declines, Beattyville is located at the convergence of the South, North and Middle Forks of the Kentucky River which has resulted in many devastating floods, including the 2021 flood which totally immersed Beattyville, exceeding the 500-year flood level. Flooding left many homes and buildings uninhabitable resulting in the documentation of over 45 Brownfields. These Brownfields include dry cleaners, gasoline stations, industry-related commercial buildings, and homes all potentially contaminated with asbestos, lead-based paint, mold, metals and volatile compounds organic compounds that has created massive redevelopment challenges. Brownfield funding is needed to evaluate these sites for possible contaminants prior to beneficial reuse. Beattyville intends to utilize grant funding to develop a *Brownfields Revitalization Plan* and *Site Reuse Assessments* for catalyst properties.

EKY Heritage Foundation's target area is the City of Whitesburg, which encompasses approximately 3.2 square miles, and is located along the southern edge of KRADD's service area near the Kentucky/Virginia border. Whitesburg is located in the center of the once prolific Appalachian coal industry. Whitesburg Brownfield challenges are similar to our other target areas in that the decline in the coal industry and near constant flooding has created over 60 Brownfields within the city limits. These include industry-related commercial buildings associated with the extraction of coal, including drilling supplies, truck and train repairs, petroleum sites, and a near depletion of banks and associated commercial businesses. Whitesburg has actively utilized past KRADD Brownfield grant funds to evaluate sites that have recently been transformed into a vibrant regional country music community. Brownfield grant funds are needed to continue Whitesburg's transformation.

City of Jackson’s target area is the current city limits which encompasses approximately 2.67 square miles. Jackson is located in the northern sector of the KRADD service area. The terrain is extremely wooded, mountainous, and bisected by the Kentucky River. As with the other target areas, Jackson has been besieged with industry declines in coal and timber and climate change flooding. The most recent of which in 2022 resulted in the displacement of over one-third of the towns’ residents. Industry declines and flooding have resulted in Brownfield challenges that have either washed away many structures or rendered them unusable. The Jackson floods has displaced hundreds of residents into FEMA shelters or temporary trailers, including in some cases tents. In January 2024, FEMA will discontinue its temporary housing provided to Eastern Kentuckians due to the 2022 flooding. This added to the already nearly 100 Brownfields that were identified in an area-wide inventory conducted through prior KRADD Brownfield funds. Jackson needs to evaluate existing Brownfields that are located outside the flood zones with these grant funds. As with the other target areas, a key component will be the use of planning funds. Site Reuse Assessments will be valuable marketing tools to housing developers and a Revitalization Plan will help formulate a new future vision for the community.

It is important to note that a visit to Jackson in 2022 by the Secretary of HUD resulted in \$297,000,000 in flood relief funding for 13 counties, including all 8 counties within KRADD. These funds are for infrastructure and housing only, so Brownfields grant funds are critical for site evaluation and assessments. Each of our three target areas share very common Brownfield issues.

According to the Climate and Economic Justice Screening tool (CEJST), all three target areas are EPA IRA disadvantaged communities, and located in Justice40 (CEJST) disadvantaged census tracts.

Socioeconomic and demographic data of the target areas are contained in the table below:

	Beattyville	Jackson	Whitesburg	Kentucky	Source
Population	1,824	2,127	2,222	4,512,310	EPA EJScreen
Area in square miles	2.3	2.67	3.2	39,492	EPA EJScreen
Poverty rate	42.4%	26.2%	47.6%	16.5%	Statsamerica.org
Minorities	15%	1.7%	3.5%	14.5%	Statsamerica.org
Age 65 or older	11.3%	20.1%	21.7%	17%	2021 ACS
High school grad or higher	65.7%	77.8%	84.3%	87.7%	Censusreporter.org

iii. Description of the Priority Brownfield Sites

Utilizing past KRADD assessment funds, area-wide environmental inventories were completed of all three target areas, which included historical data review, radius searches which included a review of government documents and site reconnaissance from right of way observations. From these properties, each coalition member selected priority sites based upon the property’s location, suspected presence of environmental contamination, potential impacts to human health and the environment, suitability for planned reuse, and current vacant status which increases the potential for timely redevelopment. All priority sites are located within underserved communities and disadvantaged census tracts. The priority sites are listed below:

Priority Site # & Address	Size	Site Description & Environmental Concerns	Contaminants of Concern (COCs)	Funding Needs
City of Beattyville (KRADD Target Area)				
Site #1: 116 Main Street	1 parcel (0.61 acre)	Former dry cleaner that operated for over 25 years, currently vacant lot with no structures. Potential contamination in soil and groundwater with effects on local area.	ACM, LBP, CVOCs, PERC	Phase I, Phase II, ABCA, RAP
Site #2: 185 Broadway Street	1 parcel (0.33 acre)	Gas station and retail building that closed in 2010s. Potential USTs remain on-site. Brick building likely contains ACM & LBP needing abatement prior to future reuse.	ACM, LBP, VOCs, PAHs, RCRA metals, USTs	Phase I, Phase II, ABCA, RAP
Site #3: 227 Main Street	1 parcel (0.12 acre)	Historic 1-story brick building was originally a movie theater and then retail space. Building has been vacant for 10 years but is in good condition. Likely contains ACM & LBP needing abatement prior to future reuse.	ACM, LBP	Phase I, Phase II, ABCA

City of Jackson (City of Jackson Target Area)				
Site #4: 1010 College Street	1 parcel (0.18 acre)	Historically a two-story brick building used for auto repair and later a market. Currently vacant after building burned down. Potential contamination in soil and groundwater with effects on local area.	VOCs, PAHs, RCRA metals	Phase I, Phase II, ABCA, RAP
Site #5: 1001 College Street	1 parcel (0.25 acre)	Gas station and dry cleaner that was razed in 2010s. Potential underground storage tanks remaining on-site with unknown soil and groundwater contamination.	VOCs, CVOCs, PAHs, RCRA metals, USTs, ACM, LBP	Phase I, Phase II, ABCA, RAP
Site #6: 331 Broadway	2 parcels (0.30 acre)	2-story brick building historically used as an armory and auto sales/repair. Building has been vacant for 10 years but is in good condition. Likely contains ACM & LBP needing abatement prior to future reuse. Potential for lead contamination from storing ammunition.	VOCs, PAHs, RCRA metals, ACM, LBP	Phase I, Phase II, ABCA
Site #7: HWY 3094	1 parcel (158 acres)	Historic coal mine operations and bulk petroleum storage. Currently vacant/wooded area with several mobile homes. Area is likely impacted by past operations and needs assessment prior to redevelopment.	VOCs, CVOCs, PAHs, RCRA metals,	Phase I, Phase II, ABCA, RAP
City of Whitesburg (EKY Heritage Foundation Target Area)				
Site #8: 59 Madison Street	1 parcel (0.85 acre)	Historic 1-story brick building formerly an auto dealer and auto repair. Building has been empty for over 5 years but is in good condition. Potentially has USTs and hydraulic lifts present. Likely contains ACM & LBP needing abatement prior to future reuse.	VOCs, PAHs, RCRA metals, PCBs, ACM, LBP	Phase I, Phase II, ABCA
Site #9: 57 E Main Street	1 parcel (0.41 acre)	2-story brick building that operated various businesses in it including a dry cleaner. Building is currently vacant and blighted. Potential contamination in soil and groundwater with effects on local area.	ACM, LBP, CVOCs, PERC	Phase I, Phase II, ABCA
Site #10: 1406 Jenkins Road	1 parcel (0.15 acre)	1960s 1-story brick building with associated former gas station, currently vacant. Potential underground storage tanks onsite. Likely contains ACM & LBP needing abatement prior to future reuse.	ACM, LBP, VOCs, PAHs, RCRA metals, USTs	Phase I, Phase II, ABCA, RAP

iv. Identifying Additional Sites

During their previous two Brownfield grants, KRADD has established a knowledgeable, active Regional Brownfields Committee (RBC). The RBC will be expanded to include citizens and interested stakeholders from each target area. The RBC will develop a regional Brownfield inventory of the by incorporating sites identified by coalition members, RBC members and the general public. The services of the Environmental Data Registry will be used to obtain historic Sanborn maps and ariel photographs to identify potential properties of interest or concern. The sites will be ranked by the RBC for assessment based on several factors, including: 1) eligibility based on EPA requirements; 2) extent or perception of contamination; 3) redevelopment potential; 4) public input, and 5) prime location. The target areas are EPA IRA disadvantaged communities, and located in Justice40 (CEJST) disadvantaged census tracts. All eight counties comprising the geographic boundary are Persistent Poverty counties, defined as counties with a poverty rate of 20% or more for the past 30 years. Thus, all properties assessed through this grant will be an underserved community.

b. Revitalization of the Target Areas

i. Reuse Strategy and Alignment with Revitalization Plans

The Coalition members share many things in common, but their reuse strategies are designed to address each City’s most pressing needs.

- KRADD’s target area (Beattyville) includes a reuse strategy to restore the more than 45 brownfields located in Beattyville’s historic downtown district, and revitalize this area to an attractive, vibrant commercial center. It is noted that as of this submittal Beattyville was awarded over \$1,000,000 in Abandoned Mine lands (AML) funds for the construction of an outdoor music venue. Construction is on-going. To best use

grant funds Beattyville also intends to utilize planning funds such as creating a *Brownfields Revitalization City Plan* and *Site Reuse Assessments* for evaluation of additional specific catalyst properties.

- The City of Jackson intends to repurpose brownfield properties and mine-scarred lands outside of the federally designated flood plain for housing development. Some buildings will be repurposed with the first floor being commercial and the upper floors housing.
- EKY Heritage Foundation’s reuse strategy is to convert Whitesburg’s brownfields into indoor entertainment venues to attract tourists and additional revenue year-round and housing. The City of Whitesburg sits on a mountainous span sometimes called “the fertile crescent of country music.” Since 2018, the Levitt AMP Whitesburg Music Series, has reenergized the site of a former railroad yard and shuttered high school to create a thriving outdoor space hosting concerts throughout the summer.

Priority Site #	Reuse Plans/Strategy	Alignment with Revitalization/Land Use Plans
City of Beattyville (KRADD Target Area)		
1	Central location and size of lot is ideal for an outdoor farmer’s and craft market. This will provide opportunities for small & local retailers in the downtown area.	Planned reuse for all Beattyville sites directly supports: KRADD’s Comprehensive Economic Development Strategy (CEDS) plan for Promoting Economic Growth, Enhance Tourism Opportunities, & promote affordable housing; Appalachian Regional Commission’s 2022-2026 Strategic Plan, Objective 3.5 “redevelop and repurpose unused, underutilized, or neglected sites, brownfields, and mine-scarred lands to fuel economic and community development”; & Shaping Our Appalachian Region’s Blueprint for the Future of Appalachia, an economic strategic plan for Eastern Kentucky, goal 7: “Tourism and Downtown Revitalization.”
2	Adaptive reuse and expansion of current structure for retail on ground floor and residential on top floor.	
3	Adaptive reuse of historic brick building as downtown community center.	
City of Jackson (City of Jackson Target Area)		
4	Central downtown location ideal for affordable/market rate multi-family housing.	City of Jackson’s 2020-2022 Strategic Plan identified housing as a need, and 2022 Comprehensive Plan identifies the development of housing as a goal. As shown, all of Jackson’s priorities are slated for new housing. Directly supports KRADD’s CEDS for Promoting Affordable Housing.
5	Central downtown location ideal for affordable/market rate multi-family housing.	
6	Adaptive reuse of building for affordable/market rate multi-family housing.	
7	Size of property ideal for large development of affordable/market rate multi-family housing subdivision.	
City of Whitesburg (EKY Heritage Foundation Target Area)		
8	Adaptive reuse of existing building from adjoining bourbon distiller who plans to purchase convert building into a distillery visitor center and restaurant.	Reuse strategy to convert Whitesburg’s brownfields into indoor entertainment venues to attract tourists and additional revenue year-round and housing directly supports KRADD’s CEDS plan for Promoting Economic Growth, Enhance Tourism Opportunities, & promote affordable housing; Appalachian Regional Commission’s 2022-2026 Strategic Plan, Objective 3.5 “redevelop and repurpose unused, underutilized, or neglected sites, brownfields, and mine-scarred lands to fuel economic and community development”; & Shaping Our Appalachian Region’s Blueprint for the Future of Appalachia, an economic strategic plan for Eastern Kentucky, goal 7: “Tourism and Downtown Revitalization.”
9	City plans to raze existing building and establish a greenspace/outdoor concert venue along river in downtown area.	
10	Adaptive reuse of existing building to convert to retail. Remove potential USTs.	

The communities’ needs are not only recognized locally, but by state and federal officials. Other grant funds have placed the target areas in prime position to take full advantage of a Brownfield Coalition grant. The City of Beattyville was awarded a FY23 Brownfield Cleanup grant to address the former City Hall, a Works Progress Administration (WPA) building constructed in 1939. The site’s redevelopment will be a model of FEMA approved flood resistant construction that investors can follow to spark much needed additional revitalization

of Beattyville’s historic Main Street district. Sixteen commercial buildings on Main Street remain vacant following the 2021 flood; therefore, additional funding is needed.

The City of Jackson lost more than 90 homes in the flood of 2022. Fortunately, an unprecedented amount of HUD Community Development Block Grant funds (\$297,000,000) has been allocated for housing in the region, (which will be discussed further in c. Strategy for Leveraging Resources). The City of Jackson must assess and cleanup properties, including mine scarred lands, for housing development.

EKY Heritage Foundation recently received \$3,500,000 from the Abandoned Mine Lands (AML) Economic and Community Development Pilot Program for the development of *Thunder Mountain*, a world-class sport shooting and archery resort park in Letcher County. This resort will prove to be an economic catalyst and is anticipated to attract than 40,000 visitors per year. The development of more entertainment venues will encourage Thunder Mountain visitors to stay longer and generate additional tourism revenue in Whitesburg.

ii. Outcomes and Benefits of Reuse Strategy

The three target areas are all in rural communities. Cleanup and renovation of the priority sites will stimulate economic growth by creating temporary, scale-wage construction and trade jobs. The creation of additional entertainment venues in Whitesburg, and commercial businesses in Beattyville will result in a minimum of 60 new, permanent jobs in each town. The development of quality, affordable housing in Jackson and Whitesburg will provide vital long-term benefits that are desperately needed to support commercial businesses. The target area towns will benefit from increased occupational and property tax revenue which is needed to maintain infrastructure and provide essential services.

In terms of the creation or preservation of greenspace, the CEDs plans include the expansion of public use space in each town. As previously mentioned, Beattyville received a \$1.5 million AML grant for the creation of an outdoor, public-use open air theatre in the heart of town, within two blocks of all their priority sites. The 2021 flood displaced 35 trailers along the Middle Fork of the Kentucky River resulting in a loss of significant housing. Repositioning housing to the higher ground Brownfield sites opens up over 50 acres along the Middle Fork for greenspace.

Jackson’s most pressing need for housing will repurpose downtown Brownfields which in turn will promote the need for public-use greenspace along the North Fork of Kentucky River. As for Whitesburg, the North Fork of the Kentucky River flooded to the extent that the space can only be used for greenspace. The common theme for all of the target areas is the continued flooding of North Fork of the Kentucky River which has rendered large areas as uninhabitable. Repurposing existing Brownfields that are on high ground is the only sustainable adaptation to protect residents against flooding that is projected to get worse with climate change and will result in the creation of greenspace for public and non-profit use. FEMA provided essential funding for many displaced residents, but in the process made re-use of the flooded land as non-inhabitable.

Additional outcomes of brownfield redevelopment include blight reduction, job creation, improved community health, increased tax base, reversed negative perception, and catalysts for additional private investment. The project will preserve undeveloped property by repurposing structurally sound, but underutilized existing buildings and mine scarred land.

Beattyville’s proposed reuse plan will improve adaptation and mitigation measures and protect community investments by renovating brownfields with FEMA approved materials and techniques, which will be modeled by their current EPA funded flood resiliency cleanup project. Jackson’s proposed reuse protects residents by building housing outside of the flood plain area. Whitesburg’s strategy focuses on the revitalizing downtown area which is outside of the flood plain which also protects investments.

Along with using building permits, the towns will provide educational materials to promote the use renewable and energy efficiency measures, such as the installation of solar panels, LED lighting, green building materials, low-flow toilets, geothermal heating/cooling, etc., to the priority site developers.

c. **Strategy for Leveraging Resources**

i. Resources Needed for Site Reuse

On March 15, 2023, in Jackson, Kentucky, Department of Housing and Urban Development (HUD) Secretary Marcia L. Fudge announced that the state of Kentucky will receive \$297,994,000 through the

Community Development Block Grant – Disaster Recovery (CDBG-DR) program. The counties eligible to receive this funding include all eight KRADD counties, which comprise the geographic boundary of this application. This unprecedented allocation of funds is not only targeted for the project area, but also for proposed reuses. “The funds are specified to be used for disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation, in the most impacted and distressed areas,” (HUD Press Release No. 23-052). Assessments provided by this Coalition grant would be extremely helpful in completing the required NEPA reviews. KRADD is uniquely positioned to access these funds as they were commissioned by the Kentucky Governor to manage half of the nearly \$300,000,000 in disaster relief funds. As mentioned throughout this application, affordable housing is the top priority within KRADD due the recurrent flooding and displacement of families. USEPA grant funds will be used to assess historic Brownfields in all three target areas and all priority sites. CDBG funds can provide the next step, housing construction.

Another source of funding is the **Abandoned Mine Lands Economic Redevelopment Program (AMLER)**. In recent conversations with AMLER staff they are committed to working within the parameters of the KRADD Brownfield grant to dovetail USEPA and AMLER funds into completing more projects. Approximately one-third of USEPA grant funds will focus on up-front site assessments leading to the use of AMLER funds for renovation and or finish out.

KRADD has more than 50 years of experience assisting its constituent governments with leveraging funds for housing, community, and economic development projects. Other potential sources of grants, loans, and incentives for brownfield redevelopment include the following:

- **Kentucky 415 Program (State Brownfield Program):** Offers liability protection for new owners who have completed a Phase I and Property Management Plan.
- **Cleaner Commonwealth Fund:** Low-interest/partially forgivable loans for brownfield cleanup
- **KDWM Superfund Branch Tax Incentive Program:** offers 95% reduction in state property/ad valorem tax and up to \$150k in income tax credits for Brownfield cleanup costs for up to 10 years.
- **USEPA Brownfield Cleanup Grants:** funds remediation of contaminants. Government and non-profits are eligible to apply.
- **Abandoned Mine Lands Reclamation Program:** offers grants to enhance economic recovery and diversity to coal impacted areas.
- **Appalachian Regional Commission:** All target areas in “Distressed” classified counties and eligible for the highest percentage of ARC funding. Objective 3.5 of ARC’s 2022-2026 Strategic Plan is to redevelop and repurpose unused, underutilized, or neglected sites, brownfields, to fuel economic development.
- **The Economic Development Administration Economic Adjustment Assistance:** funds job creating projects in economically distressed areas, with a specific allocation for coal impacted communities.
- **HUD Community Development Block Grant:** Economic development and housing projects are eligible as they will benefit low to moderate income persons and/or eliminate slum and blight.
- **USDA Rural Business Loans and Grant:** provides loans for small business.

ii. Use of Existing Infrastructure

All priority sites are equipped with the basic necessary infrastructure, such as water, sewer, electricity, broadband, and access to transportation to support the reuse plans. Redevelopment of vacant brownfields will facilitate the use of existing infrastructure by creating new customers which will generate additional revenue with which to finance future maintenance and improvements. Transportation, water, and wastewater planning are some of KRADD’s core functions. It is anticipated that infrastructure upgrades will be needed in all three target areas that have been impacted by recent floods. KRADD is already assisting municipalities by applying for funding through CDBG and the AMLER programs. Additional funding sources include the Kentucky Infrastructure Authority (KIA) State Revolving Loan Fund, the KIA Cleaner Water Fund, the Appalachian Regional Commission (ARC), and USDA Rural Development grants and/or loans for infrastructure projects.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

Environmental assessments, ABCAs and other reuse planning provided through this grant will furnish the local governments and non-profit organizations with information needed to pursue grant funding and enable developers to confidently invest in the priority sites. This grant will meet the needs of communities with the geographic boundary, all of which are located in Persistent Poverty Counties and lack the funds to independently undertake for environmental assessments, cleanup, and renovation of their many brownfields. The loss of coal severance taxes forced the local governments to operate on minimal budgets to provide essential services. KRADD is funded by grants with specific scopes of work and lacks significant discretionary funds. The target area towns lack the funding due to their small, low-income, and elderly population. The median household incomes of the target areas are less than half that of the nation median household income (MHI), while their poverty rates are more than double. Their unemployment rates rank among the highest in the state. The table below illustrates the economic challenges faced by the target area residents as compared to their state and national counterparts:

Economic Indicators of Need	Beattyville	Jackson	Whitesburg	Kentucky	U. S.
Population	1,824	2,127	2,222	4,512,310	333,287,557
2022 Annual Unemployment Rate	5.4%	7.3%	6.1%	3.9%	3.6%
Poverty Rate	42.4%	26.3%	47.6%	16.5%	11.5%
Per capita Income	\$11,035	\$22,745	\$24,525	\$30,634	\$37,638
Median Household Income	\$21,891	\$29,654	\$25,433	\$55,573	\$69,021

Sources: [*kystats.ky.gov/KYLM/*](https://kystats.ky.gov/KYLM/), [*censusreporter.org*](https://censusreporter.org), and U. S. Census Bureau *Quickfacts*

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The primary sensitive populations in the target areas are low income, older adults, young children in Whitesburg, and minorities in Beattyville, as shown in the following table:

Sensitive Population	Beattyville	Jackson	Whitesburg	Kentucky
Poverty Rate	42.4%	26.3%	47.6%	16.5%
Age 65 or older	11.3%	20.1%	21.7%	17.0%
Disabled under age 65	30.3%	28.0%	31.6%	17.7%
Age 5 or under	2.9%	4.2%	10.3%	5.8%
Minorities	18%	2%	6%	17%

Sources: [*censusreporter.org*](https://censusreporter.org), U. S. Census *Quickfacts*

These sensitive populations are especially vulnerable to health threats from brownfield contaminants due to other health conditions, compromised immune systems and/or lack access to adequate health care. The priority sites are believed to be impacted by a myriad of contaminants, including polyaromatic hydrocarbons (PAHs), petroleum, metals, asbestos, and lead paint. PCBs are also suspected in all three target areas due to their ageing infrastructure. Sensitive populations who live and work nearby are exposed to contaminants in the soil, air, and groundwater. The potential health threats include skin damage, liver, kidneys, heart, spleen, nervous system, respiratory (asthma), and immune systems, and may also cause neurological damage, birth defects and cancer ([*www.atsdr.cdc.gov*](https://www.atsdr.cdc.gov)). Lead is especially harmful to children and slows brain development.

Assessment of the sites will identify and quantify the contaminants so they can at least be controlled, and target area residents can be forewarned. The temporary housing provided by FEMA (tents and trailers) is not a permanent solution and does not provide adequate protection from potential environmental contamination. This temporary housing is especially difficult for the abundant sensitive populations in the target areas. New clean, safe, and flood resilient permanent housing will help prevent exposure to potential hazardous contamination across the identified sensitive populations. Subsequent clean-up will eliminate the adverse health risks. KRADD anticipates that numerous sites will be eligible for USEPA Cleanup funding, leading to cleaner, safer communities, reduced blight, increased property values and municipal revenue.

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

The target areas have a long coal history and all phases of coal use (mining, processing, combustion, and disposal) create adverse public health and environmental impacts. Black lung disease has impacted large

numbers of coal miners resulting in early death or becoming disabled. Public health impacts include cancer, cardiovascular disease, respiratory diseases, kidney disease, neurological disorders, low birth weight, impaired child development, and others. Petroleum, lead, and other suspected contaminants at the priority sites pose similar health risks. Identification followed by removal of contaminants present in the target areas brownfield sites is the all-important first step to reduce the population’s exposure to these hazardous substances. This in turn will help reduce the disproportionate incidences of disease and other poor health outcomes experienced by target area residents and sensitive populations. EPA EJScreen ranks Beattyville and Jackson in the 95th percentile and Whitesburg in the 94th percentile in the nation for adult asthma. The table below lists the target area residents’ greater-than-normal incidence of cancer.

Prevalence of Cancer Age adjusted per 100,000	Beattyville Lee County	Jackson Breathitt Co.	Whitesburg Letcher Co.	Kentucky	United States
All Cancers	518.5	555.0	536.1	516.0	448.6
Lung and Bronchus Cancer	84.0	127.5	97.7	87.1	57.3

Sources: statecancerprofiles.cancer.gov and kentuckyhealthfacts.org

(3) Environmental Justice

(a) Identification of Environmental Justice Issues

According to the Climate and Economic Justice Screening tool (CEJST), the City of Beattyville, located in census tract 21129950100, is disadvantaged in six out of eight possible categories. The City of Jackson, census tract 2102592033, is disadvantaged in four categories, and the City of Whitesburg, census tract 21133950402, is disadvantaged in five categories.

The EPA EJScreen Environmental Justice Index ranks the disadvantaged target areas at or above the 50th percentile compared to the state or nation in the following areas:

Variables	Beattyville	Beattyville	Jackson	Jackson	Whitesburg	Whitesburg
	State %ile	USA %ile	State %ile	USA %ile	State %ile	USA %ile
Lead Paint pre-1960s housing	59	50	57	49	75	61
Underground Storage Tanks	50	36	65	48	74	55
Wastewater Discharge	55	48	n/a	n/a	n/a	n/a

(b) Advancing Environmental Justice

This project will advance environmental justice by improving the economic status of residents by creating more jobs and improving health conditions through identification and cleanup of environmental contaminants at Brownfield sites. All 10 priority sites are underutilized and/or vacant; therefore, no businesses or residents will be displaced. Creating additional housing in Jackson will help to retain, rather than displace, residents in the target areas. The coalition’s reuse plans directly align with the Justice40 initiative by addressing the availability of affordable housing and promoting the remediation and reduction of legacy pollution.

b. Community Engagement

i. and ii. Project Involvement and Project Roles

During the previous assessment grants, KRADD established a Regional Brownfields Committee (RBC). KRADD will utilize the RBC to assist in site selection, and reuse planning of brownfield sites. A diverse group of community stakeholders from the target areas will be involved in the decision-making process, including city officials, business owners, community leaders, property owners, and residents. The primary community partners and their specific roles in the project are listed in the table below:

Name of Organization	Contact Information	Involvement/Assistance
Kentucky River Community Care; Housing Options Division (nonprofit)	Angela Crase, Director of Housing; 606-666-4351	Assist in site selection and project information distribution
Kentucky River District Health Dept.	Scott Lockard, Public Health Director; 606-439-2361	Conduct health monitoring as deemed necessary
Federation of Appalachian Housing Enterprises (nonprofit)	Pam Johnson (859) 986-2321	Provide grant writing for housing development

City of Beattyville	Scott Jackson, Mayor sjackson@beattyville.org	Serve on RBC and provide meeting venue in target area
Downtown Beattyville Alliance (community based volunteer organization)	Teresa Mays, Director 606-464-5007	Serve on RBC and assist with project information distribution
Letcher County Tourism	Lee Adams letchertourism@gmail.com	Serve on RBC
City of Whitesburg	Tiffany Craft, Mayor mayorcraftwb@gmail.com	Serve on RBC and provide meeting venue in target area

The City of Jackson and EKY Heritage Foundation, the non-lead coalition members, will be fully engaged in every phase of grant implementation. They will participate in the RBC meetings, recommend sites for assessment and potential reuses, educate and encourage project participation from residents in their sphere of influence, attend Brownfields conferences, communicate regularly with the procured environmental consultant, and be kept abreast of assessment results, budget, and quarterly reports.

iii. Incorporating Community Input

The Coalition will follow the EPA’s Steps for Effective Public Involvement that include planning/budgeting for public involvement, the provision of information/outreach, conducting involvement activity, reviewing/using input, and providing feedback and evaluating activities/processes. A Community Involvement Plan (CIP) will be prepared at the start of the grant project using the latest EPA guidance. The Coalition will use their own, as well as partner agencies’ websites, social media, radio, local newspapers, and informational brochures to convey project progress, advertise public meetings/webinars and solicit input from target area residents. It is the Coalition’s goal to provide all target area residents equal access to the decision-making process. RBC meetings will be held quarterly (or as needed) and will be accessible via Zoom or a similar platform for the convenience of those who are unable to attend in person. The meetings will be held alternately in the three target areas to ease transportation burdens for residents who would like to attend in person. Letters, phone calls, and emails will be accepted methods for supplying input from residents unable to attend RBC meetings or that lack internet service. All questions and concerns expressed by community members will receive a response within 10 business days. Printed workplans and quarterly reports will be available to the public upon request. Meetings will be held in accessible locations. Interpretation services will be provided with three days advance notice. KRADD has employed these outreach methods successfully in the past and has evidence that this plan is the most appropriate and effective for the targeted areas.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

Task 1: Project Management & Reporting
i. Project Implementation: EPA-funded tasks/activities: KRADD will oversee the Qualified Environmental Professional (QEP) activities and manage all aspects of the project in accordance with the terms and conditions established in the EPA Cooperative Agreement. At KRADD’s direction, QEP will assist with compliance reporting (quarterly and final reports, ACRES updates, annual Disadvantaged Business Enterprise [DBE] and Financial Reports, etc.) and other eligible project activities. Two members from KRADD and one from each non-lead coalition member will attend three Brownfields conferences.
ii. Anticipated Project Schedule: Activities will be ongoing throughout the 4-year project period.
iii. Task/Activity Lead: KRADD with support from the consultant.
iv. Outputs: 16 Quarterly Reports; 1 Final Performance Report; 4 DBE Utilization Reports; 4 Federal Financial Reports; ACRES updates; 3 brownfield conferences attended by 4 coalition representatives.
Task 2: Community Outreach & Site Inventory/Prioritization
i. Project Implementation: EPA-funded tasks/activities: The KRADD Project Manager with assistance from the QEP will develop a Community Involvement Plan (CIP), prepare outreach materials, and convene quarterly Regional Brownfield Committee (RBC) meetings. The RBC, comprised of Coalition members, local government representatives, CBOs, business owners, and community members, will identify and

prioritize sites for assessment beyond the priority sites. Target area inventories will be updated based on RBC identification of sites. The RBC will distribute outreach materials.

Non-EPA grant resources needed to carry out tasks/activities: Meeting space will be provided by community partner organizations and KRADD will provide the supplies needed for the outreach material.

ii. Anticipated Project Schedule: CIP completed in 1st quarter; outreach material distribution and RBC meetings through 1st – 16th quarters; Site nominations will be accepted, and inventory updated throughout the 4-year project term to assist with future brownfield projects.

iii. Task/Activity Lead: KRADD with support from coalition members, QEP, and RBC.

iv. Outputs: 1 CIP; 16 RBC meetings; 2,500 pieces of outreach material (supplied by KRADD); 3 updated target area inventories.

Task 3: Site Assessments

i. Project Implementation:

EPA-funded tasks/activities: QEP will prepare Site Eligibility Determination (SED) requests for sites prioritized by the RBC and conduct Phase I ESAs for 30 sites in accordance with the EPA AAI and ASTM E1527-21. Based on Phase I results, the QEP will perform 8 Regulated Building Material (RBM) Surveys and 15 Phase II ESAs. Prior to initiating sampling or other field investigation activities, the consultant will prepare a Generic Quality Assurance Project Plan (QAPP) for EPA approval.

ii. Anticipated Project Schedule:

Year 1: Generic QAPP, 7 Phase I ESAs, 3 Phase II ESAs, 2 RBM Surveys;

Year 2: 10 Phase I ESAs, 5 Phase II ESAs, 2 RBM Surveys;

Year 3: 10 Phase I ESAs, 5 Phase II ESAs, 2 RBM Surveys;

Year 4: 3 Phase I ESAs, 2 Phase II ESAs, 2 RBM Surveys

iii. Task/Activity Lead: QEP will lead all technical activities at the direction of KRADD Project Manager.

iv. Outputs: 1 Generic QAPP; 30 Phase I ESAs; 8 RBM Surveys; 15 Phase II ESAs

Task 4: Cleanup & Reuse Planning

i. Project Implementation:

EPA-funded tasks/activities: The consultant will prepare Site Specific QAPPs, Sampling and Analysis Plans (SAPs), Health and Safety Plans (HASPs), and ABCAs for each site selected for a Phase II ESA and/or RBM Survey. QEP will prepare 10 Property Management Plans (PMP) for prospective purchasers enrolling in Kentucky’s Redevelopment and Reuse – Liability Relief Program.

The QEP will develop Site Reuse Assessments for each of the 10 priority sites and Brownfields Revitalization Plans for each of the three target areas. These studies will assist the Coalition with identifying the best reuse for sites with unique challenges and provide valuable tools as they strive to continue Brownfield redevelopment in their communities beyond the project period.

Non-EPA grant resources: Government agency and community cooperation and participation.

ii. Anticipated Project Schedule:

Year 1: 3 SSQAPP; 3 HASP; 3 SAP; 3 ABCA; 2 PMP; 3 Site Reuse Assessments

Year 2: 5 SSQAPP; 5 HASP; 5 SAP; 5 ABCA; 3 PMP; 3 Site Reuse Assessments; 1 Revitalization Plan

Year 3: 5 SSQAPP; 5 HASP; 5 SAP; 5 ABCA; 3 PMP; 2 Site Reuse Assessments; 1 Revitalization Plan

Year 4: 2 SSQAPP; 2 HASP; 2 SAP; 2 ABCA; 2 PMP; 2 Site Reuse Assessments; 1 Revitalization Plan

iii. Task/Activity Lead: QEP with oversight from the Coalition assisted by target area community

iv. Outputs: 15 SSQAPPs; 15 HASPs; 15 SAPs; 15 ABCAs; 10 PMP; 10 Site Reuse Assessments and 3 Brownfields Revitalization Plans

b. Cost Estimates

Budget Categories	Project Tasks (\$)				Total
	Task 1 Program	Task 2 Community	Task 3 Site	Task 4 Cleanup &	

		Management	Outreach	Assessments	Reuse Planning	
Direct Costs	Personnel	\$16,800	\$5,600	\$4,200	\$4,200	\$30,800
	Fringe Benefits	\$7,200	\$2,400	\$1,800	\$1,800	\$13,200
	Travel	\$18,000				\$18,000
	Contractual	\$40,000	\$36,000	\$702,000	\$635,000	\$1,413,000
	Other* see below				\$25,000	\$25,000
Total Direct Costs		\$82,000	\$44,000	\$708,000	\$666,000	\$1,500,000
Indirect Costs		0	0	0	0	0
Total Budget		\$82,000	\$44,000	\$708,000	\$666,000	\$1,500,000

* Filing fees for Kentucky Brownfield Redevelopment and Reuse – Liability Relief Program

Note: \$702,000 is allocated for Assessments. \$635,000 is allocated for Site Specific Planning and Site Reuse Assessments. A total of \$1,337,000 or **89% of the grant funds is allocated directly to site-specific work.**

Cost Estimate Detail:

- Task 1-4 Personnel and Fringe: KRADD Project Manager was calculated at \$35/hour for personnel and \$15/hour for fringe. 480 hours (10 hours per month) were allocated for program management. 160 hours are allocated preparing community outreach materials, planning, advertising and attending 16 RBC meetings. 120 hours were allocated to KRADD staff for oversight for Task 3 and Task 4.
- Task 1 Travel: Conference registration \$200, round trip airfare \$400, lodging \$600 (\$200 x 3 nights), per diem \$300 (\$100 X 3 days) = \$1,500 per person per conference. \$1,500 multiplied by three conferences and multiplied again by 4 attendees (2 KRADD employees and one representative from each non-lead coalition member) equals \$18,000.
- Task 1 Contractual: A rate of \$100/hour was used for contractual services @ 400 hours for reporting.
- Task 2 Contractual: \$100/hour @ 160 hours for 16 RBC meetings, 1 CIP @ \$5,000, 3 updated target area inventories @ \$5,000 = \$15,000.
- Task 3 Contractual: 1 Generic QAPP @ \$15,000; 30 Phase I ESAs @ \$5,500 = \$165,000; 8 RMB surveys @ \$9,000 = \$72,000 and 15 Phase II ESAs @ \$30,000 = \$450,000
- Task 4 Contractual: 10 PMPs @ \$6,000 = \$60,000; 15 SSQAPPs @ \$3,000 = \$45,000, 15 SAPs @ \$3,000 = \$45,000; 15 HASPs @ \$3,000 = \$45,000; 15 ABCAs @ \$6,000 = \$90,000; 10 Site Reuse Assessments @ \$20,000 = \$200,000; 3 Brownfields Revitalization Plans (one per target area) @ \$50,000 = \$150,000.
- Task 4 Other: 10 filing fees @ \$2,500 = \$25,000 for enrollment in the Kentucky Brownfield Redevelopment and Reuse – Liability Relief Program

c. Plan to Measure and Evaluate Environmental Progress and Results

The project’s progress will primarily be measured by the production of deliverables and expenditure of funds. The outputs to be tracked include the number of meetings held, environmental assessments performed, ABCAs, reuse and revitalization plans developed, and acres made ready for reuse. The outcomes to be tracked include redevelopment dollars leveraged, jobs created, and improved community health metrics. Progress will be reported to EPA via Quarterly Performance Reports. Project expenditures and activities will be compared to the projects schedule to ensure the grant will be completed within the four-year time frame. Site specific information will be entered and tracked in the ACRES database. Additionally, KRADD will continue to update ACRES property profiles beyond the life of the grant to fully capture long-term outcomes. By using the tracking mechanisms described above for the past EPA Grants, KRADD was able to confirm the project was progressing as planned and monitor key performance indicators.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organization Capacity; ii. Organizational Structure; iii. Description of Key Staff

Having successfully managed two previous Brownfield Assessment grants, KRADD staff has the necessary experience to administer the grant on behalf of the Coalition. The City of Jackson and EKY Heritage Foundation, the non-lead coalition members, will be fully engaged in every phase of grant implementation. They will serve on the RBC, attend Brownfields conferences, communicate regularly with the QEP, and be updated at least quarterly of current budget and quarterly reports. They will be equally represented regarding how the grant funds are being used.

KRADD's governing Board of Directors is comprised of local elected officials and citizen members. KRADD has extensive experience managing its own federal funding sources as well as providing grant administration for their counties and cities. Tabitha Haddix, Community Economic Development Coordinator, will serve as the Project Director. Ms. Haddix served as the Project Director for KRADD's most recent Brownfield Assessment grant and has the expertise and experience to successfully administer this grant on behalf of the Coalition. Ms. Haddix will be supervised by Jennifer McIntosh, Associate Director, Community and Economic Development Division. Ms. McIntosh also has previous Brownfield grant experience and can assume the grant oversight if Ms. Haddix becomes unavailable.

In compliance with KRADD's internal controls, Ms. Kimberly Coomer, supported by three staff accountants, will oversee the financial management of the grant. KRADD successfully manages a \$5 million annual budget. In addition to the agency wide single audit, each program is monitored by its funding source. The experience of the KRADD staff, partners and the contracted QEP will ensure the timely and successful expenditure of funds and completion of all technical administrative and financial requirements of the grant.

iv. Acquiring Additional Resources

The Coalition has not procured a contractor. The procurement process will follow the work plan approval and cooperative agreement issuance. KRADD will comply with 2 CFR 200 and 2 CFR 1500 to procure a Qualified Environmental Professional (QEP). A Request for Proposals (RFP) will be advertised in target area newspapers and on KRADD's website. Minority and women owned businesses will be encouraged to apply, and notification will be sent through the Kentucky Procurement Technical Center. The Coalition will also consult with the Kentucky Brownfields Program staff and the EPA Region 4 TAB provider as needed.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

KRADD has previously received and successfully administered two Brownfield Assessment Grants. Accomplishments of the recently completed FY20 \$300,000 grant include:

- 1 Brownfield Inventory of the Hazard Downtown Historic District
- 12 Quarterly reports in ACRES
- 3 Annual and DBE reports
- 1 Community Involvement Plan
- 12 Phase I Environmental Site Assessment Reports
- 7 Phase II Environmental Site Assessment Reports
- 1 Underground Storage Tank Removed
- 1 Generic Quality Assurance Project Plan with Sampling Protocols, Methods, and Goals
- 7 Site-Specific Quality Assurance Project Plans with Sampling Protocols, Methods, and Goals
- 3 Area Studies to identify potential Brownfield sites
- 3 Public meetings with KRADD and other key stakeholders in Hazard

Outputs have been accurately reported in ACRES at the time of application submission.

(2) Compliance with Grant Requirements

KRADD complied with the reporting requirements, work plan and terms and conditions of the Cooperative Agreement. The project tasks were completed on time. All grant funds were expended by the end of the performance period. Each assessed site is accurately reported in the ACRES system.

KRADD BROWNFIELD ASSESSMENT COALITION GRANT THRESHOLD CRITERIA

1. Applicant Eligibility

The Kentucky River Area Development District is a government entity created by state legislature. Statute attached.

2. Number and Eligibility of Non-lead Coalition Members

The City of Jackson is a local unit of government and affirms it is eligible for funding. East Kentucky (EKY) Heritage Foundation is a 501(c)(3) nonprofit organization. IRS determination attached.

3. Target Areas

KIPDA (lead) target area: The City of Beattyville

City of Jackson target area: The City of Jackson

EKY Heritage Foundation target area: The City of Whitesburg

4. Existing Brownfields Grants to Non-lead Members

The non-lead coalition members affirm they are not the recipient of an open cooperative agreement for MARC Grant funding or a MARC Grant that closed in 2016 or later.

5. Coalition Agreement

Letters from the non-lead coalition members agreeing to be part of the coalition are attached.

6. Community Involvement

The Coalition will follow the EPA's Steps for Effective Public Involvement that include planning/budgeting for public involvement, the provision of information/outreach, conducting involvement activity, reviewing/using input, and providing feedback and evaluating activities/processes. The Coalition will use their own, as well as partner agencies', websites, social media, radio, local newspapers, and informational brochures to convey project progress, advertise public meetings/webinars and solicit input from target area residents. It is the Coalition's goal to provide all target area residents equal access to the decision-making process. The Regional Brownfields Committee meetings will be accessible via Zoom or similar platform for the convenience of those who are unable to attend in person due to social distancing or other restraints. The meetings will be held alternately in the three target areas to ease transportation burdens for residents who wish to attend the meetings in person. Letters, phone calls and emails will be accepted methods for supplying input from residents unable to attend RBC meetings. All questions and concerns expressed by the community will receive a response within 10 business day. Printed workplans and quarterly reports will be available to the public upon request. Meetings will be held in accessible locations. Interpretation services will be provided with three days advance notice. KRADD has employed these communication strategies successfully in past, and are assured that this plan is the most appropriate and effective for the target areas.

7. Expenditure of Existing Grant Funds

KRADD affirms it does not have an open EPA Brownfield Assessment or Multipurpose Grant.

8. Contractors and Named Subrecipients

Not Applicable.