

Bluegrass Area Development District (BGADD) *Narrative Information Sheet*

The Bluegrass Area Development District (BGADD) is pleased to submit this proposal for FY 2024 Brownfields Assessment Coalition Grant funding.

1. Applicant Identification

Bluegrass Area Development District, 699 Perimeter Drive, Lexington, KY 40517

2. Funding Requested

a. Assessment Grant Type: Assessment Coalition Grant

b. Federal Funds Requested: \$1,500,000

3. Location

a. City: Irvine, Paris, Winchester

b. County: Estill, Bourbon, Clark

c. State: Kentucky

4. Coalition Members' Target Areas and Priority Site Information

TARGET AREA	PRIORITY SITE
Estill County	Coal Washing Facility Coal Wash Rd., Irvine, KY 40336 37.72307,-84.00024
City of Paris	Gano Street Landfill Paris, KY 40361 38.21717,-83.2607
Westside Neighborhood, Paris, KY	Census Tract 21017030100 Waste Transfer Station 1004 Stewart St., Paris, KY 40361
City of Winchester	Waterflow Systems 148 Winn Avenue, Winchester, Kentucky 40391

5. Contacts

a. Project Director:

Karyn Leverenz, Bluegrass Area Development District
699 Perimeter Drive,
Lexington, KY 40517
859-269-8021
Email: KLeverenz@BGADD.org

b. Chief Executive/Highest Ranking Elected Official:

David Duttlinger, Executive Director, Bluegrass Area Development District
699 Perimeter Drive,
Lexington, KY 40517
859-269-8021

6. Population

Estill County:	14,157	(2020 Decennial Census)
City of Paris:	10,171	(2020 Decennial Census)
City of Winchester:	18,993	(2020 Decennial Census)

7. Other Factors

Other Factors	Narrative Page #
<i>Community population is 10,000 or less</i>	N/A
<i>The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.</i>	N/A
<i>The proposed brownfield site(s) is impacted by mine-scarred land.</i>	Page 1 (Section 1.a.ii)
<i>The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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).</i>	Page 2, (Section 1.a.iii.)
<i>The proposed site(s) is in a federally designated floodplain.</i>	Page 2 (Section 1.a.iii.) Page 3 (Section 1.a.iv.)
<i>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</i>	Page 4 (Section 1.b.ii.)
<i>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</i>	Page 4 (Section 1.b.ii.)
<i>The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investment.</i>	Page 4 (Section 1.b.ii.)
<i>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.</i>	Page 10 (Section 3.b.)
<i>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.</i>	N/A
Additional Final Selection Considerations	Narrative Page #
<i>≥20% of the population of the county where project is sited has been at or below the poverty level for 30 years (based on decennial censuses from 1990 and 2000 and most recent Small Area income and Poverty Estimates</i>	Page 7 (Section 2.a.ii. (3).a)
<i>Applicant has never been awarded a Brownfields Assessment grant</i>	Page 12 (Section 4.b.ii.)
<i>At least one target area within the project is or includes a disadvantaged census tract per CEJST.</i>	Page 2 (Section 1.a.iii)

8. Letter from the State or Tribal Environmental Authority

Kentucky Department for Environmental Protection letter acknowledging that the applicant plans to apply for FY24 Federal Brownfields Coalition Grant funds is attached.

9. Releasing Copies of Applications

N/A



Andy Beshear
GOVERNOR

ENERGY AND ENVIRONMENTAL CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

300 Sower Boulevard
Frankfort, Kentucky 406 01
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Rebecca Goodman
SECRETARY

Anthony R. Hatton
COMMISSIONER

October 30, 2023

David Duttlinger
Executive Director
Bluegrass Area Development District
699 Perimeter Dr. #100
Lexington, KY 40517

Re: Letter of Support for a Brownfield Assessment Coalition Grant

Dear Mr. Duttlinger:

The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of the coalition formed by the Bluegrass Area Development District, the City of Paris, the City of Winchester, Estill County, and Bluegrass Greensource 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
Richard Thomas, Division of Waste Management, Frankfort Regional Office
Karyn Leverenz, BGADD
Amy Sohner, Bluegrass Greensource

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

1.a. Coalition Members, Target Areas, and Brownfields:

1.a.i. Coalition Members:

Established through state enabling legislation in 1972 as one of 15 development districts in the state of Kentucky, the mission of the Bluegrass Area Development District (BGADD) is to enhance the economy of communities through *planning* to maximize resources, *projects* to promote development, and *programs* to improve the quality of life in a 17-county, central Kentucky region. This core mission perfectly positions BGADD to serve in a Brownfields Assessment Coalition (the coalition) leadership role in partnership with four non-lead members, including the cities of Winchester and Paris; the County of Estill; and the Westside Neighborhood Association, a community-based organization in the target area of Paris near two large brownfield sites. These members formed a coalition with the unified goal of leveraging grant funding to spur redevelopment and mitigate the environmental injustices experienced by these communities. Although each non-lead coalition member has strong community support, they have limited operating budgets and lack the technical expertise and available resources to independently manage brownfield grants or successfully pursue brownfield grant funding of this magnitude. Their requests for assistance in addressing environmental injustices have often gone unheard. Residents have the will and the passion to correct the environmental injustices left on their doorstep but need critical financial support to energize the redevelopment.

1.a.ii. Overview of Brownfield Challenges and Description of Target Areas:

Although the coalition members are in separate cities and counties within BGADD's central region, they share key challenges and goals: environmental justice challenges with residents that continue to be underserved/overburdened; and the visionary goals to advance health, economic, and environmental vitality for their communities, as detailed below.

Estill County, Kentucky (non-lead member) is an Appalachian community historically anchored in coal production, cleaning, and sorting due to past coal mineral wealth in the region (census tract 21197970200). For generations, the residents of Estill County suffered from the environmental injustice that comes with primary resource coal extraction and the associated damaging activities. The end of coal production and cleaning led to rapid economic decline and the closure of not only mines, but also support businesses, retail shops, gas stations, and other commercial service providers. Estill County has been left to address the blight of hundreds of acres of mine-scarred land and the continued impact of forgotten stockpiles of spent coal materials. The resulting environmental injustice is a major component of the total injustices affecting the County (CEJST). While the downtown and riverfront in Irvine (Estill County) has striking economic potential, the small community has incredibly limited financial resources and insufficient capacity to undertake brownfield assessment that would jumpstart redevelopment without key support through the coalition.

Paris, Kentucky (non-lead member) and the **Westside Neighborhood Association (non-lead member)** will serve as project managers for the target site of the Westside Neighborhood (disadvantaged census tract 21017030100), a historically segregated African American community. In 1930, Riverside Park was dedicated in the Westside Neighborhood as a gathering place for community residents during segregation. In the 1950s, Kentucky's segregation laws were struck down, allowing African American residents in Westside to use other parks. In 1965, a city incinerator was built directly adjacent to Riverside Park (now closed) and the area became a dumping site. This egregious act of environmental injustice in an African American residential neighborhood took place after protests from white residents forced the incinerator into the city's most marginalized area despite the original location having better infrastructure. The Westside Neighborhood has experienced the decades-long effects of environmental injustice. Today, the Westside community members have become adept at

grassroots advocacy focused on environmental justice with a vision for revitalization. They joined the coalition to foster community involvement and redevelopment.

The **Winchester, Kentucky (non-lead member)** target area (disadvantaged census tract 21049020202) historically relied on enslaved and impoverished labor to grow and harvest tobacco, with enslaved workers being the major source of labor in the tobacco fields before 1865. Tobacco led to the patronage of the R.J. Reynolds tobacco company starting in the early 1900s for sponsorship of community events and programs, but the support was withdrawn in the late 1990s after R. J. Reynolds, as a defendant, agreed to pay a \$206B National Tobacco Settlement Agreement to address tobacco-related health care costs in 46 states. Following R.J. Reynolds departure, three industrial employers shut down in the last 25 years, including Rockwell, Sylvania, and Bundy Tube, which has exacerbated the economic decline and increasing levels of poverty experienced by the Winchester residents (CEJST).

1.a.iii. Description of Brownfield Sites:

The first **priority site** is a 500-acre the former coal washing facility (Coal Wash Rd., Irvine, Estill County, KY 40336; 37.72307,-84.00024). This site is adjacent to the Kentucky River and falls within a 500-year floodplain. The site consists of several steel-framed industrial structures in good condition for reuse. Undeveloped land on the property is suitable for housing development. Trespassing is an issue in vacant and underutilized buildings, which have become spaces to engage in illicit activities. The site also contains remnants of coal washing activities with rough terrain, rubble piles, and holding ponds that pose physical and biological threat to trespassers.

The second **priority site** is the Riverside Park incinerator (1004 Stewart St. Paris, KY 40361), currently being used as a waste transfer station. The incinerator site is bordered on two sides by Houston Creek, falls within a 100-year floodplain, and is in a disadvantaged census tract (CEJST). A Phase I Environmental Site Assessment (ESA) identified Recognized Environmental Conditions (RECs), including lead, dioxin, metals, polycyclic aromatic hydrocarbons (PAH), and petroleum contamination. The waste transfer station consists of one three-story masonry building (about 4,440 square feet). The future redevelopment of this site is dependent on results of environmental testing.

The third **priority site** a former rock quarry on Gano St. (38.21717,-83.26071) that began serving as the city landfill in 1965. According to the February 2023 Phase I ESA for the Gano St. landfill site, the lack of regulations during landfill operations led to an accumulation of household waste, tires, and hazardous waste throughout approximately 4.1 acres to a depth of approximately 30 feet. Both sites are in a 100-year floodplain and are approximately 29 acres, combined.

Located in a disadvantaged census tract and within a 500-year floodplain, the fourth **priority site** (148 Winn Avenue, Winchester, KY 40391) includes a tobacco warehouse built in 1882 that subsequently served as a cabinet/countertop factory, and a highway/construction laydown area after its closure. Although underutilized because of environmental contamination concerns, the site was eventually acquired by Watson Builders and Waterflow Systems for limited use as the Old Red Barn Antique Mall (established in 2015). While the mall has become a popular destination for antique collectors and enthusiasts, it is unsurprising that areas of the building and site have fallen into a state of disrepair given its long history and disjointed economic use. This prominent historical site remains an important part of Winchester's business landscape, and structured adaptive reuse will provide strong economic opportunities that maintain a link to Winchester's tobacco growing past.

1.a.iv. Identifying Additional Sites:

BGADD and non-lead members have identified 15 additional sites in the target areas of Estill County and the Cities of Paris and Winchester that have been prioritized to advance health, economic, and environmental vitality in overburdened and underserved populations. The coalition Advisory Board

will continue to review and prioritize up to 11 additional sites for 30 Phase I ESAs. In Estill County, all additional sites identified fall within disadvantaged census tracts, per the CEJ screening tool. The first three sites listed below paint a picture of the need for jobs and have the potential to support future redevelopment for light industrial or manufacturing use: the CSX Railroad yard at 449 Kirkland Ave, Irvine KY 40336; the IDA property (799 Kirkland Ave, Irvine, KY 40336), which had multiple former uses, including garment warehousing, a boat assembly factory, and biofuels production; the Texola site (1225 Pryse Rd) was a former oil refinery and bulk storage site. The community identified the two remaining Estill County sites to address education and vocational job training needs stemming from the local high school dropout rate: the former Ravenna Grade School (317 4th St, Ravenna, KY 40472), closed in 1998, still has potential for vocational use; and the Broadway Garage (1911 Broadway St, Irvine, KY 40336) was formerly used for vocational training for auto repair and mechanics. Irvine is bordered by the Kentucky River and all identified sites are in 100 or 500-year floodplains with one site resting as close as 100 feet from the river. The Westside Neighborhood and Paris, KY include the already identified priority sites on 1004 Stewart St. and the former rock quarry landfill on Gano St. (38.21717,-83.26071) (see 1.a.iii) The Westside Neighborhood has expressed a need to address the site contaminants to improve health conditions, eradicate areas of blight, and foster adaptive reuse of the site as recreational green space and parkland. Additional sites to address blight near the priority site include the historical early 1800 brick “McGuffy” schoolhouse (21 Ardery Place); former Bourbon Laundry (137 West 7th); Bourbon County Recycling Center (scheduled for closure in 2024) at 219 East 19th St; and brick building at 301 Pleasant St. Additional sites were selected in the Winchester target area to start to address blight near the priority site. These additional sites include Sphar & Co Feeds (127 Depot Street) formerly used as a feed mill/supplier; King Bros. Salvage (317 W. Broadway), formerly an auto salvage site; Jimmy Allen Service Station (7 S. Highland); a defunct former dry cleaner (24 S. Highland); and Stamper gas station (620 N. Maple).

1.b. Revitalization of the Target Areas:

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

Each coalition member has a reuse strategy that differs based on the articulated needs of their residents, but they have shared goals to advance health, economic, and environmental vitality for their communities, as detailed below. Three of the sites in **Estill County**, including the priority site, will leverage existing rail infrastructure for adaptive commercial reuse and development of small manufacturing and light industrial businesses. The size of the sites also allows for mixed-use development with proposed new energy-efficient affordable housing, commercial properties, mixed-use sites, and a river walk and green spaces to be utilized by current and future residents in the disadvantaged communities surrounding the target area sites. Estill County seeks to continue to create more clean, renewable energy as a response to climate change Berea College retrofit lock and dam 12 on the Kentucky River in Estill County to create a hydroelectric power plant that will power up to ~1,200 homes while eliminating ~11,000 tons of carbon dioxide emissions annually. Estill County seeks to continue to create more clean, renewable energy as a response to climate change. The last two Estill County sites, the former Ravenna elementary school and the auto repair shop hold possibilities for youth engagement and additional vocational technical educational and job training opportunities. The Westside Neighborhood of **Paris** has a formal reuse plan. A community survey of more than 300 community members identified that residents want more recreational green space and priority sites were chosen in alignment with these survey results and community meetings. A Phase II ESA will facilitate planning for the redevelopment by identifying contaminants and environmental conditions that need to be addressed to improve health conditions, eradicate areas of blight, and further the adaptive reuse of the sites as green spaces and parkland. Several conceptual plans have been developed for the priority sites using landscape architect students from the University of Kentucky through the

city of Paris and the remaining commercial sites were selected to identify potential contamination in dilapidated businesses through assessment prior to future adaptive commercial reuse.

The priority **Winchester** property is categorized as light industrial zoning and the additional five sites (see 1.a.iv.) in the downtown target area comprise a combination of deteriorating and maintained structures that are underutilized. Through participatory planning meetings the community has articulated a pressing need for a downtown grocery store in an area that has become a food desert, and the planning objective for the priority property is to prepare the site for construction of a downtown grocery.

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

Addressing brownfields sites across the coalition members' target areas will jump start redevelopment on the priority sites, providing measurable employment opportunities, economic revitalization, and recreational/green space in underserved communities. The first three sites in **Estill County** are planned for adaptive commercial reuse as new commercial and light industrial businesses leveraging the existing vacant buildings and underutilized rail infrastructure. The community lacks public transportation and local jobs are critical since the cost/time spent commuting puts the area above the 92nd percentile for transportation barriers (ECJST). In Estill, 52% of workers commute more than 30 minutes each way to work (Kentucky County Health Rankings). Based on articulated community need, additional reuse planning focuses on building energy-efficient affordable housing on the properties.

The planned adaptive reuse will benefit a census tract that is in the 89th percentile for low income (ECJST) and participatory planning in the community identified a need for recreation areas, including a river walk, that will benefit residents in a census tract that is in the 95th percentile for heart disease. Estill County will proactively work with Berea College to maximize use of the existing tree canopy for carbon capture, add plants to manage runoff from parking and sidewalk hardscape, and incorporate bioswales and rain gardens to increase stormwater infiltration and improve water quality.

Adaptive reuse of the current waste transfer and landfill brownfield sites in **Paris** will revitalize an underserved community that has experienced environmental injustice for decades. Reclaimed parkland and green space appropriate for a residential neighborhood will provide the underserved community with an immediate benefit through decreased truck traffic, noise, litter/refuse that brings safer living conditions and increased quality of life. These measurably positive impacts will lead to a more attractive community and serve as a flywheel that attracts economic development. Landscape architect students from the University of Kentucky have assisted in the concept plans for the adaptive reuse of the site as parkland with a focus on sustainability and climate adaptation using native landscaping and revegetation along riparian buffer areas adjacent to Houston Creek, which encloses three sides of the neighborhood and priority sites, providing habitat for a variety of wildlife and restoring the tree canopy for carbon capture.

To address a pressing food desert issue in downtown **Winchester**, the 1882 Tobacco Warehouse is being targeted for redevelopment as a downtown grocery store with essential groceries and household items within walking distance, positively impacting the overall well-being of residents who rely heavily on public transportation. In its current state, the property has become a blight for visitors to downtown. Introducing more visually appealing structures and enhancing the landscaping with trees and plants to manage runoff from parking and sidewalk hardscape will significantly elevate the neighborhood's overall appearance while increasing stormwater infiltration and improving water quality. Combining a downtown grocery store with the historical preservation of the Tobacco Warehouse has strong community support and is aligned with residents' commitment to preserving the town's history, as well as community partners like Ale-8 One and the Greater Clark Foundation. By combining preservation efforts with economic development, adaptive reuse would not only provide a

much-needed access for a community in a food desert but also help to create a unique destination that attracts visitors from outside the town.

Redevelopment will be a benefit to local economies and communities through increased property values and the associated impacts. No re-use strategy will result in the displacement of residents. Selection and prioritization of additional sites will consider potential for displacement and will employ strategies to minimize or mitigate the displacement.

1.c. Strategy for Leveraging Resources:

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

This project will facilitate coalition member planning and coordination across neighborhood organizations, government entities, nonprofits that stimulate in-kind technical assistance and additional funding for assessment, remediation, and redevelopment. The BGADD and the coalition will apply to the state of Kentucky for matching funds through the Government Resources Accelerating Needed Transformation (GRANT) program, and leverage federal grants for projects concerning infrastructure, housing, and workforce development. The City of **Paris** has a proven track record of successfully leveraging resources, including a National Park Service Rivers Trails & Conservation Assistance (RTCA) grant in 2022, which will facilitate the development of a conceptual plan to for a network of pedestrian and cyclist alternative transportation trails through the redeveloped Westside brownfields sites, increasing health in the community while decreasing carbon emissions. Kentucky awarded the City of Paris a \$2M Community Development Block Grant (CDBG) grant in the Fall of 2022 to assist in the relocation of the waste transfer station currently located on the identified priority brownfield site. The Kentucky Department for Environmental Protection Brownfield Program completed a Phase I ESA of the City of Paris Waste Transfer Station and a Phase I ESA of the Former City of Paris Landfill in February 2023. In this same month an EPA Region 4 Targeted Brownfields Assessment (TBA) application was submitted for a Phase II ESA to initiate sampling activities at the site.

1.c.ii. Use of Existing Infrastructure:

Infrastructure (water, sewer, gas, electric, transportation) exists at all priority sites. The coal wash in **Estill County** has existing steel framed buildings and rail infrastructure that will be ready for adaptive reuse once the environmental hazards have been mitigated. The coal wash site in will need supplemental infrastructure for the multiuse redevelopment that includes affordable housing, and the County will assist with funding these efforts within their annual operating budgets, identify community development block grants, and other grant funding based on the reuse for the area of the former coal wash. No additional infrastructure needs are anticipated for the brownfield sites in **Winchester** including the Historic Tobacco Warehouse, and other sites located in the business corridor. The Stewart St. waste transfer station brownfield site in the Westside Neighborhood has an approximately 4,440 sq ft., three-story, masonry building that will be evaluated for reuse during the brownfield assessment, but the site is not anticipated to need additional infrastructure. The Westside community will be turning the brownfield sites in this area into reclaimed parkland and green space. No infrastructure will be needed for the additional brownfield sites in Paris with existing water, sewer, and electric.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

2.a. Community Need:

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

The need in these communities far exceeds the current availability of funds. However, this EPA Brownfields Coalition Grant will fill a critical funding gap and facilitate the identification of priority catalyst sites to attract additional funding for remediation and future adaptive redevelopment. None of the lead or non-lead coalition members have dedicated funding sources for brownfield

assessment/community engagement. Vacant buildings and declining property values have become a burden to the municipal governments of our target areas, and census tract data reveals the economic distress of the communities when looking at indices for poverty, income, educational attainment, and unemployment. Low incomes and high poverty rates reduce the local tax base. The cumulative picture of the factors in the table below presents a community with lower-than-average discretionary income, which results in less spending, decreased local business revenues, and taxes.

	Paris	Winchester	Estill
Population in Priority Census Tract	4,017	4,243	2,175
Percentage Below Poverty Line	14.8%	10.7%	27.3%
Median Household Income	\$24,937	\$47,034	\$35,462
Unemployment	3.7%	3.8%	5.1%
Less than HS Education	24.9%	13.4%	17.0%

Source: 2020 Decennial Census & 2021 ACS Data

2.a.ii. Threats to Sensitive Populations):

2.a.ii.(1) Health or Welfare of Sensitive Populations:

According to the 2020 Decennial Census, the tracts containing the priority sites have larger than normal percentages of children under the age of 18: Paris 27.3%; Winchester 29.1%; Irvine 54.7%. According to the CDC, children are more easily exposed to environmental contaminants because they breathe more air, drink more water, and eat more food per pound of body weight than adults; and they are more likely to put their hands in their mouth. In addition, children may not be able to break down and get rid of harmful contaminants that enter their body. Health problems from an environmental exposure can take years to develop and children have more time to develop health conditions and diseases than adults who are exposed to contaminants later in their life ([CDC.gov](https://www.cdc.gov)).

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

The Coalition Grant, if awarded, will bring about the identification/reduction of potential exposure to contaminants from the brownfield sites in their target areas. The tract for the **Estill County** site is in the 95th percentile of individuals 18 or older diagnosed with heart disease. A 2022 Report from the Appalachian Regional Commission revealed a 37% higher mortality rate in the Appalachian Region from the diseases of despair (overdose from alcohol, prescription-drug, and illegal-drug; suicide; and cirrhosis of the liver) compared to non-Appalachian areas ([ARC.gov](https://www.arc.gov)). In summary, the residents of Estill County are *twice* as likely to die of premature death when compared with national averages, and the County is ranked as one of the least healthy counties in Kentucky with the leading causes of death being heart disease, malignant neoplasms, and chronic lower respiratory disease ([Kentucky County Health Rankings](https://www.kentuckycountyhealthrankings.com)). Winchester similarly has much greater incidents of premature death from heart disease, malignant neoplasms, and chronic lower respiratory disease than national incidences ([Kentucky County Health Rankings](https://www.kentuckycountyhealthrankings.com)). The **Winchester** target area sites carry an Air Toxics Cancer Risk of the 40th percentile resulting in increased illness that raises healthcare costs to the local economy. Redevelopment in the impoverished area will reduce air pollution risks from dust and particulates becoming airborne from vehicle traffic and travel from wind disbursement. Furthermore, Winchester brownfields sites have a Lead Paint Index in the 81st percentile. Lead paint could possibly leach into the water table and adversely affect all residents, not just those within adjacent proximity to the target sites. Brownfields grant funds could alleviate any concerns to the local water source and lower health related consequences from contact. The area is also rated in the 90th percentile for potentially having underground tanks containing hazardous materials, potentially contaminating surrounding soils/waterways and increasing health risks to children and the public. Winchester sites have a Superfund Proximity Index in the 68th percentile for materials and containers that have been

stored on the property that could be potentially hazardous from time and weather and could potentially leak into the air or water. An Ozone Index identified in the 55th percentile, prolonged exposure to ground level ozone can advance breathing and lung issues for those exposed. Residents with asthma or bronchitis could have the health problems exacerbated resulting in early mortality. Brownfields assessment and clean up would prepare the current, possibly contaminated site, for adaptive reuse (EJST).

2.a.ii.(3) Environmental Justice:

2.a.ii.(3)(a) Identification of Environmental Justice Issues:

In 1993, the National Environmental Justice Advisory Council (NEJAC) was formed to provide independent advice, consultation, and recommendation to EPA on matters related to environmental justice. NEJAC's work led to the conclusion that waste transfer stations are disproportionately placed in low-income communities and communities of color and this is certainly true of the priority site in **Paris**, KY. The former incinerator and Gano St. waste transfer station is located in a primarily impoverished, minority, Westside Neighborhood. Similarly, **Estill County** is an Appalachian community that has experienced legacy pollution at the coal wash site. The cessation of coal production, cleaning, and sorting led to higher unemployment, blight from underutilized or abandoned buildings and ultimately to a 37% higher mortality rate in the Appalachian Region from the diseases of despair. Estill County exemplifies the intergenerational poverty experienced in Appalachia with a poverty rate ranging as high as 56.4% in 1960 and 27.3% today. The poverty level has never dropped below 26.1% of the Estill County population in the last 60 years ([Census.gov Historical County Level Poverty](https://www.census.gov/hhes/www/poverty/historical-county-level-poverty)). The negative impacts of the priority Gano St. waste transfer station brownfield site to the neighborhood compounded over time as they dealt with noxious smells, garbage falling from waste trucks enroute to the landfill and the impacts of heavy traffic on the infrastructure of residential streets. The presence of a brownfield site near a residential neighborhood has led to declining general health and safety and created neighborhood blight. The cleanup of the land will allow for green space that will revitalize this historically segregated Westside community in Paris, bringing mental and physical health improvements through improved ecosystem services (e.g., water access, air quality), aesthetic and recreation values, and better land productivity. This census tract shows in the 97th percentile for proximity to Risk Management Plan Facilities. The expected population loss for this census tract is in the 91st percentile and is related to fatalities and injuries resulting from natural hazards each year. This census tract is in the 81st percentile of low income and shows 19% of people ages 25 years or older with an education that is less than a high school diploma (CEJST).

2.a.ii.(3)(b) Advancing Environmental Justice:

The Federal Justice40 initiative identifies remediation and reduction of legacy pollution as a funding goal in support of disadvantaged communities that were historically marginalized, underserved and overburdened by pollution. This coalition project will address measurable environmental justice concerns by encouraging the adaptive reuse of properties and mitigating the health concerns to foster positive impacts on economic/health goals through new jobs (**Winchester** and Estill); affordable housing (Estill) and recreational green space (**Paris** and Estill). All **Estill County** targeted sites fall within a disadvantaged census tract (CEJST), and the priority site is a former coal wash site located in a tract that is in the 91st percentile of unemployment, with nearly 20% of the adult population having less than a high school diploma. The tract is also in the 89th percentile for the population considered low-income (less than or equal to twice the federal poverty level). Estill County has suffered generational harm from coal resource extraction and its associated activities, most often undertaken by parties outside the region, and been left to deal with the hundreds of acres that continue to be impacted by the stockpiling of spent coal materials. Fundamentally this Coalition Grant will address

environmental injustice by ensuring that the underserved residents of these disadvantaged census tracts have a voice in prioritizing the assessment, the cleanup activities, and the redevelopment plans.

2.b. Community Engagement:

2.b.i. Project Involvement:

The Westside Neighborhood Association has been a model of grassroots advocacy for environmental justice. Over a 3-year period, they held more than 50 neighborhood meetings to gather input on existing conditions and to identify goals and strategies for improvement. In 2021, a feasibility study was prepared to address the relocation of the Gano St. waste transfer station and remediation of the brownfield site. The study concerned the environmental injustices impacting the residents and the neighborhood. It also addressed the importance of site reclamation and the potential for redevelopment into a community asset. In summer 2022, volunteers conducted more than 300 resident surveys to discuss the future use of the Gano St. site. Survey results revealed a desire for planning to address the safety of site features, an adaptive reuse of site infrastructure, recreational opportunities, housing developments, and universal design for site accessibility. Vanessa Logan from the Westside Neighborhood Association is joining the coalition Advisory Board to ensure that all project stakeholders are afforded meaningful participation in all aspects of the cleanup and redevelopment processes.

2.b.ii. Project Roles:

BGADD will center each local entity's decision-making power over brownfield sites and priorities in the target area and hold several community/public meetings throughout the duration of the Coalition Grant project. Additionally, BGADD will distribute key project information on their website, in local newspapers, social media platforms, and factsheets. Community involvement activities will include preparing a draft Community Involvement Plan (CIP) within the first quarter of the grant, community/public meetings held quarterly with a virtual attendance option, and preparation/update of factsheets quarterly to be shared at public meetings. The Community Involvement Coordinator will work with the project director and project stakeholders to ensure that local, state, federal, and community stakeholders are kept informed of project activities. One quarterly meeting each year will be held in each target area. The Brownfield Advisory Board will meet monthly with representatives of each coalition member, and the Qualified Environmental Professional (QEP) to ensure all are engaged and informed during the project. The Advisory Board will identify and prioritize additional brownfield sites in target areas, and work to identify, secure, and implement other funding sources in the target areas. Collaboration and strong partnerships are integral to success in addressing the environmental injustices of the past. The path forward is full of potential, and the result will be increased health and economic vitality for residents in target areas.

2.b.iii. Incorporating Community Input:

Coalition members will meet quarterly and invite project input from community stakeholders and neighborhood residents near the target brownfields in open meetings. The agenda will include reviews of the project status, provide feedback to administrators and be a venue for making key decisions. The BGADD coalition members will actively solicit and conscientiously center community input in decision making. The frequency and content of these meetings will provide the communities in these historically underserved areas confidence that their needs and interests are being prioritized. Accommodations will be made for non-English speaking residents. In between quarterly meetings, coalition members will communicate via email or phone to ensure that all project activity timelines are adhered to without interruption. At least one meeting per year will be held in the target area community of each non-lead coalition member.

3. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS:

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

The Bluegrass Area Development District (lead) and non-lead coalition members (Cities of Paris and Winchester and Estill County) are requesting \$1,500,000 in funding to implement this EPA Brownfields Coalition Project based on the priority brownfield sites (as discussed in 1.a.ii) and additional brownfield sites in the target areas.

Task 1: Project Management and Reporting
3.a.i. <i>Project Implementation:</i> Karyn Leverenz, as Project Director , will oversee the grant implementation and compliance with EPA cooperative agreement schedule, terms and conditions and will further be responsible for procurement and oversight of the QEP contractor to complete the tasks. Bob Casher, the Project Manager will hold monthly Brownfield Coalition Grant Advisory Board meetings, including lead and non-lead members, to review project status and take corrective actions to stay on schedule. With QEP contractor support, the Project Manager will complete EPA quarterly and yearly reports, forms, and ACRES database entry/reporting. A Final Performance Report will document all grant accomplishments.
3.a.ii. <i>Anticipated Project Schedule:</i> ACRES reporting begins in the 1 st Quarter and Quarterly Reporting begins in the 2 nd Quarter and continues throughout the Coalition Grant project. Annual reporting and Forms will be created in the 5 th , 9 th , and 13 th quarters and during final closeout.
3.a.iii. <i>Task/Activity Lead:</i> Karyn Leverenz, Project Director
3.a.iv. <i>Outputs:</i> ACRES Database Reporting, 4 Annual Financial Reports, 14 Quarterly Reports
Task 2: Outreach
3.a.i. <i>Project Implementation:</i> The Coalition Grant Project Manager and non-lead coalition member (Westside Neighborhood Association represented by Vanessa Logan) will develop a Community Involvement Plan (CIP) within 3 months of Grant Award. Lead and non-lead members will organize and host community meetings to keep the public informed on the brownfield assessment project plans, timelines and updates. An option to attend virtually will be provided. Handouts and brochures, including EPA quarterly and yearly reports, will be made available to community members and stakeholders. One meeting each year will be held in each target area.
3.a.ii. <i>Anticipated Project Schedule:</i> Community meetings will be held on the 1 st , 3 rd , 5 th , 7 th , 9 th , 11 th , and 13 th quarters. Each non-lead member will hold one meeting per year in their target area.
3.a.iii. <i>Task/Activity Lead:</i> Bob Casher, Administrator, Bluegrass Area Development District and Vanessa Logan Westside Neighborhood Association.
3.a.iv. <i>Outputs:</i> Community Involvement Plan, Community meetings and minutes; site inventory lists and maps; handouts, brochures, fact sheets, and other meeting materials.
Task 3: Site Assessments
3.a.i. <i>Project Implementation:</i> The QEP will conduct ESA activities at sites selected and ranked through site mapping, inventory, and prioritization, starting first with the three priority sites listed in this application. ASTM-AAI compliant Phase Is; Generic Quality Assurance Project Plan (QAPP); Phase II ESAs, which will include the site-specific QAPP. Prior to assessment, site access agreements and property eligibility determinations approval will be obtained
3.a.ii. <i>Anticipated Project Schedule:</i> Assessment activities to begin in the 2nd quarter and continue throughout the grant project.
3.a.iii. <i>Task/Activity Lead:</i> The QEP will implement the technical aspects of the project with oversight from Karyn Leverenz, BGADD Project Director.
3.a.iv. <i>Outputs:</i> 1 Generic QAPP; 30 Phase I ESAs; 21 SSQAPPs; 30 HASPs; and 21 Phase IIs
Task 4: Remediation/Reuse Planning

3.a.i. <i>Project Implementation:</i> QEP will develop Analysis of Brownfields Cleanup Alternatives (ABCA) reports for sites with contamination. The ABCA will identify potentially applicable remediation alternatives for the site by comparing potential land uses with the environmental impacts associated with properties and steps required to redevelop the property. Reuse assessments and market studies will be performed for each priority site within the target areas...The QEP will also develop abatement designs for ACM. Based on these outputs in coordination with community input and associated master plans, the consultant team will create individual reuse plans and visioning concepts for the sites.
3.a.ii. <i>Anticipated Project Schedule:</i> October 2025 – October 2029; first ABCA by Quarter 5
3.a.iii. <i>Task/Activity Lead:</i> QEP team with oversight from Karyn Leverenz, BGADD Project Director
3.a.iv. <i>Outputs:</i> 21 ABCAs; 3 Site Reuse Assessments (one each in Estill County, Paris, and Winchester); 3 Market Studies (one each in Estill County, Paris, and Winchester)

3.b. Cost Estimates:

BGADD and non-lead coalition members have budgeted to allocate 87% of awarded funds to tasks directly associated with site-specific work (Phase I and Phase II ESAs and site-specific cleanup planning), with over 30% to be spent on eligible reuse/area-wide planning activities.

Task 1 Project Management & Reporting: Personnel: BGADD Project Director: 16 hrs/ month for 4 yrs. (768 hrs) at \$40/hr (\$30,720). BGADD Project Manager: 2 hrs/ month for 4 yrs. (96 hrs) at \$40 per hour (\$3,840). Contractual: ACRES Database, Yearly Financial, and Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period (\$43,750). Travel: Five members to attend three conferences/events with flights at \$700, 3 nights hotel at \$300/night, incidentals and per diem at \$82/day [4 days x 5 attendees x 3 events] (\$28,920). Of the 5 members, 4 non-lead partners will receive stipends to attend EPA brownfield conferences from the travel budget.

Task 2 Community Outreach: Personnel: BGADD Project Director: 4 hrs/ month for 4 yrs. (192 hrs) at \$40/hr (\$7,680). BGADD Project Manager: 2 hrs/ month for 4 yrs.(96 hrs) at \$40/hr (\$3,840). Contractual: Community Involvement Plan (\$6,000); Brownfield Website, Outreach Brochure/Handouts, Social Media (\$12,000); 12 Community Education Meetings (\$36,000).

Task 3 Assessment: Contractual: 30 Phase I ESAs \$5,000 each (\$150,000); 1 Generic QAPP (\$6,300); 21 SS-QAPPs with associated HASPs at \$4,500 each (\$94,500); 18 Phase II ESAs at \$20,000 each (\$360,000); Estill County priority site Phase II ESA at \$150,000; Paris priority site Phase II ESA at \$70,000; and Winchester priority site Phase II ESA at \$40,000.

Task 4 Remediation/Reuse Planning: Contractual: 21 ABCAs \$7,450 each (\$156,450); 3 Site Reuse Plans at \$50,000 each (\$150,000); 3 Market Studies at \$50,000 each (\$150,000).

OVERALL PROJECT BUDGET TABLE

Budget Categories	Task 1: Project Mgmt. Reporting	Task 2: Community Outreach	Task 3: Site Assessments	Task 4: Remediation /Reuse Planning	Total
Personnel	\$34,560	\$11,520	--	--	\$46,080
Travel	\$28,920	--	--	--	\$28,920
Contractual	\$43,750	\$54,000	\$870,800	\$456,450	\$1,425,000
Other	--	--	--	--	--
Total Direct Costs	\$107,230	\$65,520	\$870,800	\$456,450	\$1,500,000
Total Indirect Costs	--	--	--	--	--
Total Budget	\$107,230	\$65,520	\$870,800	\$456,450	\$1,500,000

3.c. Plan to Measure and Evaluate Environmental Progress and Results (5):

The BGADD as lead coalition member is tasked by the coalition with tracking, measuring, and evaluating progress on the Brownfields Coalition Grant, if awarded. To ensure the grant is on schedule, the Brownfields Advisory Board which will meet with the QEP quarterly to track all outputs identified in 3.a., including environmental assessments, ABCAs, and cleanup redevelopment plans. Meetings will be utilized to report progress in meeting goals, achieving scope of work objectives, to review project expenditures and sharing quarterly reports prepared for the EPA to ensure the Coalition Grant project will be completed in the 4-year time frame. Specific information will be entered and tracked in the ACRES database for each site. Other outcomes that will be tracked in Microsoft Project spreadsheets include community participation, acres ready for reuse, leveraging of redevelopment dollars, leveraging of in-kind, and number of jobs created. If necessary, BGADD will create a Corrective Action Plan (CAP) to help the coalition projects get back on schedule and/or budget. The BGADD will issue a final report of overall project results, and eventual project outcomes for each community.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

4.a. Programmatic Capability:

4.a.i. Organizational Capacity | 4.a.ii. Organizational Structure (5) | 4.a.iii. Description of Key Staff:

BGADD is the primary regional economic development entity for 17 central Kentucky counties. The organization possesses the **organizational capacity (4.a.i.) to administer the programmatic, administrative, and financial management of the project on behalf of all coalition members.** This includes overseeing community outreach; interface with environmental regulators; and coordinate schedules, timelines and budgets with non-lead coalition members and contractors. **A Description of Key Staff (4.a.iii)** includes the EPA Brownfields Coalition Grant **Project Director** Karyn Leverenz, BGADD's Infrastructure Development Coordinator. Given her 14 years' experience in applying for and administering more \$60M in grant/loan funds including but not limited to Community Development Block Grants, Appalachian Regional Commission Grants, and KY State Revolving Loan Funds, Ms. Leverenz is fully qualified to ensure that all coalition members adhere to the administrative and financial requirements of the EPA Brownfields Coalition Grant. BGADD's administrative and finance management policies conform with 2 CFR 200. Additionally, Ms. Leverenz is actively administering almost \$20M in American Rescue Plan Act (ARPA) funds for local governments. This experience makes Ms. Leverenz the best choice to manage the timely and accurate expenditure of EPA Brownfields Coalition Grant funding and manage the ASAP.gov draw down system. The EPA Brownfields Coalition **Project Manager**, Bob Casher, is BGADD's Sr. Public Administration Specialist, who will be responsible for managing the daily operations of the grant and providing support to Karyn Leverenz when necessary. Mr. Casher brings 45 years' experience in City Planning, Local Government, Communications and PR. He has administered 20+ projects for BGADD over the last 15 years totaling more than \$50M including but not limited to CDBG, KIA, ARC, FEMA. Mr. Casher has been involved in several multi-million-dollar projects as a former City Manager. He also has experience working with community-based non-profits and has served on the Board of Directors for YMCA, Sheltered Workshop, and American Red Cross. The EPA Brownfields Coalition **Community Involvement Coordinator**, Vanessa Logan of the Westside Neighborhood Association, will ensure that all project stakeholders are afforded meaningful participation in grant activities. In response to a need for a clear **Organizational Structure (4.a.ii.)** to govern the decision-making process about distribution of grant funds to projects in the coalition members communities, BGADD will form a **Brownfield Coalition Advisory Board** comprised of representatives from Brownfields Coalition, the Project Director, Project Manager, and representatives from **The Westside Neighborhood Association** because **collective governance of this coalition ensures timely and successful grant performance.** Such collaboration and strong community partnerships are integral to

success in addressing environmental injustices. The Advisory Board will advise on the implementation of the grant and use the funds in respect to the Memorandum of Agreement signed by Coalition partners. The Advisory Board is tasked with prioritizing sites; communicating with and supporting target communities; using grant monies to fund assessment needs; and to work with private, public, and nonprofit entities.

4.a.iv. Acquiring Additional Resources:

BGADD will follow its procurement policies to contract with a QEP. Such policies are in conformance with 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. The BGADD's provide for extending employment opportunities to perform eligible tasks/activities under the grant. The QEP will lead the environmental assessment and cleanup planning tasks on eligible priority brownfields and support outreach, redevelopment planning, and project reporting tasks.

4.b. Past Performance & Accomplishments:

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

4.b.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements:

4.b.ii.(1) Purpose and Accomplishments:

In February 2023, the KDEP Brownfield Program completed a Phase I ESA of the City of Paris waste transfer station and a Phase I ESA of the former City of Paris landfill. In this same month, an EPA Region 4 Targeted Brownfields Assessment (TBA) application was submitted for a Phase II ESA. A TBA application has also been submitted to initiate Phase I and II ESA activities for the coal wash priority site. The 500-acre property has been prioritized based on collaboration that has already begun with the property. This includes some additional mitigation of existing conditions. This estimate has been prepared with dependance on the Region 4 TBA assessment support being conducted for Estill County and Paris. EPA Region 4 TBA funds are not expected to be able to cover complete Phase II for the entire portion of the property. Therefore, the Brownfields Coalition Assessment Grant funding will complete the Phase II assessment that the Region 4 cannot.

4.b.ii.(2) Compliance with Grant Requirements:

BGADD Coalition Grant Advisory Board representatives have more than 45 years of experience in city planning, local government, communications, and PR. They have administered more than \$60M in grant/loan funds including but not limited to Community Development Block Grants, Appalachian Regional Commission Grants, and KY State Revolving Loan Funds with a demonstrated history of timely and acceptable reporting. Additional experience includes 20+ projects totaling more than \$50M including but not limited to Community Development Block Grants (CDBG), Kentucky Infrastructure Authority (KIA), Appalachian Regional Commission (ARC), and Federal Emergency Management Agency (FEMA) projects. BGADD is actively administering almost \$20M in American Rescue Plan Act (ARPA) funds for local governments and is similarly able to manage the timely and accurate expenditure of EPA Brownfields Coalition Grant funding and manage the ASAP.gov draw down system. BGADD is fully qualified to ensure that all coalition members adhere to the administrative and financial requirements of the EPA Brownfields Coalition Grant.

4.b.iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements: N/A



Bluegrass Area
Development
District

**Attachment 2:
Threshold Criteria**

1. Applicant Eligibility:

The Bluegrass Area Development District was established as a special purpose unit of government by the Kentucky General Assembly on February 10, 1972 with the enactment of Kentucky Revised Statute 147A.050. BGADD is a 501c(3) entity and, as such, is an eligible applicant. See Attachment 3 for supporting documentation.

2. Number & Eligibility of Non-lead Coalition Members:

There are a total of five coalition members:

Member	Entity Type	Eligibility Documentation
Bluegrass Area Development District	Tax-exempt non-profit organization	501c(3) By-laws
Estill County, Kentucky	Governmental entity	n/a
City of Paris, Kentucky	Governmental entity	n/a
City of Winchester, Kentucky	Governmental entity	n/a
Paris Westside Neighborhood Association	Community-based non-profit organization	SOS filing status

Estill County, the city of Paris, and the city of Winchester are all government entities that are eligible for participation without additional documentation. The Paris Westside Neighborhood Association is a community-based non-profit recognized by the Kentucky Secretary of State under organization ID # 1263773 (See Attachment 3). The organization currently is in the process of filing for 501c(3) status.

3. Target Areas:

Target Area Name	Address of Priority Sites
Estill County	Coal Wash Road, Irvine, KY 40336
Paris	Geno Street, Paris, KY 40361 (38.21717,-83.2607) 1004 Stewart Street, Paris KY 40361
Winchester	148 Winn Avenue, Winchester KY 40391

4. Existing Brownfields Grants to Non-lead Members:

None of the non-lead members have an open cooperative agreement for Brownfields MARC Grant funding or were awarded a MARC Grant that closed in 2016 or later.

5. Coalition Agreement:

Active Memorandum of Agreements for each non-lead member to serve as members of the Coalition are found in Attachment 3.

6. Community Involvement:

BGADD places a strong emphasis on community involvement as a cornerstone of its strategy. Each local entity will wield decision-making power concerning brownfield sites and priorities in the target area. Throughout the Coalition Grant process, numerous community/public meetings will be conducted, ensuring that the local residents actively contribute to the decision-making process.

The Coalition members are committed to quarterly meetings, actively seeking project input from community stakeholders and resident. Recognizing the importance of inclusive planning, a formal Community Involvement Plan (CIP) will be crafted within the initial quarter of the grant. This plan

will be accompanied by quarterly community and public meetings, with the added convenience of a virtual attendance option to maximize participation.

To further underscore transparency and engagement, BGADD will establish a dedicated page on its website. This platform will serve as a hub for sharing comprehensive information about the grant project's development and progress with the broader public. Beyond the digital space, BGADD will employ a multi-channel approach, disseminating key project information through local newspapers, social media platforms, and informative fact sheets. Through these concerted efforts, BGADD is committed to making community involvement a central and accessible aspect of the entire initiative.

7. Expenditure of Existing Grant Funds:

Not applicable, neither the applicant nor the coalition members have any open Assessment or Multipurpose grants.

8. Contractors and Named Subrecipients:

- Contractors: Not applicable.
- Subrecipients: The four non-lead coalition members will receive stipends for conference travel as discussed in the application:
 - Non-lead Coalition Member: Estill County
 - Non-lead Coalition Member: City of Paris
 - Non-lead Coalition Member: Westside Neighborhood Association
 - Non-lead Coalition Member: City of Winchester