# **DeKalb County Commissioners**

William L. Hartman, President Michael Watson, Vice President Todd Sanderson, Vice President 100 South Main Street Auburn, IN 46706 260-925-2362 260-925-5948 Fax

#### IV.D. Narrative Information Sheet

1. Applicant Identification:

Dekalb County 100 S. Main Street Auburn, IN 46706

- 2. Funding Requested:
  - a. Assessment Grant Type: Community-wide
  - b. Federal Funds Requested: \$500,000
- 3. Location:
  - a. Various communities (target areas are in Auburn, Butler, and Waterloo)
  - b. DeKalb County
  - c. Indiana
- 4. Target Areas:
  - Auburn Target Area (ATA) is a mix of industrial, commercial, and residential properties in the City of Auburn. The ATA is a 0.18 mi² area bound by 8<sup>th</sup> St. to the north, Sprott St. to the east, 20<sup>th</sup> St. to the south, and a rail line to the west (CT # 18033020500). The ATA is dominated by several large brownfield sites adjoining low-income neighborhoods in our downtown. Despite this, the area has tremendous reuse potential, with several large vacant tracts that are targeted for affordable housing, mixed-use commercial development, and light industrial expansion. Two priority brownfield sites are targeted for assessment in the ATA, with planned reuses as a tech park and a mixed-use development.

- Butler Target Area (BTA) is comprised of several commercial and industrial brownfield sites interspersed with residential properties in the City of Butler (CT # 18033020300). The BTA is bounded by Green St. to the north, Pearl St. to the east, a rail line to the south, and city limits to the west (0.33 mi2). Two priority brownfield sites are initially targeted for assessment in the BTA, with planned reuses to include a downtown brewpub and needed light manufacturing.
- Waterloo Target Area (WTA) consists of several commercial and industrial brownfield sites interspersed with residential properties in the Town of Waterloo (CT # 18033020200). The WTA is bounded by Union St. to the north, Meadow Ln. to the east, Walnut St. to the south, and Elm St. to the west (0.23 mi2). One priority brownfield site is initially targeted for assessment in the WTA, with planned reuses to include a potential educational support facility for the adjoining school and/or mixed-use redevelopment.

# Priority Sites:

Auburn Foundry, 635 W 11<sup>th</sup> Street, Auburn, DeKalb County, IN Former Foundry, 525 Hazel Street, Auburn, DeKalb County, IN Vacant Commercial Buildings, E. Main Street, Butler, DeKalb County, IN Former Foundry, 600 W. Main Street, Butler, DeKalb County, IN Bus Garage, 220 E. Maple Street, Waterloo, DeKalb County, IN

#### 5. Contacts:

a. Project Director:

Mr. Anton King
CEO, DeKalb County Economic Development Partnership, Inc.
(260) 927-1180
<a href="mailto:anton@dekalbedp.org">anton@dekalbedp.org</a>
112 S. Jackson Street

Auburn, IN 46706

b. Chief Executive:

Bill Hartman
President of County Commissioners
(260) 927-4385
<a href="mailto:bhartman@co.dekalb.in.us">bhartman@co.dekalb.in.us</a>
100 S. Main Street
Auburn, IN 46706

# 6. Population:

City of Auburn, DeKalb County, IN – 13,281 City of Butler, DeKalb County, IN – 2,882 Town of Waterloo, DeKalb County, IN – 2,029 (2021 ACS 5-YR Estimates)

# 7. Other Factors:

Other Factors	Page#
Community population is 10,000 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.	
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).	
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.	Page 3
30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area(s).	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	7

- 8. Letter from the Indiana Department of Environmental Management, Indiana Brownfields Program (attached).
- 9. Releasing Copies of Applications: Not Applicable



#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204 (800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb Governor Bruno L. Pigott

Commissioner

November 8, 2023

Mr. Todd Sanderson Dekalb County Commissioner, VP Dekalb County 1051 Morningstar Road Auburn, Indiana 46706

Re: IDEM Acknowledgement Letter

U.S. E.P.A. Brownfields Grant Proposal Community Wide Assessment Grant

Dekalb County
Dekalb County

Dear Mr. Sanderson:

This letter is provided in support of the Dekalb County proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community Wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that Dekalb County is requesting \$500,000 for hazardous substances and/or petroleum assessment.

IDEM understands that Dekalb County has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered through the Indiana Brownfields Program (Program) and that Dekalb County, based on the information it has provided with its request, believes it has the capability to perform the proposed grant-funded activities. The requested community wide assessment grant funding will help Dekalb County with community outreach, evaluating and prioritization site inventory, conducting Phase I and Phase II Environmental Site Assessments, and developing site-specific cleanup and reuse plans within three targeted areas of Dekalb County: The Auburn Target Area (ATA), Waterloo Target Area (WTA), and Butler Target Area (BTA).

Each target area represents a congregation of vacant or underutilized commercial and industrial sites near each other, areas in need of redevelopment, and businesses no longer in operation or are underutilized. Dekalb County believes that the ATA, WTA, and BTA represent the best opportunities for quality redevelopment, mitigation of potential health hazards, and value added to their respective communities in terms of enhanced property values, commercial and residential development, and new jobs.



IDEM Acknowledgement Letter U.S. EPA Brownfields Grant Proposal November 8, 2023 Page 2 of 2

Since Dekalb County has not yet selected/indicated the specific sites that will benefit from U.S. EPA brownfield grant funding, IDEM cannot make site-specific eligibility determinations at this time. However, should Dekalb County be awarded the requested grant funding, the Program will work together with U.S. EPA and Dekalb County to determine site eligibility once Dekalb County has established the sites intended for funding.

IDEM has worked with Dekalb County on several projects. IDEM recognizes that Dekalb County is committed to working with the Program and/or the IDEM Voluntary Remediation Program for technical oversight of grant-funded site activities as applicable during the grant project period. The Program and IDEM are committed to continuing to support brownfield redevelopment within Dekalb County by providing technical and other assistance through the Program.

Based on the information submitted, IDEM considers the Dekalb County an excellent candidate to receive U.S. EPA assessment grant funding to continue its brownfields redevelopment efforts, which support Indiana's brownfields initiative. IDEM looks forward to continuing its partnership with Dekalb County and its constituent communities. For further assistance, please contact John Morris of the Indiana Brownfields Program directly at (317) 234-0235 and at <a href="mailto:immirris@ifa.in.gov">immirris@ifa.in.gov</a>.

Sincerely,

Andrea Robertson Habeck Technical Staff Coordinator Indiana Brownfields Program

ARH/JTM

cc: (via electronic transmission)

Mr. Len Hinrichs, BCA Environmental Consultants

1. Project Area Description & Plans for Revitalization, a. Target Area & Brownfields, i. Overview of Brownfield Challenges and Description of Target Area: Dekalb County, Indiana (County) is located in northeast Indiana in a rural setting within commuting distance of Fort Wayne, Indiana, 12 miles to the south. With a population of 43,059 (2022 ACS 5-Year Est.), the County covers approximately 363 mi<sup>2</sup>. Spurred by the growth of a diverse transportation infrastructure including major highways including I-69 and several major rail lines, connecting us to surrounding communities in Northeast Indiana as well as Indianapolis, Chicago, and Detroit, the County was established as a thriving industrial hub, including agriculture, transportation, glass manufacturing, and metals casting & fabrication. Throughout the early to mid-20th century, robust communities grew and thrived around these industries. However, as in much of the Midwest's rust belt, Dekalb County's manufacturing base declined in the 1960s and 1970s, Many surviving industries chose to leave our community centers for greenfields on community peripheries, leaving our downtowns in states of decay. Since 2013, large employers such as **Eaton Corp.**, Auburn Graphic Packaging, Contech Castings, Triple Crown, Hendrickson Elastomers, and many smaller companies have closed or downsized, resulting in over 1,550 jobs lost. As defunct properties have fallen to neglect, they burden our communities with dozens of brownfields covering hundreds of acres, restricting economic development and posing health risks to nearby residents. We have made strides to recover, with aggressive redevelopment efforts at locations throughout our County. With bold thinking and strategic engagement of local and regional assets and opportunities, we will leverage this transformative potential and create a new dynamic character for our communities.

If awarded, Dekalb County will utilize funding from this FY24 EPA Brownfields Assessment Grant to assess eligible sites in communities throughout our County corporate limits. We've chosen target areas in 3 communities (Auburn, Butler, and Waterloo) as our focus where EPA Brownfields Assessment Grant funding will have the greatest impact and move these sites towards redevelopment.

**Auburn Target Area** (ATA) – Dominated by several large brownfield sites adjoining low-income neighborhoods in our downtown (in CT205), the ATA is bound by 8<sup>th</sup> St. to the north, Sprott St. to the east, 20<sup>th</sup> St. to the south, and a rail line to the west (0.18 mi<sup>2</sup>). Two priority brownfield sites are targeted for assessment in the ATA, with planned reuses as a tech park and a mixed-use development.

**Butler Target Area (BTA)** – Containing several commercial and industrial brownfield sites interspersed with residential properties along our municipal corridor (in CT203), the BTA is bounded by Green St. to the north, Pearl St. to the east, a rail line to the south, and city limits to the west (0.33 mi<sup>2</sup>). Two priority brownfield sites are initially targeted for assessment in the BTA, with planned reuses to include a downtown brewpub and needed light manufacturing.

**Waterloo Target Area (WTA)** — Consisting of several brownfield sites located in our downtown and adjoining a low-income neighborhood (in CT202), the WTA is bounded by Union St. to the north, Meadow Ln. to the east, Walnut St. to the south, and Elm St. to the west (0.23 mi²). One priority brownfield site is initially targeted for assessment in the WTA, with planned reuses to include a potential educational support facility for the adjoining school and/or mixed-use redevelopment.

Residents living among brownfields in the ATA, BTA, & WTA experience low income: MHI in the target areas is 42% - 55% less than US and 35% - 44% less than IN respectively; and poverty is 25% and 13% higher in the BTA and WTA than the US & IN, respectively. (see 2.a.ii) (2021 ACS). The financial challenges experienced by target area residents have perpetuated a cycle of low-quality jobs; inadequate affordable housing; unhealthy nutritional options; insufficient park/recreational space; and poor community walkability, resulting in social and economic constraints that threaten their physical and financial wellbeing. We recognize the great redevelopment potential of the target areas and are making a focused effort to address priority brownfields (1.a.ii) and leverage additional funding for these hard hit parts of our communities where redevelopment investment has the greatest opportunity for success. We are already working hard to repurpose and reshape the businesses and commerce of the target areas, such as the \$3.8M brownfield redevelopment of Auburn's Memorial Park. Strategic investment of EPA assessment funds will revitalize Dekalb County, making our communities more attractive to new businesses, developers, visitors, and residents.

<u>1.a.ii.</u> <u>Description of the Priority Brownfield Site(s)</u>: Our priority sites (Table 1) offer the greatest opportunity to trigger successful reuse/resurgence in our target area. However, numerous other brownfields are also present in our target areas. The historical/current uses, likely environmental issues, potential health effects from exposure to these sites, and planned reuses are listed below.

Table 1 – Priority Brownfield Sites and Impacts

Priority Site, Size, Proximity to Target Area Residents	Historic Use / Current Use & Condition / Planned Reuse	Suspected Contaminants*	
<b>Auburn Foundry (635 W 11<sup>th</sup> St)</b> – 9.1 acres in ATA; adjoins residential neighborhood; 350' from school	Former foundry / Vacant lot / Technology Park	PCBs, metals, petroleum, VOCs, PAHs	
Former Foundry (525 Hazel St) – 1.7 acres in ATA; adjoins residential neighborhood; 350' from school	Industrial site/ Vacant buildings adjoining railroad/ Mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs, asbestos	
Bus Garage (220 E Maple St) – 1.8 acres in WTA; adjoins residential neighborhood & elementary school	Former bus garage / Vacant lot / Mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs	
Vacant Commercial Buildings (E Main St) – 0.81 acres in BTA; adjoins residential neighborhood	Industrial site/ Vacant buildings / Brewpub or mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs, asbestos	
Former Foundry (600 W Main St) – 27.8 acres in BTA; adjoins rural residential	Former foundry / Vacant buildings / Light manufacturing, warehouse	PCBs, metals, petroleum, VOCs, PAHs, asbestos	

\*According to the Agency for Toxic Substances and Disease Registry (ATSDR), the contaminants listed in Table 1 pose a real threat to human health. Health threats include: skin damage, liver, kidneys, heart, spleen, nervous, respiratory, hormonal, blood, and immune systems, and may also cause neurological damage, birth defects and cancer (www.atsdr.cdc.gov).

These sites are our highest priorities because they will meet immediate needs in the target areas, align with our revitalization plans, and redevelopment is imminent due to funding already committed (approximately \$500K from public investors). The investment to redevelop historic structures, residential/mixed-use commercial assets, and greenspace amenities on priority brownfield properties in our target areas and throughout Dekalb County (we have an inventory of 20 brownfield properties) will serve as examples of success, triggering further investment. For example, the Auburn Foundry site in the ATA potentially impacts the adjoining neighborhood with historical solvents or other industrial chemical releases. The city has plans to repurpose this site, removing the environmental and health threats and transforming it into a much-needed Technology Park bringing desperately needed high-paying employment to this part of our community (as specified in our Revitalization Plans (1.b.i.)).

<u>I.a.iii. Identifying Additional Sites</u>: Our focus at the outset of this grant will be the ATA, BTA, & WTA. If we complete assessment of all priority sites, new sites will be identified using the brownfield inventory and community input and will meet the demographic and environmental justice conditions used to define our disadvantaged target areas (they will be in an underserved community or a disadvantaged census tract (as defined by EJScreen and/or CEJST).

1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans: The 2017 Dekalb County Comprehensive Plan, Auburn 2040 Comprehensive Plan, 2013 Waterloo Comprehensive Plan, and Dekalb County Trails Plan (Revitalization Plans) specify target area revitalization as a key initiative and outline critical infrastructure and renovations to transform our communities and enhance our role as a regional economic hub. This mix of brownfield to commercial/residential redevelopment and increased walkability/connectivity in our target areas will allow residents to live, work, shop, and recreate in their neighborhoods and throughout Dekalb County.

Dekalb County is requesting \$500,000 in grant funding, which is essential to complete environmental assessments of target area priority brownfields. The key to revitalization of our target areas and other portions of our community is brownfields reuse, for which this EPA brownfields grant is vital. These funds will help us reach redevelopment goals outlined in our Revitalization Plans, tackling environmental challenges associated with the highest priority sites within the ATA, BTA, & WTA, triggering further environmental and redevelopment funding (1.c.i). Increasing our stock of owner-occupied, affordable housing and mixed-use commercial/residential properties near our commercial center will alleviate our housing shortage and aligns with our goal to increase the walkability/connection of our downtowns to area neighborhoods and regional trail systems. Revitalizing the Vacant Commercial Buildings site in the BTA to become a potential gastropub and mixed-used commercial development, will bring this property back to productive reuse and become an asset that will

draw people to Butler's downtown. Other plans are being considered to transform the large former foundry property in the BTA into a modern light manufacturing or warehousing facility, bringing additional high-quality jobs to the community. The revitalization efforts for our priority sites will create jobs, affordable housing, and walkable greenspace in our target areas, improving our residents' quality of life and meeting the vision outlined in our Revitalization Plans. Significant resources have already been pledged for reuse of ATA, BTA, & WTA properties (1.c.i), including a leveraging commitment of \$2.2M from Auburn to leverage the Indiana HELP program for Memorial Park. With EPA funds to cover environmental assessment and planning costs, we will realize the outcomes and benefits described below. 1.b.ii Outcomes & Benefits of Reuse Strategy: Assessment and reuse of priority sites such as the former Bus Garage in the WTA will remove environmental threats, eliminate blight, reduce crime, and stimulate private sector investment in surrounding properties. This in turn will be linked to successful reuse outcomes, creating equitable, affordable housing; improving the economic competitiveness of our target area; leveraging current and future investments; and creating unique, healthy, safe, and walkable neighborhoods, particularly in our target areas, where the largest number of our low-income residents, people living in poverty (especially children), women who are pregnant or of child-bearing age, and other sensitive populations reside, supporting environmental justice goals. Reuse of brownfields will also generate higher tax revenue for our target area communities, and through increased investment, new jobs will be created, new residential units will be constructed, and property values will rise. Reuse/redevelopment of all Table 1 properties will create an estimated 1,071 construction jobs and 663 permanent jobs and will generate more than \$2.97M in annual income and property taxes for target area communities, according to projections.

During all phases of the revitalization process, we will promote/encourage the re-use of existing buildings and infrastructure, including implementing building codes that require or promote energy efficiency measures such as energy efficient lighting, low-flow showers/toilets, geothermal heating/cooling, etc. Residents will benefit from increased property values or may seek housing with energy efficiency and less maintenance costs. Addressing priority sites in the target areas will create affordable and sustainable housing, workforce development (new jobs), and remediate/reduce legacy pollution in areas with high concentrations of low-income residents. **EPA's investment in brownfields in Dekalb County will help meet Justice40 goals by creating energy efficient, sustainable development, conserving and preserving greenfields, reducing carbon emissions by enhancing our parks network, encouraging green transportation, and turning idled brownfields into new hubs for the growth of our economies. These accomplishments will deliver justice to disadvantaged residents (due to low-income, poverty, distressed neighborhoods, disproportionate exposure to environmental impacts from brownfields, etc.).** 

<u>I.c. Strategy for Leveraging Resources</u>, <u>i. Resources Needed for Site Reuse</u>: Dekalb County and the target area governments have a history of leveraging investment in projects throughout our communities. For example, Waterloo has recently acquired several properties in our downtown area for future redevelopment. We've also invested \$2.6M in parks, trails, a train depot to help revitalize the community. More investment is planned, focusing on the ATA, BTA, & WTA, as outlined below.

- *Public Funding* see above
- *EPA* Additional EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) to further the brownfield reuse goals of the city (\$500K-\$1.5M)
- Federal Highway Administration Infrastructure improvements like streets & pedestrian/bicycle pathways (Est. \$5M+)
- *Indiana Economic Development Corp.* Tax credits & other incentives to help communities create a climate where pressures from taxes, investment costs, & red tape are lower (Est. \$1M+)
- *Indiana Brownfields Program* Low-interest/partially forgivable loans for brownfield investigation and cleanup through the EPA-funded Revolving Loan Fund (Est. \$1M)
- *Indiana Finance Authority* SRF funding generated from an interest rate discount on wastewater improvement project loans. The savings realized through the rate reduction can be used to remediate brownfield sites (\$500K+)
- *Indiana Brownfields Program (IBP):* Petroleum Orphan Site Initiative (POSI) funding may be used to complete the investigation of sites identified and partially assessed in this Grant and other sites in

- the target area (Est. \$75K)
- *Indiana Office of Community and Rural Affairs* Main Street Revitalization Program (Est. \$500K); Blight Clearance Program for demolition of unsafe structures (\$500K)
- Excess Liability Trust Fund State insurance funding for investigating and remediating eligible petroleum contaminated sites with underground storage tanks (up to \$2M)
- Liability Insurance Funding Indiana courts have ruled that historical general liability policies must cover assessment and remediation costs on sites known to be contaminated. Using EPA Assessment Grant funding to demonstrate the presence of contamination will help trigger viable liability insurance policies to fund cleanup of environmental damages. The city will make efforts to apply this funding source to all eligible sites, including privately and municipally owned property (often \$1-3M/site). Insurance coupled with EPA assessment funding has been used on brownfields in many communities in Indiana, commonly leveraging hundreds of thousands, or even millions in assessment and cleanup funding.

A detailed funding plan will be developed for brownfield sites/areas as assessment projects progress, and each site will have a unique funding plan due to individual status and eligibility.

<u>L.c.ii.</u> <u>Use of Existing Infrastructure</u>: Land use goals in our Revitalization Plans emphasize the build-out of existing parcels, and rehabilitation and infill development in our county's core urban neighborhoods. All priority sites have full utilities already present including 3-Phase electricity, natural gas, city water and sewer, telephone, and fiber optic service. Redevelopment will utilize these existing services and other physical infrastructure such as roads, curb cuts, on- and off-street parking, commerce (I-69, SR 6, and SR 8), and Dekalb County's greenway trail systems to attract new investment in area brownfields, reducing redevelopment costs of these sites. Traditional transportation infrastructure will be complemented by pedestrian connectivity, bicycle improvements, and universal accessibility. Our utility infrastructure is large and robust enough to handle the added capacity and need brought by the planned redevelopment in the ATA, BTA, & WTA. With revitalization ranging from mixed-use commercial/residential to light industrial, using existing infrastructure will allow for easy access to developers and enable residents the opportunity to work and live in the same neighborhood.

2. Community Need and Community Engagement, a. Community Need, i. The Community's Need for Funding: Dekalb County needs EPA's financial assistance because we do not have the necessary funds for environmental assessment in our general budget (\$23M FY24) to address brownfields anywhere in our community, let alone in our target areas. Indicators of need in our target areas are evident in several key economic-demographic factors. MHI is \$31,049 (WTA), \$32,571 (BTA), and \$40,350 (ATA), which are 42% to 55% less than the US, and 35% to 44% less than IN respectively; poverty is 15.8% (BTA) and 14% (WTA), which are 25% and 13% higher than in the US & IN, respectively. (see 2.a.ii) (2021 ACS). The large number of vacant buildings on ATA, BTA, & WTA brownfields has resulted in an estimated twofold increase in crime within our target area brownfields compared to other parts of our communities (according to community estimates), further limiting local government resources due to additional public safety services (police and fire calls) to brownfield sites. Dekalb County priority brownfield sites further add to the financial burden of target area residents by suppressing residential property values and straining municipal budgets through a reduced tax base. In addition, the loss of over 1,550 jobs (Eaton Corp., Auburn Graphic Packaging, Auburn Foundry, Triple Crown, Hendrickson Elastomers, etc.) in the Region since 2013, (2023 IN DWD), adds substantially to the economic challenges facing our County, diminishing local income and property tax revenues, and increasing poverty in our communities. With budgets barely able to provide essential services and needed infrastructure maintenance, our target area communities lack the discretionary funds necessary to complete the proactive assessment and planning activities that this grant will provide, including clarifying environmental issues on brownfield sites, encouraging developers to seek and invest in them, and eliminating risk to the health and wellbeing of our residents and environment. Ultimately, this EPA grant will allow Dekalb County to fulfill the revitalization needs for our target areas, creating unique, healthy, safe, and walkable neighborhoods.

**2.a.ii.** Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations: Some of our community's most sensitive populations (low-income residents, individuals living in poverty, and children living in poverty (Table 2), as well as women who are pregnant or of child-bearing age, live in

and around brownfield sites in the ATA, BTA, & WTA that are often unsecured, and trespassers (including children), risk exposure to toxic chemicals, asbestos, chemicals causing soil and groundwater contamination, and unsafe structures, Contaminants such as PCBs, metals, petroleum, VOCs, PAHs, glycols, lead paint, and asbestos are potentially causing harm to our sensitive populations. 62% to 83% of houses in our target areas were constructed before 1980, making them much more likely to contain lead-based paint, a significant threat to young children and pregnant women. For example, **the former Auburn Foundry site, adjoining a low-income neighborhood, is potentially impacted with petroleum, VOCs, PAHs, metals, asbestos, and other contaminants that are known to cause kidney disease, diabetes, intestinal disease, chronic respiratory disease, and asthma, all of which are experienced by Dekalb County residents at higher rates than Indiana and the US (2.a.ii(2)).** The proximity of brownfields to low-income neighborhoods in our target areas drives down housing values, suppresses commercial investment, and limits residents' access to adequate employment, resulting in a disadvantage for ATA, BTA, & WTA residents with no relief in sight.

Table 2	US 1	IN <sup>1</sup>	ATA <sup>1</sup>	BTA <sup>1</sup>	WTA <sup>1</sup>
Median Household Income	\$69,021	\$61,944	\$40,350	\$32,571	\$31,049
Individuals Living in Poverty 2	12.6%	12.5%	12.5%	15.8%	14%
Children Living in Poverty 2 17.0% 16.8% 19.0% 28.5% 17.4%					
<sup>1</sup> Stats from 2021 ACS <sup>2</sup> Last 12 months					

An infusion of funding from this EPA grant will provide much needed capital for the assessment of blighted properties, clearing the way for remediation and revitalization of our target areas to include affordable housing, increased greenspace, and connectivity through our growing trail system. The resulting resurgence of commerce will support new and revitalized local retail businesses which in turn will boost local employment with quality diversified jobs. Redeveloping our brownfields will increase tax revenues which will directly benefit Dekalb County's underserved and sensitive populations, including removal of blight, reducing exposure to toxic chemicals, lowering crime, providing safer neighborhoods, and better access to public services, ultimately improving the health of our community. 2.a.ii(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Contaminants from target area brownfields are affecting the health of our residents. Many of our priority brownfield sites are believed to contain PCBs, VOCs, PAHs, petroleum, metals, asbestos, lead paint, and/or other chemicals. Studies on the health effects of exposure to these contaminants link them to higher incidences of cancers, kidney disease, liver disease, heart disease, diabetes, intestinal disease, and infant birth issues. As Table 3 below shows, **Dekalb County has high incidences of kidney disease**, diabetes, intestinal disease, ER visits due to asthma, and chronic lower respiratory disease, all potentially linked to impacts from nearby brownfields. Though not available at the municipal level, this data is believed to be representative of our target areas due to the large number of economically vulnerable residents.

Table 3 – Health Indicators

Disease/Health Condition <sup>2</sup>	Dekalb County Rate <sup>3</sup>	Rank <sup>1</sup>	Difference	IN Rate <sup>3</sup>
Kidney Disease Deaths 2	19.4	16 <sup>th</sup>	269% higher	7.2
Diabetes Deaths <sup>2</sup>	31.7	28 <sup>th</sup>	42% higher	22.3
Intestinal Disease Infections	70	11 <sup>th</sup>	65% higher	42.4
ER Visits due to Asthma 4	29.5	25 <sup>th</sup>	28% higher	23
Chronic Lower Respiratory Disease <sup>2</sup>	66.1	31st	22% higher	59.1
Out of 92 IN Counties <sup>2</sup> Source: 2023 Indiana Indicators <sup>3</sup> Incidence per 100K Residents <sup>4</sup> Incidence per 10K Residents				

There are 194 Dekalb County properties with environmental records on IDEM's Virtual File Cabinet (VFC). The cumulative effects of these sites likely contribute to the adverse health conditions impacting our residents. Removal of sources of environmental contaminants present at brownfields in our target area will reduce exposure of our underserved populations to these materials and in turn, reduce disproportionate incidences of disease and other poor health outcomes that these residents currently experience.

<u>2.a.ii(3)</u> Environmental Justice (a) Identification of Environmental Justice Issues: The public health impact from ATA, BTA, & WTA brownfields, and their proximity to our underserved populations, including low-income and impoverished residents, has disproportionately exposed them to

environmental pollutants, resulting in an inability to maintain their health and wellbeing. EPA's EJScreen tool indicates that ATA residents are in the 93<sup>th</sup> to 99<sup>rd</sup> percentile for Hazardous Waste Proximity; 85<sup>th</sup> to 87<sup>th</sup> percentile for Underground Storage Tanks; and 73<sup>rd</sup> to 79<sup>th</sup> percentile for Lead Paint when compared to the US and IN. The WTA is in the 68<sup>th</sup> to 82<sup>nd</sup> percentile for Toxic Releases to Air; 70<sup>th</sup> to 77<sup>th</sup> percentile for Lead Paint; and 72<sup>nd</sup> to 77<sup>th</sup> percentile for Underground Storage Tanks when compared to the US and IN. The BTA is in the 80<sup>th</sup> to 83<sup>rd</sup> percentile for Wastewater Discharge Indicators; 80<sup>th</sup> to 84<sup>th</sup> percentile for RMP Proximity; and 75<sup>th</sup> to 80<sup>th</sup> percentile for Lead Paint when compared to the US and IN. Environmental stressors such as those listed above, have a direct impact on the health, prosperity, and wellbeing of our target area residents, as evidenced by their poor health (2.a.ii(2)), poverty status (2.a.ii(1)), exposure to environmental contaminants, etc. Our brownfield reuse strategy will improve the welfare of our residents by eliminating the health risk they pose.

2.a.ii(3)(b) Advancing Environmental Justice: Brownfield assessment, cleanup, and reuse strategies will improve the welfare of our sensitive populations in the ATA, BTA, and WTA by eliminating the health risks they pose, and this EPA grant will play a crucial role, reducing threats by funding environmental investigation work needed to trigger stalled cleanup and redevelopment on priority sites. New jobs in our target area will create gainful employment for residents, reducing poverty, minimizing displacement, and improving the state of our housing by redeveloping some sites as low-income residential. For example, repurposing the former Foundry in the ATA will provide needed mixed-use commercial/residential development in the community. Grant funds will assess lead-based paint, spurring other federal programs (e.g. CDBG) to help fund lead-based paint abatement and other residential improvements. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of the neighborhood, incentivizing investment in other area properties. New tax revenue will be generated and reinvested in the community. **Health** indicators such as kidney disease, diabetes, intestinal disease, ER visits due to asthma, and chronic lower respiratory disease (2.a.ii(2)) will no longer be influenced by environmental impacts caused by ATA, BTA, and WTA brownfields. This will be accomplished in areas where low income and impoverished are concentrated, supporting environmental justice for all Dekalb County residents. 2.b. Community Engagement, i. Project Involvement & ii. Project Roles: Several community organizations have pledged supporting roles for our brownfields program and grant (Table 4). This diverse assemblage of community groups is well suited to engage the community and public at a grassroots level, with regional influence and local ties, maximizing the benefits they bring to the project.

Table 4 – Project Partners and Roles

Partner Name	Point of Contact	Description and Project Roles		
Dekalb County Economic Dev. Partnership	Anton King, President/CEO 260-927-1180 anton@dekalbedp.org	Local economic development & workforce development organization site selection & prioritization; identify potential buyers; connecting workers to job opportunities created by environmental redevelopment and end use of brownfields; disseminate information about the grant		
United Way of Dekalb County	Tyler Cleverly, Exec. Director 260-927-0995 tyler@unitedwaydekalb.org	Local civic non-profit - provide input on priority site cleanup and future uses, assist w/ community outreach and needs evaluation		
Habitat for Humanity of Northeast Indiana	Marianne Stanley, Exec. Director 260-925-2508 mstanley@hfhnei.org	Local housing advocate - disseminate information regarding brownfield reuse; provide meeting space; potential use of brownfields for low cost housing for disadvantaged residents in the target areas.		
Community Tanya Young, Exec. Director Foundation of 260-925-0311 ext. 302 DeKalb County tyoung@cfdekalb.org		Local philanthropic & visioning organization - disseminate grant information, provide meeting space, identify priority sites		
Butler Main Street	Tracey Robideau, President 260-333-2594	Grassroots economic dev. organization in target area - provide public feedback, disseminate grant information; assist with site selection & prioritization		

2.b.iii. Incorporating Community Input: Dekalb County has a culture of community involvement that we will maintain throughout this grant. A total of 8-12 public meetings will be held during the 4vear grant period to maintain stakeholder engagement and continue to gather input on site selection, prioritization, assessment needs, cleanup decisions, mitigation measures from the cleanup and redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire target area community has an opportunity to provide input. In the event social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA's Office of Land and Emergency Management Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). The target area communities will be updated on progress throughout the grant and will have the opportunity to share input through comment opportunities on county and community partner websites. For residents with limited internet or cellular network access, paper surveys will be available at local businesses, enabling community input without access to digital resources. The County has multi-lingual personnel available to advertise meetings, interpret presentations, or translate documents in Spanish or other languages as needed. We have already begun engaging ATA, BTA, & WTA residents, business owners, non-profits, churches, and other community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and a schedule for future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted through the Dekalb County Economic Development Partnership to bring awareness of the redevelopment opportunities priority sites offer. When developers are identified, they will be invited to attend public meetings to describe their plans for reuse. As a project progresses, we will involve target area stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on reuse. As stakeholder input is received, we will evaluate it against our development goals and available resources, adopting input that feasibly meets these criteria.

3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities & Outputs: The County will begin activities immediately upon award confirmation, working to prepare a Work Plan approved by EPA's PM/PO. No subawards or participant support costs are planned. After the Cooperative Agreement period begins, Dekalb County and its QEP will complete the following tasks: Task / Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization

i. Project Implementation: County staff will travel to regional and national brownfields conferences/meetings, participate in calls, meetings, and correspondence between the city, QEP, EPA, etc. to manage the grant's Cooperative Agreement. We will complete Quarterly, DBE, Annual reports, and ACRES database entries. We will carefully track contractor costs, comparing to budget, expenditures, and project progress, to ensure that grant funds will be utilized within the prescribed 4-year project period. The County, with QEP support, will develop a brownfield inventory to use as a tool to help accomplish reuse goals. Inventoried sites are prioritized based on the following criteria, in no order: 1) reuse potential, 2) potential for environmental or human health impact and environmental justice, and 3) community input. Additional sites will be identified by the County, community leaders, local governments, redevelopment investors, and through community outreach. Priority will be granted to sites within areas identified as disadvantaged by the EJ Screen tool or CEJST and to sites near residential areas that pose health risks to an underserved community. Priority will also be considered for sites that have a higher chance of redevelopment and a greater economic impact potential within our target areas.

*ii.* Schedule: QEP selected through a competitive bidding process (compliant with federal procurement regulations - 2 CFR 200.317 - 200.326) before Cooperative Agreement period begins; correspondence will occur at least monthly (more frequently as specific project activities require) throughout the grant period; update and prioritize brownfield inventory the first 2 quarters, then as necessary for the remainder

of the grant period; ACRES updates will be conducted at least quarterly throughout the grant period *iii. Task/activity Leads*: Dekalb County & QEP

*iv. Output(s)*: Travel - County staff to regional/national brownfields conferences/meetings; prioritized inventory; project performance reports: 16 Quarterly Reports, ACRES entries, 4 MBE/WBE reports, 4 annual reports, etc.; calls, 8-12 public meetings to update communities on the brownfield program, and correspondence between the County, QEP, EPA, etc. to manage the grant's Cooperative Agreement.

# **Task/Activity 2: Environmental Investigation**

*i. Project Implementation*: Prior to applying for site eligibility, an access agreement will be prepared and executed for each site being considered. Eligibility determinations will be completed under this task and the QEP will complete Phase I ESAs activities on sites selected by the County. All Phase I ESAs will be conducted by/in accordance with the applicable ASTM standard (E1527-21) and the All Appropriate Inquiry (AAI) rule. Areas of focus will include those already determined in the inventories as priority sites listed in Table 1. The QEP will prepare a Quality Assurance Project Plan (QAPP) as well as Sampling & Analysis Plans/Health & Safety Plans (SAPs/HASPs) for EPA approval. Once approved, the QEP, directed by the County, will complete Phase II ESAs based on environmental conditions identified in the Phase I ESAs.

*ii.* Schedule: Obtain site access, request eligibility determinations & finalize site access to initial sites for investigation-early 2<sup>nd</sup> Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 15th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted-45 days before end of grant period.

iii. Task/activity Lead(s): Dekalb County & QEP

iv. Outputs: 11 Phase I ESAs; QAPP, SAPs/HASPs, estimated 12 Phase II ESAs.

#### <u>Task/Activity 3: Clean-up & Reuse Planning:</u>

- *i. Project Implementation*: The QEP, directed by the County, will prepare site specific clean-up plans/documents including: Analysis of Brownfield Cleanup Alternatives, remediation plans, site closure letter requests, and clean-up/reuse funding development (1.c.i).
- *ii. Schedule*: Prepared after Phase I and II ESAs are complete, contamination is present, and if cleanup is necessary. Task 3 activities will continue throughout the grant period.
- iii. Task/activity Lead(s): Dekalb County & QEP
- iv. Output(s): 5-10 cleanup planning documents

#### Task/Activity 4: Community Outreach & Involvement:

- *i. Project Implementation*: 8-12 public meetings will be held at various venues throughout Dekalb County during the grant period to update ESA progress and seek public input/involvement. Print and mail material for project/site information and marketing documents will also be funded under this task. The County will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program, and will attend/participate in outreach events. Social media outlets and online media will be developed/maintained, and outreach efforts will inform the public on the progress of brownfield investigation/cleanup planning and provide marketing resources for future development. Additional sites can be identified during public community outreach meetings. These meetings will be focused on public engagement including what sites the community views as a priority for redevelopment. Priority will be granted to sites identified by underserved communities, especially when those sites are within areas identified as disadvantaged by the EJ Screen tool or CEJST.
- *ii. Schedule*: 2-3 public meetings per year; the 1<sup>st</sup> planned for the 2nd Quarter of the grant period.
- iii. Task/activity Lead(s): Dekalb County & QEP
- iv. Output(s): 8-12 public meetings to update communities on the brownfield assessment progress and seek public input and involvement; supplies: printed flyers, advertising, postage, etc.

We will work diligently to ensure startup activities are completed per the schedule above. The County will allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the 4-year Cooperative Agreement contract. Because there is an extremely high demand for assessments and site access has already been

obtained for some of the highest priority sites in 1.a.ii, it is likely that funds will be spent prior to the end date. We are proactively communicating with representatives of privately-owned brownfields to gain access and resolve issues in anticipation of this grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and reuse, and creates a positive dialog between property owners, local government, and impacted citizens.

<u>3.b. Cost Estimates</u>: The costs outlined in Table 5 were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1. The city will allocate \$431,800 (86% of total grant funds) to Phase I and II ESAs.

Table 5 Budget	Budget Categories¹	1. Program Mgmt, Training Support, Inv / Prioritization	2.Phase I / II ESAs	3. Clean-up / Reuse Planning	4. Community Outreach & Involvement	Budget Category Total
	Travel	\$3,000				\$3,000
	Supplies				\$350	\$350
	Contractual <sup>2</sup>	\$22,100	\$431,800	\$30,000	\$12,750	\$496,650
TOTAL B	UDGET	\$25,100	\$431,800	\$30,000	\$13,100	\$500,000

<sup>1</sup>Table 5 only includes budget categories with costs. <sup>2</sup>In accordance with Federal, State, and local procurement regulations. Grant tasks will be completed at the anticipated costs per unit with the following anticipated outputs/outcomes:

- **1. Program Management & Training Support, Inventory/Prioritization:** \$25,100 *Travel*: Attend National Brownfield Conf.: airfare x 2 @ \$1,000, 2 rooms, 3 nights lodging @ \$1,400, meals @ \$450, ground transportation @ \$150 = \$3,000, *Contractual*: total \$22,100, includes approximately 120 hrs. \$85/hr. = \$10,200 for inventory, & approximately 140 hours \$85/hr. = \$11,900 for program mgmt.
- **2. Env. Investigation:** \$431,800 *Contractual*: 11 Phase I ESAs at an average cost of \$3,800 each = \$41,800, & 12 Phase II ESAs at an estimated cost of \$30,000-\$45,000 (depending on site complexity/environmental conditions) = \$390,000 (@ \$32,500 average cost). Though our budget will support 11 Phase I's and 12 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in 1.a.ii.
- 3. Clean-up & Re-use Planning: \$30,000 Contractual: 5-10 ABCAs/Clean-up plans or Re-use plans expected to cost \$3,000-\$6,000 each = \$30,000.
- **4.** Community Outreach & Involvement: \$13,100 Supplies: printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = \$350, Contractual: approx. 150 hours at an estimated \$85/hr. = \$12,750.
- 3.c. Plans to Measure & Evaluate Environmental Progress & Results: We will track, measure, and evaluate progress through meeting minutes, Quarterly and Annual Financial Reports, quarterly review/analysis of grant performance, ACRES entries, and completion of Work Plan tasks. If planned outputs/outcomes are not achieved or milestones/project schedule outlined in 3.a are not being met, we will create a corrective action plan to identify deficiencies and make appropriate adjustments to achieve anticipated outputs on schedule. The Assessment Grant will also have the following measurable outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels cleaned up/redeveloped, acreage made ready for greenspace/recreation, and leveraged monies. These and other statistics will be included in Quarterly Reports and ACRES submittals as data becomes available, which will allow the EPA to better evaluate and highlight the grant program success. At the close of the grant, county staff will provide a final report to the EPA and our residents summarizing project outputs and outcomes. After evaluation of sites is done, it is in the County's best interest that redevelopment happens, and as such, close monitoring of subsequent actions will be done diligently. Outputs and outcomes following the close of the grant will be uploaded to EPA's ACRES page for continued monitoring of the program's success.
- 4. Programmatic Capability & Past Performance, a. Programmatic Capability, i. Organizational Capacity, ii. Organizational Structure & iii Description of Key Staff: Dekalb County Economic Development Partnership (DCRDP) will manage this grant. The DCRDP has previously managed many

other economic development resources at well over \$20M over the past 10 years. The DCRDP, along with other County staff, have the technical, financial, and administrative ability in place to implement this grant project successfully. Mr. Anton King, Executive Director, will serve as the County's Grant Manager. Mr. King has been with the DCEDOP since 2016 and has assisted businesses, industry, and organizations by cultivating investment to enhance Dekalb County. Mr. King will be assisted by Mr. Chris Gaumer, Director and Zoning Administrator for DeKalb County Indiana Department of Development Services. Mr. Gaumer has 17 years of experience in the private and public sector working in community development with local citizens and developers, Plan Commission & Board of Zoning Appeals. King and Gaumer will aggressively use their brownfields and small business growth experience to seek redevelopment opportunities for brownfield properties in Dekalb County. Ms. Susan Sleeps, Dekalb County Auditor, will serve as the Grant Financial Manager and will be responsible for accounting and financial reporting. Ms. Sleeps has been with the Auditor's office since 2013 and has performed similar financial management including the tracking and reporting of all Federal Grants the County receives. In the unlikely event that a member of the team leaves their job prior to the completion of grant tasks, the depth of the County's team will allow for a seamless transition to other experienced members. 4.a.iv. Acquiring Additional Resources: Dekalb County and our QEP will make every effort to contract with disadvantaged business enterprises (women and/or minority owned) and consultants/contractors who employ disadvantaged people, when possible, and we will require our QEP to make every effort to do the same. County staff have a history of working cooperatively with state and federal environmental agency personnel and engaging qualified environmental consultants. Through a competitive bidding and procurement process, the city will select a QEP with experience administering EPA Brownfields Grants and working with IDEM/IBP. The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed 4-year project period. This team will be supported by other county departments including the Redevelopment Commission, Auditor, Development Services, and Legal. We will work with the Small Business Administration (SBA) to identify small businesses in the area with strong labor practices who have been vetted by the SBA as qualified to perform remediation activities and other contracted services. We will invite vetted contractors through the competitive bidding process noted above. We will also work with DCEDP (2.b.ii.) to link our community members to job opportunities related to the investigation, remediation, redevelopment, and ultimate reuse of brownfields.

4.b. Past Performance & Accomplishments, ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (1) Purpose & Accomplishments: Dekalb County has never received an EPA Brownfields grant. However, we have received other federal and non-federal assistance agreements as indicated in Table 6 below.

Table 6 – Past Federally/Non-Federally Funded Assistance Agreements

Awarding Agency	Project	\$ Received	Accomplishments/Outputs/Outcomes/Measures of Success
National Park Service	Historic Preservation Fund Grants-In-Aid Covered Bridge Grant (2021)	\$50,000	Replace rotted beams for Spencerville covered bridge. Dekalb County paid for the flooring
Indiana Dept. of Transportation	Local, Public Agency Project Coordination Contract (2019)	\$162,149	Reconstruction services on CR56, SR205 to SC171 DES# 1702950 Monthly Eng. for DES #1702950 for Topography Survey for roadway design with utility coordination, Preliminary Eng. Services
Federal Highway Administration	County Road 56 Federally Supported Road Project	\$17,917	Reconstruction services on CR56, SR205 to SC171 – DES# 1702950 ROW services, Design services, appraisal mgmt., land purchase, engineering expenses, temporary ROW services

**4.b.ii(2)** Compliance with Grant Requirements: All funding assistance agreement terms and conditions have been and are being met for the above projects, including: providing Spencerville covered bridge maintenance and restoration; and providing road maintenance of county roads. All grant goals and outputs/outcomes (indicated in Table 6) have been achieved to date, all reports were completed in a timely manner, and no corrective measures have been needed. Dekalb County is fully compliant with the terms and conditions of these grant programs which are ongoing.

#### III.B. Threshold Criteria for Assessment Grants

# III.B.1 Applicant Eligibility

DeKalb County meets the definition of a Local Government under 2 CFR 200.64 and is a political subdivision of the State of Indiana. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

#### **III.B.2** Community Involvement

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, and our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions, and solutions. 8 - 12 outreach events (2-3 per yr.) will be held throughout the grant period to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, mitigation measures from cleanup/redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost, or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/ guidance including EPA's Office of Land and Emergency Management Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

# **III.B.3** Expenditure of Assessment Grant Funds

This criterion is not applicable as DeKalb County is not a current EPA Brownfields Assessment Grant recipient.

# **III.B.4** Named Contractors and Subrecipients

DeKalb County has not procured/named any contractors or subrecipients.