



R04-24-M-001

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Palmetto, Florida 34220
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www.palmettofl.org

Narrative Information Sheet

1. Applicant Identification: Palmetto Community Redevelopment Agency
516 8th Avenue West
Palmetto, FL 34221
2. Funding Requested
 - a. Grant Type: Multipurpose
 - b. Federal Funds Requested \$1,000,000
3. Location City of Palmetto, Manatee County, Florida
4. Target Area and Priority Site Information:
 - Palmetto Community Redevelopment Area
 - Manatee County CT 12081001300 and CT 12081001502
 - Assemblage of multiple parcels near to 4th Street W and 5th Avenue W and at Estuary Park/Carr Drain at 8th Avenue and US 41 N in Palmetto
5. Contacts
 - a. Project Director
Ed Johnson
CRA Director
Palmetto Community Redevelopment Agency
324 8th Ave West
Suite #103
Palmetto, FL 34221
Phone (941)723-4988
ejohnson@palmettocra.org
 - b. Chief Executive/Highest Ranking Elected Official
Mayor Shirley Groover-Bryant
City of Palmetto

516 8th Avenue W
 Palmetto, FL 34221
 941-723-4570
 sbryant@palmettofl.org

6. Population 13,323

7. Other Factors

Sample Format for Providing Information on the Other Factors	Page #
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The priority site(s) is impacted by mine-scarred land.	2
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).	2
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	7
At least 20% 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.	9, 10
The target area is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority - **See attached.**

9. Releasing Copies of Applications - Not applicable



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

October 18, 2023

Esmeralda Vargas
Brownfields Program
U.S. Environmental Protection Agency
61 Forsyth Street, S.W. 10th Floor
Atlanta, GA 30303-8960
Vargas.Esmeralda@epa.gov

Dear Ms. Vargas:

The Florida Department of Environmental Protection (Department) acknowledges and supports the Palmetto Community Redevelopment Agency's (CRA) Brownfields grant application for a Brownfields Multipurpose Grant. The Department understands that this application has been prepared in accordance with the U.S. Environmental Protection Agency's (EPA) guidance document EPA-OLEM-OBLR-23-11, titled "Guidelines for Brownfields Multipurpose Grants." This letter of acknowledgement addresses the requirement for a "Letter from the State or Tribal Environmental Authority," described in SECTION IV.D.8. EPA Brownfields grant funding will strengthen the CRA's cleanup and redevelopment efforts. This federal grant effort also supports Florida's Brownfields Redevelopment Act and the Department's role in administration of site rehabilitation of contaminated sites.

The Department encourages EPA grant recipients to use the incentives and resources available through Florida's Brownfields Redevelopment Program with EPA grant funding to enhance the success of their Brownfields project. The Department recommends that the CRA consider including Brownfields sites or areas that could potentially receive federal funding in a state-designated Brownfield area. The CRA is also encouraged to contact Philip Wilkerson, the Southwest District Brownfields Coordinator, at (813) 470-5753 to learn more about the Florida Brownfields Redevelopment Program.

Sincerely,

A handwritten signature in blue ink that reads "Billy Hessman".

Billy Hessman, P.G., Environmental Manager
Brownfields and CERCLA Site Screening Section

BH/jc
cc:

Ed Johnson, Palmetto CRA – ejohnson@palmettocra.org
Jenny Silverio, Palmetto CRA – jsilverio@palmettocra.org
Philip Wilkerson, DEP Southwest District – philip.wilkerson@floridadep.gov

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

The City of Palmetto (city) in Manatee County, Florida (population 13,304, US Census, 2021 ACS 5-year estimates) has established a Community Redevelopment Agency (CDA) in accordance with the Community Redevelopment Act and based on a finding of necessity, established a specific community redevelopment area within the boundaries of the city, including US Census Tracts CT 12081001300 and CT 12081001502. Pursuant to the Community Development Act, CDA areas must be “a blighted area or an area in which there is a shortage of housing that is affordable to resident of low or moderate income, including the elderly.” The established Palmetto CDA area met these criteria due to the fact that properties within this older central core of the city have become deteriorated due to age, obsolescence, and lack of investment; moreover, **the CRA US Census Tracts (CT), CT 12081001300 and CT 12081001502, are considered disadvantaged as both CTs carry more than one environmental burden and meet the associated socioeconomic thresholds**, as per EPA CEJST (accessed 9/29/23). The CRA area constitutes 27.85% (approximately 1,268.65 acres) of the total city area and will be the specific project target area.

The city is located on the Tamiami Trail (US 41), which took motorists between Tampa and Miami. When the Interstate highways were constructed in the mid-20th Century, I-75 took tourism traffic away from this locale, and the once thriving community moved further and further towards economic and physical decline. While growth has been experienced in other areas of Manatee County (like Bradenton to the south) and nearby areas such as Tampa (40 miles to the north), development here has been comparatively minimal. Regardless, our local roads are clogged with commuters moving through on their way to these other areas. Average Daily Traffic Counts range from 8,000 uses on our major thoroughfares to over 20,000 on our local highways, such as US 301 and US 41 (AADT 2020 Count). Other than to buy gas, they are not stopping to frequent our businesses. The overall condition of existing housing stock in the community has meant that the area is less than desirable for new residents, visitors/tourists, investment, and business growth. Governmental, institutional, and utility purposes constitute 30% of land use in the CRA, which has resulted in development moving to the east of the city and closer to I-75.

Former industrial uses that existed within the community, such as tomato packing, cargo rail lines, gas stations, marine engine and auto repair, and phosphate and dolomite processing, as well as current industrial uses, such as cement production, mean that the potential for contamination and health impacts on our residents are highly likely. In order to spur infill redevelopment, improve housing stock and improve environmental conditions, the CRA has purchased a cluster of substandard residential properties in the Target Area. To move these properties towards the appropriate intended reuse, affordable healthier housing, the CRA must perform current environmental assessments and remediate any found contaminants. Given the age of these properties and adjacent industrial uses, these conditions are highly likely. Without these multipurpose funds, these activities will be stalled and disadvantaged residents will continue to experience the effects of living in an area of environmental and economic burden.

ii. Description of Priority Brownfields Sites

The city will focus its efforts on two priority sites within the CRA Target Area, which is also a state-designated brownfield area:

1. CRA Mixed-use Assemblage (CT 12081001300): The CRA owns 18 parcels (11+ acres) on 4th Street W and 5th Avenue W. The sites are a priority because of their location within the Target Area; the potential for relatively larger scale development given that multiple parcels are

adjacent/continuous; and the potential benefits of residential or mixed-use redevelopment within an area of need for improved affordable/workforce housing, access to essential goods and services, and job creation. The potential reuse is also in keeping with the *Palmetto CRA 2022-2028 Community Redevelopment Plan*. The sites will be assessed and if necessary remediated for the purposes of sale and finance for redevelopment as suitable and affordable/workforce housing, both single-family and multi-family units, and for commercial, professional, such as doctor offices, and retail space in order to spur local job opportunities and promote further sustainable redevelopment in the CRA. Currently the sites are vacant or contain structures (former single-family homes, sheds, storage areas, and garages) in varying stages of decay or disrepair. The sites have been formerly used as single-family home properties or agricultural uses with unsuitable migrant housing. On and/or adjacent to the priority sites were multiple historic uses of concern. Environmental concerns include lead-based paint, asbestos, and possible leaking fuel tanks due to the age of remaining structures. The CRA is the owner of these properties, so no access issues exist. The CRA is also not the Potential Responsible Party, so if contamination issues are determined for these properties and the sites are deemed eligible, then these sites would be considered for cleanup within this project. Potential contaminants would also include particles from neighboring cement production, proximity to phosphate mining/processing/ and pesticides from historic agricultural uses, local landscaping and pest control.

2. Estuary Park West Expansion (CT 12081001300): Estuary Park exists as a reserve along the Carr Drain spill out and Manatee River and US 41 N in the Target Area. The city would like to expand the park by adding additional City of Palmetto-owned (9.6 acres) and privately-owned parcels (4.4 acres) that currently meet the definition of brownfields to the existing park in order to create stormwater park to capture runoff from the adjacent Carr Drain, a historic stormwater spill out that runs from the CRA to the river. The Manatee River flows to Tampa Bay and onto the Gulf of Mexico. Tampa Bay is “estuary of national significance as designated by EPA in 1990 due to its essential marine ecosystem and the threats to it. By incorporating these parcels into a park that also serves as a wet detention system, the CRA will reduce the suspended solids and harmful elements within the stormwater that flow onto the river and bay while reducing the risk of future flooding in the CRA and city through nature-based solutions to address climate change. The intention for this project is to assess the current environmental conditions of these additional parcels and remediate any found contaminants. The CRA and the city would also seek to provide linkages to existing area walking/non-motorized trails and create kayak access to the river in the Target Area. Currently the parcels that make up this site are vacant but overgrown and scattered with debris. Adjacent to the sites were historical industrial uses such as cement production and mechanical shops. These sites have been also used for illicit dumping and homeless encampments due to vacancy and the overgrown conditions.

iii. Identifying Additional Sites

After addressing the priority sites, the CRA owns an additional 45 sites in the Target Area that can be assessed for the purpose of executing sales to prospective developers so that those developers qualify for bank financing. The city also partners with Manatee County Habitat for Humanity that began in 2011 with a 16 homes rehabilitated and renovated in that first year. Habitat is looking to acquire and develop sites for single-family home development in the Target Area. Habitat currently has families on the waiting list for homes in the Target Area (The partnership is also described in section 2.). The CRA and community residents would also like to see a new full-service grocery store be established in the area, and the CRA will propose appropriate sites during community engagement meetings. The CRA Team will also continue its current community

engagement efforts to garner input from area residents as to potential sites for assessment.

b. Revitalization of the Target Area

i. Overall Plan for Revitalization

The *Palmetto CRA 2022-2028 Community Redevelopment Plan (CRA Plan)* was approved by the CRA Board in March 2022. The CRA Plan is an evolving document, much like the City of Palmetto Comprehensive Plan that is evaluated and amended on a regular basis to accurately reflect the changing conditions within the CRA. This plan was prepared using extensive public participation and with sound planning principles to guide redevelopment. The CRA Plan is in keeping with the statutes and policies of the City of Palmetto. The Plan calls for efforts on the part of the CRA to take action that will spur private development of suitable workforce and affordable housing, creation of economic opportunity, the public development of parks, and the removal of blight and substandard housing without displacing current residents.

Further, the City of Palmetto Comprehensive Plan policies require that the City enact Water Quality and Conservation measures: **Policy 9.4.4:** The City shall continue to review its land development regulations to encourage the use of innovative development practices that minimize negative water quality impacts. **Policy 9.4.6:** Natural landscape barriers to flooding and stormwater shall be preserved or enhanced as a requirement to obtain a development order. The CRA and the City specifically call for the further development of Estuary Park in these plans. The inclusion of the additional parcels to expand Estuary Park as a priority site is an essential part of the overall plan for revitalization.

Planning funds made available through this grant would allow for the creation of an area-wide brownfields redevelopment plan. Such a plan would direct further phased and specific planning strategies in the Target Area. For instance, the CRA has acquired 45 properties for the purposes of redevelopment of housing, a strategy described in the CRA Plan, and for mixed-use commercial that encourages private business start-up, local job creation, and overall better maintenance of all properties within the CRA. Funding for an area-wide brownfields redevelopment plan would allow the CRA to engage with developers and community members to drive a tiered plan for this type of sustainable development across the Target Area. The CRA Plan has determined what elements the community has envisioned; now we need to blueprint to guide us toward its realization.

ii. Outcomes and Benefits of Overall Plan for Revitalization

The purposeful and planning infill redevelopment of sites within the Target Area, such as the CRA Mixed-Use Assemblage priority site, will create suitable workforce and affordable housing options within this disadvantaged census tract. The CRA estimates that no less than 45 single-family and 540 multi-family units will be constructed on the CRA Mixed-Use Assemblage priority site. This includes the following proposed developments within the Target Area: Heartland Site with 204 units; Riverside with 186 units; Elementary Site 150 units; and 40 Single Family homes. Another dozen units may be constructed in the remaining CRA-owned properties that we intend to assess with these funds. Improving properties within the CRA for both residential and commercial redevelopment will improve the physical appearance of the Target Area, which will in turn lead to greater private development and investment. By encouraging mixed-use within the priority site and at other identified and future sites in the Target Area, opportunities for local job creation and needed services will arise. These physical improvements will also result in increased property values and generation of greater city revenues in sales tax and increased property taxes, and Tax Incremental Funding, which can be used by the City to invest in additional community improvements to infrastructure and resiliency strategies. The construction of new housing options will mean that energy efficiency measures will be more widely implemented in the Target Area. In Appendix C

of the City of Palmetto Comprehensive Plan, Policy 3.7.5 states that the city requires new residential construction to meet the energy efficiency requirements of Florida Building Code.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

On September 13, 2022, the Manatee County Board of County Commissioners approved the amendment to the Livable Manatee Incentive Program regarding homeowner and rental affordable housing projects and authorizing the amendments of administrative procedures. Manatee County offers various incentives for affordable housing designated projects, including Rapid Response Team/Fast Tracking; Fee Refund and Fee Increments; Density Bonus; Expedited Permitting. The CRA will assist qualified developers to access these incentives. This grant will also stimulate the availability of other funds to allow for further reuse and redevelopment in the Target Area. Once Phase I ESAs are completed on CRA-owned sites (non-priority sites), then the CRA will be able to move those surplus properties towards resale for infill housing and mixed-use development. These generated funds will allow the CRA to move forward with other priority projects within the Target Area, such as furthering incentivizing the rehabilitation of existing privately-owned housing stock and financing the implementation of energy conservation techniques/equipment, which will further improve environmental justice issues in the CRA. Further reuse and redevelopment will require both public and private investment. The City and CRA have successfully utilized State or County funds for redevelopments projects. With the results from assessment and reuse planning tools created, the City will leverage this EPA grant to approach the following funding sources for grants or loans that will lead to site reuse.

Funding Source	Description	Purpose
CDBG	Provides federal CDBG funding for eligible activities through Implementation and Planning Grants to communities that assist in brownfield redevelopment. Expected amount of funding: \$200,000	Cleanup Redevelopment
Florida Department of Environmental Protection	Recreation grant for the development of trail connectors/waterway trails Expected request: \$400,000	Redevelopment
USDA Community Facilities	Grant program would be considered for stormwater park Expected amount of funding: \$400,000	Redevelopment
Tax Incremental Funding	Funds be leveraged to support the completion of the redevelopment projects. Estimated FY24 funding: \$2.7 million (City of Palmetto)	Redevelopment

Additionally, as combined with the proposed brownfield funding, these programs provide powerful incentives for private businesses to invest in the target area once assessment and cleanup (if necessary) is achieved.

ii. Use of Existing Infrastructure

The City of Palmetto mostly has existing infrastructure to support the redevelopment of the priority sites and the Target Area. By reusing vacant commercial spaces, existing roads, and existing utilities, the CRA will make the most efficient use of its resources.

Adjacent to the proposed Estuary Park Expansion on US41 bisecting the CRA, the Palmetto Trails Network is a shared-use pathway that was initiated in 2020 and is expected to be completed in 2024. The pathways and facilities at this park will intersect with this more extensive network to provide safe and viable travel options for the community to access area destinations and to support quality of life and economic objectives of the surrounding area.

One upgrade needed within the Target Area is adequate parking. A parking study is planned in cooperation with the Sarasota/Manatee Metropolitan Planning Organization (MPO). The City

has also been reworking ordinances in the City of Palmetto Comprehensive Plan that will require changes in construction code for new development requiring higher levels of parking depending on business type; construction of a multi-story garage is being considered. Funding will come from a combination of EDA, CDBG, DOE (in order to include electric vehicle charging stations). Intersection improvements and improved interconnectivity of transportation systems within the target area are outlined in MPO studies and plans, such as US 41 Corridor Mobility and Safety stud; Bradenton-Palmetto Connector Alternative Corridor Evaluation Study; Active Transport Plan. These projects will be funded by applications to the FL DOT from the MPO.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

EPA EJSscreen indicates that the CRA Target Area is in both **the 90-95th and 80-90th percentiles for low-income and the 95-100 and 90-95th percentiles for unemployment rate**. As such, the community lacks the tax base and economic engine to fund the environmental assessment needed for redevelopment. The current CRA budget does not allocate funds for environmental assessment, remediation, planning activities, and subsequent reuse in the target area. Due to the small population and low-income status of the community, our funds must be applied to essential services, such as safety/policing/emergency response and sanitation. As described in section 1, the CRA staff, planning studies and previous community engagement activities have determined that the greatest needs in the Target Area are appropriate workforce and affordable housing options, economic revitalization, including jobs, and environmental improvements that include resiliency, recreation, and healthier living options. The assessment, remediation, and planning activities proposed (see section 3) will initiate much-needed solutions to address these concerning community conditions. The redevelopment and reuse of the priority sites alone will result in better housing, business opportunities, storm resilience, water quality improvements, connectivity, and recreational enhancements in the Target Area and for disadvantaged residents.

ii. Threats to Sensitive Population

(1) Health or Welfare of Sensitive Populations

In the Target Area, the sensitive populations are disproportionately impacted by economic and environmental impacts, including the number of brownfields, particularly as a higher percentage of residents living in proximity to priority sites are sensitive populations. As noted in section one, **the Target Area census tracts, CT 12081001300 and CT 12081001502, are considered disadvantaged** as per EPA CEJST (accessed 9/29/23).

Target Area Census Tracts	CT population	% women of child-bearing years	% Aged 65 or older	% Children under 18 years	% Individuals living below poverty level	% Single- female households with children under the poverty level
12081001300	4,018	30.2%	12%	21.2%	18%	72.9%
12081001502	6,675	29.8%	20.7%	25.6%	29.4%	55.3%

US American Community Survey, 2021, 5-year estimates

The minority population of the entire city is 36% (US American Community Survey, 2021, 5-year estimates); yet, **in the Target Area, minority population ranges from the 65th to the 95th percentiles** (EPA EJSscreen).

Target Area CT	CT pop.	% one race- White	% one race-Black	% Hispanic	Speak language other than English
12081001300	4,018	75%	23.1%	15.8%	16.2%
12081001502	6,675	55.8%	35.8%	34.1%	32%

US American Community Survey, 2021, 5-year estimates

SJ Screen identifies CT 12081001300 as a food desert with low-income population and low access to fresh healthy foods. According to the US Department of Health and Human Services, HRSA data, Manatee County and all of Palmetto are Medically Underserved Areas (MUA) due to a lack of primary care physicians. Lack of access to nutritious food and medical care makes it more likely that area residents will encounter health disparities as described in the next section.

Historic racial disparities in housing exist across the US and are even more serious in the CRA. Across the US, about 75% of owner-occupied residences are owned by whites. In the Target Area CT 12081001300 only 11% of homeowners are people of color or mixed race. In CT 12081001502, 52% of homeowners are people of color or mixed race; while this is a relatively high ownership rate for minorities, the rub comes in the value of the area's homes. The median value of owner-occupied housing units in the US is \$244,900; in CT 12081001300 the media value is \$212,200, significantly lower value. Moreover, in CT 12081001502, the median value is \$112,600. The majority of residents in the Target Area live in housing constructed prior to the year 2000; in CT 12081001300 90.5% live in housing constructed before 2000, and in CT 12081001502, the percentage is 60.4% (SOURCE: all data, US American Community Survey, 2021, 5-year estimates). As noted earlier, both Target Area census tracts are considered disadvantaged due to low-income. Thus lower-income households are often forced to live in areas with lower property costs, which are those in neighborhoods where conditions of concerns exist such as health and welfare issues noted above.

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

EPA EJ Screen indicates that the CRA Target Area is in **the 95-100 and 90-95th percentiles for heart disease and in the 90-95th and 80-90th percentiles for low-life expectancy. Both CTs are in the 76th percentile for cancer amongst adults.** The *Manatee County 2021-2023 Community Health Improvement Plan* noted that Black people have the lowest life expectancy of all races in the County and that they have higher rates of death from cancer, diabetes, and heart disease. Infant mortality rate for black infants is 3.9 points higher in Manatee County than the entire state. Compounding these health issues, according to EJ Screen, the majority of the Target Area fall into the 90-95th percentile for lack of health insurance.

The assessment, cleanup and reuse of the targeted sites would reduce potential exposure to asbestos, lead, petroleum products, and hazardous substances, all of which have adverse health effects on these sensitive populations. Addressing blighted vacant sites would remove the potential for exposure through trespass. Creating recreation opportunities, improving area water quality, and providing stormwater systems would also improve the health and welfare of area residents. The redevelopment of these sites into commercial spaces would create jobs and to help alleviate the negative impacts on the majority sensitive populations in the Target Area and City.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues

Multiple threats impact the residents of the CRA Target Area. EPA EJScreen indicates that the Target Area is in **the 95-100, 90-95th and 80-90th percentiles for traffic proximity and the 90-95th and 80-90th percentiles for ozone. The entire Target Areas is in 80-90th percentiles for RMP Facility proximity and in the 95-100 and 90-95th for underground storage tanks.**

According to the Trust for Public Land, Urban Heat Island ArcGIS map, **the Target Area ranges from moderate to severe on the urban heat island scale.** "Federal statistics over a 30-year period show extreme heat is the leading cause of weather-related deaths in the United States. Extreme heat exacerbated by urban heart islands can lead to increased respiratory difficulties and heat stroke. These environmental stressors significantly affect the most vulnerable children, the

elderly and those with preexisting conditions.” Further EJ screen places the **Target Area in the 95-100th percentile for flood risk**. The proposed grant will promote environmental justice in this community from inception through conclusion by embracing community engagement in the planning process. It will seek input from these community members, stakeholders, and residents without regard to race, income and employment status, disability status, age or gender.

Improvement in housing options and conditions will protect our sensitive populations from further exposure to harmful environmental factors. The planned creation of the stormwater park within Estuary Park will mitigate or at least improve local climate adaptation and mitigation capacity and resilience in several ways. Blue-green infrastructure in urban ecosystems mitigates urban heat islands and improves air quality¹. These initial benefits also positively impact long-term climate change, which protects area residents and community resources.

(b) Advancing Environmental Justice

This project will help to address environmental justice challenges, by encouraging the redevelopment of brownfield sites to mitigate health risks, introduce new businesses and services, create jobs, and build new, quality workforce housing directly in the Target Area. Through this project, the Target Area will overcome the Environmental Justice and brownfield issues to transform their community, and these funds will provide the needed catalyst to overcome these barriers and move to purposeful reuse and redevelopment of brownfields.

b. Community Engagement

i. Prior/Ongoing Community Involvement

The CRA incorporated community engagement activities into the development of its current CRA Plan, which incorporated input and feedback from multiple community stakeholders including elected and non-elected officials gathered through public hearings and community drop-in days at the CRA office. The CRA Board, under Florida Statute 163 Part III and the CRA Redevelopment Plan develops and approves the policies, budgets, and contracts of the Community Redevelopment Agency of the City of Palmetto. The CRA Board meets monthly and has additional working group meetings, all of which are open to the public and are noticed on the CRA website. The CRA Advisory Board is a volunteer board that meets monthly and makes recommendations to the CRA Board on initiatives, funding, plans, and capital improvements. Residents are encouraged to apply to serve on the Advisory Board.

ii. and iii. Project Involvement and Roles

Name of community organization/entity/group	Point of contact	Specific project involvement
Habitat for Humanity – Manatee County	Kaveecia Moore & Bernie Quinn	Homeowner Services (Moore) & President (Quinn)
Keep Manatee Beautiful	Jennifer Hoffman	Executive Director
One Stop Housing	Mark Vengroff	Director
Manatee Rural Health	Dr. Edgar Price	Director/Chairman

iv. Incorporating Community Input

The CRA staff will meet with neighborhood and community groups directly within the Target Area to further identify and prioritize additional brownfield sites for assessment and planning efforts. The CRA will also appoint a Community Liaison, who will be a community resident or serves within one of these community partner organizations noted above, to ensure that

¹ Xiong Y. et al. *How can urban parks be planned to mitigate urban heat island effect in “Furnace cities” ? An accumulation perspective.* Journal of Cleaner Production, 2022.

neighborhood and community organization interests are represented on the CRA Board. The Community Liaison will also regularly attend (at least quarterly) the public meetings of the community partners to ensure that input and feedback is gathered on an ongoing basis and that project updates are conveyed to these valued community members and stakeholders. As assessments and cleanup plans are developed, the city will solicit input on specific cleanup plans and strategies. The City will then work with community stakeholders to create revitalization plans and property-specific redevelopment concepts that account for site constraints, community and market needs, and potential funding strategies. The City will communicate project updates at least quarterly via City Council briefings, social media, the CRA website, and press releases to traditional area media. The City’s project team will consider community concerns at their monthly meetings and respond to any questions and concerns raised in a timely manner. Community members will be updated as to how their input will be responded to or included in the project via CRA project website updates (quarterly) or at community engagement meetings. An example of such a response would be the inclusion of public garnered input into further site selection and the notification of those suggested sites being assessed would be included at the next public engagement meeting and/or CRA board meeting. Opportunities for community participation via video conferencing, web forums and other non-face to face methods will be implemented for community input and participation when in-person attendance is not possible.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

Task/Activity 1: Programmatic Support
<i>i. Project Implementation:</i> Project management of EPA-funded activities for the priority & non-priority site(s), cooperative agreement oversight; budget management, scheduling and coordinating subcontractors, monthly team meetings, conference/workshops travel for purposes of staff development and efficiency improvement; ACRES reporting, identification of non-priority sites <i>Non-EPA grant resources needed:</i> in-kind resources including project team staff effort
<i>ii. Anticipated Project Schedule:</i> Months 1-60, project activities will commence immediately upon issuance of cooperative agreement. The project team will meet monthly throughout the program.
<i>iii. Task/Activity Lead(s):</i> Project Director with support from a contracted QEP and project staff
<i>iv. Output(s):</i> # Quarterly reports, ACRES data entry; notes from monthly team meetings; maintenance of a complete and accurate project information repository
Task/Activity 2: Community Engagement
<i>i. Project Implementation:</i> The project staff in cooperation with a QEP will be responsible for the coordination and delivery of active community engagement throughout the project lifetime that builds on previous efforts of the CRA and City staff, including securing site access; community engagement meetings that educate community members on Brownfields and the importance of addressing these sites; site selection through community input. Discussion of EPA-funded activities for non-priority site(s), if applicable, are identical to item i. <i>Non-EPA grant resources needed:</i> in-kind resources including project team staff effort and efforts of partners who will host and promote community participation
<i>ii. Anticipated Project Schedule:</i> Months 3 through 54; first community meeting will occur within 4 months.
<i>iii. Task/Activity Lead(s):</i> Project Director with support from QEP and project staff
<i>iv. Output(s):</i> Community Involvement Plan; meeting summaries; community input for reuse plans
Task/Activity 3: Assessment Phase I, Pre-Demolition, and Data Gap Assessments
<i>i. Project Implementation:</i> <i>EPA-funded activities for the priority site(s)– After the generic QAPP is developed, a significant amount of funding will be allocated to the priority sites. Once data gaps are identified, a comprehensive investigation will be completed relative to each of priority sites. This work will also include Phase I ESAs and Phase II ESAs (including site specific QAPPs. Non-EPA grant resources needed:</i> in-kind resources including staff time for oversight of the QEP and review of all reports/activities
<i>ii. Anticipated Project Schedule:</i> Months 4-54, assessment of the priority sites launching by month 6

iii. Task/Activity Lead(s): QEP with oversight by the project director
iv. Output(s): 1) Generic Quality Assurance Project Plan (QAPP); 2) Environmental Investigation; 3) FASTM-AAI compliant Phase Is; 4) Phase II Environmental Site Assessments (including site specific QAPPs)
Task/Activity 4: Brownfields and Remediation Planning
i. <i>Project Implementation:</i> ABCAs will summarize the strategy for cleanup and ultimately reuse of priority sites. Area-wide brownfield planning will produce a reuse/redevelopment strategy including funding plans, site disposition strategies and visioning concepts/site reuse plans for two priority sites. Non-EPA grant resources needed: in-kind resources - planning and economic development activities by CRA staff effort
ii. <i>Anticipated Project Schedule:</i> Months 16 through 54
iii. <i>Task/Activity Lead(s):</i> QEP experienced in these task elements will lead the remediation design planning and the project director with assistance from QEP, will lead the reuse planning portion of this activity
iv. <i>Output(s):</i> 1) # of Analysis of Brownfield Cleanup Alternative (ABCAs) for priority sites; 2) Area-wide brownfield plan(s); 3) Planning charettes); 4) Land use assessments; 5) Community health assessment; 6) Site disposition strategies
<i>Notes:</i> Proposed planning efforts are a critical component for the City to move sites to valuable reuse. 20% of the budget is dedicated to planning.
Task/Activity 5: Remediation
i. <i>Project Implementation:</i> Remedial activities at priority sites 3-5 will be led by a QEP experienced in remediation. The project will result in the removal of hazardous building materials or other onsite contamination, such as described in the next section. The City will contract with an expert abatement firm through an open bid process. Non-EPA grant resources needed: in-kind resources - staff efforts for procurement and oversight of QEP
ii. <i>Anticipated Project Schedule:</i> Months 16 through 57
iii. <i>Task/Activity Lead(s):</i> QEP will provide oversight of the remediation contractor. The City project staff will provide procurement services and will review technical documents.
iv. <i>Output(s):</i> Remediation activities and removal of regulated materials

3b. Cost Estimates: Cost estimates are based on our previous grant project experience and with input from TAB providers.

Project Tasks	Budget Table					
	1: Programmatic	2: Community Engagement	3: Assessment	4: Planning	5: Remediation	Total
Travel	\$10,000					\$10,000
Contractual	\$60,000	\$37,500	\$255,000	\$200,000	\$400,000	\$952,500
Other: Community liaison stipend		\$37,500				\$37,500
Sub/totals	\$70,000	\$75,000	\$255,000	\$200,000	\$400,000	\$1,000,000

Task 1 – Program Management: *Travel Costs-\$10,000* in travel expenses for attendance for one person at two national and two persons at one regional brownfields-related training /conferences. *National Brownfields Conference attendance for 1 staff person X 2 national conferences = \$5,900* (\$2,900 per national conference) *Breakout:* \$700 Flight; \$1,000 hotel (5 nights x \$200 per night), \$500 registration, \$300 (airport/hotel transfers), \$400 per diem expenses (\$80 (national) per day for 5 days). *Regional brownfields conference attendance X 2 persons = \$3,500:* \$1,200 hotel (2 persons X 4 nights (including travel day x \$150 per night), \$400 registration (\$200 per person), \$1,000 flights (\$500 per person, or mileage for drivable location), \$600 per diem expenses (\$75 (regional) per person X 2 for 4 days) and \$300 ground transport (parking and airport transfers, taxis). \$600 = remaining travel funds would be applied to *local travel/mileage* to meetings with property owners, developers or to public meetings by city staff members (@\$0.575 mile). *If workshops are held virtually, the City will apply any excess funds*

towards community engagement and assessment activities. *Contractual: \$60,000* is budgeted for program support by a QEP, which will provide 480 hours at \$125 per hour over the project period. The City, with support from the QEP, will complete quarterly reports, MBE/WBE forms, & EPA ACRES database and other programmatic elements. **Task 1 total: \$70,000**

Task 2 – Community Engagement: *Contractual Costs: \$37,500* in QEP support are approx. 300 hours at \$125 per hour over five years (\$37,500) for development of Community Involvement Plan (CIP); community meetings, visioning sessions as well as for meetings with site owners and potential developers. A **community liaison** will be identified with cooperation from our community partners. The liaison will be given a stipend of \$7,500 per year over the five-year project period (estimated effort of 150 hours per year at \$50 per hour) for a total of **\$37,500**. The project liaison will be paid in accordance with time and effort spent on the project. The project liaison will be required to track time on a time sheet and will invoice the project monthly. The liaison will be required to seek approval and purchase any necessary supplies through the CRA as the CRA staff are experienced in federal grants/expenditures. **Task 2 total: \$75,000**

Task 3 – Assessment: *Contractual: Set Fees* 1) Generic Quality Assurance Project Plan (QAPP) = \$6,000; 2) Two (2) ASTM-AAI compliant Phase I for priority sites 1 and 2 (due to size and complexity @ \$7,500 each = \$15,000.00; 3) Two Phase II Environmental Site Assessments for the priority sites (including site specific QAPPS) @ \$27,000 each (depending on complexity) = \$54,000; 4) 45 estimated Phase I ESAs x \$4,000 per (including the 45 sites owned by the CRA and/or community-identified sites) = \$180,000

Task 3 total: \$255,000

Task 4 – Remediation/Reuse Planning: *Contractual Costs: set fees* 1) Analysis of Brownfield Cleanup Alternative (ABCA) report for two priority sites: \$6,000 per = \$12,000; 2) Area-wide brownfields redevelopment reuse plan for Estuary Park/Carr Drain area with two community planning charrettes to garner community input into reuse plans and creation of planning-related presentation materials for the purposes of public and community engagement meetings = \$75,000. 3) Site-specific reuse planning for priority site - CRA Assemblage - with two planning charrettes and creation of planning-related presentation materials for the purposes of public meetings and community engagement=\$48,000; 4) land use assessments for multiple sites in the CRA= \$20,000; 5) Community Health Assessment = \$20,000; 6) site disposition strategy for multiple CRA properties \$25,000. **Task 4 Total: \$200,000** (20% allocated to planning)

Task 5 – Site Remediation: Contractual costs are estimated at this stage, but they would be refined upon the completion of Phase II ESAs. The Strategy to transform the priority sites into reusable properties will include detailed remediation planning documents and characterizing the potentially unknown remaining hazardous and regulated materials. Any remaining funds from the remediation of priority sites will be applied to necessary cleanup activities in the additional sites owned by the CRA or identified in the public engagement process. **Task 5 Total: \$400,000**

Project Total \$1,000,000

3.c. Plan to Measure and Evaluate Environmental Results: The Project Director with support from key staff and a procured QEP will document, track, and evaluate outputs and outcomes through quarterly progress reports, annual disadvantaged business enterprise reporting, closeout reporting and in monthly, or more frequent, communication with the EPA Project Officer. The activities and outcomes are tracked through a project and invoice management system. *Outputs:* 1) Generic Quality Assurance Project Plan (QAPP); 2) ASTM-AAI compliant Phase I ESAs); 3) Phase II Environmental Site Assessments (including site specific QAPPS); 4) Analysis of Brownfield Cleanup Alternative (ABCA) reports; 5) Design/Bidding Document development; 6)

Area-wide Brownfields planning; 7) site-specific reuse plans; 8) Number of formal community meetings; 8)) Community Involvement Plan; 9) ACRES data entry; and 10) subsequent project funding received for other environmental activities *Outcomes*: Acres of land remediated and redeveloped; Amount of private investment and other funding leveraged; Jobs created or retained; and increased property and sales tax revenue generated. An overall gauge of success will be the creation of jobs and the improvement in environmental justice conditions. Should the project run into delays or obstacles, the project team will work the assigned EPA Project Officer and the QEP to implement countermeasures, such as budget reallocation.

Outputs: *Project outputs are noted in the table above and include but are not limited to the following*: Quarterly reports, ACRES data entry; notes from monthly team meetings; maintenance of a complete and accurate project information repository; Community Involvement Plan; meeting summaries; community input for reuse plans; Generic Quality Assurance Project Plan; FASTM-AAI compliant Phase Is; Phase II Environmental Site Assessments (including site specific QAPPs); # of Analysis of Brownfield Cleanup Alternative (ABCAs) for priority sites; Area-wide brownfield plan(s); Planning charettes; Land use assessments; Community health assessment; Site disposition strategies; Remediation activities and removal of regulated materials.

Outcomes: The CRA will strive to provide the following outcomes. Land within the CRA will be assessed and remediated; a portion of these lands will be sold in order to facilitate further redevelopment planning documents produced. Community engagement will result in increased civic interest and pride amongst community members. Private investment and other funding leveraged; Jobs created or retained; and increased property and sales tax revenue generated. An overall gauge of success will be the creation of jobs and the improvement in environmental justice conditions. Should the project run into delays or obstacles, the CRA staff will work with the assigned EPA Project Officer and the QEP to implement countermeasures, such as budget reallocation. Health outcomes should be realized in the long-term and could include decreases in asthma rates, better blood pressure and rates or heart disease that are positively impacted by improved environmental conditions, walkability, and reductions in stress as neighborhood conditions are improved.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a.i.- iii Organizational Capacity and Structure and Description of Key Staff: The Community Redevelopment Agency of the City of Palmetto, Florida (CRA) is a dependent special district of the City. Its public purpose is the reduction and/or elimination of slum and blight within its area. The City of Palmetto has had one brownfield cleanup grant in which the activities were managed by the CRA, the community redevelopment agency of the city. Additionally, the CRA was a partner in two EPA Brownfield Coalition grants, the 2011 Sarasota/Manatee Metropolitan Planning Organization Coalition assessment grant, and the 2015 Manatee County Coalition Assessment Grant, which provided CRA staff with a tremendous amount of experience with the EPA Brownfields Program. All fiscal accounts and grant finances of the CRA are managed by the City, but the CRA is technically the lead applicant. The CRA staff has the administrative capacity and experience, over 50 years in combined staff administrative experience, to manage project implementation, administrative tasks, fiscal management and compliance with applicable federal award conditions and requirements within the five-year performance period. The CRA will implement a project management system for tracking and monitoring progress towards the programmatic, administrative, and financial requirements of the project and grant. The team will participate in monthly project meetings and offer ongoing input in decision making. ACRES will be updated on a quarterly basis with site activity and quarterly reports. The project director will work with the

EPA Project Officer and QEP to implement countermeasures, such as reevaluating management strategies to resume the project schedule and meet workplan milestones should delays or obstacles be encountered. Initial information regarding the project will be presented at public work sessions of the CRA Board and ongoing summaries will be shared at regular public meetings. These efforts will be via Zoom when in-person meetings are not possible. Community input will be sought as described earlier in the application. This process will achieve transparency and public consensus. Quarterly updates will be provided for EPA quarterly reports.

The CRA Director, Ed Johnson, will serve as the Project Director. Mr. Johnson was formerly Urban Development Manager for the City of Tampa, where he was the Project Director on over \$3 million in brownfields assessment grants, including the first Multipurpose Grant awarded in the Region for the City of Tampa. Johnson will oversee the day-to-day operation of the grant project, including community outreach and reporting. He has more than 25 years of related experience and earned a Bachelor of Science in Management from the University of Tampa. The City of Palmetto Finance Office, headed by Cheryl Miller, will manage the financial side of the project. Ms. Miller has 25 +years of finance experience and managed the finances of the City of Palmetto FY2016 EPA Cleanup Grant. The Finance Department currently manages approx. \$9M in grant funding which includes 2 CDBG, ARPA, FEMA grants. Jenny Silverio, the CRA Compliance Coordinator, will serve as project coordinator and will support the project director in all aspects of project management and implementation. She has extensive experience in community outreach and engagement and with pragmatic aspects of the Brownfields program gained during the last EPA Cleanup Grant.

iv. Acquiring Additional Resources

The CRA will implement the same procurement process that the City of Palmetto has implemented in its past grants. The CRA will contract with a QEP/multiservice consulting firm in accordance with local and federal procurement requirements at 40 CFR 200.317-200.326, which include the advertisement of a Request for Qualifications, and the review of multiple proposals by a selection committee. The committee will choose the top QEP based on qualifications, prior experience in remediation, reuse planning, community engagement and program management, and inclusion of DBE subcontractor(s). The committee will make a recommendation to the CRA Board for approval. The CRA has mechanisms in place to replace lost staff and obtain additional contractor resources if needed.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments: The following is a table of previous EPA Brownfields Funding and accomplishments/outputs, which were entered into ACRES.

Program/Date	Amount	Funds Remaining	Grant Accomplishments and Outputs
2016 Brownfield Cleanup	\$200,000	\$16,942.10* * Due to cost savings achieved on the project	Completion of the Clean Up of the former Edenfield Property resulting in the redevelopment of a former rail spur into a Stormwater park that treats 70 acers of stormwater, provides walking trails, environmental education, habitat creation and a nature based solution to address climate change. Activities completed included: completion of Analysis of Brownfields Cleanup Alternatives, extensive community outreach and engagement, remediation of contaminated media including arsenic& PAHs , pragmatic support and reuse planning.

(2) Compliance with Grant Requirements: The City complied with work plans, schedules, terms, and conditions for the 2016 EPA Brownfields Cleanup Grant. Quarterly reports and deliverables were submitted to EPA and entered into ACRES in a timely fashion. The 2016 grant was completed and closed-out within the grant period. All terms/conditions were met.



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**Threshold Criteria - Multipurpose Grant
Palmetto Community Redevelopment Agency, Florida**

1. Applicant Eligibility

- The applicant is a Community Redevelopment Agency: See attached documents

- b. Indicate if your organization is exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code. Yes.
 - If yes, indicate if your organization lobbies the Federal government.

No, City does not lobby the Federal government.

2. Community Involvement

The CRA staff will meet with neighborhood and community groups directly within the Target Area to further identify and prioritize additional brownfield sites for assessment and planning efforts. The CRA will also appoint a Community Liaison, who will be a community resident or serve within one of these community partner organizations noted above, to ensure that neighborhood and community organization interests are represented on the CRA Board. The Community Liaison will also regularly attend (at least quarterly) the public meetings of the community partners to ensure that input and feedback is gathered on an ongoing basis and that project updates are conveyed to these valued community members and stakeholders. As assessments and cleanup plans are developed, the city will solicit input on specific cleanup plans and strategies. The City will then work with community stakeholders to create revitalization plans and property-specific redevelopment concepts that account for site constraints, community and market needs, and potential funding strategies. The city will communicate project updates at least quarterly via City Council briefings, social media, the CRA website, and press releases to traditional area media. The City's project team will consider community concerns at their monthly meetings and respond to any questions and concerns raised in a timely manner. Community members will be updated as to how their input will be responded to or included in the project via CRA project website updates (quarterly) or at community engagement meetings. An example of such a response would be the inclusion of public garnered input into further site selection and the notification of those suggested sites being assessed would be included at the next public engagement meeting and/or CRA board meeting. Opportunities for community participation via

video conferencing, web forums and other non-face to face methods will be implemented for community input and participation when in-person attendance is not possible.

3. Target Area

The City of Palmetto Community Redevelopment Area (Manatee County, Florida) is the target area for this project.

4. Affirmation of Brownfield Site Ownership

The Palmetto CRA affirms that the organization owns multiple sites that meet the CERCLA § 101(39) definition of a brownfield is: a) not listed (or proposed for listing) on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

5. Use of Grant Funds

Indicate the page number where there is information on your plan to:

- Complete at least one Phase II environmental site assessment: pages 9, 10, 11
- Remediate at least one site: pages 1, 2, 9, 10, 11
- Develop an overall plan for revitalization and includes a feasible reuse strategy: pages 3, 10

6. Expenditure of Existing Grant Funds: The Palmetto CRA affirms that it does not have a current EPA grant.

7. Contractors and Named Subrecipients: Not applicable