

PTRC Narrative Information Sheet

- 1. Applicant:** Piedmont Triad Regional Council (PTRC)
1398 Carrollton Crossing Drive
Kernersville, NC 27284
- 2. Funding Requested:**
- Assessment Grant Type: RLF Coalition
 - Federal Funds Requested: \$1,500,000
- 3. Location:** City of Eden (Rockingham County), City of High Point (Guilford County) North Carolina; Town of Madison (Rockingham County), City of Thomasville (Davidson County)
The geographic area includes the following counties: Caswell, Davidson, Guilford, Randolph and Rockingham.
- 4. Coalition Members' Target Areas and Priority Site Information:**
- Piedmont Triad Regional Council (Lead): Underserved census tracts in Caswell, Davidson, Guilford, Randolph and Rockingham counties
 - Eden-Census Tract 37157040400; Former American Warehouse 206 Warehouse St. Eden, NC 27288
 - High Point–Census Tract 37081014300; 300 Oak Street, High Point, NC 27260
 - Mayodan–Census Tracts 37157040800 & 37157040900; Near 104 E. Roosevelt St., Mayodan, NC
 - Thomasville–Census Tract 37057061000; 117 Taylor Street Thomasville, NC 27360
- 5. Contacts:**
- | | |
|---------------------------------------|--------------------------------------|
| <u>Project Director:</u> | <u>Chief Executive:</u> |
| Jesse Day, Regional Planning Director | Matthew L. Dolge, Executive Director |
| PHONE: (336) 904-0300 | PHONE: (336) 904-0300 |
| E-MAIL: jday@ptrc.org | E-MAIL: mdolge@ptrc.org |
| Piedmont Triad Regional Council | Piedmont Triad Regional Council |
| 1398 Carrollton Crossing Drive | 1398 Carrollton Crossing Drive |
| Kernersville, NC 27284 | Kernersville, NC 27284 |
- 6. Population (Source: 2022 State Demographer of NC)**
- Target City/Town population: Partners: City of Eden (15,388); City of High Point (116,567), Town of Mayodan (2,428) and City of Thomasville (27,720). Population of Geographic Area (Caswell, Davidson, Guilford, Randolph and Rockingham): 981,396.

7. Other Factors Checklist

Apply	Other Factor	Narrative Page #
	<i>None of the Other Factors are applicable.</i>	
X	Community population is 10,000 or less.	p. 1 (one site)
	The applicant is, or will assist, a federally recognized Indian tribe or United States territory	N/A
	The priority site(s) is impacted by mine-scarred land	N/A
X	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).	p. 2 (3 sites)
X	The priority site(s) is in a federally designated flood plain.	2 (2 sites)

	The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
	The reuse of the priority site(s) will incorporate energy efficiency measures.	N/A
X	The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments	2 – Proposed reuses of property will mitigate climate impacts when incorporate streambank restoration and site work.
	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 site(s) within the target area.	N/A
	The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	N/A

8. Letter from the State Environmental Authority

See Attachment A – Letter from State Environmental Authority

9. Releasing Copies of Application

We have no issues releasing information on this application to the public.

Attachment A – Letter from the State Environmental Authority

ROY COOPER
Governor
ELIZABETH S. BISER
Secretary
MICHAEL SCOTT
Director



November 9, 2023

Mr. Jesse Day
Planning Director
Piedmont Triad Regional Council
1398 Carrollton Crossing Drive
Kernersville, NC 27284
jday@ptrc.org

Re: U.S. EPA Brownfields Coalition Assessment Grant
PTRC, and Cities of Eden, Mayodan, Thomasville, and High Point Coalition

Dear Mr. Day,

The North Carolina Department of Environmental Quality (DEQ) Brownfields Redevelopment Section (BRS) acknowledges and supports the Piedmont Triad Regional Council's (PTRC's) application as the lead member of a regional coalition that also includes the Cities of Eden, Mayodan, Thomasville, and High Point for a U.S. EPA Brownfields Coalition Assessment Grant. We understand that you intend to focus on the former American Warehouse, 300 Oak Street, a former wastewater treatment plant, and the former Loftin and Black Furniture Mill in these member cities. Repurposing of these substantive properties would be a tremendous economic development success for their communities.

The BRS offers technical project guidance to help ensure assessments conducted utilizing grant funds are in accordance with our program requirements throughout the life of your project. Coordination with the BRS is critical to ensuring that the assessments make efficient use of the federal funds awarded. The BRS can also assist with evaluating the benefits of entering specific properties into our State Brownfields Program through a brownfields agreement. A brownfields agreement outlines the controls needed to make the site safe for the intended reuse and is often a marketing tool for developers and instrumental in securing redevelopment financing. Additional tax incentives are also available upon completion of Brownfields redevelopment if completed in the State's Program.

We hope that the Coalition is successfully awarded this grant, but we will continue to support you in your Brownfields redevelopment efforts whether a grant is awarded or not. We truly believe successful Brownfields projects can rejuvenate a community.

Sincerely,

A handwritten signature in blue ink that reads "Jordan L. Thompson".

Jordan Thompson
Brownfields Project Manager

cc: NCDEQ Brownfields Public Outreach Team



North Carolina Department of Environmental Quality | Division of Waste Management
217 West Jones Street | 1646 Mail Service Center | Raleigh, North Carolina 27699-1646
919.707.8200

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Coalition Members, Target Areas and Brownfields

i. Coalition Members and ii. Overview of Brownfield Challenges and Target Areas

In partnership with the coalition members of the *City of Eden, City of High Point, Town of Madison and City of Thomasville*, the lead applicant - Piedmont Triad Regional Council - will leverage in-house experience with prior EPA assessment grants (2009, 2014, and 2018), to complete assessment and clean up planning at the 4 priority sites outlined below. The priority sites in the four Coalition non-lead member communities have been strategically selected to have the highest impact on redevelopment goals of each community, while mitigating public health and environmental risks. **The 4 municipalities are not in a position to manage an EPA assessment grant on their own, so have elected to form a Coalition. In the case of Mayodan, its small population of just over 2,000 residents is a key factor in its inability to draw on other initial sources of funding to carry out environmental assessment or remediation, and subsequent reuse in its jurisdiction.** Also, each priority site features low-income and historically excluded populations that bear the burden of environmental injustice, such as being subjected to higher incidence air toxics than the U.S. or N.C., according to EJScreen Data. The State EPA Assessment Grant for North Carolina will not fund assessment work in the counties of the selected target areas and coalition member communities, so access to the \$2,000,000 awarded to North Carolina previously from EPA is not an option currently to address barriers to redevelopment.

The Piedmont Triad is a 12-county region of mill towns – large and small, urban and rural – located in the rolling foothills of central North Carolina. Our grant request is targeting 5 of the region’s counties to have the highest impact where assessment dollars are not currently available. Our region’s manufacturing heritage spans nearly two centuries. As North Carolina’s main industrial hub throughout much of the 20th Century, this region was the largest manufacturer of furniture, textiles, and tobacco products in the nation. Most of the world’s denim, corduroy, and flannel were spun, woven, dyed, cut, and sewn in the Piedmont Triad.

Table 1 – Geographic Boundaries and Priority Sites

Geographic Boundaries	Description
Caswell, Davidson, Guilford, Randolph and Rockingham Counties	These 5 counties do not have access to any EPA assessment funding, not prioritized in the NC State Assessment Award FY 22
Priority Sites	Target Area Census Tracts & GEOIDs
American Warehouse Mill, Eden	Census Tract 404 (37157040400)
300 Oak Street, High Point	Census Tract 143 (37081014300)
Former Wastewater Treatment Plant and Landfill, Mayodan	Census Tract 408 & 409 (37157040800 & 37157040900)
Former Loftin & Black Furniture Mill, Thomasville	Census Tract 610 (37057061000)

In its on-going support of redeveloping brownfield properties, PTRC continues to expand its inventory of more than 500 brownfields sites throughout our 12-county region. The geographic boundaries have upwards of 250 brownfields sites. Coalition assessment, reuse planning and redevelopment efforts will focus initially on 4 priority sites within a 5-county area not served by the NC State Assessment grant nor the active EPA Coalition Assessment grant for Alamance County. The five counties are: Caswell, Davidson, Guilford, Randolph and Rockingham counties. The four priority sites are emblematic of the 250+ brownfield sites across the 5-county area.

Revitalizing brownfields is a high priority of our region’s adopted *Comprehensive Economic Development Strategy (CEDS)*, which was updated in 2023. *The CEDS* situates brownfield

redevelopments as key to supporting vibrant communities, recognizing them as unique and highly valuable opportunities for renewal in our region's communities, and as catalyst redevelopment projects central to our Coalition's targeted neighborhoods. Selected target areas have a high concentration of historically underserved communities, people of color, and are in need of re-investment. Left behind are disproportionately impacted households that cannot afford to move away from potentially high concentrations of soil and water contaminants commonly produced by adjacent textile, furniture, and tobacco manufacturing processes.

iii. Description of the Priority Brownfield Sites - The American Warehouse at 206 Warehouse Street, Eden (PIN # 707015744852 – 10.42 acres) is in the Spray Industrial Historic District. There are a couple other mills adjacent to this target site. These textile mills were built in the late 1800s and early 1900s and added on manufacturing processes that include old boilers, dyeing, finishing and warehouse space. By 2001, major manufacturing in the Spray Industrial Historic District had ceased with Spray Cotton Mill closing. These sites have had some assessment done, but due to changing ownership and evolving end uses, additional assessment and clean-up planning work is necessary. The American Warehouse Mill building footprint (approximately 1 acre) has been assessed, but the balance of the 10 acres will require additional assessment depending on future use (e.g. recreation amenities). The site is now going through active planning around the development of 200 housing units and other supportive uses in the existing mill and the Calcium Carbide greenway is planned through the parcel to tie in with the Smith River greenway. Calcium Carbide was first produced in North America in 1892 at the adjacent historic Spray Cotton Mill which recently had a destructive fire in January 2023. Contaminants of concern in the area that will require further testing include chloroform and TCE. This site currently is under a brownfields agreement with NC Brownfields, but greenway alignment and other site amenities for public use will require further soil testing, EMP updates and additional Phase II assessment activities.

The 300 Oak Street (PIN #7800025649) building in High Point, Guilford County, NC, occupies a 1.29 acre parcel with approximately 64,000 sq ft of former industrial space. The City purchased the building in 2022 to support small-scale manufacturing and building out the vision of the *Small Scale Manufacturing Plan of 2019*. Prior assessment (Phase 1 and Phase 2) work was completed in 1997 and some further assessment has been complete. The City is also looking at two neighboring parcels to complement the 300 Oak Street campus location for future small-scale manufacturing, these sites will likely require Phase I and II assessment.

The Former Wastewater Treatment Plant and Landfill (PIN #791607577921 and 791607578442) in Mayodan along the Mayo River covers approximately 14 acres and has been vacant and unusable for decades. Regional trail plans have a greenway trail through these parcels and would connect State Park owned land with the Town's recreation department building and former Washington Mill Site. The latter is being assessed utilizing a Targeted Brownfield Assessment with EPA. These two parcels will require testing, with the focus of the EPA Brownfields Assessment on the former Wastewater Treatment plant, while other sources of pre-regulatory State funding will be pursued to address pollution and geotechnical issues at the former landfill. For the Town of Mayodan to provide recreation along the Mayo River, it will require the resources from this Coalition Assessment request.

The Former Loftin & Black Furniture Mill 117 Taylor St, Thomasville (PIN # 6787-01-17-3441) is a 2-acre site along the N. Hamby Creek and within ½ mile of downtown Thomasville. The building is in disrepair and about 15% of the parcel is in a flood hazard area. Assessment will likely require Phase II work to determine location and extent of contamination from furniture

manufacturing. There are several other former industrial manufacturing sites in close proximity as this property is along a former rail line where several furniture mills were in active use up until the early 2000s. The City has a belt-line greenway planned along this former rail line surrounding downtown Thomasville and runs adjacent to this parcel. Greenway implementation will improve recreation and alternative transportation. Additional reuse and area planning will be of benefit to this area southeast of downtown, but initial interest from City staff would be for desperately needed quality workforce housing. The site is within ¼ mile or 5-minute walk to the Central Recreation Center, providing an ideal workforce housing opportunity for families.

iv. Identifying Additional Sites – With at least 250 sites in our regional brownfield inventory in the 5 counties, we anticipate a strong demand for brownfield assessments for both Phase I and II activities as well as clean up planning. There are 37 member governments in the 5 counties and many have limited capacity to seek and manage federal funding for Brownfields Assessment. The PTRCs work in economic development and workforce development has produced a 2023 Regional Equity Assessment Study called *Strengthening Equity and Community Growth* <https://ptrc.digitalceds.com/en/equity/>. Utilizing strategies around engaging with underserved communities, marketing and outreach will be targeted to those underserved communities in the 5-County region and will also inform the priority of selection for these locations. Demographic and environmental data as described below in section 2a.ii *Threats to Sensitive Populations* for new sites will be benchmarked against the priority sites in this application (see also *Threshold Criteria Response – Attachment C-Description of Community Involvement*) for further detail on new site selection.

1b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans – The PTRC is committed to working with Coalition members and local governments to best align revitalization strategies with existing plans and evolving community priorities. The regional *Comprehensive Economic Development Strategy (CEDS) 2023-2028* has *Goal 3 – Create and Connect Vibrant Healthy and Resilient Communities*, which has a tactic to “foster the assessment, cleanup and redevelopment of old commercial/industrial sites.” All of the Coalition members have Comprehensive Plans completed in the last five years, except the Town of Mayodan who will begin a comprehensive planning process in January of 2024. Our 4 priority sites are closely aligned with local and regional land use, community revitalization, capital improvement, and water quality plans.

The *City of Eden Comprehensive Land Use Plan* completed in April 2022 prioritizes the revitalization of mills for employment centers and commercial uses and specifically mentions the Spray Industrial Historic District in the policy recommendations. The American Warehouse is situated in this historic district of Eden. The proposed reuses at these sites include converting former textile mill space into over 200 units of residential housing and some commercial space. Revitalization of the Spray district mills can also help fill a gap in quality, workforce housing in the City of Eden. The mill revitalization will improve public access to the rivers, such as the Smith River, which is a growing draw for outdoor recreation - a key feature of community amenities - that today’s workforce expects. The community is acutely aware and prioritizes addressing the shortage of their housing stock and attainable housing by outlining that they must create a place where younger people will desire to locate, while aging members will choose to remain. This priority site does just that by offering solutions that meet the community's needs, while commencing a site-specific visioning process through the TAB program. The importance of greenways and recreational trail systems within the City limits would be established near this brownfield property, projecting the continuation of the Smith River Greenway with spur trails of

the Calcium Carbide Greenway connecting to the site. Brownfield redevelopment here will catalyze the implementation of the community's vision.

The 300 Oak Street building is now owned by the City of High Point and is located in the Southwest Quadrant (SWQ) of High Point. The City continues to implement the 2019 *Small-Scale Manufacturing Plan*, funded by the US Economic Development Administration and Smart Growth America. The Plan was conducted alongside local public officials, business leaders, and community stakeholders and outlines redevelopment strategies that can catalyze economic development in the area. The Plan specifically recommends investment in an anchor space or a catalyst project to establish the vision for the SWQ, and the 300 Oak Street facility offers the opportunity to turn the recommendation into reality. Some private investment and prior EPA assessment work has helped the SW quadrant of High Point, but significant blight and the need for additional assessment funding is necessary to sustain the revitalization. The USDOT has made a significant multi-million-dollar investment in a greenway that will run right past 300 Oak Street in the next 5 years, allowing the potential EPA investment to help revitalize land uses directly adjacent. Neighboring parcels to 300 Oak Street will need assessment as well for redevelopment that ties into the Small-Scale manufacturing and greenway development. The upshot of the *Small-Scale Manufacturing Plan* is to explore innovative, equitable, and resilient ways to stimulate the local economy.

The Former Wastewater Treatment Plant and Landfill parcels are owned by the Town of Mayodan. This site is a key trail connection for the Town of Mayodan to State Park land and the Town of Madison just down the Mayo River. These two parcels connect directly to State Park owned land and would create the land connection needed to access the nearly 100-acre State Park parcel to the south of the Landfill and Treatment plant. The Towns of Mayodan and Madison are currently in the process of conducting a feasibility study and partial design through the Rural Planning Organization to connect Mayodan, Madison and the State Park.

The Former Loftin & Black Furniture Mill will benefit from site specific reuse planning and will be incorporated into the EPA Coalition Assessment grant work. Prior EPA assessment work has led to affordable housing projects and future City parks in Thomasville. This parcel does have a greenway planned along the edge of the property, which would be a key feature of redevelopment.

ii. Outcomes and Benefits of Reuse Strategy – The cumulative impacts of large-scale blighted industrial properties at and around our priority sites have compounded the lack of access to quality affordable and attainable housing, safe and healthy public parks, trails, libraries, and community centers. Where these large-scale industrial properties were once economic hubs of vitality within our region, now they are symbols of hardship that anchor the community to economic injury. This project proposes the assessment and cleanup planning efforts of these blighted industrial properties to return them to their former glory, as pinnacles for the community's economic vitality and livelihood. The Piedmont Triad Regional Development Corporation has an active Brownfield Revolving Loan Fund for clean-up that may be utilized to fund clean-up activities post assessment.

The renovation of the American Warehouse site will provide affordable and attainable housing, retail businesses and jobs, and trail improvements to one of the most economically dislocated areas in Eden. When housing units are complete and the trail is constructed both sides of the Smith River will have trail. Additionally, recreation business opportunities along the old mill races for kayak rental and use may create additional opportunities for economic development.

The redevelopment of 300 Oak Street will provide High Point with a premier economic catalyst site that is on the cusp for large-scale redevelopment. The site will provide small scale

manufacturing and prototyping space, unlocking the potential of environmentally-sustainable development to address the climate crisis through the development and implementation of green products, processes, places, and buildings. Once complete, the project will serve as a community lifeline for generations.

The Former Wastewater Treatment Plant and Landfill when clean-up is complete and the trail is constructed, this asset will provide recreational trail opportunities for the Towns of Mayodan and Madison, which have been planning for trail development for a number of years. Increased recreation access to the Mayo River will also unlock outdoor recreation economic development opportunities for the Town and surrounding area.

The Former Loftin & Black Furniture Mill is visible from downtown Thomasville. The benefits of redevelopment at this site may lead to housing, commercial or industrial reuse, but the implementation of the greenway around downtown Thomasville and sidewalk connection to the Central Recreation Center is a key feature of the sites reuse and impact.

None of the proposed revitalization plans or reuses strategies will cause the displacement of residents or businesses. Three of the priority sites in Eden, Mayodan and Thomasville are next to rivers and creeks and will provide an opportunity to incorporate nature-based solutions to mitigate increase flooding that results from increased climate impacts. Streambank restoration, landscape installations and waterway buffers will incorporate best management practices related to flooding mitigation and climate resilience.

1c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse The American Warehouse site in Eden, NC is currently utilizing technical assistance from the TAB Provider for Region 4 to complete visioning and reuse planning ideas that serve the community. Housing is a key part of the mill redevelopment, however with some space available for commercial or institutional use in the redevelopment, the owner is looking for community input on key uses and recreational amenities for redevelopment of the 10-acre site and surrounding Spray Historic District. Additionally, the proximity to the Smith River and greenway on the other side of the river provides an opportunity to utilize an abandoned railroad bridge over the river connecting riverbanks with greenway trail. The bridge will require additional improvements to bring to AASHTO standard for a bicycle facility, the City staff is excited about productive discussions between the City, Conservation Fund and Norfolk Southern Railroad to unlock greenway trail connections.

The 300 Oak Street site plans to use the EPA Coalition Assessment grant for additional assessment needs on site and potentially for adjacent properties. The City of High Point is considering acquisition of additional sites adjacent to 300 Oak Street for parking and campus development at the 300 Oak Street building. The project leverages funds that were previously used to complete planning products such as the *Small-Scale Manufacturing Plan*. Additionally, the USDOT investment into a greenway that connects this disadvantaged area of High Point to Downtown and the public library, makes this EPA proposed investment timely for land reuse and development.

An EPA Coalition Assessment opportunity would also be particularly useful to two of the communities in this proposal located in a Qualified Census Tract (QCT). Eden's American Warehouse and High Point's 300 Oak Street building are in QCTs – a U.S. HUD designation that indicates need and affords eligibility for the Low-Income Housing Tax Credit (LIHTC) program. Grant funds can stimulate the State and Local Fiscal Recovery Funds (SLFRF) from the American Rescue Plan Act received by local governments. SLFRF use QCTs as areas of presumed eligibility for more flexible fund uses, including affordable housing and community development. Each

priority site has an interested developer and community passion to help achieve site reuse, but significant assessment costs are a barrier. Some preliminary assessment work has been initiated on the Eden and High Point sites. Focused assessment activities and reuse planning will stimulate the availability of funds from other local and private funding sources; whereas, the cleanup planning tasks are anticipated to stimulate funds from public sources such as LIHTC to achieve site reuse.

The Town of Mayodan will leverage already completed Targeted Brownfield Assessment directly from EPA on a nearby location and seek recreation and transportation grants for trail development, while also seeking resources from NC's pre-regulatory landfill program to repurpose the Former Wastewater Treatment Plant and Landfill to a recreation trail.

The City of Thomasville will seek recreation and transportation funding to help implement the belt-line greenway that runs alongside the Former Loftin & Black Furniture Mill from the State trails program and MPO. The existing building and reuse is served by roads and water/sewer, but significant building improvements will need to be completed for re-use including a new roof due to a fire in 2022.

ii. Use of Existing Infrastructure – All of the proposed priority sites intend to utilize existing infrastructure to the fullest extent possible. PTRC and the developers will ensure that cleanup planning and revitalization efforts utilize existing utility infrastructure, plan for nature-based solutions that support climate and flood resilience and improve capacity or reduce maintenance costs where necessary. The City of High Point will be able to utilize the construction of the USDOT funded greenway to incentivize economic development at 300 Oak Street. The City of Eden will be able to apply for transportation and recreation funding to connect the American Warehouse site to accommodate common/open space for the envisioned housing and potential commercial/recreational use, while making connections to the greenway on the opposite side of the river. The City of Eden recently repurposed a similar site along the Smith River greenway to a brewery, so the unique features of the former Wastewater Plant in Mayodan could be incorporated into a potential business opportunity as well.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2a. Community Need

i. The Community's Need for Funding – The 5-county area is composed of mill towns – large and small, urban and rural and is North Carolina's main industrial hub. The global economy has expanded exponentially in recent decades, shutting down almost all of the mills that led the region's former economic prominence, relocating many jobs overseas or to large urban centers or transportation hubs. This is the story of our priority sites and the communities that host them. Marginalized since the great flight of industrial leaders, these sites and communities are in desperate need of investment and cannot undertake the burden or afford reuse strategies individually.

The small towns of Eden and Mayodan have suffered from years of disinvestment and the low-income areas of High Point and Thomasville have yet to recover like other parts of our urban centers. Decades of dislocation have adversely affected the local tax base and labor markets, crippling the jurisdictions with little means to address sites themselves. However, PTRC has successfully rehabilitated brownfield sites that contribute to economic growth and environmental health, and we are confident that these sites have the potential to contribute to a healthier, vibrant, and more resilient region. Timing of key federal and state funding initiatives also create a unique opportunity for brownfield support. All of the sites in the four cities include planned or potential connections to investments in greenway trails, paddle trail or affordable housing development. As

described in section *I.c.i.* the towns and city in our proposal can leverage resources from the Infrastructure Bill and ARPA funds to maximize Brownfield investment.

ii. Threats to Sensitive Populations – *Piedmont Together*, our region’s *Sustainable Communities Plan* has an *Equitable Growth Profile of the Piedmont Triad Region* – which was updated in 2023. The *Profile* outlines our slow economic recovery and rising inequality that include wide racial gaps in income and education, which places our region’s economic sustainability at risk. We also recognize research that shows neighborhood poverty is connected to low economic mobility and predicts negative outcomes for children in adulthood, such as a higher incarceration rate and low household income, according to the Pew Charitable Trusts and the US Census Bureau’s Opportunity Atlas. And this research shows neighborhood poverty and its effects are impacting the communities in this grant request. For example in recent years, the Opportunity Atlas shows that children in low-income homes who grew up in census tract 404 containing the priority site in Eden, NC, went on to have an average annual household income over 30% less than the State average and 43% less than the State in the High Point, NC tract. Affordable housing is a recommended intervention for disrupting this link between poverty and children’s outcomes in adulthood – a remedy for which the sites in Eden and Thomasville can play a direct role by adding affordable housing units.

(1) Health and Welfare of Sensitive Populations. From 2000 to 2020 our region grew 19%. the white (non-Hispanic) population lost 3% while the minority population grew by 75%. The target area will add an estimated 129,098 people between 2020 and 2040 (a 13% increase), all of which will be in the minority population. The minority population will increase by 33% while the white population will lose 0.2%. In 2040, our target area population will be 48% minority, with much higher percentages in the urban areas. According to 2021 ACS Data (*see Table 2 below*) the 4 of the 5 census tracts of each priority site experience higher than normal levels of Households utilizing SNAP Benefits when compared to the region, persons with disabilities when compared to the region, and a percentage of people without health services. Two of our priority sites envision affordable and attainable housing in revitalized cores of communities which offer the opportunity to improve social determinants of health burdens through good housing.

Table 2 – Key Demographic Data for Target Areas

Demographic Data (2021 ACS Data)	Thomasville Tract 610	High Point Tract 143	Eden Tract 404	Mayodan Tract 408	Mayodan Tract 409	Five County Region	NC	US
Population	4,859	3,179	6,412	1,610	2,446	962,538	10 M	330 M
Minority (%)	30.7%	70.9%	35.7%	31.6%	22.8%	39.2%	37.9%	40.6%
Poverty (%)	13.6%	28.5%	18.0%	8.3%	19.6%	15.0%	13.7%	12.6%
SNAP Benefits (HH%)	23.4%	54.0%	26.5%	17.6%	21.1%	14.8%	12.7%	12.3%
Median HH Income (\$)	\$41,406	\$34,366	\$51,071	\$41,894	\$35,125	\$55,337	\$60,516	\$69,021
No HS Diploma (%)	15.1%	37.1%	10.2%	10.7%	20.9%	12.4%	11.0%	11.1%
No Health Insurance (%)	27.1%	45.3%	14.0%	17.7%	22.4%	15.3%	15.6%	12.3%
Have a Disability (%)	15.2%	14.3%	14.4%	15.5%	21.0%	13.6%	13.2%	12.7%
No Vehicle Access (HH%)	9.5%	14.7%	8.3%	8.7%	13.9%	5.8%	5.5%	8.3%
Limited English (%)	5.8%	19.9%	0.6%	2.9%	5.4%	4.6%	4.5%	8.2%

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

Furthermore, according to NCSCHS 2019 Data (see table 3 below) the Counties that host each priority site experience a range of health concerns adding to the population’s sensitivity and endangerment. When compared with the state of NC, many of these performance indicators are experienced at higher than normal frequencies. Possibly the most tragic indicators are those that are often linked to fatalities, particularly cancer incidence, which speaks to the need for this assessment grant to understand priority sites impacts on human health and the environment.

Table 3 – Key Health Data for Target Area Counties

Health Data (NCSCHS 2021)	Caswell	Davidson	Guilford	Randolph	Rockingham	NC
Low Birthweight Rate	13.5%	11.8%	12.0%	10.6%	11.2%	11.1%
Infant Mortality Rate (per 1,000 live births)	n/a	5.9%	8.6%	9.5%	7.2%	6.9%
Cancer Incidence (per 100,000 population)	506.8	500.0	496.4	515.8	509.3	484.2
Heart Disease Death Rate	284.3	230.2	162.7	251.2	288.5	190.8

(3) Environmental Justice. (a) Identification of Environmental Justice Issues. Since the flight of the textile industry in the region and the aftershock that followed, the negative environmental consequences resulting from industrial and commercial operations were disproportionately felt by some of the region’s most vulnerable populations. According to EJScreen Data, all of the priority sites serve low-income populations and historically excluded populations that bear the burden of environment injustice and have higher incidence of air toxic cancer risk than the US or NC.

Table 4 – Environmental Justice Indicators in Target Areas

Environmental Justice Indicators (EPA’s EJScreen: Climate and Economic Justice Screening Tool)	Thomasville Tract 610	High Point Tract 143	Eden Tract 404	Mayodan Tract 408	Mayodan Tract 409
Designated Disadvantaged Community	No	Yes	Yes	Yes	Yes
Underground Storage Tank Proximity (Percentile of National)	88	99	92	76	67
Hazardous Waste Proximity (facility count/km distance) (Percentile of National)	80	98	64	63	54
Air Toxics Cancer Risk (lifetime risk per million) (Percentile of National)	80	99	85	76	67

(b) Advancing Environmental Justice. Through our community outreach and visioning, we will demonstrate genuine engagement utilizing equitable development approaches and intentional strategies to ensure that low-income and minority communities can participate and benefit from project activities. Workforce housing, low cost recreation options (e.g. trails) and small-scale manufacturing with well-paying jobs will serve the environmental justice goals via the intended reuse of the priority sites and benefits to the target area census tracts.

2b. Community Engagement

i. & ii. Project Involvement & Project Roles – As lead applicant and Project Manager, PTRC will take primary responsibility for implementing all key project activities within the 3-year performance period. Additional entities, groups, and organizations that are relevant to the proposed project and their degree of meaningful involvement in the project include: Qualified Environmental Professional (QEP) – Procured under all federal policies, the PTRC will finalize

and post its Request for Qualifications (RFQ) for a contractor within the first month and will select and enter into a contract with selected consultants within the first quarter. The QEP will be responsible for providing a range of services that include: environmental site assessments; clean-up and redevelopment planning; and community outreach assistance. International City/County Management Association (ICMA) - ICMA and the New Jersey Institute of Technology are EPA Region 4's Technical Assistance to Brownfield (TAB) providers. PTRC and Coalition partners intend to partner with TAB and NCDEQ Brownfields to co-host Community Outreach Events across the project area. PTRC is hosting a Decoding Brownfields Workshop on November 30, 2023 to help prepare communities for brownfield redevelopment. These events and additional outreach play an instrumental role in educating community stakeholders and local governments on providing input to ongoing brownfields programs and efforts.

Table 5 – Project Contacts and Roles

<u>Organization</u>	<u>Point of Contact & Email</u>	<u>Description of Role/Assistance</u>
PTRC Coalition Lead	Jesse Day jday@ptrc.org	Project manager and oversight of procurement, reporting and community outreach/visioning
Eden, High Point, Mayodan & Thomasville – Coalition members	Kelly Stultz kstultz@edennc.us Eric Olmedo eric.olmedo@highpointnc.gov Kathleen Patterson kpatterson@mayodannc.org Michael Brandt michael.brandt@thomasville-nc.gov	Community planning and outreach/visioning and leveraging additional grant resources/implementation
Technical Assistance for Brownfields	Colette Santasieri santasie@njit.edu Chris Harrell charrell@icma.org	Trainings, webinars, community engagement strategy support, site specific technical assistance
Regional Brownfields Advisory Group	Adam Shull ashull@ptrc.org	Existing Advisory group for RLF cleanup funding, assist with prioritizing assessment activity.
Qualified Environmental Professional	TBD – Procured using 2 CFR 200 guidelines	Conduct assessment and clean-up planning activities to get sites into productive reuse.

ii. Incorporating Community Input – The PTRC is committed to incorporating community input into this project, utilizing existing planning process, while also partnering with neighborhood organizations and task forces. Although entities like the *Southwest Renewal Foundation* and *Davidson County Tourism and Recreation Investment Partnership* do not have explicit roles within the project scope, they add value by supporting community outreach efforts for equitable and just inclusion in project efforts. Furthermore, community leaders and local plans will be leveraged for effective community engagement. PTRC will also make use of two proactive and accessible forms of community engagement meant to solicit feedback: (1) soliciting feedback on our Brownfields website for anonymous feedback from community members and (2) hold quarterly outreach events with member governments, Chambers of Commerce, real estate groups, affordable housing coalitions and others effected by brownfield remediation work. These meetings will be complemented by at least four public engagement meetings near priority area sites to solicit meaningful and inclusive input from residents on assessment work and future plans for reuse.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3a. Description of Tasks/Activities and Outputs – Key tasks include community outreach, Phase I Environmental Site Assessments (ESAs), and a strong focus on Phase II ESAs and cleanup and corrective action plans (CAPs) as needed.

Table 6 – Description of Tasks, Activities, Schedule, and Outputs

Task/Activity 1: Community Outreach/Visioning
i. PTRC will conduct community outreach efforts in coordination with priority site owners, community based organizations and Coalition members. Staff is committed to hosting a community engagement and visioning event within one mile of each priority site to gather input on reuse plans. Additionally, PTRC will work with NCDEQ Brownfields Program and TAB providers to co-host educational brownfield workshops and community events to further engage the public. PTRC intends to actively seek community input.
ii. Anticipated Project Schedule: Ongoing
iii. Task/Activity Lead: PTRC
iv. Outputs: 4 Community Outreach Events, one for each priority site; 12 Quarterly events to create awareness of EPA Brownfields investment (e.g. chamber of commerce, real estate meetings, workforce housing summits, etc.), 12 Quarterly Progress Reports.
Task/Activity 2: Phase I Assessment Activities & Reporting
i. Under prior assessment grants, we conducted Phase I ESAs on smaller properties for as little as \$3,000, while one Phase I for a large industrial site can cost nearly \$18,000. From our previous Brownfields awards, we estimate costs of \$6,000 for a Phase I. Therefore, we estimate to conduct up to 22 Phase I ESAs under EPA's <i>All Appropriate Inquiry Rule</i> and <i>ASTM D1527-05 - Standard Practice for Environmental Assessments</i> . This task includes financial and performance reporting costs for the period of performance.
ii. Anticipated Project Schedule: Begin 6 Months after award and then ongoing
iii. Task/Activity Lead: PTRC & Qualified Environmental Professional (QEP)
iv. Outputs: 22 Phase I ESAs. Performance and Financial Reports Submitted on Time.
Task/Activity 3: Phase II Assessment Activities & Reporting
i. Under previous assessment grants, Phase II ESAs ranged from as little as \$16,000 on small properties, while one Phase II for a large industrial site can cost over \$125,000. Based on these comparables we expect Phase II costs to range between \$40,000-\$50,000. Therefore, we estimate conducting up to 22 Phase II ESAs under <i>ASTM E1903-97</i> or similar protocols. This task includes financial and performance reporting costs for the period of performance.
ii. Anticipated Project Schedule: Begin 8 Months after award and then ongoing
iii. Task/Activity Lead: PTRC & Qualified Environmental Professional (QEP)
iv. Outputs: 22 Phase II ESAs. Performance and Financial Reports Submitted on Time.
Task/Activity 4: Cleanup Planning
i. PTRC estimates the average cost of a Analysis of Brownfield Cleanup Alternatives (ABCA) to be \$6,000. We anticipate conducting up to 22 ABCAs. Each ABCA will address the screening of several technologies and will vary depending on the site-specific hydro-geologic environments for sites where widespread soil and groundwater contamination has been encountered and/or that exhibit the greatest threat to human health and the environment. Entering NC Brownfield will be encouraged, so close coordination with NCDEQ will be essential. The budget allows up to 8 sites to enter NC Brownfields Program. There is an available RLF for clean-up that landowners may have access after assessment.
ii. Anticipated Project Schedule: Begin 12 Months after award and then ongoing
iii. Task/Activity Lead: PTRC & Qualified Environmental Professional (QEP)
iv. Outputs: 22 ABCAs, Up to 8 NC Brownfield Applications

3b. Cost Estimates i. Application & Development of Cost Estimates – Costs were developed using a comparative analysis from previous Brownfields Assessment grants by PTRC. Indirect and

fringe cost rates are applied to personnel expenses and approved by HUD, PTRC’s cognizant federal agency. The Fringe Benefits cost rate is established as 45.5% of total personnel costs and the Indirect cost rate is established as 26.5%. Administrative costs are not anticipated, program work under Personnel, Fringe, and Indirect costs will contribute to the outlined tasks under the Community Outreach/Visioning, Phase 1, Phase II and Cleanup Planning Tasks.

Table 7 – Cost Estimates by Task

Budget Categories		Budget by Major Tasks				
		1. Community Outreach/Visioning	2. Phase I Assessment Activities & Reporting	3. Phase II Assessment Activities & Reporting	4. Cleanup Planning	Total
Direct Costs	Personnel	\$60,000.00	\$9,000.00	\$9,000.00	\$6,000.00	\$84,000.00
	Fringe (45.5%)	\$27,300.00	\$4,095.00	\$4,095.00	\$2,730.00	\$38,220.00
	Travel (1)	\$1,750.00	\$1,250.00	\$1,250.00	\$1,000.00	\$5,250.00
	Equipment (2)					
	Supplies	\$3,141.70				\$3,141.70
	Contractual	\$15,000.00	\$132,000.00	\$990,000.00	\$200,000.00	\$1,337,000.00
	Construction (3)					
	Other					
Total Direct Costs (4)		\$107,191.70	\$146,345.00	\$1,004,345.00	\$209,730.00	\$1,467,611.70
Indirect Costs (26.5%) (4)		\$23,134.50	\$3,470.18	\$3,470.17	\$2,313.45	\$32,388.30
Total Budget		\$130,326.20	\$149,815.18	\$1,007,815.17	\$212,043.45	\$1,500,000.00

1 Travel to brownfields-related training conferences is an acceptable use of these grant funds.
2 EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year unless the applicant has a lower threshold for equipment costs. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for Brownfield Grants.
3 Costs must be placed on the Construction budget line when at least 50% of the estimated amount of the contract(s) will be for the remediation of contamination at the brownfields site. Construction costs do not typically apply to assessment activities.
4 Administrative costs (direct and/or indirect) for the Assessment Grant applicant itself cannot exceed 5% of the total EPA-requested funds.

3c. Plan to Measure and Evaluate Environmental Progress and Results – Our strategy for tracking and measuring progress includes the following key elements: 1) Evaluate achievement of output and outcome milestones established in the grant application and work plan (see table below); 2) Generate quarterly documentation of project outcomes and outputs in both narrative and spreadsheet form; and 3) Share quarterly progress evaluations and documentation with EPA, NC Brownfields, Coalition partners, and community stakeholders.

Table 8 – Metrics for Tracking and Measuring Progress

Anticipated Outputs and Outcomes		
Work Task	Outputs	Outcomes
Community Outreach/Visioning	<ul style="list-style-type: none"> • 3 Community Outreach Events & Meeting Summary • 12 Quarterly presentations to community groups (e.g. chamber of commerce, real estate groups) • 12 Quarterly Progress Reports 	<ul style="list-style-type: none"> • Community ownership & understanding of BF redevelopment process & goals • Establishment of public/private redevelopment partnerships • Inclusive solicitation and input
Site ID, Assessment and Cleanup Planning	<ul style="list-style-type: none"> • 22 Phase I ESAs • 22 SSQAPPs & Phase II ESAs • 22 ABCAs and 8 NC Brownfields Applications 	<ul style="list-style-type: none"> • Hazardous sites readied for cleanup & redevelopment • Sites ready for cleanup & reuse • Stormwater management, water quality and climate resilience improvement plans • Plans for additional public green space.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

4a. Programmatic Capability – PTRC has extensive brownfield assessment experience and expertise. Jesse Day, Regional Planning Director, will serve as project manager. While managing its 2009, 2014, and 2018 Assessment Grants, as well as a recently awarded clean-up fund for three regions in North Carolina and Virginia, PTRC successfully illustrated its ability to select and manage outside consultants with specific expertise conducting brownfield site assessments and cleanup planning. Staff successfully manage numerous other programs and leverage resources to address complex environmental, economic, and sustainability challenges faced by our local government members. We will continue to work with communities to ensure meaningful engagement of community stakeholders, expanding our relationships with state and local brownfields professionals; and using environmental consultants, chosen through an RFP process following Federal procurement policies, to perform Phase I and II ESAs, Clean-up Planning, and other assistance as necessary.

4b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments – PTRC successfully administered prior EPA grants and has an active RLF Cleanup fund ongoing. All funds for each grant were completely spent. The following table describes accomplishments.

Table 9 – Prior/Active EPA grants

Grant Details	Outputs/Outcomes
2009 Assessment grant (BF-96460406) \$200K	6 site assessments
2014 Assessment grant (BF-00D12113) \$600K	24 Phase I and 8 Phase II ESAs, 7 NC Brownfields agreements
2018 Assessment grant (BF-00D72418) \$600K	8 Phase I and 5 Phase II ESAs, 2 NC Brownfields Agreements
2022 RLF Cleanup grant (BF-02D31822-0) \$1M	\$750k cleanup loan in underwriting currently through the Piedmont Triad Regional Development Corporation

These exceptional accomplishments are a direct result of the Coalition’s last three grants. Our Coalition’s proposed assessment and clean-up planning activities will make a significant impact in our targeted communities and strongly support our long-term goals of creating more sustainable communities and equitable opportunities for everyone in our region.

(2) Compliance with Grant Requirements – PTRC closed out several EPA Assessment Grants over the past 15 years. All quarterly and annual reports and all financial status reports have affirmed adequate progress towards achieving and exceeding the expected results under all grants, and all reports and grant deliverables have been submitted and approved on time and all required information concerning project outputs and outcomes entered into the ACRES database. Although the region has an active RLF Cleanup fund, many brownfield sites need additional assessment to be ready for the RLF Cleanup fund.

Threshold Criteria Responses & Attachments (Coalition Assessment Proposal)

1. Applicant Eligibility - see *Attachment A – Documentation of Applicant Eligibility*
 - The Piedmont Triad Regional Council is organized as one of 16 regional councils of government in North Carolina. General Statute information for North Carolina showing the authority of Councils of Government are included and are considered a “unit of local government”.

2. Coalition Non-Lead Members – see *Attachment B – Signed Letters of Commitment*
 - City of Eden
 - City of High Point
 - Town of Mayodan
 - City of Thomasville

3. Lead Member Target Areas
 - Piedmont Triad Regional Council: Caswell, Davidson, Guilford, Randolph and Rockingham Counties

4. Non-lead member target areas and MARC Grant Funding Status
 - Eden - Census Tract 404; Former American Warehouse 206 Warehouse St. Eden, NC 27288
 - High Point– Census Tract 143; 300 Oak Street, High Point, NC 27260
 - Mayodan – Census Tract 408 and 409; Near 104 E. Roosevelt St., Mayodan, NC
 - Thomasville – Census Tract 610; 117 Taylor Street Thomasville, NC 27360

5. Community Involvement – see *Attachment C – Description of Community Involvement* and *Attachment D – Support Letters from Community Based Organizations*

6. Expenditure of Existing Grant Funds
 - The Piedmont Triad Regional Council does not have an open Assessment or Multi-Purpose grant

7. Named Contractors and/or Subrecipients
 - The Piedmont Triad Regional Council has not procured/named a contractor or designated a subrecipient related to this funding opportunity. A request for qualifications/proposals will be conducted if awarded the grant.

8. Attachment D – Support Letters from Community Based Organizations