R04-18-C-006

City of Kinston

Post Office Box 339
Kinston, North Carolina 28502

Kinston
All-America City
2009

November 6, 2017

Ms. Barbara Alfano
Environmental Protection Agency Region 4
Atlanta Federal Center
61 Forsyth Street, S.W., 10th Floor
Atlanta, Georgia 30303-8960

RE: City of Kinston, North Carolina
EPA Brownfields Cleanup Grant Proposal
Former Harvey Oil Site

Dear Ms. Alfano:

The City of Kinston has experienced a 25% decrease in population in the past 10 years and we are currently experiencing some of the worst economic conditions in North Carolina (high unemployment, poverty, and crime while income and property values are low). One of the census tracts that make up and our target area ranks 9th among the most economically stressed rural tracts in NC. However, there is reason for optimism. Encouraged by the outcomes of assessments recently conducted under the City's EPA Brownfield Community Wide Assessment Grant, we have identified the former Harvey Oil site that, with some cleanup efforts, can be assembled with another adjacent brownfield property into a contiguous site ideally located adjacent to Historic Grainger Stadium. After losing minor league baseball in 2011, we have worked very hard to bring baseball back to Kinston. We are proud to inform you that 2017 was the inaugural season for the Down East Wood Ducks, a new minor league baseball team that calls Historic Grainger Stadium home.

To support the team and nurture the economy, civic pride and welfare of the community, we need to encourage additional investment in the former Harvey Oil site and adjacent MLK Corridor. The former Harvey Oil site has significant environmental liabilities, but with grant funds these environmental impediments to redevelopment can be vanquished. With the site remediated, coupled with a North Carolina Brownfield Agreement secured, we are confident in the redevelopment prospects for this site and the future prospects of the MLK Corridor. As such, we are pleased to submit the following Environmental Protection Agency (EPA) Brownfields Cleanup Grant Proposal for $195,000. Thank you for your consideration and please feel free to contact me or Adam Short (Project Director), if you need any additional information.

Sincerely,

Tony Sears

Tony Sears,
City Manager

COUNCIL MEMBERS: ROBERT A. SWINSON IV – SAMMY C. AIKEN – FELICIA SOLOMON – JOSEPH M. TYSON – WYNN WHITTINGTON

a. **Applicant Identification:**
City of Kinston, North Carolina
207 East King Street
Kinston, North Carolina 28502
DUNS Number: 0755889130000

b. **Funding Requested:**
i): Grant Type: Single Site Cleanup
ii): Federal Funds Requested: $195,000, cost share waiver requested
iii): Contamination: Petroleum

c. **Location:** City of Kinston, Lenoir County, North Carolina

d. **Property Information:** The site is known as the former Harvey Oil site. The former site address was 800 North Tiffany Street. Tiffany Street was renamed Dr. Martin Luther King Jr. Boulevard. However, the site was not issued a new street number when the street name changed. The site is northwest of the intersection of Dr. Martin Luther King Jr. Boulevard and East Vernon Avenue, Kinston, North Carolina 28502.

e. **Contacts:**
i) **Project Director:**
Adam Short
City of Kinston
Planning Department
207 East King Street
Kinston, NC 28502
(252) 939-3269
E-mail: adam.short@ci.kinston.nc.us
ii) **Head of Organization:**
Tony Sears
City Manager
207 East King Street
Kinston, NC 28502
(252) 939-3110
E-mail: tony.sears@ci.kinston.nc.us

f. **Population:**
i) General Population: City of Kinston, 21,677
ii) Not applicable
iii) Lenoir County is not experiencing persistent poverty

g. **Other Factors Checklist:** Attached

h. **Letter from State Environmental Authority:** Attached

Appendix 3
Cleanup Other Factors Checklist

Name of Applicant: City of Kinston

Please identify (with an x) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	**Page #**
None of the Other Factors are applicable.	
Community population is 10,000 or less.	
The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	10
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

Waste Management
ENVIRONMENTAL QUALITY

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL SCOTT
Director

November 1, 2017

Mr. Adam Short, Planning Director
City of Kinston
207 East King Street
Kinston, NC 28502

Re: U.S. EPA Brownfields Cleanup Grant – Harvey Oil Site

Dear Mr. Short:

The North Carolina Department of Environmental Quality (DEQ) Brownfields Program acknowledges and supports the City of Kinston's. application for a U.S. EPA Brownfields Cleanup Grant. We are aware that your grant focuses specifically on the redevelopment of the former Harvey Oil property. This property is significant to the City of Kinston in that it is a prime area for economic redevelopment associated with the new minor league baseball team in Kinston. The new team, the Down East Wood Ducks, was established in 2017 and its home is Grainger Stadium. The Harvey Oil site is located to the southeast of Grainger Stadium and is part of the Salt Wood project, which is currently in the North Carolina Brownfields Program and working towards a brownfields agreement.

Cleanup of the Harvey Oil site would enable the City to move forward with plans for a bunkhouse for the team on the adjacent former Salt Wood property and be redeveloped for supportive retail, restaurant, and other commercial enterprises. This grant would be a boon toward ensuring economic redevelopment for the City around this new sports franchise.

We hope that the City of Kinston is successfully awarded this grant, and we will continue to support you in your Brownfields redevelopment efforts on the entire Salt Wood Brownfields Property. The Brownfields Program offers technical project guidance in accordance with our program, throughout the life of your project. This is a major key to ensuring grant applicants make efficient use of the federal funds awarded. The liability protection offered by the program is also a primary marketing tool for developers and instrumental in securing financing.

The Brownfields Program can also assist with outreach efforts to your local community regarding reuse for recreational purposes and the controls put in place to make the property suitable. The liability protection offered by a Brownfields Agreement is a benefit to the whole community and can often facilitate additional economic development. We look forward to working with you regardless of a grant award or not. We truly believe successful Brownfields projects can rejuvenate a community.

Sincerely,

Bruce Nicholson,
Brownfields Program Manager

ec: Cindy Nolan, U.S. EPA Region 4
Darin McClure, MidAtlantic

1. COMMUNITY NEED

a. Targeted Community and Brownfields

i. Community and Target Area Description: The City of Kinston (16.9 square miles) is located in eastern North Carolina and has been the County seat of Lenoir County since 1791. Kinston was the home of the Neusiok Indians in the 1500 - 1700's when English settlers first discovered the area along the Neuse River. Due to its fertile soils, moderate climate, and water transportation, English settlers continued to find their way to Kinston during the 1700 and 1800's. The formation of the City of Kinston along the banks of the Neuse River, the Revolutionary War (1776 – 1783), the Civil War (1861 – 1865), agriculture (cotton and tobacco), manufacturing (textiles), and weather (floods and hurricanes) have all had major impacts on the current City.

Kinston's location (75 miles east of Raleigh and 65 miles west of the North Carolina coast line) with fertile soils and moderate climate and its location as the western most navigable point on the Neuse River made the City a desirable location to live. The City also has a rich cultural heritage with major influences coming from the Civil War (CSS Neuse) and also an abundance of global caliber African-American musical talent. The City thrived until the 1990s with ample jobs in agriculture (tobacco) and manufacturing (textiles). With the decline of agriculture and manufacturing there has been a push by City leaders within the last few years to take advantage of Kinston's location and heritage as a tourist location. In 2012, the CSS Neuse Civil War Interpretive Center was opened and more recently significant progress has been made to develop a hub in Kinston for the African American Music Trail (AAMT). The AAMT is an eight county partnership led by the North Carolina Arts Council and locally by our community partner, the Kinston Community Council for the Arts to celebrate a variety of music, musicians, and places in eastern North Carolina, where music has been a part of family, church, and community life for generations.

The loss of jobs in agriculture and manufacturing has greatly impacted the City today; however, natural disasters (hurricanes and flooding) may have had an even greater impact. Within a three year period Kinston was hit hard by Hurricane Fran (September 1996) and Hurricane Floyd (September 1999). The historic Lincoln City neighborhood was devastated. This neighborhood was one of the first African American communities in the City. The City, with $1.6 million in financial assistance from the Federal Emergency Management Agency (FEMA) Hazard Mitigation Program Grant and $500K from the State, acquired more than 100 properties through a voluntary buyout, that were significantly damaged from flood-waters. These properties were converted to greenspace to prevent future property damage and protect human life. Flooding occurred again in 2016 with the arrival of Hurricane Matthew. In total, Lenoir County has had 10 major disasters (Presidential Declaration), most associated with hurricanes including Matthew in October 2016[1].

Our target area for this project consists of Census Tracks 104[2] and 105, which comprise the Martin Luther King (MLK) Corridor. The target area is primarily residential in the northern portion, with a small agricultural area to the northeast. In total, the MLK Corridor has 16 brownfield properties located in it. As detailed in the following section, Kinston is experiencing depressed economic conditions and the resultant effects of a stagnant economy. The target area has been especially

[1] www.city-data.com/city/kinston-north-carolina.htlm

[2] The site is located at the southern end of Census Track 1(5, directly adjacent of Census Track 104.

impacted by the poor economic conditions. Kinston is also the home of historic Grainger Stadium. With its 4,100 person capacity, the stadium has supported minor league baseball since it was constructed in 1949 until 2011 when the Kinston Indians moved, leaving the Stadium underutilized and its economic contribution to the City lost. However there is good news as Kinston continues to direct economic development away from agriculture and manufacturing towards heritage and tourism. In 2016 City leaders secured a minor league baseball team to play in Kinston's historic Grainger Stadium. The Down East Wood Ducks are the High-A Minor League Baseball affiliate of the Texas Rangers. With the Down East Wood Ducks entering a 12-year commitment to Kinston, baseball's economic contribution to the target area and the City has restarted. In order to nurture this economic engine, the City launched efforts to revitalize the area around the Stadium. The City has obtained two former industrial properties adjacent to the historic Grainger Stadium with plans to enhance the opportunity for additional facilities to support the growth of baseball in Kinston. These two properties, the former Salt Wood Products and former Harvey Oil distribution facility, are vacant Brownfield sites. These two sites were target properties in the City's recently (2014-2017) completed EPA Brownfield Assessment Grant Project. Assessment activities conducted at the former Harvey Oil site have identified significant environmental impacts which are an impediment to the redevelopment of this site. The former Harvey Oil site is critical for the redevelopment of the area not only because it provides vehicular access from Dr. Martin Luther King, Jr. Boulevard, but also because it can provide street frontage for future commercial/retail/restaurant use of this space.

ii. Demographic Information and Indicators of Needs: The following table demonstrates key demographic data for our target area and Kinston.

Demographic	Census Tract 104	Census Tract 105	City of Kinston	Lenoir County	North Carolina	United States
	MLK Corridor					
Population	1,007	3,790	21,677	59,495	9,535,483	308,745,538
Percent Minority	99.5%	94.4%	71.3%	46.6%	30.5%	27.6%
Percent Black or African-American	97.8%	92%	68%	40.5%	21.5%	12.6%
Population 25 years and older: Without a High School Diploma	41.6%	22.7%	19.7%	20.5%	14.2%	13.3%
Poverty Rate	59%	46.2%	33.1%	23.2%	17.4%	15.5%
Median Household Income (dollars)	13,516	20,307	28,060	34,717	46,868	53,889
Families with Female householders with no husband present Below Poverty Level	75%	48.5%	46.3%	35.3%	34.0%	30.6%
Median Home Value (dollars)	48,000	61,900	102,100	92,500	154,900	178,600
Housing Units Vacant	44.5%	16.6%	18.7%	14.7%	14.5%	12.3%
Unemployment Rate	29.6%	18.3%	15.9%	13.1%	9.4%	8.3%

Source: U.S. Census American Community Survey 2011-2015 Five Year Estimate-www.census.gov, accessed October 2017

As noted above, our target area is home to a high minority population, 99.5% and 94.4% compared to 71.3% for the City, 46.6% for the County and 30.5% for the State. The unemployment rates (29.6% and 18.3%) are higher than the City (15.9%), County (13.1%) and State (9.4%). The high unemployment rates leads to high individual poverty rates identified in Census Tract 105 (40.6%)

and 104 (59%) compared to the City (33.1%), County (23.2%) and State (17.4%). It also follows that Census Tract 105 has Per Capita Income 40% lower than the City. Median Home Value in Census Tract 105 is 39% lower than the City as well. Census Tract 104 ranks 9th among the most economically distressed rural tracts in North Carolina[3]. These data clearly indicate that the target area is economically stressed.

iii. Description of the Brownfields: This grant proposal is focused on the remediation of the top priority site in the MLK Corridor. The former Harvey Oil site is located northwest of the intersection of two major streets in Kinston, Dr. Martin Luther King Boulevard and East Vernon Avenue (the site does not have a street address). Another brownfields site (the former Salt Wood Products) sits adjacent to the east and adjacent to that is Grainger Stadium. Residential areas of Kinston surround Grainger Stadium, located within 500-1,200 feet of the former Harvey Oil site (depending on direction). During the initial stages of the City's Brownfield Assessment Project we completed a city-wide brownfield inventory and identified 16 potential brownfield properties encompassing approximately 33 acres in the vicinity of the site along the MLK Corridor. Five properties were identified as priorities for environmental investigation including Kinston Shirt Factory, Community Garden, Salt Wood Products, 501 East Lenoir Avenue and Harvey Oil. These site have been historically used for manufacturing, wood processing, petroleum storage and scrap metal recycling. Assessment activities confirmed contamination at three of these sites consisting of petroleum products and chlorinated compounds. The blight associated with the site and other brownfields continues to be a hurdle as we seek to bring life to this area.

The 0.57 acre former Harvey Oil site was previously used for the bulk storage and distribution of petroleum products including gasoline, kerosene, heating oil, diesel fuel and various motor oils and lubricants. Based on review of historic information, the subject site was developed as early as 1925 with a bulk fuel storage facility owned by the Standard Oil Company of New Jersey. The subject site continued to operate as a bulk fuel storage and distribution facility under various names until at least 1998. The site was purchased by the Harvey Oil Company in 1979 from the Exxon Corporation. The subject site has remained vacant since the former structures associated with the fuel storage facility were removed in 2001. The large amount of contaminated soil and free product identified at the site have us concerned about current and future impacts to residents and the environment through contaminant migration. Yadkin Branch, a tributary of the Neuse River is located just 1,100 feet west (hydraulically downgradient) of the site.

b. Welfare, Environmental and Public Health Impacts

i. Welfare Impacts: Environmental justice concerns are very real as Kinston's poorest, homeless and minority residents live among blighted, abandoned and contaminated properties in the target area. Living under these circumstances challenges stability with home life which contributed to the higher levels of single parent homes in poverty compared to City, County and State. These living conditions also have a detrimental effect on creating environments that can support educational priorities. In the target area, the adult population without a high school diploma is also amplified compared to the City, State and County. There are 16 brownfield sites in the MLK Corridor. Unfortunately these sites contribute to an overall feeling of hopelessness and despair in

[3] North Carolina's Distressed Urban Tracts: A View of the State's Economically Disadvantaged Communities, University of North Carolina at Chapel Hill, February 2014

the community. These properties also provide an opportunity for mischief, vandalism, crime and become havens for drug abuse. The City of Kinston has a violent crime rate that is 225% higher than North Carolina (over 3 times higher) and a property crime rate that is 123% higher than North Carolina (more than twice as high)[4].

ii. Cumulative Environmental Issues: The residents in our target area are subjected to a disproportionate amount of potential pollution sources. During the assessment phase of our project, it was determined that within a 1/2-mile radius of the former Harvey site were: 20 sites on the list of leaking underground storage tanks; 12 sites with active, registered USTs; five sites on the list of documenting releases from aboveground storage tanks; 22 sites with documented emergency response releases; four sites listed as historic automobile servicing facilities; and one site on the federal CERCLIS list. Various other small industrial facilities have historically been interspersed among the residential areas along East Vernon Avenue. The former Harvey oil site is also located on Dr. Martin Luther King Jr. Boulevard (NC Highway 11), a major north-south highway in eastern North Carolina. Finally, power generation historically took place at the Kinston Power Plant and a manufactured gas plant (MGP) operated until the 1950s in the vicinity of the MLK Corridor.

iii. Cumulative Public Health Issues: As a small community, we are not plagued with large polluting industries or power plants. However, we do have an industrial legacy that has resulted in the release of petroleum and chlorinated solvent into the environment in the MLK Corridor. Petroleum and chlorinated solvents contain compounds known to be carcinogens and/or toxins. Exposure to petroleum and chlorinated solvents is possible through dermal contact and inhalation. With free product on the shallow water table at the former Harvey site, we are especially concerned with residents of our target area being exposed to vapors that migrate into breathing spaces and the potential safety concerns if product or explosive vapors migrate into utility chases.

Lenoir County health department data suggests that public health in Lenoir County lags behind the state of North Carolina. Low birth weight, very low birth weight and premature births were all higher than North Carolina averages by 23%, 26% and 16% respectively over the period from 2001 to 2015[5]. For Lenoir County, cardiovascular disease death rates (37%), heart disease death rates (31%), stroke death rates (19%) and diabetes death rates (25%) are all higher than North Carolina rates[5]. Cancer death rates in Lenoir County are also elevated when compared to North Carolina (colorectal 25% higher, lung 5% higher, breast 9% higher and prostrate 31% higher)[5]. Some of these indicators of poorer public health may be directly attributed to environmental contamination. It is also likely that the blight, depressed economic conditions, and lower education rates also contribute to the public health challenges in the target area.

c. Financial Need

i. Economic Conditions: Kinston is a small community with a population of 21,677 that has declined almost 25% over the past 40 years. A shrinking population, high unemployment, and low incomes has left us struggling to cover our base necessities. Four factors have contributed to the decline in population and an impoverished community with more than 1/3 of the population living

[4] www.areavibes.com/kinston-nc/crime/
[5] North Carolina Department of Health and Human Services

below the poverty level. 1.) Loss of jobs in tobacco and textiles 2.) Natural disasters 3.) Economic Recession and 4.) Rural Location. Foreign competition and the decline in tobacco users have been the biggest contributors to the loss in tobacco jobs. Historically, North Carolina has been number one in tobacco production in the U.S. The textile industry has suffered nationwide due to foreign competition. Kinston experienced the loss of more than 1,000 jobs during the period of 1997 – 2004, with the closure of four textile facilities. Based on trends, these jobs are not expected to return to the community. Two sites located adjacent to the former Harvey site, Salt Wood Products and Coastal Wholesale, closed in 2009 and 2015 respectively, eliminating another 50+ jobs from our target area. As discussed previously, the historic flooding from hurricanes in 1996, 1999 and 2016 may have had the greatest economic impact on the City. For a period of time all City and outside resources were focused on the recovery of the City and not growth. The nationwide economic recessions in 2001 and 2007 – 2009 just prolonged the poor economic conditions for the community.

Over the past thirteen years the City and community partners have completed a series of visioning and planning documents for the City that outline the steps needed to revitalize the area. Unfortunately, we (City and community partners) have struggled in obtaining the necessary public and private funding to make this revitalization happen. With a depleted tax base and struggling to provide the basic necessities for the community, the City could utilize this EPA Brownfield funding to jumpstart the redevelopment of the former Harvey Oil site.

ii. Economic Effects of Brownfields: Nothing demonstrates the economic effects of our brownfields more effectively than the shrinking population for our city and target area. This is a direct reflection of the jobs lost, resulting in a continually shrinking tax base and reduced property values. From 2000 to 2015, the population in Census Tract 104 shrank by 18%. Today, the residential vacancy rate is at 44.5% in Census Tract 104, with renter occupied housing at 86.4% (2015 ACS). Further, the number of brownfields and vacant properties has significantly impacted residential property values. The median home value within Census Tract 104 is $48,000 compared to $102,000 for the City as a whole. These values are the lowest in the City.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a. Project Description

i. *Existing Conditions:* The former Harvey Oil site is located northwest of the intersection of Dr. Martin Luther King Jr. Boulevard and East Vernon Avenue in the City of Kinston, Lenoir County, North Carolina. The flat, rectangular-shaped site covers 0.57 acres with road frontage on East Grainger Avenue (north, 130 feet), Dr, Martin Luther King Jr. Boulevard (east side, 250 feet) and East Vernon Avenue (south side, 90 feet). A six-foot-high dilapidated chain-linked fence topped with barbed wire runs along the site's western border. There are no longer any structures on the site, but remnants of foundations are present. The majority of the site is covered with short weedy vegetation. A debris pile is located along the western property border with litter evident at various locations across the site. There is also evidence that the site is used as a pedestrian cut through to the convenience stores located east and south of the site.

The north adjacent property, across East Grainger Avenue, is an abandoned warehouse (former Coastal Wholesale Grocery). To the east, across Dr. Martin Luther King Jr. Boulevard is a

community garden, a former gas station (Donald Taylor Exxon) currently a used tire store and a convenience store/gas station (Tony's Friendly Mart). Adjacent to the south, across East Vernon Avenue, is a convenience store/gas station. Adjacent to the west is the former Salt Wood Products lumber yard a brownfield site which has recently been razed.

Petroleum products have been identified at the site as free-phase product, dissolved in groundwater and adsorbed in vadose zone soil. The presence of free-phase product, the concentration of benzene dissolved in groundwater and the shallow water table (~6 feet) all suggests the potential for vapor intrusion, which is a significant issue for future development. Free-phase product is located in two areas of the site with a combined spatial extent of 1,800 square feet. The estimated extent of vadose zone soil contamination is approximately 4,300 square feet; assuming a depth of 5 feet the volume is approximately 800 cubic yards. The groundwater plume encompasses the northern half of the subject site and likely moves with groundwater flow towards the east.

ii. Proposed Cleanup Plan: Pursuant to North Carolina General Statutes, the North Carolina Brownfields Program will have oversight of the cleanup activities at the former Harvey Oil site. Work plans and cleanup activities will be approved/overseen by qualified licensed Professional Geologists and/or Professional Engineers licensed in the state of North Carolina.

The City intends to revitalize the property as a recreational/community focus area supporting Grainger Stadium (parking, food and souvenir venders) with future development to include restaurant and retail. Because children will frequent the area to make use of the site, the residential Soil Remedial Goals (SRGs) and Vapor Intrusion Screening Levels (VISLs) will be used for the cleanup of the site. In accordance with the anticipated provisions of the Brownfield Agreement, contaminated soil will be excavated and transported off site for disposal. An *Environmental Management Plan* (EMP) will be developed to restrict potential future exposure during construction activities on the site. Perpetual land use restrictions (LURs) will be recorded with the property deed to restrict use of groundwater at the site and for certain land uses.

During the preparation of the draft ABCA, three cleanup alternatives were evaluated. The most cost effective and the quickest remedial alternative is an excavation-based strategy. Petroleum impacted soils, both in vadose zone and smear zone will be excavated and disposed at a permitted facility. Experience suggests that excavation conducted in the smear zone is an effective means of free product removal. In the event free product is identified within the open excavation, the product will be removed using vacuum tanker truck(s). Upon completion of excavation activities, local clean imported soil will be used to backfill the excavations. Perpetual LURs will also be used as an administrative approach to prevent human exposure to petroleum-impacted groundwater. An outline of the Cleanup Plan follows:

A. Reporting: As required in Brownfield Agreements (BFA), an EMP will be developed for the entire site. The EMP is a broad document that addresses all anticipated media and exposure scenarios. A more targeted Remedial Work Plan will be developed to address the specific activities associated with the remediation. This document will be approved by the Brownfield Program prior to implementation. At the conclusion of the remedial activity a Remedial Action Report, describing activities conducted, laboratory test results, disposal manifests and

conclusions related to the effectiveness of the remedial action will be developed and submitted to the Brownfield Program.

B. Permits: Excavation activities will only be conducted after Brownfield Program approval of the Work Plan is obtained. As needed, construction, erosion and sediment control, fire marshal and transportation-related permits will be obtained.

C. Health and Safety: A Health & Safety Plan will be developed, discussed with and provided to all site workers. Each morning a tailgate meeting will be conducted to discuss the day's planned activities and potential hazards associated with those activities. All site workers will be OSHA HAZWOPER certified.

D. Security: Open excavations will be barricaded during times when no workers are on site. During period of remedial activities, the City of Kinston police will prioritize patrols in the vicinity of the site.

E. Utility Location: North Carolina One Call will be notified prior to initiating excavation activities. This service will notify public utilities that excavation is planned and that utility location is required in the target area.

F. Field Screening: As excavation activities proceed, soil samples will be periodically screened for Volatile Organic Compounds (VOCs) using a Toxic Vapor Analyzer (TVA) equipped with a Photoionization Detector (PID) and a Flame Ionization Detector (FID). This tool will provide qualitative data that aid in directing excavation activities. Additionally, soil samples will periodically be collected and tested in the field for the presence of Total Petroleum Hydrocarbons (TPH) using an Ultraviolet Fluorescence (UVF) petroleum analyzer. This tool provides qualitative real-time data that will be used to direct excavation activities.

G. Soil Excavation: Soil will be excavated from three target areas on the site. Soil will be direct loaded into trucks for transport to the disposal facility. In the event stockpiling is required, stockpiles will be placed on and covered with plastic sheeting in accordance with NCDEQ guidelines. In total, approximately 1,500 tons of soil will be excavated.

H. Soil Transport and Disposal: Dump trucks will be used to transport the soil from the site to the disposal facility. All wastes will be manifested. The disposal facility will be a permitted petroleum-impacted soil land farm. Certificates of disposal will be provided.

I. Dewatering: Dewatering is not anticipated. If free product is identified in excavations during field activities, a vacuum tanker truck may be used to remove the product. These fluids will be disposed at a permitted facility. If necessary, saturated excavated petroleum-impacted soil will be mixed with dry petroleum-impacted soil to eliminate liquid runoff from the petroleum-impacted soil prior to transport.

J. Post-Remediation Soil Sampling: In accordance with Brownfield Program requirements, soil samples will be collected from sidewalls and bottom (if above the water table) of the completed excavations. These samples will be tested for VOCs and semi-VOCs using EPA Methods 8260 and 8270. Analysis for 8 RCRA metals may also be required by the Brownfield Program.

K. Excavation Backfilling: As required by the Brownfield Program, the fill material planned for use at the site will be tested for VOCs, and semi-VOCs (possibly 8 RCRA metals) prior to being used at the site. The soils approved for use as backfill at the site will be placed in the excavations and compacted using the bucket of the excavator. The excavation area will be seeded and covered with straw to mitigate erosion.

L. Post-Remediation Groundwater Monitoring: Three groundwater monitoring wells will be constructed at the site in each excavation area. These wells will be gauged for the presence of

free phase product. In the absence of product, groundwater samples will be collected and tested for VOCs and semi-VOCs.

iii. Alignment with Revitalization Plans: In March 2008 the Eastern Carolina Regional Council prepared a *Vision and Redevelopment Plan* for the City. This plan was developed with the objective of improving economic conditions and the quality of life for the citizens of Kinston. This included addressing conditions along the MLK corridor and in particular in the area that intersects with East Vernon Avenue. Our plans received a major kick-start when the Wood Ducks agreed to a 12-year lease at Grainger Stadium! The objective of the Proposed Cleanup Plan detailed herein is to make the former Harvey Oil site safe for reuse as a compliment to the stadium activities and attractive for future redevelopment that will bring jobs to the area.

The former Harvey site already has access to existing infrastructure (water, sewer, electricity, etc.). Our project will also incorporate equitable and sustainable practices that will help address some of the economic and social barriers of the area. These include: removing the contaminants will remove exposure and safety concerns associated with the site; linking this site with the adjacent Salt Wood site will improve the walkability of the area, particularly residents access to Grainger stadium; redevelopment will provide jobs for local residents; and removal of the blighted areas will improve the emotional condition of our residents.

b. Task Description and Budget Table

The City plans to complete the following specific tasks with the proposed budget:

Task 1 – Community Outreach: We have budgeted $14,700 of the requested funding for contractual expenses related to community outreach, education and involvement activities. The selected consultant will present at community meetings to provide updates on cleanup activities at the former Harvey Oil site. The consultant will assist the City with issuing public notices and newspaper articles to keep the local community informed of environmental cleanup activities and results. Part of the community outreach work will include the continued quarterly Brownfield Steering Committee meetings. Groups that previously participated on the Brownfields Steering Committee are detailed in Section 3.c. of this proposal. The Brownfield Steering committee members represent of a cross section of the community. Costs associated with community involvement activities planned for the project include:

- Public Involvement Plan – that will outline outreach activities over the life of the grant ($2,000)
- Brownfields Steering Committee meetings – meetings will occur quarterly (or more often as needed) – ($9,500)
- Press Events and Public Meetings – facilitate 2 – 3 public meetings to disseminate information on the proposed cleanup project, results of the cleanup and redevelopment planning for the site - ($2,000)
- Preparation, Printing, and Distribution of Project Brochure and Fact Sheet ($700)
- Public Notices and Comment Periods ($500)

In addition to the contractual costs outlined above, the City is requesting funds for travel ($2,500) and supply ($1,500) expenses under this grant application. Travel funds will allow City staff to attend regional and national EPA Brownfield conferences as well as other relevant workshops and

training associated with sustainable redevelopment of brownfield properties. Supply funds will allow the City to purchase supplies needed to support community outreach, such as printing brochures, conceptual renderings, and maps.

Task 2 – Cleanup Planning: Cleanup planning will include finalizing the ABCA document, preparing the Quality Assurance Project Plan(s) for confirmation soil sampling, and negotiating and receiving the necessary regulatory approvals. Cleanup planning costs are anticipated to be $15,000 and include the following:

- Finalization of ABCA document, including incorporation of comments from public notice and regulatory review ($4,500).
- Preparation of a Quality Assurance Project Plan, Confirmation Sampling Plan, and Health and Safety Plan ($5,000).
- Development of bid documents for site cleanup activities, evaluation of bids, and selection of contractor ($5,500).

Task 3 – Site Cleanup: We will use the majority ($161,300) of the grant funds for the actual site cleanup activities. Based on the Phase II ESAs of the property and the findings from the draft ABCA, we plan the following remedial activities:

- **Contaminated Soil Excavation, Transportation and Disposal: $97,500:** Estimated 1,500 tons of petroleum-impacted soil.
- **Backfill Procurement, Transportation and Placement: $30,000:** Estimated 1,500 tons of clean backfill.
- **Monitoring Well Construction, Sampling: $5,000:** Estimated 3, 15 foot deep wells.
- **Field Oversight: $9,000:** Estimated 7 days of labor and expenses.
- **Laboratory Testing: $6,000:** UVF, 8260, 8270
- **Project Management, Brownfield Program Documentation: $13,800:** Work Plan, EMP, Remedial Action Report

In summary, the total cost of project activities is estimated to be $195,000. Since the City has requested a cost share waiver, the requested grant funds are $195,000.

Former Harvey Oil Site Proposed Budget

	Project Tasks			
Budget Categories *(programmatic costs only)*	Task 1 Community Outreach	Task 2 Cleanup Planning	Task 3 Site Cleanup Activities	Total
Personnel				
Fringe Benefits				
Travel	*$2,500*			*$2,500*
Equipment				
Supplies	*$1,500*			*$1,500*
Contractual	*$14,700*	*$15,000*	*$161,300*	*$191,000*
Other (specify)				
Total	***$18,700***	***$15,000***	***$161,300***	***$195,000***
EPA Share	*$18,700*	*$15,000*	*$161,300*	*$195,000*
City Share	*$0*	*$0*	*$0*	*$0*

c. Ability to Leverage

Source	Purpose/Role	Amount	Status
City Staff	In-Kind Services	$12,000 (est.)	Secured
City of Kinston	Stadium & Salt Wood Upgrades	$1.6M	Secured
Wood Ducks	Stadium Lease	$900,000+	Secured
Salt Wood Owner	Purchase of Salt Wood Site	$100,000+	Secured
Lenoir Committee of 100	Purchase of Salt Wood Site	$100,000	Secured
Harvey Oil Co.	Donation of site to City	$75,000	Secured
NC Brownfields Program	Tax Exclusions for Developers	$100,000 (est)	Pending
CBDG	Infrastructure and building upgrades for subsequent sites as project progresses	$750,000	Pending

The City has been very successful in leveraging funds, negotiating agreements and being steward of resources as this project has taken off. The linchpin was the City's successful negotiation with the Down East Wood Ducks to make Kinston their home. The City agreed to invest $1.6 million in infrastructure improvements to historic Grainger Stadium and another $50,000 in upgrades to the Salt Wood site. In return, the Wood Ducks signed a 12-year lease that will pay approximately $60,000 per year for rental of the stadium. The City also gets a portion of the ticket sales, providing a welcome revenue stream and motivation for increased ticket sales (excerpt of lease is attached). During the procurement of the adjacent former Salt Wood Products parcels, the City was able to leverage approximately $100,000 from the previous owner. The former Salt Wood Products parcels had an appraised value of $253,000 and the property was obtained for approximately $150,000. The Lenoir Committee of 100, a local non-profit investment group, assisted the City with $100,000 for the purchase of the former Salt Wood Products parcels. The former Harvey Oil site was donated to the City thus providing the City with $75,000 (the appraised value of the property) in leveraged funds. Once cleaned up, the former Harvey Oil site combined with the Salt Wood Products site will create a safe, conveniently located combined site of approximately 2.7 acres with direct street access to both Dr. Martin Luther King Jr. Boulevard and East Vernon Avenue. The city also used assessment funding to enter the combined Salt Wood/Harvey site into the NC Brownfields Program. The tax exclusions provided by the brownfields agreement will be used as a de-facto "incentive package" to market the property to potential developers. The redevelopment of this combined site with commercial businesses will be fundamental to maintaining and growing a long term relationship between the City and the Wood Ducks and provide job opportunities to the surrounding community.

Developers and property owners can also leverage the County's strong incentive package (including tax credits for every job created and low interest rates for equipment and renovations) and Local Economic Development Grant Program for new and expanding companies (the amount of which is calculated based on investment, number of jobs created, and level of training for workers). In addition, Lenoir County is designated by the NC Department of Commerce as a Tier I county, meaning it receives the maximum state incentives, including Job Tax Credits, Business Property Investment Credits; Real Property Investment Credits; Research and Development Credits; Renewable Energy Tax Credits; Job Development Investment Grants; access to the One North Carolina Fund; and Job Maintenance and Capital Development Fund Grants.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Engaging the Community

The former Harvey Oil site is located within the MLK Corridor. Several community-based associations are very active within this area, including the Pride of Kinston and Kinston Community Council for the Arts. These groups, and others, have a vested interest in the improvement of the area. All are working together to improve the MLK Corridor. These organizations are excited about the prospect of the cleanup project and look toward achieving this collective goal. These steering committee members will serve as liaisons between the project and their respective organizations to disseminate and discuss information and collect input from the community. They will also serve as a resource to educate the community at large about brownfields as well as the equitable redevelopment of the MLK Corridor in the redevelopment planning stage. We will utilize the Brownfields Steering Committee (during quarterly meetings and public meetings) as the primary method to both disseminate and gather information. The Project Team will also be available to meet with property owners, prospective developers/business owners looking to locate in the MLK Corridor. We will maintain an information repository in the City's Planning and Development office located at 207 East King Street, Kinston, NC. Project updates will be provided to the local newspaper, *The Kinston Free Press*. Social media will also be utilized with regular updates on the City's Facebook page. We will also reach out to the community via more traditional methods, such as the preparation and distribution of a project brochure, fact sheets about the environmental cleanup and press releases/public notices in the local paper.

We plan to hold 2-3 public meetings in the target area to further solicit input from our target community. At the first public meeting, held prior to cleanup activities, we will present our project details and solicit input and questions from the community. We will also discuss safety measures to be taken throughout the project and ways we will mitigate impact to our residents. Our project will be conducted under a site-specific health and safety plan which includes site security measures, personal protective equipment requirements, ambient air monitoring procedures, dust suppression measures and contingency plans. In our second public meeting we will discuss the results of the cleanup activities and engage the community on proposed use and redevelopment of the site and surrounding parcels. During our third public meeting (if necessary) we will continue discussions and solicit input on the redevelopment activities in the area. Past experience has shown that public meetings are the best avenue to solicit meaningful input from residents in this area.

Given the demographics of the area, and a very low Hispanic population, it is not anticipated that a Spanish speaker will be needed at public meetings. However, we will provide a translator should the need arise. Assistance will also be made available to those persons with physical disabilities who would otherwise be prohibited by their disabilities from participating in project-related meetings (such as holding meetings at locations that are handicap accessible).

b. Partnerships with Government Agencies

The City identified various government partners at the local, state, and federal levels during the development of the EPA Brownfield Assessment project. We will continue to work with these

government agencies to ensure the cleanup at the former Harvey Oil site is protective of human health and the environment.

NCDEQ Brownfields Program - We will continue to work with NCDEQ staff to ensure appropriate and sustainable cleanup/redevelopment of brownfields in Kinston. In particular, NCDEQ staff will be providing oversight of cleanup activities at the former Harvey Oil site to ensure the cleanup is completed in accordance with the ABCA and Brownfield Agreement.
Lenoir County Health Department is fully accredited by the N.C. Local Health Department Accreditation Board. It's goal is to strive to promote healthier lifestyles, reduce risks, disabilities, and years-of-life lost by providing personal and environmental health services. The role of this organization will be to assist in identifying site specific health concerns, help prepare health and safety plans (as appropriate), assist in community education efforts, participate in community outreach meetings to discuss potential health related issues and answer questions.
Lenoir County has an Economic Development Department with the mission to promote economic development in the County by establishing a diverse employment base for future generations, and a tax base that will support the enhancement of the community's foundation and quality of life. The County's Economic Development Department also supports the Lenoir Committee of 100, which is a non-profit organization that provides funding to economic development projects that are beneficial to the citizens of the County, and the Lenoir County Manufacturer's Association. A member of the County's Economic Development and Planning Departments will continue to participate in the Brownfields Steering Committee.
Lenoir Community College is a member of the NC Community College System with their main campus located in Kinston. The College provides an excellent location for hosting public meetings and workshops. The City and College have a great relationship and will find ways to provide opportunities for students to participate in the brownfield project. A representative will participate on the Brownfields Steering Committee.
Eastern Carolina Council (ECC) is the regional council government for Kinston and Lenoir County. Their mission is to improve the region's quality of life by providing planning, economic development, and senior services to local governments in their area. The ECC frequently assists the City with obtaining CDBG funding and other state/federal grants. In March 2008, the Eastern Carolina Regional Council prepared a *Vision and Redevelopment Plan* for the City, which included meeting with and surveying community organizations with the purpose of developing a shared vision for the revitalization of the City.
North Carolina Rural Economic Development Center (Rural Center) is the state's non-profit agency committed to development, promotion, and implementation of sound economic strategies to improve the quality of life of rural North Carolinians.

c. Partnerships with Community Organizations

The following community-based organizations were part of the City's EPA Brownfield Assessment project and will continue their involvement on the EPA Brownfield Cleanup project. The following community-based organizations provided letters of support for the project.

Pride of Kinston is a non-profit organization formed in 1984 to lead revitalization strategies and activities in the City by strengthening our existing economic assets and diversifying our economic base through business retention, recruitment and outreach to developers, investors and

entrepreneurs. The Pride of Kinston is committed to assisting the City with site access, redevelopment planning and will serve on the Brownfields Steering Committee.
Kinston Community Council for the Arts is a non-profit organization dedicated to helping Lenoir County residents experience the joy, promise and pursuit of artistic excellence. The Council is the regional center unifying communities through exposure to the arts and providing rich cultural experiences while promoting tourism, economic development and educational opportunities for all. The Council will assist the City with outreach activities and will serve on the Brownfields Steering Committee.
Kinston - Lenoir County Chamber of Commerce acts as a voice and advocate for the community regarding economic, community and government issues. A member of the Chamber will participate on the Brownfields Steering Committee.

d. Partnerships with Workforce Development Programs

As a partner in this Brownfield Cleanup, Lenoir Community College will have the opportunity to offer its students the chance to observe the field activities associated with real-world environmental remediation. Field activities will need to be conducted by specially trained personnel (HAZWOPER), but there will be opportunities for student observation. We will endeavor to find local qualified contractors to conduct the remedial action at the former Harvey Oil site. However, activities that may result in exposure to contaminants will need to be conducted by properly trained individuals which may not be readily available in the locale of the site. Activities that do not require specialty training will be available to the local workforce. These activities may include traffic control, transportation, security and sanitation.

4. PROJECT BENEFITS

a. Welfare, Environmental and Public Health Benefits

The remediation of the former Harvey Oil site is expected to provide the following benefits:

- Reduced blight in the MLK Corridor and increased pride in the community;
- Additional jobs, reduced unemployment, lower poverty, higher incomes, and an increased tax base from the redevelopment of the former Harvey Oil site and surrounding sites supporting the Wood Ducks presence and other community activities at the refurbished stadium;
- Reduction in crime as vacant and blighted properties are put into productive use;
- Public assurance that the site and its redevelopment plans are safe to the community which is demonstrated through the North Carolina Brownfields Agreement;
- Elimination of free product reduces likelihood of vapors entering nearby storm sewers, vapor intrusion at nearby structures and the site itself, and migration of petroleum contaminated groundwater to the nearby Community Garden, adjacent sites and Yadkin Branch;
- Elimination of free product (inhalation) and reduction of petroleum in the soil (dermal contact) reduces likelihood of pedestrian exposure;
- Elimination or reduction of contaminants will mitigate exposure scenarios, potentially reducing the high incidents of cancer and other health ailments experienced in Kinston and Lenoir County; and

- Reduction of petroleum in source area soil reduces contaminant transport to groundwater (secondary source elimination) and the likelihood of construction worker exposure during redevelopment.

b. Economic and Community Benefits

Project outcomes that will lead to numerous economic, non-economic and community benefits include, but are not limited to, the number of new engaged community members resulting from our project, 0.57 acres of brownfields made ready for reuse (just the Harvey Oil site), the number of jobs created and the number of redevelopment dollars leveraged. Redeveloping into an attractive commercial development will lower our unemployment, increase our tax base, increase sales taxes, and reverse the outward migration of businesses and residents. We anticipate that the successful redevelopment of the Harvey Oil site with a $5M commercial development will result in 20-25 new jobs and an additional $77,000 in annual property tax revenue. In addition to improving our tax base, this project will have other economic benefits. Successful redevelopment in the area should decrease the number of vacant homes in the area, decrease rental percentages, and spur property owners to repair their properties, having a positive impact on the targeted community. Non-economic and community benefits include the renewed sense of hope our residents will feel as economic investment and positive activity flow into this area of the city.

5. PROGRAMMACTIC CAPABILITY AND PAST PERFORMANCE

a. Audit Findings

The City has not received any adverse audit findings.

b. Programmatic Capability

The City, with assistance from a qualified contractor, has the ability to effectively manage and oversee all phases of the remediation work under this grant. Mr. Adam Short, Planning Director with the City, served as the Project Director for the 2014-2017 assessment grants and will serve in that capacity for this grant. Mr. Short, in conjunction with City Council, City support staff, and Steering Committee will provide the overall direction for the project. Mr. Short will provide regular updates and progress reports to the City Manager, Mr. Tony Sears and City Council. Mr. Short will be supported by Ms. Catherine Gwynn, Finance Director for the City. Ms. Gwynn has had extensive experience working with all of the City's grant projects including budgeting for expenditures, dispersal requests, grant reconciliation and preparation of interim, final and close out reports. In addition to the Project Director and his assistant, the Town will contract with an environmental firm that has expertise in all aspects of brownfield cleanup and redevelopment.

c. Measuring Environmental Results: Anticipated Outputs/Outcomes

The Project Director will report to EPA quarterly with status reports as the project proceeds and with a final summary report at the conclusion of the project. The anticipated outputs include public meetings, quality assurance project plan(s), work plan(s), remediation construction bidding, site remediation and post-remediation monitoring. These outputs are quantifiable by the number of public meetings, the number of viable bids and the amount of soil/free product removed from the site. Some anticipated outcomes will include the reduction (elimination) of free phase product, the reduction in dissolved phase (in groundwater) contamination and the reduction in contaminant concentration in soils remaining on site. These outcomes will be measurable at the conclusion of the active remediation/monitoring. An additional outcome is a North Carolina Brownfield Agreement that establishes that the site is safe for reuse for commercial and recreational purposes. The ultimate objective is redevelopment of the site. This may occur outside the grant timeframe. When redevelopment takes place, the outcome could be quantified by increased tax revenue and jobs created.

d. Past Performance and Accomplishments

i. Currently or Has Ever Received an EPA Brownfields Grant

1. Accomplishments – The following highlights some of the outputs and outcomes of the City's 2014-2017 EPA Brownfield Assessment Grant project. The outputs and outcomes for this project include: completed community involvement plan; two public meetings; completed inventory with 62 potential brownfields inventoried; 11 completed Phase I ESAs; 4 completed Phase II ESAs; one completed ABCA; three sites entered into the NC Brownfields Program (with one completed agreement during the grant period); one site (Kinston Power Plant) redeveloped into a vodka distillery; and one site (former Glen Raven Mill) put under a brownfields agreement and donated to the City. The City has the following accomplishments for the combined Salt Wood Products and Harvey Oil site: Phase I & II ESAs; ABCA; eligibility for the NC Brownfields Program; acquisition of the Salt Wood site and donation of the Harvey Oil site. The majority of these activities are reflected in ACRES. Final entries into ACRES have not been made as our time has been consumed preparing this grant application. We anticipate ACRES to be completely updated by December 15, 2017. The ma

2. Compliance with grant requirements – The City completed the EPA Brownfield Assessment grant (BF-00D26314) activities in compliance with the work plan, schedule and terms and conditions. All performance and technical reports were submitted in a timely fashion including the closeout report, which is scheduled for submission prior to December 31, 2017.We were able to expend all but $2,107.49 (0.5%) of the Assessment Grant funding. Approximately 87% of project expenditures were on environmental assessments.

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 11/15/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Kinston, North Carolina

* b. Employer/Taxpayer Identification Number (EIN/TIN): 566001259

* c. Organizational DUNS: 0755889130000

d. Address:

* Street1: 207 East King Street
Street2:
* City: Kinston
County/Parish:
* State: NC: North Carolina
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 28501-4917

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr.
* First Name: Adam
Middle Name:
* Last Name: Short
Suffix:

Title: Planning Adminstrator

Organizational Affiliation:
City of Kinston Planning Department

* Telephone Number: 252-939-3269
Fax Number: 252-939-3388

* Email: adam.short@ci.kinston.nc.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-17-09

* Title:

FY18 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

City of Kinston, NC EPA FY18 Brownfields Cleanup Grant - Former Harvey Oil Site

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant NC-007 * b. Program/Project NC-007

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2018 * b. End Date: 09/30/2021

18. Estimated Funding ($):

* a. Federal	195,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	195,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: Tony

Middle Name:

* Last Name: Sears

Suffix:

* Title: City Manager

* Telephone Number: 252-939-3110 Fax Number: 252-939-3388

* Email: tony.sears@ci.kinston.nc.us

* Signature of Authorized Representative: Adam Short * Date Signed: 11/15/2017

R04-18-C-008

ROBBINS

November 10, 2017

Ms. Barbara Alfano
Brownfield Coordinator
Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, SW 10th FL
Atlanta, Georgia 30303-8960

RE: Town of Robbins, North Carolina
EPA Brownfields Robbins Mill Smokestack Parcel Cleanup Grant Proposal

Dear Ms. Alfano:

The Town of Robbins, North Carolina, is pleased to submit the enclosed application for an Environmental Protection Agency (EPA) Brownfields Cleanup Grant for the Smokestack Parcel of the former Robbins Textile Mill. Since receiving an EPA Assessment Grant in 2013 and two EPA Cleanup Grants in 2016, we have completed significant assessment, cleanup planning, and cleanup on the former mill complex, and we have been able to safely remove tons of contaminated debris. With this grant, we will be able to take the steps necessary to remediate and redevelop the smokestack parcel, which will serve as the entrance to a light industrial or commercial development with valuable rail access. Our community is excited to continue the cleanup and redevelopment of the formerly blighted mill complex to reverse the negative effects our Town has felt since the closure of the Robbins Textile Mill, the economic recession, and the loss of 1,500 manufacturing jobs in a ten-year period.

a. **Applicant Identification:** Town of Robbins, North Carolina
101 North Middleton Street
Robbins, North Carolina 27325

b. **Funding Requested:**
i): Grant Type: Single Site Cleanup
ii): Federal Funds Requested: $200,000, requesting waiver for cost share
iii): Contamination: Petroleum

c. **Location:** Town of Robbins, Moore County, North Carolina

d. **Property Information:** Former Robbins Mill – Smokestack Parcel
200 South Kennedy Street

Post Office Box 296 | 101 N. Middleton Street | Robbins | North Carolina | 27325
Phone: 910.948.2431 | Fax: 910.948.3981

Robbins, NC 27325

e. **Contacts:**

i) **Project Director:**
David Lambert
Town Manager
Town of Robbins
101 North Middleton Street
Robbins, North Carolina 27325
Phone: (910) 948-2431
Fax: (910) 948-3981
E-mail: manager@townofrobbins.com

ii) **Head of Organization**
Lonnie B. English
Mayor
Town of Robbins
101 North Middleton Street
Robbins, North Carolina 27325
Phone: (910) 571-1649
Fax: (910) 948-3981
E-mail: lenglish@mountaire.com

f. **Population:**
i.) 1,201 (U.S. Census, 2015 American Community Survey 5-yr. Estimate)
ii.) The Town of Robbins is a municipal form of government.
iii.) Moore County has not experienced persistent poverty over the past 30 years.

g. **Regional Priorities Checklist:** Attached

h. **Letter from the State Environmental Authority**: Attached

Thank you for your consideration. If you should have any questions, please do not hesitate to contact me at (910) 571-1649.

Regards,

Lonnie B. English
Mayor of Robbins

Cleanup Other Factors Checklist

Name of Applicant: **Robbins, North Carolina**

Please identify with an (X) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	**Page #**
None of the Other Factors Apply	
Community Population is 10,000 or less	1
The jurisdiction is located within, or includes, a county experiencing 'persistent poverty' where 20% of more of its population have lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

Waste Management
ENVIRONMENTAL QUALITY

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL SCOTT
Director

October 26, 2017

Lonnie English, Mayor
Town of Robbins
101 North Middleton Street
Robbins, NC 27325

Re: U.S. EPA Brownfields Cleanup Grant – Town of Robbins

Dear Mr. English,

The North Carolina Department of Environmental Quality (DEQ) Brownfields Program acknowledges and supports the Town of Robbins application for a U.S. EPA Brownfields Cleanup Grant. We are aware that your grant focuses specifically on the redevelopment of the former Robbins Mill Property, parcel number 20040034, Tract 1, referred to as the smoke stack parcel. The grant would assist in addressing asbestos containing materials and soil impacts identified on the site, which is already enrolled in the State Brownfields Program.

We hope the Town of Robbins is successfully awarded this grant, and we will continue to support you in your Brownfields redevelopment efforts. The Brownfields Program offers technical project guidance in accordance with our program, throughout the life of your project. This is a major key to ensuring grant applicants make efficient use of the federal funds awarded. The liability protection offered by the program is also a primary marketing tool for developers and instrumental in securing financing.

The Brownfields Program can also assist with outreach efforts to your local prospective developers regarding Brownfields redevelopment and the liability relief and tax incentives available. The liability relief and tax incentives offered by a Brownfields Agreement can often facilitate deals that would not have been possible without an Agreement.

We look forward to working with you regardless of a grant award or not. We truly believe successful Brownfields projects can rejuvenate a community.

Sincerely,

Bruce Nicholson
Brownfields Program Manager

ec: Cindy Nolan, U.S. EPA Region 4
Brian Kvam, Cardno

1. COMMUNITY NEED

a. Target Area and Brownfields

i. Community and Target Area Descriptions: Located in the agricultural heart of North Carolina, the small Town of Robbins had humble beginnings as a railway crossroads. Geography led Robbins to become home to multiple textile mills and manufacturers as it was a hub for farmers to bring cotton to industry as well as a means for industry to ship goods to consumers across the country. The Town of Robbins, encompassing 1.3 square miles, was home to the Robbins Mill/Milliken Plant which opened in the 1920's and grew to employ hundreds of workers over the next fifty years. Ithaca Industries (manufacturer of women's hosiery), Carolina Lace, Mansion Homes (mobile home manufacturer), and Perdue Farms (poultry processor) also operated in Robbins. As the industries grew during the peak years of the 1970's and 1980's, multiple support and service industries also opened, including several gas stations, automobile repair shops, and department stores.

With a manufacturing-based economy, Robbins has always differed from the southern part of Moore County. The southern portion of the county is home to the Pinehurst Resort, a popular destination for wealthy 'snowbirds' and the location of the prestigious 2014 US Open Golf Championship. The southern part of the county includes the affluent communities of Pinehurst and Southern Pines, while the northern portion of the county tends to be the home of the laborers and 'blue-collar' workers. As southern Moore County grew and developed into the wealthy "destination" area, the demand for low-wage service industry-type jobs also grew. New Hispanic immigrants found they could meet this need, as well as the demand for low-wage manufacturing/processing jobs, and began rapidly populating the area in the late 1980's to mid-1990's. Because housing costs were actually affordable in Robbins versus the wealthy communities in the southern portion of the county, Hispanics made their homes within the town. Today, the Town of Robbins is more than 46% Hispanic compared to only 6% in Moore County.

The town itself is small with a population just over 1,200 making their home in a 1.3 square mile area of land. Former industrial giants are found throughout the town's footprint in various stages of blight and decay – visible signs of an era gone-by. These visible reminders highlight the differences felt between the Town and the county. Robbins' residents, who have heavy hearts and dampened spirits were highlighted in a CBS national news segment which aired in October 2011 titled, "Town Struggles in County Deemed Too Rich for Aid" that highlighted the Town's plight. Subsequently, the BBC news produced a similar segment titled "Incomplete: The North Carolina Town the Recovery Forgot" that aired in September 2012. Numerous residents spoke from their hearts in these nationally aired segments stating they felt "left out" and "throwed out" by the government's lack of help, that their "way of life was a dying tradition" in reference to farming and textile manufacturing, that the "government doesn't care what happens in small towns," and that seeing businesses close in the Town's heart was "like boarding up windows at home," something difficult to see, yet the norm in this small town.

ii. Demographic Information and Indicators of Need: Statistical demographic data demonstrate the Town's economically depressed plight. Robbins has a high Hispanic minority population (46.4%) and is an impoverished community with just over 53% of the population of children living below the poverty level. This sensitive population is especially susceptible to environmental contaminants. Only 70.9% of the population in Robbins completed High School, compared to 98% in nearby Pinehurst, while only 12.9% have a Bachelor's Degree compared to 56% in Pinehurst. The per capita income in Robbins is almost half that of Moore County and a third of that in Pinehurst. The median household income in Robbins is significantly less than those in both Pinehurst and Moore County, while the unemployment rate is higher.

Table 1 | Demographic Information

Demographic	Town of Robbins	Town of Pinehurst	Moore County	North Carolina
Population	1,201	15,313	91,743	9,845,333
Percent Minority (Alone)	5.8	3.7	17.2	30.5
Percent Hispanic (Alone)	46.4	4.4	6.2	8.8
Percent African-American (Alone)	2.7	1.6	12.3	21.5
Percent Children (5 –under)	7.2	3.6	5.5	6.2
Percent Elderly (65-over)	15.2	42.4	23.6	14.2
Families with Children Below Poverty (under 18)	53.1	3.9	19.9	20.5
Speak English less than "Very Well"	16.6	2.1	2.8	4.8
High School Graduate or Higher	70.9	98.0	89.2	85.8
Bachelor Degree	12.9	56.0	32.6	28.4
Per Capita Income	$15,594	$49,503	$29,643	$25,920
Median Household Income	$30,313	$74,849	$50,998	$46,868
Individuals Below Poverty Level	43.4	1.8	15.2	17.4
Median Home Value	$83,500	$284,200	$99,100	$154,900
Percentage of Renter Occupied Housing Units	47.1	14.4	25.4	34.9
Unemployment Rate	9.6	4.1	8.0	9.4

Source: U.S. Census 2015 American Community Survey 5-year Estimates, accessed October 2017

iii. Description of Brownfields: Located in the heart of Robbins lies the former Robbins Mill. The former woolen weaving mill was once a major employer for the Town. In operation for decades, it was a major blow to the economy and the disposition of numerous employees, when the mill was forced to close in 1990. The property was briefly used by a sign manufacturer during the late 1990s and 2000s; however, that too was forced to close due to rising operational costs and cheaper labor found overseas. What remained of the historic building succumbed to fire in August 2008. Prior to the fire, the mill had been purchased and subsequently leased to a company with plans to manufacture recycled paper products for sale across the nation. The hope and promise of 200 much-needed jobs went up in smoke as the structure burned. The various remnants of the building (that "looks like a pile of garbage" according to a Robbins resident) remained on the property as symbols of lost dreams. The property was left vacant – littered with debris and rubble remaining from the fire – and stood as a significant brownfield negatively impacting the small town of Robbins.

In an effort to address this blighted property and others in similar conditions, the Town of Robbins applied for and received brownfield assessment funding from the Environmental Protection Agency (EPA). Initial assessment work for the former Robbins Mill was completed utilizing the Town's brownfield grant including Phase I and Phase II Environmental Site Assessments (ESAs). The Phase II identified soil contamination across the site, primarily due to polycyclic aromatic hydrocarbons (PAHs) and heavy metals (chromium and arsenic) at levels above established regulatory thresholds. An Asbestos-Containing Materials (ACM) survey determined that debris piles in specific areas of the subject property contained ACM. In 2016, the Town was awarded two separate hazardous clean-up grants to address contamination at two of the larger parcels at the mill complex – the Northern and Southern. The Town is now in the finishing stages of completing those cleanups. In addition to these parcels, the Phase II also identified significant contamination in and adjacent to the mill's former smokestack. The Smokestack Parcel currently contains two large aboveground storage tanks (ASTs) containing fuel oil and soils in the area have been impacted from PAHs, likely from years of burning fuel in the mill boilers. The site also contains a significant amount of building debris suspected of containing ACM. The Smokestack Parcel is the subject of this cleanup application and the next piece of the redevelopment puzzle to be addressed.

In addition to the assessments completed at the Robbins Mill, the Town also inventoried other potential brownfield properties. Six other properties were immediately identified as brownfields that are negatively impacting Robbins. Due to the small size of the Town (a 1.3 square mile footprint), the impact from these properties is significant.

Immediately adjacent to the former mill is the typical southern textile mill village. Once home to the mill workers, 47% of the homes are now rentals. Most of the small, single-family residences in this predominantly Hispanic neighborhood (72.4% Hispanic) are in need of significant repair and/or renovation. Data from the Moore County Tax Assessor indicates that property values are significantly lower in this neighborhood when compared to those just a few blocks away. While the homes located immediately west of Highway 705 (the major thoroughfare in Robbins) have an average property value of just over $69,000, the homes adjacent to the former Robbins Mill average in value of just over $59,000 – ***15% lower than their neighbors' homes***. Due to their proximity to the former mill, residents are also concerned about potential impacts from the former industrial operations, the fire, and the remaining asbestos-containing debris. The stigma, in part, has caused the property values to decline and the neighborhood to fall into a state of disrepair. What is left of the mill, once a vital part of the community and a huge economic driver (the town's largest employer), now stands as a symbol of a forgotten era to residents reflecting how growth and prosperity left their community when the mill closed. Local residents have been very concerned about the state of the former mill; anxiously support the continued cleanup of the site; and are highly interested in the eventual redevelopment of the property.

b. Welfare, Environmental, and Public Health Impacts

i. Welfare Impacts: Residents throughout Robbins, especially those living closest to the former Robbins Mill, bear the higher burden of greater environmental contamination. These neighborhoods have elevated Hispanic population numbers and higher poverty levels, which raises concerns of environmental justice. Those with the financial means have fled the Town all together for opportunities in other areas of the County, leaving the small town of Robbins to deteriorate over time. Remaining residents have had to face a disproportionate amount of vacant, blighted properties that are both environmental and emotional hazards. Lingering environmental contamination is documented at the mill and must be addressed before the site can be redeveloped. Without the continued environmental assessment and cleanup that is so desperately needed, residents will continue to be exposed to the remains of an industrial era long past; specifically contaminated soils and debris. Further, residents will continue to bear the emotional burden living adjacent to the crumbling, vacant industrial eyesores which blemishes their landscape. A 2005 study published in the Journal of Social Health and Behavior noted that public health officials need to seriously consider the mental health impacts of living near industrial facilities. "Residential proximity to industrial activity has a negative impact on mental health. This impact is both direct and mediated by individuals' perceptions of neighborhood disorder and personal powerlessness, and the impact is greater for minorities and the poor than it is for whites and wealthier individuals."[1] The residents' comments, quoted above, featured in the CBS and BBC programs seem to corroborate the study's findings.

The former Robbins Mill, which remained in a dilapidated state for years, has impacted the surrounding community. The once vibrant Robbins Mill neighborhood has become a less than desirable place to live with declining property values and high minority populations. When the mill closed, the working class who supported operations and populated the neighborhood left the area in search of other jobs. Homes became vacant, dilapidated, and unkempt. Those who now remain are a predominantly low-income, minority population. The Smokestack Parcel and the

[1] Downey, L, Van Willigen, M. (2005). Environmental stressors: the mental health impacts of living near industrial activity. The Journal of Health and Social Behavior, 46(3), 289-305.

other mill parcels have had a significant impact on adjoining residential property values. Redevelopment and revitalization of the area is being hindered by the presence and environmental status of this property, and residents fear their neighborhood will not achieve meaningful revitalization because of its status.

ii. Cumulative Environmental Issues: The Town of Robbins has clearly been impacted by numerous environmental issues for hundreds of years. Our agricultural history rooted in textiles and the railway caused a legacy of environmental issues that we must address today on order to prosper once again. In addition (according to EnviroFacts) Robbins has three industries with reported toxic releases and five facilities with reported hazardous waste activities. The EPA Environmental Justice screening tool (www.ejscreen.epa.gov/mapper) clearly demonstrates the toll these cumulative environmental issues are taking on Robbin's neighborhoods. For example, the southern portion of Robbins (south of Broad Street adjacent to the mill) ranks in the 80-90% percentile for nearly all measurable inputs including ozone, traffic, lead paint, Superfund proximity, RMP proximity, and water discharger.

iii. Cumulative Public Health Impacts: The County Health Rankings database (www.countyhealthrankings.org) reports that 19% of the population in Moore County is potentially exposed to exceeding a violation limit during the past year compared to 4% for the State of North Carolina. At the same time, the portion of Robbins closest to the mill also ranks in the 90-95% percentile for demographic parameters such as minority population, low income population, linguistically isolated, less than high school degree, and children under the age of five. Addressing the environmental concerns associated with brownfields is certainly a step in the right direction towards reversing these disparaging statistics.

Approximately eleven homes are either immediately adjacent to or within 200' of the mill property boundary and within 300' of documented soil contamination from PAHs and debris with ACM. In the census block closest to the former mill, 18% of the population are children under the age of five and who are particularly sensitive to PAHs (which have been linked to difficulties with neurodevelopment) and 72% of the population is Hispanic (certainly raising environmental justice concerns). The property is fenced, but trespassers frequent the site as they explore or take a shortcut to town. There is an elevated risk of exposure to these contaminants via the dermal, inhalation, and ingestion pathways for the trespassers as well as residents (particularly sensitive populations of children) living immediately to the former mill.

c. Financial Need

i. Economic Conditions: The Town of Robbins has been deeply affected by both foreign competition and the domestic economic recession. Robbins flourished for nearly seventy years until foreign outsourcing began pulling jobs overseas. The former Robbins Mill closed its doors in 1990, consequently eliminating the 235 jobs that had managed to remain at the end of its lifespan. Over the next 15 years, nearly every other Robbins factory closed, including Ithaca Industries in 1998, Carolina Lace in 2000, Mansion Homes in 2002, Perdue Farms in 2003, Klaussner Home Furnishings in 2010, and most recently, American Growler in October 2012. All together, these closings resulted in the loss of 1,500 jobs in the 15-year timespan, a significant loss considering the population of Robbins now stands at only 1,201 people. In the three year timeframe from 2008 to 2011, Moore County experienced the fifth-largest percentage increase in poverty in the nation, with the jump occurring primarily in and around the town of Robbins.[2]

One of the few remaining places of employment, American Growler, ceased production and closed its doors on approximately 50 Robbins workers on October 26, 2012. A former manufacturer of combat vehicles for the U.S. Marine Corps, American Growler's contract with

[2] Andrew A. Beveridge, Queens College Sociology Department; Census Bureau, "Measuring the Recession's Toll," New York Times 21 Sept. 2011.

General Dynamics and the U.S. Marine Corps ended. This property has the potential to become yet another brownfield site, if left vacant and idle. While a smaller American Growler plant is still open in nearby Star, (Montgomery County) North Carolina, the company is unfortunately discouraged by federal law to hire residents of Robbins. The Star Plant is part of the Small Business Administration (SBA) program, HUBZone (Historically Underutilized Business Zones), which gives federal contract preference to small businesses in areas that qualify — in part by employing staff who live in their HUBZone.

The Town's economic plight was further exacerbated by their efforts to support the growing industries prior to the economic recession. In the early 2000's, the Town went through a major sewer system upgrade to meet the industrial need. When the industries closed, they left the town $1.4 million in debt from the system upgrade alone. The Town's biggest water customers were no longer using/purchasing the volumes of water previously needed. This left Robbins with no choice but to increase water and sewer rates to their already struggling citizens by more than 150%.

On July 1, 2015, as part of a follow-up to a 2013 state tax form legislation, the N.C. General Assembly placed new limits on municipalities' collection of local business privilege license taxes. While state legislatures promised to work with local governments to find a solution to the loss of revenue, no solutions have yet been implemented to account for the $62 million deficit towns and cities now face. The smaller communities such as Robbins are particularly affected by this; they are already operating under economic stress with limited financial options with which to pay for basic services. The impact of this decrease in tax dollars can only mean further pressure on local governments to raise property taxes, which will in turn limit economic growth.

Moore County completed a property tax re-evaluation in 2015 – the first such re-assessment since 1998. Seven years of little to no growth in Robbins meant a decrease in property values; in Robbins property values decreased from $47.5 million in 2014 to $46.3 million in 2015. The $1.2 million drop resulted in an approximate $10,000 revenue decrease to the Town's budget. For FY18, the Town is only projecting $367,000 in revenue from ad valorem taxes and $283,000 from the Local Option Sales Tax, while other revenues are flat, projected to decrease, or restricted. With the limited revenues, Robbins has been operating with the bare minimum of sixteen total staffers (7 of which are public safety – police and fire workers) and limited spending on capital improvements and equipment. Despite these efforts at budget control, the Town still had to transfer over almost $12,000 from the Town's fund balance (savings) in order to balance the overall operating budget of just over $1.2 million. As a result, the Town continues to struggle to provide basic services and does not have funds to conduct environmental assessments on the brownfields.

ii. Economic Effects of Brownfields: With the increasing unemployment, Robbins has suffered a loss of tax base to support basic services and infrastructure costs. In her 2011 interview with the national CBS news, then-Mayor Theron Bell pointed out that the town's young people were most affected by the town's economic state. The 2010 census data showed that the median income for workers between the ages of 15-24 dropped by 9% as compared to the 2000 census. Consequently, Mayor Bell stated, the "town's young people were forced to move to bigger cities when they finish college. I am a champion for the Robbins area... but our young people cannot stay, because they cannot find jobs. They have to move to larger municipalities." Only 12.9% of the population in Robbins holds a four-year college degree compared to 56.0% in Pinehurst, where job opportunities for college graduates exist. Higher education brings better-paying jobs, growing tax revenues, enhanced public safety, and a better quality of life. Sadly, those Robbins residents achieving higher-education degrees are forced to look away from home for the better quality of life their degrees will afford them.

The disparity between the Town of Robbins, the Town of Pinehurst, and the surrounding Moore County are clearly seen in the demographic data. Residents from Robbins have a median family income of just over $30,000 compared to those in Pinehurst whose median family income exceeds $74,000. This is a decline in median income from the 2010 Census which cited a median income of $31,000. Nearly 53% of families with children live below the poverty threshold in Robbins compared to 4% in Pinehurst. This is a significant increase in poverty levels; the 2010 Census cited 36% of families with children lived below the poverty threshold. Furthermore, the 'haves' of Pinehurst have skewed the demographics so that Moore County appears as a wealthy county overall, despite the impoverished state of the 'have-nots' in the Town of Robbins. Rising costs for basic services in Robbins coupled with no jobs contributed to the dramatic increase in the poverty rate. But, in what is described as the ultimate irony, Moore County maintains its status as a wealthy county. Similar to many states, North Carolina uses a tiered ranking system as a guide for issuing state funds to cities and towns in need. Demographic data from wealthy towns such as Pinehurst and Southern Pines rank Moore County as a fairly wealthy county, meaning it and the cities and towns within the county, are ineligible for certain types of aid. Unfortunately, this means that although Robbins is clearly not on par with the County in terms of economic, housing, or social data – it too is ineligible for aid. Robbins truly is the "Town the Economic Recovery Forgot" as coined by the BBC.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a. Project Description

i. Existing Conditions: The Smokestack Parcel of the former Robbins Mill currently exists in a state of blight. The remains of the mill complex on this parcel include piles of debris remaining from the 2008 fire, two large fuel-oil ASTs, and the historic smokestack. In this condition, the property is a significant impediment to efforts being undertaken to revitalize the area. However, the mill complex is centrally located in the heart of the small town, and the cleanup of the Smokestack Parcel is a key piece to the overall redevelopment of the former mill complex and to the revitalization of this distressed community. Residents of this area have called for improved access to affordable housing, new industry that would afford residents the jobs they so desperately need, and a variety of commercial services many other wealthier areas of the County take for granted: grocery stores, health care, banks, and green space. Residents are particularly interested in saving the historic smokestack and potentially developing a historical display to pay homage to significant role the mill played in the Town's history.

Due to the community's concerns about the unsafe conditions and physical and environmental hazards on the property, we began taking steps to assess and acquire the property. The Robbins Mill complex is comprised of six parcels. The Smokestack Parcel is the subject of this grant application. Following a Phase I Environmental Site Assessment (ESA) performed in accordance with ASTM E1527-05 and All Appropriate Inquiries (AAI) requirements in September 2013, we submitted an application for a Brownfield Agreement with the NC DEQ. In December 2014 another Phase I ESA was completed, and the Town subsequently purchased the Robbins Mill complex on December 31, 2014. Prior to site acquisition, we expended approximately $125,000 of EPA assessment grant funds to complete the pre-property inquiry, and a redevelopment plan for the Former Robbins Mill Complex. A draft ABCA was prepared for the Smokestack Parcel in October 2017 in anticipation of submission of this grant application.

In order to make the Smokestack Parcel of the former Robbins Mill Complex safe for redevelopment, several specific environmental concerns must first be addressed, including removing approximately 800 cubic yards (cyd) of ACM-contaminated debris, approximately 300 cyd of soils contaminated with PAH and heavy metals, and the emptying, removal, and proper disposal of two above-ground storage tanks. The draft ABCA was completed to determine the best method of addressing these concerns based on a combination of cost, effectiveness, long-

term reliability, and implementation risk as appropriate for the most likely reuse of the property in preparation for this application.

ii. Proposed Cleanup Plan: In October 2017, a draft ABCA was prepared to address cleanup of the Smokestack Parcel of the former Robbins Mill Complex. Three options for remediation of impacted site soils and removal of the ACM debris and ASTs were outlined, including the estimated costs to fully address the property. These options included a combination of no action, excavation and off-site disposal, and capping.

The ABCA recommended the excavation and off-site disposal option. Total removal of impacted site soils will require the excavation of 300 cubic yards of material. This includes one discrete area associated with the existing ASTs, where soils are documented to contain high levels of metals and PAHs. Additionally, removal and disposal costs were estimated for 800 cyd of ACM-contaminated debris. An estimated 16,000 gallons of fuel oil will be pumped from the ASTs and disposed of properly. Total costs for soil and debris removal, including removal and disposal of two ASTs (one 28,500-gallon AST and one 3,000 gallon AST) are estimated at $161,920. Contaminated groundwater will not be addressed during the cleanup, instead institutional controls in the form of a restrictive covenant will be placed on the property to prevent use of groundwater.

In accordance with the update to the Robbins Master Plan (updated in June 2015) and the community charrettes conducted under the assessment grant, the Town will be able to market the Smokestack Parcel for light industrial and commercial use once the cleanup is complete. As the success with locating the granite company on the North Parking Lot site demonstrates, we believe the Smokestack Parcel will be an attractive location once the environmental concerns are mitigated.

iii. Alignment with Revitalization Plans: As part of the Town's EPA assessment grant, a redevelopment plan was prepared for the former Robbins Mill complex, based on input from residents adjacent to and surrounding the former mill. The proposed redevelopment plan is ambitious and provides a conceptual design for a major mixed-use project to anchor the revitalization efforts in the heart of Robbins. The former Robbins Mill complex includes six parcels (the Smokestack Parcel site is the subject of this application). The plan is for a mix of uses, where each parcel can be redeveloped independent of the other. The Smokestack Parcel (subject of this application) is located along the rail siding and at the corner of Kennedy and Broad Streets. The site is adjacent to the Northern Parcel, which is in the process of being cleaned up. The Smokestack Parcel will serve as the entrance to the Northern Parcel, which is planned for light industrial, warehousing, or commercial redevelopment to take advantage of the rail line and other existing infrastructure. Therefore, the community envisions the Smokestack Parcel as a site for an entrance monument and historical display that incorporates the remaining mill smokestack.

Cleanup and redevelopment of the mill complex has been one of the highest priorities of the Town, since the fire destroyed the building. After successfully assessing and acquiring the property, the Town has begun the cleanup efforts and is moving forward with implementing the redevelopment strategy the community envisioned for the site. Specifically, with this cleanup, the Smokestack Parcel will be an attractive asset for the Town's efforts to market and attract a company to the Northern Parcel (planned for light industrial, warehousing, or commercial). Meanwhile, the Southern Parcel is slated to become retail fronting Hemp Street with multi-family housing above and to the north to facilitate the transition of land use from the adjoining residential neighborhoods to the commercial/industrial parcels and railroad tracks. The Eastern Parcel and South Parking Lot Parcel, which are essentially carved out of existing residential blocks, will be redeveloping into single-family housing to complete those neighborhood blocks. Fortunately, the North Parking Lot Parcel had no environmental concerns, and a local

businessman located a granite shop on the site. The Town partnered with Habitat for Humanity to construct two single-family houses on the South Parking Lot Parcel, which also had been cleared of any environmental concerns under the brownfields assessment grant.

b. Task Descriptions and Budget Table:

i. Task Descriptions: Grant funds will be used for Project Management, Community Outreach, Cleanup Planning, and Site Cleanup. All cost estimates are based on similar expenses incurred by the Town's EPA cleanup grant for the Northern and Southern Parcels:

Task 1 – Project Management: With oversight from the Town of Robbins, our qualified brownfields consultant will assist with management of grant activities including completion of all quarterly and annual performance reporting; input property-specific information into ACRES; and completing the final closeout report ($500 per quarter). Travel is budgeted for two staff members to attend the National Brownfields Conference ($1,500 each) and the EPA Region 4 Grantees workshop ($1,000 each). Therefore, we are budgeting $6,000 in contractual expenses and $5,000 in travel expenses.

Task 2 – Community Outreach: Community outreach is vital to the success of any public endeavor. As such, outreach activities will be performed to ensure that the revitalization efforts continue to take into account the needs and expectations of residents, business owners, and patrons of Robbins. Planned outreach activities consist of holding meetings with focus groups established as part of the Assessment Grant, developing newspaper articles that describe the project and associated activities, and meeting with prospective buyers and developers. For all community outreach activities, we will continue to work closely with the community and residents immediately adjacent to the mill and the focus groups who were so instrumental during our previous grants. A budget of $15,000 in contractual expenses is included for assistance in public outreach as well as web design and creation of marketing materials. Costs associated with community involvement activities planned for the project include:

- Public Involvement Plan – will update the previously approved plan ($1,500)
- Brownfields steering committee meetings – meetings will occur quarterly (or more often as needed) ($2,500)
- Development and Maintenance of a Media Campaign – prepare electronic, print, and traditional press released including social media platforms such as Facebook, Twitter, and Instagram, a project specific website, and radio/television briefings ($6,000)
- Public Meetings – facilitate 2 – 3 meetings to discuss project start and cleanup plan, disseminate project activities, environmental cleanup results ($2,500)
- Preparation, Printing, and Distribution of Project Brochure, Fact Sheets, and Public Notices ($2,500)

Task 2 – Cleanup Planning: Cleanup planning will include finalizing the ABCA document, placing the ABCA on a 30-day public review and comment period, preparing the Quality Assurance Project Plan for confirmation soil sampling, and negotiating and receiving the necessary regulatory approvals. Cleanup planning costs are anticipated to be $12,080 and include the following:

- Finalization of ABCA document, including incorporation of comments from public notice and regulatory review ($3,580).
- Preparation of a Quality Assurance Project Plan, Confirmation Sampling Plan, and Health and Safety Plan ($5,000).
- Development of bid documents for site cleanup activities, evaluation of bids, and selection of contractor ($3,500).

Task 3 –Site Cleanup: We will use the majority of the grant funds for the actual site cleanup activities. Based on the Phase II ESAs of the property and the findings from the draft ABCA, cleanup activities are estimated to be $161,920 and include the following remedial activities:

- Remove and dispose of approximately 300 cubic yards of hazardous substance-contaminated soil. The cost of this task is estimated to be $19,800.
- Remove and dispose of approximately 800 cubic yards of ACM-contaminated debris. The cost of this task is estimated to be $105,600.
- Remove and dispose of two ASTs including removal and disposal of remaining contents in each AST. The cost of this task is estimated to be $25,250.
- Collect and analyze 20 samples for waste characterization and confirmation sampling. The waste characterization samples will be analyzed for RCRA metals, including the Toxic Characteristic Leaching Procedure, and TCLP SVOCs. The confirmation samples will be analyzed for TAL metals and SVOCs. ($11,000).

In summary, the total cost of project activities is estimated to be $200,000. The Town is requesting $200,000 in cleanup funds and a cost-share hardship waiver for the required 20% match contribution of $40,000. Without the hardship waiver, the Town will be unable to proceed with the project. However, Town personnel time to manage the grant, report on performance, input information into ACRES, and complete the final closeout report will be in-kind leveraged work.

c. Budget Table:

Table 2 | Smokestack Parcel of the Robbins Mill Cleanup Proposed Budget

	Project Tasks				
Budget Categories (programmatic costs only)	Task 1 Project Management	Task 2 Community Outreach	Task 3 Cleanup Planning	Task 4 Site Cleanup Activities	Total
Personnel					
Fringe Benefits					
Travel	$5,000				$3,500
Equipment					
Supplies					
Contractual	$6,000	$15,000	$12,080	$161,920	$196,500
Other (specify)					
Total	**$11,000**	**$15,000**	**$12,080**	**$161,920**	**$200,000**
EPA Share	$11,000	$15,000	$12,080	$161,920	$200,000
Town Share				Waiver requested	$0

d. Ability to Leverage: We have already leveraged our brownfields program to seize new opportunities, secure other sources of funding, and tap community volunteer hours to improve the Town. For example, the Town of Robbins is working with the USDA on a grant to improve the efficiency and capacity of their water and sewer systems that will be essential to future development and redevelopment. Infrastructure improvements were noted as the number one priority in the recently completed Robbins Redevelopment Plan. As the infrastructure improves, so does the potential for redevelopment at the key brownfield sites. We are continuing our partnership with the EPA with this application for clean-up grant funding to help prepare the former Robbins Mill for reuse, and we will again seek opportunities to leverage the EPA funds to complete the cleanup and redevelopment as well as generate additional benefits for the community. The following is an example of successful leveraging from our previous EPA grants:

In the cleanup project for the Northern and Southern parcels, we leveraged approximately $90,000 of work by partnering with a recycling company to remove nearly 1,400 tons of brick from the former Robbins Mill site. The company removed the brick at no cost to the Town in exchange for the recycling value. In order to ensure the safety of the workers and protect from exacerbating existing contamination on the site, the company was required to have a 3rd party environmental profession with an asbestos license and the authority to stop work in order to prevent any activities in areas with contamination or asbestos containing materials.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Engaging the Community: Community Involvement: The Town took a unique approach to community participation as the assessment grant was implemented by forming four specific focus groups to consider options for redevelopment of brownfields. Led by project partner NMFRC, the four focus groups were established at a community-wide meeting early in the grant program. One group centered on Community and Economic Development, another focused on Education, a third group concentrated on Housing, and the final group focused on Recreation. Each group met independently to provide recommendations and help guide the project. Each focus group is comprised of volunteer citizens (with between 5-7 members per group on average). These focus groups represent a varied cross-section of our entire community such that all community members have an equal voice. All four of our community focus groups have successfully helped make a difference in their area: Economic – established RBA; Education – Hope Academy; Recreation – mill pond, playground improvement; and Housing – improved code enforcement. In addition, we have an active executive steering committee, which includes Town staff, elected officials, and representatives from our community project partners. Members will attend regularly scheduled (anticipated to be quarterly) meetings to review project progress, bring any issues of concern up for discussion, receive project updates that they will in turn share with those who they represent, and give their opinions on redevelopment options, and health and/or environmental concerns. They and the focus groups will serve as the information conduit between the citizens of Robbins and the brownfield project, as well as the project's advocates.

We will also reach out to our citizens by meeting with differing community organizations. These range from the churches to the regulars who congregate in the local chicken hut for lunch. Being a small town, word of mouth is often times the best way to spread news – and we will continually discuss the project with the community as it progresses. A variety of methods will continue to be employed during implementation of the brownfields program, including updates to Town Council and press releases and fact sheets distributed to local newspapers.

Consideration of Residential Concerns During Cleanup: The community will continue their involvement throughout the cleanup of the Smokestack Parcel of the Robbins Mill site, including input of the scheduling of cleanup activities, input on the routing of trucks and times of operation, and continued visioning and redevelopment planning for the site. This communication will take place via several methods, such as one-on-one discussions with concerned citizens, Town council briefings, public meetings, information sessions, city website, distribution of print media, including brochures and fact sheets, and articles in the local newspaper. This dialogue will take place prior to cleanup activities beginning, to inform the community on the planned activities, address concerns, and receive input on scheduling and routing of construction traffic. During the cleanup, we will check in with residents, solicit feedback, and listen to any concerns and/or praises. And, of course, during the actual redevelopment of the site, we will once again engage the community to ensure the development meets the residents' needs.

Consideration of Hispanic Population: Due to the high Hispanic population within Robbins, we will continue to provide a translator at all community meetings and visioning sessions. In addition, all program materials will be published in both English and Spanish. We will also continue the outreach and inclusion of the Hispanic community and build upon the great success we have already had. For example, NMFRC helped to establish a Latino Leadership Team in Robbins. This group recently completed a major park cleanup and safety program at the Town's Tracey Brown Park, and other Hispanic-led community projects are under development working in partnership with Town officials. The goal is to further Hispanic engagement and visibility within the community and on this project.

Protection of Sensitive Populations and Nearby Residents During Cleanup: During the actual environmental cleanup, nearby and sensitive populations throughout the community (such as

those living immediately adjacent to the former Robbins Mill) will be protected from contaminants utilizing standard safety features. Environmental consultants working on the site will be briefed prior to initiating work to let them know of the close proximity of neighborhood residents. Since most of the environmental work anticipated to be conducted through this grant consists of removal of contaminated surficial soils and debris, an exposure threat does exist. Therefore, measures to restrict access, such as signs and barricades in English and Spanish, will be utilized as appropriate. Silt fencing will be installed to prevent offsite migration of soils, and soils and debris will be watered to reduce dust as they are removed to prevent airborne exposure. Physical controls shall also include erosion control, storm water control, plastic lined containers and covers to manage the waste and prevent release of the waste material into the surrounding environment. As part of the community involvement, an education and outreach program will be conducted by the Town to seek community input and to educate the surrounding community on the process and effects of brownfield cleanup at the former Robbins Mill. The Moore County Health Department will be available on an on call basis to answer questions and provide technical assistance, as needed.

Continued Communication With Citizens: Providing updates on the progress of the project is essential to the success of maintaining the project's community-driven focus. The Town will continue to disseminate information and gather input from the neighborhood groups, residents, businesses, and property owners via the focus groups and steering committee. Plus, we always seek and welcome new participants, so we will continue to reach out to those who may not have been actively involved during public involvement activities during the previous grant.

We will use a variety of communication methods to disseminate information, such as the preparation of and distribution of a project brochure, fact sheets about the environmental cleanup, and press releases/public notices in the local paper. For example, a public notice was printed in the local newspaper, *The Pilot*, on October 11, 2017, announcing the Town's intention to submit this EPA Brownfield Cleanup Application and the availability of the draft ABCA and application. A public meeting was held to discuss the application and cleanup project, where the public was invited to comment and provide input, on October 17, 2017. While the public was invited to comment and ask questions, the primary focus of the discussion centered on the potential redevelopment of the site and the entire mill complex. Residents indicated a desire to see some of the bricks salvaged and incorporated into a historical marker or display at the smokestack site.

b. Partnerships with Government Agencies: The Town of Robbins has development the following strong partnership for this project:

- US EPA is an essential part of this cooperative agreement. The assigned brownfield project officer will guide the project, review budgets, ensure the terms and conditions of the project are met accurately, and provide support and expertise.
- NC DEQ Brownfields Program will serve as a technical resource during the implementation of the cleanup activities. The NC DEQ oversees the state's brownfields program, which offers liability protections and tax incentives to prospective developers. The Town entered into negotiations for a Brownfields Agreement prior to acquiring the site, and the NC DEQ provided a letter of acceptance and confirmation that they will oversee the cleanup under the terms to be negotiated under the agreement.
- USDA Rural Development makes investments in North Carolina to strengthen the rural economy, strengthen rural communities, and maximize opportunity for folks who call rural America home. Recently, the Town partnered with the USDA to build a new fire station. USDA will continue to help the Town by providing their expertise in rural development and by providing funds for the Town to establish a revolving loan fund for downtown businesses.

- Moore County Health Department will support remediation and redevelopment planning activities, including but not limited to ensuring public health issues are addressed during assessment, cleanup, and redevelopment of the sites, providing information to the public on the health risks of contaminants, and answering the public's health-related questions.
- Moore County Planning and Community Division has worked with the NMFRC and the Town on place-based and community development projects in the area, including building the NMFRC's capacity to administer an Individual Development Account program aimed at helping low income families achieve home ownership. The Community Division will offer planning expertise during the project.
- Moore County Partners in Progress is the economic development organization for Moore County, North Carolina. A non-profit, public/private entity with a 501(c)(3) tax status, the organization will support the project by actively marketing brownfield properties that become ready for redevelopment.

c. Partnerships with Community Organizations:

i. Community Organization Description & Roles: Provided below is a list of Community-based Organizations that support and are involved in the project.

Community Group	Mission Statement	Support for the Brownfield Project
Northern Moore Family Resource Center	A 501 (c) (3) nonprofit organization established in 1996 to serve children and families in northern Moore County, North Carolina.	Will continue to lend grant management experience and community connections to help educate the public and involve the community in the brownfields process.
Chamber of Commerce	Organization for business leaders to network, provide leadership training, assist with relocation information for those considering moving to our dynamic community	Will assist in directing business support to Robbins and will make needed business connections for Robbins redevelopment.
Robbins First Baptist Church	To share the love of Christ with our community.	Will assist in communicating with the Latino community through our growing Latino ministry and will continue to host community meetings at the church.
Maira Anayeli Campuzano	Community member who wishes to see the mill site cleaned up and made into something that would be productive and useful for Town residents.	Will continue to serve as a translator during community-wide meetings for residents who do not speak English well and assist with outreach to the Hispanic community.
Robbins Civic Association	To improve the Town and further progress in economic development.	Will invite team members to provide project updates at association meetings
North Moore High School	To educate the population of Robbins.	The Principal of the school is a focus group member and consistently reaches out to students to show them the importance of environmental protection.

ii. Letters of Commitment: Letters of support from the above listed organizations are included as an attachment to this proposal.

d. Partnerships with Workforce Development Programs: Due to the close proximity of Robbins to Durham (about 60 miles), the Town will encourage contractors to consider hiring environmental technicians that graduated from Durham's Brownfield Job Training Program for brownfields assessment and remediation activities. Preferences will be given to proposals from contractors whose staff members include local community members and/or those that have graduated from Durham's program. In addition, the Town will look to the Regional Partnership

Development Workforce Board which has a career center in Aberdeen (Moore County) to link community members to employment opportunities.

4. PROJECT BENEFITS

a. Welfare, Environmental, and Public Health Benefits: Robbins is a resilient town. Despite the fact that it has been hit over and over again by devastating economic blows (first the loss of the manufacturing industries that originally defined it followed by the loss of the agricultural based jobs and most recently by the loss of military-manufacturing jobs), the community still has faith that "history will repeat itself – Robbins will come back," as stated by an interviewee on the BBC news clip. Furthermore, our town is a place where neighbors truly help one another. "Only In Robbins," the slogan captured on the welcome banner, depicts the true heart of this small town, and the new motto "Robbins is no longer a Mill Town but a We Will Town" reveals the determination of its citizens to adapt to a changing economy.

Robbins is committed to redefining its purpose and bringing back to life the prosperity known from decades past. Our highest priority brownfield target remains the former Robbins Mill complex. With the Phase II ESA of the property complete and the taking of title to the property by the Town with a NCDEQ brownfields agreement in place, the first phases of site cleanup/remediation are being completed taken place. However, additional cleanup work remains. Phase II ESA results indicate petroleum products in two large ASTs as well as petroleum constituents in site soils in excess of regulatory threshold values from years of operating the boilers for the textile mill and asbestos-containing materials in the debris on the parcel. The Town is now focusing on additional strategies to redevelop the site, including this application of clean-up grant funds from the EPA for the Smokestack Parcel. Cleaning up the former mill complex will have the direct health benefit of eliminating or limiting exposure pathways for nearby residents (as well as future recreational users) from site contaminants. The proposed redevelopment will further improve public health by affording residents access to jobs which will ultimately increase quality of life.

Perhaps more importantly, however, are the indirect benefits to be had from the cleanup of the brownfield properties around Town. The current status of the mill complex has had significant negative emotional effects on those living in its shadow. Long-time residents, who remain in the village despite the poor conditions, as well as newer Hispanic residents, looking to fulfill their American Dream, have been discouraged and disheartened by the blight at the center of their neighborhood. In its current state, the Smokestack Parcel keeps the surrounding neighborhood in an economically depressed state and perpetuates the cycle of poverty-driven unhealthy lifestyles. The effect is far reaching, as other properties also fall into disrepair and are ignored. Without adequate environmental cleanup, there is little to no hope that the brownfield sites will be redeveloped and the public health improved.

Environmental Benefits: The specific environmental outcomes anticipated from the cleanup of this parcel include reduction of contamination of soils, elimination of potential source of contamination (ASTs), and reduction of contamination from stormwater runoff. The project will also help us to continue to increase environmental awareness among all community members. Teaching people about the environment encourages them to appreciate nature, its complex and vital functions, and how their actions can impact it positively or negatively. People who learn about their relationship to the environment are more likely to conserve natural resources and energy, and resist activities that degrade environmental health.

b. Economic and Community Benefits:

One of the major accomplishments of our first brownfields grant was to complete a Redevelopment Plan (an update to the Town's Master Plan). In light of the change in the global economy and demise of the founding textile industries which once supported Robbins, the plan

was overdue. Since the Town does not have an engineering or planning department or staff, the work could not have been completed without assistance from the Brownfields program. As a result, we took a long hard look at how brownfields properties are viewed in Robbins. Where once they were viewed as a nuisance and something to be avoided, they are now viewed as properties of opportunities with legitimate concern to be addressed and eventually redeveloped.

While the economic recession has been the major obstacle to the redevelopment and reuse of these properties, other obstacles hindering meaningful reuse centered on on-site environmental concerns. Now, the Town is completing the cleanup on the adjacent parcels, portions of the former mill complex can be marketed for reuse. The Smokestack Parcel will be a gateway to any future redevelopment.

We are still in the early stages of our revitalization and brownfields program; and, we realize these public endeavors can take a long time. However, our community is patient and determined. We will continue to diligently work to develop partnerships to ultimately achieve our revitalization goals. The cleanup of the Smokestack Parcel will be another step towards those goals. The site will complement and become an asset for the other five parcels, particularly the Northern Parcel, at the former mill complex. In fact, we are fortunate to already be seeing some successful redevelopment at the mill complex. For example, a local businessman looking to expand was planning to relocate to a neighboring town. Using data from the brownfields assessment grant, the Town was able to market one of the former parking lot parcels associated with the Robbins Mill to him. He is now opening a granite shop on the site with an investment of approximately $150,000 and the creation of 6-8 jobs. Also, the Town partnered with Habitat for Humanity to construct two single-family houses on the South Parking Lot Parcel, which also had been cleared of any environmental concerns under the brownfields assessment grant. Habitat estimates an investment of approximately $75,000 per house. One house has been completed with a new family occupying it. The redevelopment of these sites and the rest of the mill site with affordable housing and a businesses that create jobs will help reverse the negative trends of increasing poverty our residents continue to experience.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Audit Findings: The Town of Robbins has not received adverse audit findings.

b. Programmatic Capability: The Town of Robbins is once again fully prepared to effectively manage these grant funds. Mr. David Lambert, Town Manager, will lead the project team. He holds a B.A. in Political Science and Sociology from UNC-Greensboro, a J.D. from Elon University School of Law, and an MPA from UNC-Chapel Hill. Mr. Lambert manages the current EPA Brownfields Cleanup project for the Northern and Southern Parcels. He will be supported by Mayor Lonnie English. Mr. English has served as Mayor and as the Manager of the Mountaire Farms Feedmill in Candor, NC, for the last twelve years. Mr. Lambert and Mayor English will be assisted by other members of the project team, including Debbie Daggett, Town Clerk, and Kim Williams, Finance Officer. In addition, due to the technical nature of the projects, the Town hired an experienced and qualified consultant to assist with the implementation of the projects by following Federal procurement guidelines to procure those services. The consultant will assist the Town with project activities and the procurement and oversight of a contractor for remediation activities in accordance with Federal guidelines.

c. Measuring Environmental Results: Anticipated Outputs/Outcomes: The Town's project team will meet quarterly to track the project's progress in fulfilling the scope of work, goals, and objectives. Each Quarterly Report submitted to EPA will include an update of project expenditures and will track activities and expenses against the project's schedule. Corrective action and work plan modification requests will be identified, as appropriate. Specific performance metrics detailed in the Work Plan will be used to summarize project accomplishments. Additionally, site-specific information will be routinely entered and tracked in the online ACRES database. At a

minimum, the outputs to be tracked include the number of advisory committee meetings, public meetings, meetings with community groups, tanks removed, gallons removed, amount of soil and debris removed/remediated; and, the outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created.

d. Past Performance

i. Currently has an EPA Brownfields Grant: Robbins received two $200,000 hazardous cleanup cooperative agreements from the EPA in 2015, officially beginning on October 1, 2016. The Town was also awarded a $400,000 assessment cooperative agreement from the EPA in 2013.

1. Accomplishments: The following are the significant accomplishments from the grants:

- Built a significant community engagement program, including creation of four-focus groups to guide redevelopment and planning efforts
- Completed a Brownfields Redevelopment Plan (update to the Town's Master Plan), including GIS mapping for different planning purposes
- Completed a Phase I ESA at the former Robbins Mill site
- Updated the Phase I ESA at the former Robbins Mill site
- Completed a Phase I ESA on the South Parking Lot Parcel
- Completed a Phase I ESA on the Barnes Property
- Completed a Phase II ESA at the former Robbins Mill
- Negotiated a Brownfields Agreement with NCDEQ for former Robbins Mill
- Completed a Draft ABCA for the Robbins Mill – Northern Parcel
- Completed a Draft ABCA for the Robbins Mill – Southern Parcel
- Removed 830 tons of ACM-debris from the Northern and Southern Parcels

2. Compliance with Grant Requirements: The Town has completed all Quarterly progress reports, MBE/WBE Utilization Forms, Annual Financial Status Reports, and updated property specific information into the ACRES database in a timely manner and in compliance with the grant terms and conditions. The Town expended all of the assessment grant funds. As of the last Quarterly Report (September 30, 2017), Robbins has expended $328,891.97 of the $400,000 in the cleanup grant. The $71,108.03 remaining has been obligated to finish the cleanup activities at the sites.

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [x] Preapplication
- [ ] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 11/16/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Town of Robbins, North Carolina

* b. Employer/Taxpayer Identification Number (EIN/TIN): 56-6001853

* c. Organizational DUNS: 9310159520000

d. Address:

* Street1: 101 North Middleton Street
Street2:
* City: Robbins
County/Parish:
* State: NC: North Carolina
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 27325-8480

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: David
Middle Name:
* Last Name: Lambert
Suffix:

Title: Town Manager

Organizational Affiliation:

* Telephone Number: 910-948-2431
Fax Number: 910-948-3981

* Email: manager@townofrobbins.com

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-17-09

* Title:

FY18 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Robbin Mill Smokestack Cleanup Application

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant NC-02

* b. Program/Project NC-02

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2018

* b. End Date: 09/30/2021

18. Estimated Funding ($):

* a. Federal	200,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	200,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: Lonnie

Middle Name:

* Last Name: English

Suffix:

* Title: Mayor

* Telephone Number: 910-571-1649 Fax Number:

* Email: lenglish@mountaire.com

* Signature of Authorized Representative: Kim M Williams * Date Signed: 11/16/2017

R04-18-C-012

The Pelzer Heritage Commission

Post Office Box 627
Pelzer, South Carolina 29669

November 13, 2017

Ms. Barbara Alfano
Brownfield Coordinator
Environmental Protection Agency, Region IV
Atlanta Federal Center, 10th Floor
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

RE: EPA Hazardous Brownfield Cleanup Application
Upper Pelzer Mill Site, Pelzer, South Carolina

Dear Ms. Alfano:

On behalf of the Pelzer Heritage Commission (PHC), I am pleased to submit the enclosed hazardous brownfield cleanup application for the Upper Pelzer Mill Site in Pelzer, South Carolina. PHC is a 501(c)3 non-profit public charity as recognized by the Internal Revenue Service. The letter acknowledging this status is included with the Threshold Criteria.

PHC acquired the Former Pelzer Mill complex, including the Upper Mill Site via a donation on December 27, 2013, after entering into a Voluntary Cleanup Contract with the South Carolina Department of Health and Environmental Control (DHEC). A Phase II Environmental Site Assessment, Asbestos Survey, and Lead-based Paint Survey were performed by the Concurrent Technologies Corporation as part of the Town of Pelzer's EPA Brownfields Assessment Grant. It was found that the soils on the site were contaminated and that the old warehouse that remains contains asbestos and lead-based paint. This grant is needed to address the environmental contamination found at the property. PHC is pleased to tell you that we have entered into a contract with a developer, State Investors LLC, who plans to lease the property and construct 2-3 buildings for commercial or light industrial use. We are so thrilled to have the opportunity to bring some jobs to Pelzer.

a. **Applicant Identification:** Pelzer Heritage Commission
Post Office Box 627
Pelzer, South Carolina 29669

b. **Funding Requested**
i): Grant Type: Single Site Clean-up
ii): Federal Funds Requested: $200,000; We are not requesting a cost-share waiver.
iii): Contamination: Hazardous Substances

c. **Location:** Pelzer, Anderson County, South Carolina

d. Property Information: Forme Upper Pelzer Mill
Smyth Street and Stevenson
Street
Pelzer South Carolina 29669

e. Contacts:

i) Project Director:
Mr. Larry Coker
Pelzer Heritage Comm ssion
872 Cooley Bridge Ro d
Pelzer, South Carolina 29669
Phone: 864 243 9120
E-mail: lcoker8@att.net

ii) Chief Executive:
Ms. Dianne Lollis
President, Pelzer Heritage
Commission
Post Office Box 627
Pelzer, South Carolina 29669
Phone: 864 847 5743
E-mail: missetta@charter.net

f. Population:

i) PHC not a municipal form of government.
ii) Targeted Area Population: 82, Town of Pelzer, ACS 2015 5-year estimate data, Census.gov, accessed November 2017
iii) The Town of Pelzer is located in Anderson County which has not experienced persistent poverty over the past 30 years.

g. Other Factors Checklist: Attached

h. Letter from the State Environmental Authority: Ms. Daphne Neel, Bureau Chief for the South Carolina Department of Health and Environmental Control's Bureau of Land and Waste Management, issued a letter acknowledging this grant proposal and DHEC's support of the planned clean-up of the Upper Pelzer Mill site. The DHEC letter is included as an attachment.

Thank you for your time and consideration. If you have any questions, please do not hesitate to contact me at 864 847-5743.

With best regards,

Dianne Lollis

Dianne Lollis
President

Appendix 3
Cleanup Other Factors Checklist

Name of Applicant: Pelzer Heritage Commission in Pelzer, South Carolina

Please identify (with an ***x***) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	**Page #**
None of the Other Factors are applicable.	
Community population is 10,000 or less.	X, P. 2
The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	X, P. 10,11
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

dhec

Healthy People. Healthy Communities.

November 10, 2017

Barbara Alfano
Region 4 Brownfields Coordinator
United States Environmental Protection Agency
Resource Conservation and Restoration Division
61 Forsyth Street SW
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Cleanup Grant
Pelzer Heritage Commission, Pelzer, South Carolina

Dear Ms. Alfano:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the Pelzer Heritage Commission's (PHC) application for a Brownfields Cleanup Grant for environmental cleanup of the Pelzer Upper Mill site in Pelzer, South Carolina. The grant will facilitate redevelopment of the site for light industrial use.

The Department appreciates your consideration of the application and hopes for a favorable outcome. Your positive response will assist the PHC in its efforts to revitalize the community. If you have any questions or need additional information, please contact Robert Hodges of my staff at (803) 898-0919.

Sincerely,

Daphne Neel

Daphne Neel, Chief
Bureau of Land and Waste Management

cc: Chris McClusky, Upstate EA Anderson
Robert Hodges, Manager, Brownfields Program

NARRATIVE PROPOSAL/RANKING CRITERIA

1. COMMUNITY NEED

1.a. Target Area and Brownfields

1.a.i. Community and Target Area Descriptions

Twelve miles southeast of the City of Greenville's bustling downtown, and just across the Saluda River's border into neighboring Anderson County, lies the quiet town of Pelzer, South Carolina. This small, yet closely-knit community is deeply rooted in the textile industry. Drawn to the banks of the Saluda River as a power source during the South's Reconstruction period, the Pelzer Manufacturing Company's four mills were constructed in the late 1800s, rapidly growing to become the largest mill community in the South and one of the largest in the world. The mills were not only significant in terms of size and production capability, but also because of the technology employed at the time. Pelzer Mill No. 1 was the first cotton mill to have an incandescent lighting system as well as the first electric generators. Pelzer Mill No. 4 was the first textile mill to be powered solely by electricity, and even more impressively, via overhead cables from a power plant located four miles away. Eventually Mill No. 4 came to be known as the Upper Mill due to its location further upstream from Pelzer Mills Nos. 1-3 which were collectively grouped together and subsequently named the Lower Mill.

Poor tenant farmers and sharecroppers who had struggled to scratch out an existence in South Carolina's upstate were drawn to the promise of a steady paycheck and a living situation that was deemed 'new' and 'better' than their rural origins. Consequently, the sleepy area that had once been a simple ferry crossing-turned-bridge spanning the river rapidly evolved into a mill town with a distinct working class. This sudden migration of thousands of workers and their families was supported entirely by the Pelzer Manufacturing Company. The homes, stores, churches, banks, hotel, and motion picture theatre were all owned and operated by the mill corporation. Mill workers (comprised mostly of white men, women, and children of all ages) worked long hours in the mills – just as they had in the fields – and the paychecks, albeit steady, were low. However, as the mills flourished (operating 136,000 spindles and looms during peak production in the 1920s) so did the community, becoming as closely knit to their fellow laborers as they were dependent on the mill. Pelzer was decimated by the loss of its primary industry, when foreign competition forced the mills to cease production and shutter their doors. Production dwindled, then finally ceased in the mid-1990s. A mostly uneducated blue-collar workforce that had been tied to the mill for generations now found themselves with no source of local employment and forced to move from their family homes to seek work elsewhere. The once healthy Pelzer area population of more than 4,000 during peak production rapidly declined in the years following the mill's closure. Though the number of residents declined, the pride and the love of their heritage of those who grew up on the "mill hill" remained.

In 2010, the "mill hill' kids who now lived in Pelzer, West Pelzer, Williamston (just over 2 miles south of Pelzer), and beyond united to form the Pelzer Heritage Commission (PHC). This group of people, born and raised in Pelzer, came together with a vision to save and preserve the rich heritage that belongs to the town. With few assets but plenty of Pelzer Pride, this group set out to revive the old Pelzer spirit and its special memories. Reunions held at the historical Pelzer gym brought scattered residents back to town. Festivals held in the old Monkey Park displayed Pelzer crafts and local merchants. Events held at the school auditorium brought back memories of plays and musicals enjoyed by grandparents. Two books published help preserve Town memories and

veterans' service records. PHC's fundraising efforts occur at these events. They sell T-shirts, and books. Now, the PHC has acquired all of the former mill properties, 72 acres, in an effort to redevelop the sites for the benefit and use of the entire community. This task is a difficult one for a non-profit organization led by volunteers. However, the organizations has received significant help from Anderson County and others to move these projects forward.

The Upper Mill sits within the Town of Pelzer at the intersection of Smythe Street and Stevenson Street. The Town of Pelzer – a small community of 82 residents (2015 ACS US Census Bureau) – is the selected Target Area for this grant application

1.a.ii. Demographic Information and Indicators of Need

Target Area and Comparison Geographies

ACS 2015 5-year estimate data, Census.gov November 2017

Demographic	TARGET AREA (Town of Pelzer)	Anderson County	South Carolina	United States
Population	82	191,215	4,777,576	316,515,021
Percent Minority (Alone)	12.2%	19.9%	32.8%	26.4%
Percent African-American (Alone)	6.0%	16.4%	27.5%	12.6%
Percent Hispanic (Alone)	3.6%	3.3%	5.3%	17.1%
Percent Children (5 -under)	13.4%	6.0%	6.1%	6.3%
Percent Elderly (65-over)	20.7%	16.6%	15.2%	14.1%
High School Graduate or Higher	94.7%	82.8%	85.6%	86.7%
Bachelor Degree or Higher	8.8%	19.5%	25.8%	29.8%
Poverty Rate	29.3%	16.4%	17.9%	15.5%
Families with Children Below Poverty (under age 18)	50.0%	21.0%	22.0%	18.0%
Per Capita Income	$17,089	$22,400	$24,604	$28,930
Households with Food Stamp/SNAP	17.9%	15.4%	15.1%	13.2%
Median Household Income	$38,750	$42,143	$45,483	$53,889
Unemployment Rate	12.5%	9.2%	9.5%	8.3%
Median Home Value	$95,000	$128,100	$139,900	$178,600
Percent Vacant Homes	30%	13.2%	16.5%	12.3%
Percent Rental Homes	47%	28.1%	31.4%	36.1%
Percent Built Before 1939	67.5%	6.3%	4.6%	13.2%

Pelzer is a poor, struggling town. The small community of Pelzer has a twice as many children (13%) and more elderly (21%) residents than the county (6%, 17%), state (6%, 15%), and nation (6%, 14%). The community is poor with half of all families (50%) with children living in poverty – more than double the county (21%), state (22%), and nation (18%). No new home construction has been seen in the community since the 1980s and over two thirds of the homes (68%) were constructed before 1939 compared with only 6% for the county and 5% for South Carolina as a whole. Home values are low ($95,000), nearly 50% are rental properties, and 30% are vacant – all greatly exceeding county, state, and national averages. Per capita ($17,089) and median household income ($38,750) are well below these comparison geographies and more households receive Food Stamp/SNAP assistance (18%). While high school attainment is high (94.7%), only about 9% have a Bachelor degree or higher level of education versus 20% for Anderson County, 22% for South Carolina, and 30% nationally. The US EPA Environmental Justice Screen Tool confirms that Census Block Group containing the brownfields property (450070103004) is in the 88th percentile for low income population groups in South Carolina, 87th for EPA Region 4, and 89th nationally (https://ejscreen.epa.gov, Accessed October 2017).

1.a.iii. Description of the Brownfields

The properties originally owned by the Pelzer Manufacturing Company include 4 main parcels grouped in three properties: the Upper Mill, the Lower Mill, and a Dump Site (2 parcels). In the 2000s, these shuttered mill properties changed hands several times before they were sold to Greenlight Enterprises, LLC (Greenlight) and Brickyard Trucking, Inc. (Brickyard). Brickyard and Greenlight are related companies with the same managing members. With this sale, the Pelzer community anticipated positive changes and had high hopes for job creation, new home construction, park facilities on the Saluda River, cleanup of environmental hazards, and the removal and reuse of the dilapidated mill structures. Demolition work began on the Upper and Lower Mills, and while the town's people were understandably saddened and emotional to see this part of their history being torn down, they eagerly anticipated positive changes. Unfortunately, once the salvageable materials were removed, work ceased. The sites were left in a deplorable condition. Greenlight became an absentee owner with no interest in reviving the property once the potential money-making materials had been recovered. Recognizing the physical hazards that the mill complex posed to the residents living adjacent to it – with partially demolished buildings and debris strewn across the property – and not knowing the environmental hazards, the Town of Pelzer began taking steps to address these concerns. Pelzer applied for and received a $200,000 brownfields hazardous assessment grant in 2010 to assess the status of environmental conditions of the Upper and Lower Mill sites. Additional funding was provided by Anderson County's grant program and the EPA Region IV's Targeted Brownfields Assessment (TBA) Program to assess mill properties lying outside the town's boundaries.

For the **Upper Mill** property, a Phase II ESA found Polycyclic Aromatic Hydrocarbons (PAHs) exceeding the EPA Regional Screening Levels (RSLs) for industrial residential uses across most of the property's surface and in some subsurface soils. The South Carolina Department of Health and Environmental Control (SCDHEC) uses the EPA's Regional Screening Levels (RSLs). Metals at levels greater than EPA RSLs for residential and industrial use were found in soils primarily on the central and southern portions of the property and in groundwater (exceeding EPA Maximum Contaminant Levels (MCL) for drinking water and EPA RSLs for tapwater) on the western portion of the property. Also, coal ash and coal were found in soils on the eastern portion of the property.

The Phase II ESA completed at the **Lower Mill** found PAHs (above EPA RSLs for residential and industrial use) in surface and subsurface soils throughout the property. Metals were found in surface soils (above EPA RSLs for residential and industrial use) and in groundwater (exceeding EPA MCLs for tapwater), and perchloroethylene (PCE) and it derivatives are prevalent in groundwater (exceeding EPA MCLs). A nearby **Dump Site** on the banks of the Saluda River was once utilized by Pelzer Manufacturing and subsequent owners during a time when environmental management and 'best practices' were yet unheard of. Located north of the Upper Mill and separated from the mill property by a portion of the mill neighborhood, the former Pelzer Mill dump occupies two contiguous parcels that are separated by an active rail line. The Saluda River is being used for fishing and kayaking regularly, so many more people from the area come to launch their kayaks and fish. The Phase II ESA (using TBA funds) completed at this site in July 2011 indicated impact to surface soils (arsenic, lead, multiple PAHs) at levels that exceeded the EPA RSLs for industrial and residential use. The PHC received two EPA Brownfield Cleanup grants to install engineered caps on the dump parcels in order to transform the properties into a riverside park. Site work on the parcels is expected to begin in December.

1.b. Welfare, Environmental, and Public Health Impacts

1.b.i. Welfare Impacts

The Upper Mill property is bordered by low-income residential properties to the north and south. The Tabernacle Baptist Church is to the west. The Upper Mill property is vacant and overgrown with a dilapidated warehouse facility still standing on the site in addition to several debris piles from demolition activities. In this condition, the site is a hazard for the community. The site divides the communities to the north and south and neighborhood children have been seen crossing the property. The presence of brownfields – their associated problems of blight, vandalism, and vagrancy – indirectly contribute to Pelzer's crime rate, which is nearly 50% higher than the national average according to Homefacts, and a registered sex offender concentration 99.8% higher than the national average.[1] Local resident, Gilbert Garrett, PHC secretary, states that drug use and prostitution are flagrant in the area. The vulgar graffiti found on the walls of the old warehouse of the Upper Mill is indicative of activities that occur at this unsecured site. The Upper Mill property is a blight that decreases the value of homes and stifles investment in both housing stock and local businesses – contributing to Pelzer's economic woes.

1.b.ii. Cumulative Environmental Issues

Homefacts identifies 4 brownfields, 1 State superfund site, and 12 tanks and spills in their database – giving the entry a red alert for environmental hazards.[1] The brownfields all have documented soil contamination above industrial and residential RSLs, and they are unsecured. Children and trespassers have easy access to the contaminated areas, especially residents/children walking in a north-south direction across the Upper Mill property. The Environmental Data Research Report obtained for the Phase I ESA conducted for the PHC in August 2013, reports six leaking underground storage tank sites in Pelzer. Most of the homes in Pelzer are mill village houses. The demographic data shows that two of every three homes in Pelzer (67.5%) were built prior to 1939. Mill village houses were typically constructed with asbestos siding and were painted with lead based paint. As a poor community, it is unlikely that substantial renovation and repair has been done to these homes, especially to the homes (low median home value, poor, and low educational attainment) nearest the brownfields properties. While repainting is likely to have occurred, peeling paint may expose lead-based paint that was originally used. Generally, asbestos siding is not addressed until the home is demolished, so deteriorating siding may cause asbestos exposure. The Pelzer community is very small, about 1.2 square miles, but its residents are impacted by these unsecured properties with known contamination exceeding industrial and residential RSLs and six leaking underground storage tanks sites. The Pelzer Mills operated for about 100 years, and it is likely that the dump was used for at least 70 years until landfill regulations were passed in South Carolina. Burning of waste was common prior to landfill regulations, and burn pits were noted during the Phase II ESA. The former dump is separated from the Upper Mill by a portion of the former mill village with about 12 homes, sandwiched between the Upper Mill and the dump. . The dump property is unfenced also and easily accessible from the streets. Asbestos and Lead Based Paint assessments were conducted in 2011 on the remaining warehouse structure at the site. Both tests found high levels of contamination and recommended remediation of contaminated materials prior to demolition. Specifically, asbestos was found in the warehouse's roofing flashing and window glazing. Lead paint was found on several surfaces of the building at levels exceeding regulatory limits.

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1 Source: https://www.homefacts.com/city/South-Carolina/Anderson-County/Pelzer.html

1.b.iii. Cumulative Public Health Impacts

PAHs were detected by the Phase II ESA conducted at the Upper Mill property exceeding residential US EPA RSLs. These observations were widespread, covering nearly all of the property. It is likely this geographic spread was the result of on-site burning and the storage of coal to power the mill facilities. PAHs generally have a low degree of acute toxicity to humans, but the chronic effect of long term exposure (the mill operated for 100 years) is cancer. PAHs have also been associated with increased incidences of lung, skin, and bladder cancers. The latest available SC DHEC Community Cancer Assessment (2010-2014) for the ZIP code including Pelzer (29669) found higher than expected incidents and mortality related to cancer than expected. There were 335 new cases of cancer in the ZIP code, while 329 were expected; and, a total of 139 deaths occurred, while only 121 were expected. IARC classifies lead as probably carcinogenic to humans, but children are especially susceptible to lead which has been confirmed in the surface soils on the Upper Mill property. Also, 67.5% of the homes in Pelzer were built prior to 1939, and 50% of the families with children in Pelzer live in poverty. Thus, the children in Pelzer are much more likely to be exposed to lead paint in their homes, since their families have not been able to afford lead paint abatement in these old homes. Studies have shown that children who have elevated levels of lead in their systems are often more inattentive, hyperactive, disorganized, and less able to follow directions in school and additional follow-up of some of those children showed higher rates of failure to graduate from high school, reading disabilities, and greater absenteeism in the final year of high school. Younger children, especially, are much more at risk to exposure due to inadvertently eating contaminated soil and peeling paint with more hand-to-mouth activity. Elevated blood lead levels measured in children is maintained by DHEC. In 2015, Anderson County, which includes Pelzer, had a high level of children under the age of 36 months and of children between 36 and 72 months tested for lead poisoning compared to other counties. The US EPA Environmental Justice Screen Tool data for Census Block Group containing the brownfields property (450070103004, population 944) confirms these findings. The tool identifies high levels for NATA Cancer Risk (in the 70-80th percentile for the nation) and Lead Paint Indicator (92th percentile in the nation and 99th percentile for the state).[2]

1.c. Financial Need

1.c.i. Economic Conditions

The PHC is a volunteer-based nonprofit organization attempting to deal with the numerous brownfield issues. In 2016, the organization had a total revenue of just $5,128, $2,485 in expenses, and $2,643 in net assets. Its principals receive no compensation. We only have our time and effort that we can give, but we are willing to work hard to see Pelzer thrive again as we once knew it. Residents and former residents – the sons and daughters of the textile mill workers – have born the burden of these properties, the decline of industry, and plant closures and now face the unfortunate legacy of environmental contamination and health impact. Now they are shouldering the burden of cleaning up these sites and redeveloping the properties with the hope of saving their community. The Town of Pelzer is a tiny community of low-income residents with extremely limited financial resources. The Town has no taxing authority. Its only source of revenue is from water supply. It does not even operate a Town Hall as of the last few months. The town's only employee is part-time and works from the West Pelzer Town Hall. Even when combined with the populations of nearby West Pelzer and Williamston, the resources of the

2 Source: https://ejscreen.epa.gov, Accessed October 2017

people in this rural area are well below the amount needed to tackle even one sizeable brownfields site with serious environmental contamination – let alone three of them.

1.c.ii. Economic Effects of Brownfields

The presence of these brownfield properties in Pelzer have had a significant, long-term impact on the economic prospects of the community. As the mills closed and hope for redevelopment from absentee owners dried up, the town has descended deeper into its economic troubles. Today, per capita income is extremely low - $17,089 versus $22,400 for Anderson County. Brownfields have negatively impacted home values (median home value of $95,000 versus $128,100 for Anderson County). Residents also suffer from low higher education attainment (only 8.8% have a Bachelor Degree or higher education versus 19.5% for Anderson County and 25.8% for South Carolina), a very high level of poverty for families with children (50.0% versus 21.0% for Anderson County), and a higher number of households with Food Stamp/SNAP assistance (18% versus 15% for the county).[3] The brownfield sites are located in the heart of the community surrounded by residential areas, blocking development along the Saluda River – a key potential asset, and near commercial sectors of town. The properties suppress investment in both commercial activities and improvements to residential properties. Two out of every three buildings in the town were constructed before 1939 (2015 ACS US Census Bureau) and most have seen little improvement.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

2.a. Project Description

2.a.i. Existing Conditions

The Upper Mill site (13.44 acres) is located along Smythe Street and Stevenson Street in the Town of Pelzer. The site originally hosted Mill Number 4 and various support buildings. However, the majority of the mill structures were demolished and only a warehouse remains standing. The remainder of the property is vacant and overgrown with several debris piles left over from the demolition of the mills structures. The property is located in an area consisting primarily of residential properties and the Tabernacle Baptist Church. A Phase II ESA was completed by CTC Public Benefit Corporation in 2013 for the Town of Pelzer with funding from the town's US EPA Brownfields Assessment grant project. The assessment found significant levels of contamination on the property's soil, including:

- **Bis(2-chloroethyl)ether and Bis(2-chloroisopropyl)ether** – levels were observed exceeding residential US EPA RSLs throughout the property, likely from cleaning fluids used as part of the textile manufacturing operations associated with the mill.
- **Hexachlorobenzene** – levels were observed exceeding residential US EPA RSLs throughout the property, likely from chemical solvents associated will mill operations.
- **N-Nitrosodi-n-propylamine** – levels were observed exceeding residential US EPA RSLs throughout the property.
- **PAHs** – levels were observed exceeding residential US EPA RSLs throughout the property, likely from on-site burning and storage of coal to power the mill facilities.
- **Vanadium and Aluminum** – levels were observed exceeding residential US EPA RSLs in the vicinity of the former machine shop.

3 Source: 2015 ACS US Census Bureau

- **Arsenic** – levels were observed exceeding residential and industrial US EPA RSLs in high concentrations in the area of the warehouse, in the area of the former boiler house, in the former machine shop, and the retention pond.
- **Antimony** – levels were observed exceeding residential US EPA RSLs in the area of the former boiler house, likely from flame retardant materials used at that location.
- **Lead** – levels were observed exceeding residential and industrial US EPA RSLs in the vicinity of the Picker Room and Mill 4.
- **Iron** – levels were observed exceeding residential US EPA RSLs in the central and southern portions of the property near large areas of building debris.

The chief contaminants of concern are primarily the high levels of PAHs and Arsenic on the property. In addition, asbestos and lead based paint assessments conducted in 2011 found asbestos containing materials in the warehouse's roofing flashing and window glazing and lead paint on surfaces throughout the building exceeding regulatory limits.

2.a.ii. Proposed Cleanup Plan

Cardno, Inc. prepared an Analysis of Brownfields Cleanup Alternatives (ABCA) for the Upper Mill site with funding from a Brownfields Cleanup Revolving Loan Fund grant supplied by SCDHEC. PHC is the current owner of the property and is coordinating the redevelopment of the site. Based on this report, PHC intends to address the impacted soils at the site through a "Capping" solution to cover the contaminated soil areas with a combination of an engineered cap, buildings, and hard surfaces. This option allows for the redevelopment of the site with adequate protection from future exposure to site contaminants. PHC has located a private company (developer), State Investors LLC (SI), that intends to redevelop the property as a small business park that will include two warehouse/distribution buildings and a multi-tenant office building. A first tenant company has expressed interest in the site with a formal announcement expected in December. The plans anticipate that the remaining warehouse on site will be demolished. The new buildings and their associated parking areas will cover much of the contaminated area. A stormwater pond is planned, which will encapsulate contaminated soil in that area of the property. The engineered cap will cover areas not covered by the planned buildings, hard surfaces, and stormwater pond. The cap will consist of a geotextile membrane with a covering of 6" clay soil and 6" topsoil. An additional 25% of topsoil is planned for planting areas. Asbestos Containing Materials (ACM) will be removed and properly disposed at a permitted landfill prior to demolition of the old warehouse.

2.a.iii. Alignment with Revitalization Plans

The community of Pelzer has been attempting to deal with its brownfields properties for more than two decades. It was easy for the Town, its residents, its former residents, and Anderson County to see significant potential in Pelzer – the Saluda River access, its history, the number of people traveling through Pelzer on Highway 8, and its close proximity to the City of Greenville, but it has been difficult knowing where to start and how to finance the effort. Visioning sessions conducted by the US Army Corps of Engineers as a part of the Town's EPA Brownfields Assessment Grant with the community identified reuse and redevelopment options for these sites that included commercial facilities for the Upper Mill site, parks and river access on the dump parcels, and commercial and residential properties with river access on the Lower Mill. The redevelopment of the Upper Mill site will be a critical part of the overall community plan for brownfields redevelopment and economic revitalization.

The *2016 Comprehensive* Plan for Anderson County – a strong supporter of the Town of Pelzer's efforts to redevelop its brownfield sites – recommends the encouragement of public/private partnerships throughout the county to encourage brownfield cleanup efforts (part of Recommendation 3). PHC and State Investors have entered into such a partnership with a contract for the redevelopment of the Upper and Lower Mill properties. The plan also recommends encouraging new business recruitment to the area (part of Recommendation 1). As a new business park, the Upper Mill site will host new tenant companies helping the region fulfill its long-term collective economic development goals. An announcement of the first tenant is expected in December.

The *2017 Comprehensive Plan* for the neighboring town of West Pelzer recommends working with the Town of Pelzer on joint initiatives to promote economic development. Additional employment opportunities generated by tenant companies at the Upper Mill site business park will benefit West Pelzer residents who are within a 5 minute drive from the site and Williamston residents, who are a 6-7 minute drive from Pelzer. In 2016, Pelzer and West Pelzer were awarded a Municipal Association of South Carolina Economic Development grant for the *Master Planning of Main Street* – which is located a short distance from the Upper Mill site – and to conduct an economic impact analysis. Both communities will continue to work jointly to make the Upper Mill site a success for area residents and businesses as part of their economic development strategies.

PHC is currently applying for a Master Planning Grant for Pelzer from the Appalachia Regional Commission. The plan will organize the various brownfields redevelopment efforts in conjunction with SI's proposed work and a longer-term vision for Pelzer's economic revitalization.

2.b. Task Descriptions and Budget Table

2.b.i. Task Descriptions

Grant funds will be used for Community Outreach, Cleanup Planning and Site Cleanup. Overall grant programmatic support will be provided by PHC as an in-kind contribution and a part of its match. All cost estimates are based on similar expenses incurred by PHC's EPA cleanup grant for the Disposal areas.

Task 1 – Project Management: The PHC will track project tasks, schedule and budget; oversee the work of the selected brownfields cleanup contractor; and report on project activities and accomplishments to stakeholders. The project manager and/or other PHC members will also attend relevant meetings, workshops, and conferences sponsored by the EPA and/or SC DHEC. The anticipated level of effort required will be 100 hours of the project manager's time amounting to $2,500 in cost ($25/hour X 100 hours = $2,500), which will be provided as an in-kind match. Based on expenses incurred on PHC's Disposal Area Cleanup Grants, $5,000 is budgeted for travel to send two PHC members to the national brownfield conference and one member to the regional brownfield conference. The project management work will be accomplished by the organization's Project Manager, PHC's officers, and a volunteer Board member who is an attorney with support from the contractor. Outputs will include 12 Quarterly Reports, three annual Disadvantage Business Enterprise Utilization reports, three Financial Status Reports, and appropriate entries made to the ACRES database.

Task 2 – Community Outreach: PHC will work closely with partner organizations such as the areas local governments, the Tabernacle Baptist Church, and Palmetto Business Association – a

local economic development organization – to plan and conduct a series of stakeholder meetings for this grant effort. The organization will also distribute vital project information through local newspapers, radio and television media, postcards, and social networking platforms. The project will also coordinate a Brownfields Task Force made up of representatives of the community and the project's partner organizations. The $15,000 budget for the contractor performing the community outreach includes:

- Developing a Community Involvement Plan ($2,500)
- Facilitating 3-4 press events and public meetings to discuss project activities and cleanup results, specifically including a community meeting prior to cleanup start and after cleanup completion so that the community will be well informed as to what will occur on the site during cleanup, truck routes, etc. as well as the final results ($8,500)
- Preparing and distributing project brochures, postcards and public notices ($4,000)

A budget of $500 in Supplies is included for the printing of the brochures and postcards. In addition, PHC will contribute 40 hours of Project Manager time to participate in and help coordinate the community meetings ($25/hour X 40 hours = $1,000) as in-kind match. Total cost for Task 2 – Community Outreach is $16,500, and the work will be accomplished by contractor in conjunction with the organization's Project Manager. Outputs will include one Community Involvement Plan, three to four community stakeholder meetings, and 250 project brochures, 500 postcards, and four public notices to reach community stakeholders in Pelzer, West Pelzer, Williamston, and Anderson County.

Task 3 – Cleanup Planning: Cleanup planning will include finalizing the ABCA document to include obtaining review and approval from EPA and SCDHEC Project Managers, placing the ABCA on a 30-day public review and comment period, preparing the Quality Assurance Project Plan for confirmation soil sampling, and negotiating and receiving the necessary regulatory approvals. Cleanup planning contractor costs are anticipated to include the following:

- Finalization of ABCA document, including incorporation of comments from public notice and regulatory review ($4,000).
- Preparation of a Quality Assurance Project Plan (QAPP), and Health and Safety Plan (HASP) ($5,500).
- Development of bid documents (RFP) for site cleanup activities, evaluation of bids, calling references, coordination of a pre-bid onsite meeting and selection of contractors to include ($9,500).

PHC will also contribute 20 hours of Project Manager time to review documents ($25/hour X 20 hours = $500) as in-kind match. Total cost for Task 3 – Cleanup Planning is $19,500, and the work will be accomplished by subcontractors in conjunction with oversight from the organization's Project Manager. Outputs will include one ABCA, one QAPP, one HASP, and bid documents for the capping activities.

Task 4 – Site Cleanup: PHC will use the majority of the grant funds for the actual site cleanup activities. Based on the Phase II ESA of the property and the findings from the draft ABCA, contractor cleanup activities are estimated to be $350,144 and include the following remedial activities:

- Mobilization/Demobilization and construction entrance ($4,000).
- Crew labor ($4,000 X 12 days = $48,000).
- Clearing of vegetation and grading (4.7 acre X $2,000 = $9,400).

- Removal and proper disposal of ACM debris piles and deconstruction materials to an appropriate permitted off-site facility ($9,820 for 14 cubic yard of ACM, inclusive of landfill disposal fees).
- Installation of silt control fences along the south boundary to prevent soil erosion (400.0 LF X $3.50 = $1,400).
- Placement of engineered silt cover consisting of a bright orange woven geotextile membrane ([4 man crew @ $2,500/day X 9 days = $23,500] + [69 rolls of geomembrane X $207 = $14,283] + [51 ground stake packages X $34 = $1,734] + [freight charge = $950] = $39,467)
- Provision of 1 foot of clean soil, 6" of topsoil (364 truckloads X $350 = $127,400) and 6" of clay (342 truckloads X $150 = $51,300) – includes installation of planting beds at predetermined locations in the capped areas with 256 surface square feet of loosely compacted topsoil around specimen trees and a minimum depth of 5 feet.
- Engineering, permitting, etc. (20% of direct construction costs = $58,357).

PHC will also contribute 50 hours of Project Manager time to review documents, interface with contractor personnel performing the work and monitor progress ($25/hour X 50 hours = $1,250) as in-kind match. Total cost for Task 4 – Site Cleanup is $351,394, and the work will be accomplished by contractors with oversight from PHC's Project Manager. Outputs will include one final Cleanup Report and a Certificate of Completion letter.

2.b.ii. Budget Table

In summary, the total cost of project activities is estimated to be $394,894. PHC is requesting $200,000 in cleanup funds from the EPA, while PHC and SI will contribute $194,894 in a mixture of in-kind contributions (210 hours of Project Manager time totaling $5,250 and cash pledged by SI in the amount of $189,644).

Pelzer Upper Mill Proposed Cleanup Project Budget

Budget Categories *(programmatic costs only)*	**Project Tasks**				**Total**
	Task 1 Project Management	Task 2 Community Outreach	Task 3 Cleanup Planning	Task 4 Site Cleanup Activities	
Personnel	$2,500	$1,000	$500	$1,250	**$5,250**
Fringe Benefits					
Travel	$5,000				**$5,000**
Equipment					
Supplies		$500			**$500**
Contractual		$15,000	$19,000	$350,144	**$384,144**
Other (specify)					
Total	**$7,500**	**$16,500**	**$19,500**	**$351,394**	**$394,894**
EPA Share	$5,000	$15,500	$19,000	$160,500	**$200,000**
PHC Share + SI pledge	$2,500	$1,000	$500	$190,894	**$194,894**

2.c. Ability to Leverage

PHC has very limited assets and runs on volunteer labor; however, PHC is successfully leveraging other sources of funding to complete this cleanup and cleanups on the other mill parcels. PHC has been awarded two (2) EPA Brownfields Cleanup Grants for the Pelzer Dump Sites to put in a place a similar capping strategy and prepare the site for river access. For the Lower Mill project, PHC secured a $250,000 SC DHEC Brownfields Revolving Loan Fund

(BRLF) cleanup loan (guaranteed by Anderson County), a $48,000 BRLF grant for asbestos and lead based paint cleanup activities, and a $12,000 match from Anderson County.

Source	Purpose/Role	Amount ($)	Status
SI	Site Cleanup (beyond required $40,000 match)	$154,894	Secured
SC DHEC's BCRLF Loan	Site cleanup (capping) on Lower Mill	$250,000	Secured
SC DHEC's BCRLF Grant	ACM Removal	$48,000	Secured
Anderson County	Match for BCRLF Grant for ACM Removal	$12,000	Secured
Anderson County	Removal of Pallets at Lower Mill	$50,000	Secured

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

3.a. Engaging the Community

PHC is the heart of the Pelzer community. It was formed by and is run by volunteers who grew up in and love Pelzer and continue to live in the area. As a community-based volunteer-run nonprofit organization, PHC grew out of a grassroots effort to see Pelzer thrive again. They took a bold step when they acquired all of the mill properties under a Voluntary Cleanup Contract with SCDHEC, but they wanted to see redevelopment of Pelzer's brownfields properties and revitalize its economy. The organization and its members are well-connected both within Pelzer's small community and with residents from the surrounding area that have an association with Pelzer and its mills. PHC will work with its partner organizations and governments to involve the community in the cleanup project activities. Grant activities will be overseen by a Brownfields Task Force comprised of representatives of the community and the project's partners. The Task Force will meet on a quarterly basis to review activities, monitor progress, and plan future events. Task Force meetings will be held at the Tabernacle Baptist Church or other suitable facilities.

PHC will work with its partners to disseminate project information and accomplishments and organize community meetings. The organization anticipates holding four or more community meetings throughout the duration of the project's period of performance. PHC will develop a Community Involvement Plan to guide outreach activities during the project. Those activities will include a pre-cleanup public meeting with community members from the target area and stakeholders to discuss the project initiative and upcoming activities. Participants will be able to provide comments on the anticipated efforts and their implementation. Activities will also include a review of the ABCA plans and recommendations, hours of operation, truck routes, site signage, and other safety measures being put in place to protect the area's sensitive young population. The meeting will allow the project team to seek out and address the concerns of local residents regarding health, safety, and community disruption from the project. PHC will also hold a post-cleanup meeting to describe the work that was completed and solicit feedback on next steps for redeveloping the property.

Communication will be facilitated through notices in local media including *The Journal* (local weekly newspaper) and local radio stations WHZT, WLTE, WJMZ, and WABB. David Meade, the editor of *The Journal* will support the project by writing articles related to the cleanup and community meetings. He has been present and written articles about every PHC community meeting relating to it brownfields projects over the last seven years, including one article about this potential brownfields cleanup project. PHC will also post notices on its social media platforms to primarily engage the youth population in the Target Area, including its own Facebook page. At the community meeting prior to submitting the application, the group decided

to start an email list for upcoming meeting notices. Notices will also be posted on the social media platforms of partner organizations and governments, including the Town of Pelzer's website.

The Town of Pelzer is a very small community and we have been implementing brownfields-related projects in the area almost a decade. During this time we have developed strong communication networks and community partnerships. The community meeting held on November 9th to discuss Upper Mill redevelopment brought out 57 community members, including the Mayors of Pelzer, West Pelzer, and Williamston. After introductions by PHC members, SI made a presentation of the commercial/light industrial redevelopment proposed for the Upper Mill site. Then, the ABCA was presented. Excitement could be felt in the room. Most attendees were not so interested in how the site would be cleaned up, but that it would be cleaned up, redeveloped, and providing jobs in Pelzer. One lady asked, "Will it happen before Christmas?" Of course, the answer was no, but SI did state that they expect an announcement of the first tenant before Christmas. On November 7th, SI issued a press release about the contract that it had entered into with PHC to lease the properties for redevelopment of the Upper and Lower Mills as well as some housing development in Pelzer. The press release helped drive the large turnout at the community meeting in such a small town. It is anticipated that the high level of community interest in the redevelopment projects combined with our broad-based community network within the nearby neighborhoods will enable us to easily and effectively disseminate critical project information such as project meeting notices and activity status updates. Specific emphasis will be placed on reaching the lower-income residential areas and sensitive young populations located near the property. PHC also intends to issue press releases with information on the project's background and history as well as environmental issues and cleanup activities.

Project announcements will be distributed through all these formal and information channels as major milestones are achieved. This will include, but not be limited to, grant award and project startup, pre-cleanup stakeholder meeting and the post-cleanup stakeholder meeting.

3.b. Partnerships with Government Agencies

In anticipation of acquisition of the property, to meet the terms and conditions of a bona fide prospective purchaser, and to meet the requirements of the SC DHEC's Voluntary Cleanup Program (VCP) as a non-responsible party, the PHC, at a cost of $2,900, had a Phase I ESA performed in August 2013 in preparation of accepting the donation of all the Pelzer Mill Properties. PHC signed Voluntary Cleanup Contract (VCC) 13-5832-NRP on November 21, 2013. This contract addresses cleanup at the Upper and Lower Mill parcels as well as the dump site. The VCC became effective on January 13, 2014. SCDHEC is the state agency responsible for environmental issues. The SCDHEC letter is included with the Cover Letter for this application. PHC will continue to report on the status of the project to SCDHEC as required by that contract, and the agency will provide regulatory oversight and serve as a technical resource for the project team during the implementation of the cleanup activities. Under the contract, SCDHEC sets the cleanup standards and issues the Certificate of Completion once the terms of the contract are satisfied.

The SCDHEC Upstate Public Health Regional Office has also provided a letter of support for the grant application. The organization will provide core statistics and other relevant data as needed and support the efforts of the Brownfields Task Force in implementing the grant program. Letter is attached.

The Towns of Pelzer, West Pelzer, and Williamston submitted letters of support for PHC's brownfields application. Anderson County also submitted a letter and offered to provide a representative to serve on the Brownfields (BF) Task Force.

3.c. Partnerships with Community Organizations

3.c.i. Community Organization Descriptions & Roles

PHC will collaborate with the following community organizations for this project.

- Tabernacle Baptist Church – Located adjacent to the Upper Mill, the church will support the project by providing meeting facilities for community meetings, serving on the BF Task Force, and disseminating project information to its members in the community.
- Palmetto Business Association – An association of businesses in Pelzer, Williamston, and West Pelzer supports the effort to redevelop the Upper Mill and is providing a representative to serve on the BF Task Force.
- *The Journal* – The local newspaper has covered all of the community meetings to date as well as having published all public notices and solicitations. David Meade, Editor, will continue to support PHC in the efforts of this cleanup grant.

In addition, the project is supported by Mr. Wayne Fowler, a former Anderson School District One Superintendent. In this role he oversaw the implementation of over $15 million in federal grants. On previous PHC EPA grant projects he has served on the BF Task Force and assisted in making sure the program correctly implemented the grant requirements, and he will continue those roles with this grant. Calvin Waters, CPA, treasurer of PHC with over 45 years of budgeting, finance, and accounting experience, will continue his role on the BF Task Force and manage the financial aspects of the grant. Another former and future Brownfields Task Force member is Mr. Gilbert Garrett – a long-time Pelzer resident who provides information technology support to PHC and its brownfields activities. Westley Cox, Esquire, current BF Task Force member who has provided numerous hours of legal work pro bono, will continue his role on the BF Task Force to see redevelopment of the former mill properties. Tice Welborn, a professional geologist who spent summers of his youth with his grandparents in Pelzer, will continue his work on the BF Task Force providing technical assistance on the cleanup work.

3.c.ii. Letters of Commitment

Letters of commitment for each of the organizations identified in Section 3.c.i are included as an attachment to this proposal. No subawards will be made to community organizations.

3.d. Partnerships with Workforce Development Programs

There are no current EPA Brownfields Job Training grantees in South Carolina. However, Rick Cothran, Dean of Corporate and Community Education, Tri-County Technical College (TTC-the technical school that serves Anderson County) states that they offer HAZWOPER, asbestos survey, inspector, and abatement training. WorkLink Workforce Development Board (WDB) is the regional agency linking employers and employees in Anderson County. PHC with the assistance of Anderson County will connect potential employers to TTC and WDB to assist with staffing needs, as well as work with its consultant to provide subcontracting and procurement opportunities to local firms when feasible.

4. PROJECT BENEFITS

4.a. Welfare, Environmental, and Public Health Benefits

The Upper Mill site has significant environmental issues and there is evidence the operations on the property have had a negative long-term impact on residents in adjacent neighborhoods. These

neighborhoods have high concentrations of the elderly and young children – populations particularly sensitive to these environmental issues. Cleaning up the property will protect these vulnerable populations from future harm associated with the asbestos, lead based paint, PAHs, and arsenic present at the site. Property blight may also had a negative impact on property values (which are substantially lower than the county average), lack of community investment, and business recruitment efforts. The area may also be a habit for the Northern Longhair Bat – a vulnerable species that is known to live nearby. Cleaning up the site will protect wildlife and reduce the possibility of contamination reaching the nearby Saluda River.

Anticipated Welfare, Environmental and Public Health Benefits

Area	Anticipated Benefit	Community Need Addressed
Welfare	Removal of blight	Expanded economic potential and residential investment
	Development of a business park	Increased local employment and water revenue
Environmental	Removing sources of contamination Capping soil contamination	Protect wildlife and nearby Saluda River Preventing further contaminant migration
Public Health	Capping soil contamination	Protect future site users and nearby residents, particularly neighborhood children, from hazardous sources of contamination

4.b. Economic and Community Benefits

The primary benefits anticipated by this project are economic. The site will be reused as a business park that will contain two warehouse/distribution buildings and a multi-tenant office building. This site will provide vital economic development for this very small community by creating vital job opportunities for residents and increase the tax base. A developer has already been identified and one tenant company has expressed interest in locating to the property. The developer has expressed that getting the funding from the EPA and our leveraged sources for cleanup, is vital for this project to move forward. He can only commit to the project if he can start with a "clean" site that is ready to build. The initial tenant expects to employ 30 people initially and expand to 50 jobs. The developer anticipates the full site will support 300 new jobs for the community. For a rural area, this will be a huge boost for the economy.

5. Programmatic Capability and Past Performance

5.a. Audit Findings

PHC has not received adverse audit findings. The last audit was performed in August 2017.

5.b. Programmatic Capability

PHC has the requisite capacity to administer the EPA grant funds based on its previous experience managing two EPA Brownfield Cleanup Grant projects. Mr. Larry Coker, Vice President of PHC, will serve as the Project Director. Mr. Coker is a Vietnam veteran who retired after 42 years as a job training instructor at Cryovac. Mr. Coker is the Project Director for the two current EPA Brownfield Cleanup Grants. Mr. Calvin Walters, CPA, and member of the Board of Directors of the PHC will serve on the Brownfields Task Force and assist with financial grant management as needed. In addition, PHC utilizes the services of a qualified contractor to complete the cleanup planning and community outreach tasks and oversee cleanup activities. PHC has already procured a contractor in full compliance with state and new federal guidelines, 2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500. Therefore, the project team will be prepared to begin work upon grant award. Upon the SC DHEC approval of the final cap design, remediation contractors will be procured through a Request for Proposals (RFP) in accordance with the federal guidelines. All procurements will be advertised in the local newspapers and include those who express interest in the work to the PHC.

5.c. Measuring Environmental Results: Anticipated Outputs/Outcomes

The following key performance measures and outcomes will be tracked for this project:

- Number of acres of contaminated soil capped.
- Number of acres made ready for reuse as business park facilities.
- Number of participants involved in community meetings and planning activities as documented on meeting sign-in sheets.
- Number of tenant companies signing firm commitments to locate in the business park.
- Number of jobs planned by tenant companies selecting the site.
- Amount of dollars leveraged in cleanup and redevelopment.

All performance measures will be reported in the quarterly reports and the online ACRES database.

5.d. Past Performance and Accomplishments

5.d.i. Prior EPA Brownfields Assistance Grants

PHC has previously received $400,000 in EPA Brownfields Cleanup Grant funds for cleanup of the 16.8-acre Eastern Parcel and 11.8-acre Western Parcel of the Pelzer Mill Dump. . The grants are being managed under a single, combined cooperative agreement (BF-00D33415-0).

Accomplishments: PHC has convened the Brownfields Task Force on a regular basis and conducted outreach to the community members per our outreach plan. Because of the uniqueness of these sites in terms of redevelopment and limited resources, several high level meetings were held between SCDHEC, PHC, and PHC's consultant to prepare for the cleanup. SCDHEC involvement included not only the brownfields group but also the landfill group. This coordination caused several delays and the necessity of modifying the schedule. SCDHEC required a very specific survey of the disposal area sites prior to reviewing revised ABCAs. After revisions, the ABCAs were approved by SC DHEC, cultural resource and protected species surveys were performed, a stormwater permit application was submitted, and RFPs for capping the two disposal areas were submitted to eight cleanup contractors and advertised in the local newspaper, *The Journal,* on September 14, 2017. A site visit was held with those companies on September 28th. After final selection, project work will begin over the winter and be completed within 90 days, before end of the grant period. Since the consultant has been providing a substantial amount of pro bono work to stretch the grant dollars, and the subcontractor has not been selected to actually start the capping work on the sites, only $32,907.82 of the grant funding has been expended to date. In addition to the activities listed above, these funds were spent on attending brownfields conferences and making a presentation at the Southeastern Brownfields Conference in Jacksonville last year.

Compliance with Grant Requirements: PHC has complied with the EPA approved work plan, its modified schedule, and the terms and conditions of its cooperative agreement. PHC has completed all required quarterly progress reports, MBE/WBE utilization forms, and annual financial status reports on time. Using these grant funds, PHC has achieved the expected results of the grant to date.

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☒ Preapplication	☒ New	
☐ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
11/15/2017	

5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Pelzer Heritage Commission

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
273304573	9692488840000

d. Address:

* Street1:	PO Box 627
Street2:	
* City:	Pelzer
County/Parish:	
* State:	SC: South Carolina
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	296690000

e. Organizational Unit:

Department Name:	Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	Mr.	* First Name:	Larry
Middle Name:			
* Last Name:	Coker		
Suffix:			

Title: Member

Organizational Affiliation:

* Telephone Number:	864-243-9120	Fax Number:	

* Email: lcoker8@att.net

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-17-09

* Title:

FY18 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Brownfields Cleanup Project for Pelzer Upper Mill

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: SC-03
* b. Program/Project: SC-03

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2018
* b. End Date: 09/30/2021

18. Estimated Funding ($):

* a. Federal	200,000.00
* b. Applicant	40,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	240,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on _____.

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: Larry

Middle Name:

* Last Name: Coker

Suffix:

* Title: Member

* Telephone Number: 864-243-9120 Fax Number:

* Email: lcoker8@att.net

* Signature of Authorized Representative: Larry Coker * Date Signed: 11/15/2017

CITY COUNCIL
Ed L. Hatley, Mayor
Martin A. Eaddy, Mayor Pro-Tem
David M. Black
Roby D. Jetton
Tim Smith

Lincolnton NC
Near the City, Near the Mountains, Near Perfect.

CITY MANAGER
Steve Zickefoose, MBA
szickefoose@lincolntonnc.org
CITY CLERK
Donna C. Flowers, MMC, NCCMC
donnaflowers@ci.lincolnton.nc.us
CITY ATTORNEY
Thomas J. Wilson, Jr..

November 16, 2017

R04-18-A-058

Ms. Barbara Alfano
Brownfield Administrator
Environmental Protection Agency, Region IV
Atlanta Federal Center
61 Forsyth Street, SW 10th Floor
Atlanta, Georgia 30303-8960

RE: City of Lincolnton, North Carolina
FY2018 Community-wide Brownfields Assessment Grant Application
Hazardous Substances and Petroleum Funding

Dear Ms. Alfano,

The City of Lincolnton (City) is requesting $300,000 from the United States Environmental Protection Agency (EPA) for its Brownfields Redevelopment Program. Lincolnton, the only incorporated community in Lincoln County, is a small community located in the heart of North Carolina. Lincolnton's industrial history of forges and furnaces for the ironworks industry, was followed by saw mills, grist mills, tanneries, paper mills, potteries and textile mills. The geographic location of Lincolnton, which sits on the Catawba River, and the presence of two rail lines, made it an ideal location for these former industries. With the decline of this industrial past, unemployment and poverty increased, and new development and a growing economy ceased. However, the past several years have seen a resurgence of "life" within the City. An emerging downtown revitalization has started and the City is taking the necessary steps needed to continue this renewed interest. By capitalizing once again on our location within the center of the State, on the banks of the Catawba River, and in such proximity to rail lines, this community-wide brownfields grant will be used by the City to clarify, assess, and plan for mitigation from the environmental concerns of our former industrial past.

a. APPLICANT IDENTIFICATION: City of Lincolnton
PO Box 617
Lincolnton, North Carolina 28093-0617

b. FUNDING REQUESTED:
   i. Grant Type: Assessment
   ii. Assessment Grant Type: Community Wide
   iii. Federal Funds Requested: $300,000
   iv. Contamination: Hazardous Substances $150,000/Petroleum $150,000

c. LOCATION: City of Lincolnton, Lincoln County, North Carolina

d. PROPERTY INFORMATION: N/A – Community-wide Assessment Proposal

e. CONTACTS:

i. Project Director
Laura Elam, AICP
Director of Planning and Development Services
PO Box 617
Lincolnton, North Carolina 28093-0617
Ph. (704) 736-8930
lauraelam@ci.lincolnton.nc.us

ii. Chief Executive
Steve Zickefoose, MBA
City Manager
City of Lincolnton
PO Box 617
Lincolnton, North Carolina 28093-0617
Ph. (704) 736-8980
szickefoose@lincolntonnc.org

f. POPULATION:

i. 10,486
ii. The City of Lincolnton is considered a municipal form of government.
iii. The City of Lincolnton is located in Lincoln County, North Carolina which according to the Small Area Income and Poverty Estimates maintained by the U.S. Census Bureau has not experienced "persistent" poverty over the past 30 years. However, since the time of significant mill closures in the late 1990s and early 2000s, the poverty rate in Lincoln County continues to increase.

g. REGIONAL PRIORITIES CHECKLIST: The Region IV EPA Checklist is attached to this cover letter.

h. LETTER FROM THE STATE OR TRIBAL ENVIRONMENTAL AUTHORITY: Mr. Bruce Nicholson, Brownfields Program Manager, for the North Carolina Department of Environmental Quality (NCDEQ) has provided a letter of support for the City. A copy of the letter is attached.

Thank you for your consideration of this grant application. We look forward to hearing from you on our successful application and look forward to working with you in the up-coming grant cycle. If you have any questions, please feel free to contact me.

Sincerely,

Steven B. Zickefoose

Steven Zickefoose, MBA
City Manager

Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: **City of Lincolnton, North Carolina**

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s): **Assistance to Communities that Have Limited In-House Capacity to Manage Brownfields Projects**

Page Number(s): **N/A**

Assessment Other Factors Checklist

Please identify with an (X) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	**Page #**
None of the Other Factors Apply	
Community Population is 10,000 or less ***(Close – 10,486; Page 1)***	
The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	**Pages 9, 10**
Applicant is a recipient of an EPA Brownfields Area-Wide Planning Grant.	

Waste Management
ENVIRONMENTAL QUALITY

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL SCOTT
Director

November 2, 2017

Laura Elam, AICP
Planning Director
City of Lincolnton
P O Box 617
Lincolnton, NC 28093

Re: U.S. EPA Brownfields Assessment Grant – City of Lincolnton

Dear Ms. Elam:

The North Carolina Department of Environmental Quality (DEQ) Brownfields Program acknowledges and supports the City of Lincolnton's application for a U.S. EPA Brownfields Assessment Grant. We understand that the City of Lincolnton plans to focus grant funding on closed mill properties in its downtown area. The grant funding that the City of Lincolnton is now seeking will be a tremendous boon to revitalization of the City.

We hope the City of Lincolnton is successfully awarded this grant, and we will continue to support you in your brownfields redevelopment efforts. The City of Lincolnton shows great vision by identifying brownfields as a key economic driver for these communities. This funding would facilitate your pursuit of that vision and result in environmental and public health benefits for these communities.

The Brownfields Program offers technical project guidance in accordance with our program, throughout the life of your project(s). This is a major key to ensuring grant applicants make efficient use of the federal funds awarded. The liability protection offered by the program is also a primary marketing tool for developers and instrumental in securing financing. The Brownfields Program can also assist with outreach efforts to your local prospective developers regarding brownfields redevelopment and the liability relief and tax incentives available. The liability relief and tax incentives offered by a brownfields agreement can often facilitate deals that would not have been possible without an agreement.

We look forward to working with you regardless of a grant award or not. We truly believe successful brownfields projects can rejuvenate a community.

Sincerely,

Bruce Nicholson
Brownfields Program Manager

ec: Cindy Nolan, U.S. EPA Region 4
Brian Kvam, Cardno

1. COMMUNITY NEED

a. Target Area and Brownfields

i. Community and Target Area Descriptions

Located a short drive from both the foothills of the Blue Ridge Mountains and the Charlotte metropolitan area, lies the City of Lincolnton. Our City motto "Near the Mountains, Near the City, Near Perfect" sums up the small-town lifestyle present in Lincolnton. Akin to numerous small southern towns, Lincolnton's roots lie in the textile industry. The first textile mill south of the Potomac River was constructed here in 1813, setting the stage for a long history in manufacturing. Over time, particularly during the period of New South Industrialism, multiple enterprises located here, ranging from textile mills to ironworks, machine foundries, saw and paper mills, and grist mills. The geographic location of Lincolnton, which sits on the Catawba River, and the presence of two rail lines, made it an ideal location for these former industries.

Prior to 1990, textile manufacturing was big business for Lincolnton, but according to the US Census, employment opportunities fell by 46.4 percent between 1990 and 2000 and an additional 67.4 percent between 2000 and 2010, due in part to more stringent regulations regarding pollution generated by textile factories as well as cheaper production costs and labor found overseas. As the major economic drivers for Lincolnton declined and eventually closed, so too did the businesses that supported the human capitol once employed in the mills. Locally owned commercial establishments such as restaurants, shops, gas-stations, and dry-cleaners were forced to close due to a severely decreased customer base. Downtown Lincolnton, once bustling with shoppers and merchants became a shell of its former self. In order to reverse these negative conditions, a group of concerned citizens came together in the early 1990s to facilitate the sustainable redevelopment of Lincolnton's Historic District, earning a designation as a North Carolina Main Street Community from the Department of Commerce in 1995. Much work has since been put into revitalizing and reviving our historic core and the greater Lincolnton as a whole; however, the large brownfields located within and adjacent to downtown are a significant impediment to reaching our redevelopment goals. With only a little over 8 square miles of land area, Lincolnton is a small city; therefore, the entire city will be the Target Area for this project with an initial focus on the former mills and properties in the City Center Neighborhood.

ii. Demographic Information and Indicators of Need

Data from the most recent (2015) American Community Survey 5-year estimates (US Census Bureau) indicate Lincolnton is an economically challenged area with double the amount of families with children (30%) living below the poverty threshold (compared to 15% in Lincoln County). This economic disparity (more wealth found in the unincorporated eastern portions of Lincoln County) can be attributed to the more affluent residents who live within commuting distance to nearby Charlotte and the increased job opportunities the metropolitan region holds. Similarly, the unemployment rate in the City of Lincolnton is 16%, significantly higher than the County (10%), State (9%) and United States (8%). The City's housing market lags behind markets in the larger geographic areas—with significantly lower median home values than at the state and national levels. The median home value in the City ($131,500) is approximately $20,000 less than the County ($153,200), and State ($154,900) values.

Table 1: Demographic Information

Demographic	City of Lincolnton	Lincoln County	North Carolina	United States
Social Statistics				
Population	10,486	78,265	10,146,788	308,745,538
Percent African-American (Alone)	15.0	5.8	22.2	12.6

Demographic	City of Lincolnton	Lincoln County	North Carolina	United States
Percent Hispanic (Alone)	17.4	7.2	9.2	17.8
Percent Children (5 -under)	6.2	5.9	6.0	6.2
Percent Elderly (65-over)	16.9	13.2	12.9	13.0
High School Graduate or Higher	78.6	82.9	85.8	86.7
Bachelor Degree	20.8	20.2	28.4	29.8
Economic Statistics				
Individuals Below Poverty Level	28.6	13.4	17.4	12.7
Families with Children Below Poverty (under 5)	30.2	15.2	20.5	18.0
Per Capita Income	$19,886	$26,439	$25,920	$28,930
Median Household Income	$32,217	$49,215	$46,868	$53,889
Unemployment Rate	16.0	10.2	9.4	8.3
Median Home Value	$131,500	$153,200	$154,900	$178,600
Percent Vacant Homes	17.5	11.2	14.5	12.3
Percent Rental	48.2	22.9	34.9	36.1

Data are from American Community Survey 5-year 2015 Estimates, United States Census, accessed October 29, 2017.

iii. Description of the Brownfields: Numerous brownfield properties have been identified through a collaborative effort of City and local residents prior to preparation of this grant application. Some properties have been long-standing concerns for the community, such as the former **Eureka Manufacturing Company Cotton Mill**. Located one block south of East Main and four blocks east of the courthouse square (the center and heart of our city), the former Eureka Mill is one of the earliest established textile mills and one of the best preserved textile mills in the South. It has remained virtually unchanged since the early 1900's and was added to the National Register of Historic Places in 2013. In addition to textile, there was a machine shop and foundry as well as a dye works and, later, Tait Yarn Company. With mill windows boarded up and the surrounding property overgrown with invasive weeds, the historic structure stands in a state of neglect. Over 100-years of industrial textile use have left lingering concerns as to the environmental state of the property, including potential exposure to a host of chemicals (particularly PAHs, solvents, heavy metals, and petroleum hydrocarbons commonly occurring at mill sites) as well as asbestos and lead based paint in building materials. The property is surrounded by the former mill village residential neighborhood on three sides and a bank followed by Main Street on the fourth side.

Located to the south of the Eureka Mill and in the southern portion of the City limits lies the former **Massapoag Mill.** The mill was built in 1907 and was the first mill in the U.S. with the distinctive Japanese–made o-M Spinning Machine. The property has been the site of multiple fires and was condemned after a fire in 2013, which cost the city $48,000 (Lincolnton Fire Department Annual Report), followed by yet another fire in 2014. The property was deemed an eyesore and danger to emergency personnel and residents and demolished in response to public outcry over the conditions. According to former Lincolnton Fire Department Chief Mitch Burgin, the property was "deemed one of Lincolnton's 'signal 13' structures, a label slapped on unstable city sites with the potential to put first responders in danger…there is no value on that property." The former mill site is located near residential homes, within 1200 feet of a primary drinking water source, and in a state of blight. Ash and soot covered building debris and rubble are piled across the site, and the property's long use for textile manufacturing has left the community worried about environmental contamination and public health exposure to PAHs, solvents, petroleum hydrocarbons, metals, and PCBs. The site is unsecured, and a perfect location for nearby neighborhood children with their innate sense of curiosity to explore and play.

In the eastern portion of the city is the former **Mohican Mill Plant.** This large plant (over 782,000 square ft.) stands at the main gateway to Lincolnton from nearby Hwy. 321 and is what visitors

first see as they enter the City. Located approximately one quarter mile upgradient of single family residential properties, it was built in 1960 with additions in 1965 and 1998 of brick, block and mortar, and steel and includes an additional building consisting of 34,237 sq. ft., 30,000 sq. ft. parking, two guard houses, two large pump house, a boiler house and a 300,000 gallon water tank. It was formerly used to manufacture knit fabrics including drying and finishing. Incorporated in 1966, it was a flourishing textile mill with sales of more than $100 million in 1980, with over 1,000 employees at its prime. By the time the mill closed in 2015, it only supported 157 employees. It is currently underutilized for warehousing, and the potential for environmental contamination at the property (solvents, metals, petroleum hydrocarbons) are deterring reuse.

The following table includes other potential brownfield properties identified in the target area:

Property	Previous Use	Potential Contaminants	Proximity to Residents	Potential Reuse
Former Burlington Plant (Motz Ave. Site)	Former industrial manufacturing/mill property – approx. 20 acres	Various industrial chemicals, solvents, dyes, heavy metals, potential PCBs, potential petroleum related compounds	Residential across the street from the site	Currently underutilized with a small technologies company. Owner is looking to expand into other areas of the property with high tech incubator/small business space
Former Sealed Air Plant	Commercial operations and light industrial uses in the manufacture of air equipment; Additionally was used in packaging manufacturing – approx. 7 acres	Various industrial chemicals, solvents, dyes, heavy metals, potential PCBs, potential for petroleum related compounds	Mostly commercial, light industrial district, but some multi-family residential adjoining the site	Potential commercial or light industrial reuse; or extension of multi-family residential
Former Willowbrook Mill (built ca. 1888)	Historic textile mill associated with 12 different manufacturers. Various textile operations including dyeing and finishing – approx. 5 acres	Various industrial chemicals, solvents, dyes, heavy metals, potential PCBs, coal ash	Adjoining residential neighborhood blocks; 1 block from downtown business district and courthouse	Potential reuse as moderate income to market rate residential
Former Homespun Hosiery	Former manufacturer of hosiery products for men and women – approx. 4 acres	Various industrial chemicals, solvents, dyes, heavy metals, potential PCBs, potential petroleum products	Located in a commercial and industrial area of the city	New commercial or light industrial space for new business
Former E. Main Gas Station	Closed gas station in the middle of downtown commercial district – approx. 0.5 acres	Petroleum USTs	1 block from residential	New downtown commercial space for retail, restaurant or artisan shop

b. Welfare, Environmental, and Public Health Impacts

i. Welfare Impacts: The demise of the textile industry and the advent of brownfield properties in Lincolnton, including the most recent closure of the Mohican Mill in 2015, has caused an increase in economic and social despair. This can be seen in the excessive crime rates present in the City, where public safety is a primary concern. The City Center Neighborhood (where the majority of the brownfields are located) has a total crime index of 17 out 100 (with 100 being the safest). Only 17% of municipalities across the United States have worse crime indicators than this area of Lincolnton, with violent and property crimes being major factors. The violent crime index in Lincolnton is 25 out of 100, and the property crime index is 16 out of 100. The vacant and abandoned mill properties provide attractive locations with ample cover for crime and illegal activities. This, coupled with a feeling of despair from living in economically challenging situation,

demonstrate the classic correlation of poverty and crime. Research has proven that when the standard of living is depressed, the individuals living in poverty see the benefits of committing a crime to meet their basic needs is worth the risk of getting caught. And, when severe poverty is considered, there is a direct correlation to a rise in violent crime.[1]

Public schools in Lincolnton are struggling, and 79.5% of public school students at GE Massey Elementary (located in the heart of Lincolnton and geographically closest to the former Mohican Plant) participated in the National School Lunch Program (NSLP) in 2015. To qualify for free lunch, according to North Carolina guidelines, children's family income must be under $15,171 in 2015 (below 130% of the poverty line), and 68.9% of students at GE Massey Elementary received free lunch. To qualify for reduced lunch, children's family income must be below $21,590 annual income in 2015 (185% of the poverty line), and 10.6% of students at GE Massey Elementary receive reduced lunch. The NSLP participation rate at GE Massey is higher than average for both the City of Lincolnton (60.1%) and North Carolina (57.2%).[2] In addition, children attending GE Massey Elementary are underperforming compared to peer students. Less than 25% of students have a solid command of both reading and math compared to 40% reading and 34% math in the encompassing school district. The school received an overall performance 'D' rating from the North Carolina Department of Education with 'D' ratings in both reading and math.

The crime and school performance statistics for Lincolnton are disparaging for residents. As described in section 1.a.iii, the once prominent mill properties are now a blight on the surrounding mill villages that are located in close proximity. Residents express frustration that the properties have languished for so long and lack of response from the property owners and responsible parties.

ii. Cumulative Environmental Issues: In addition to the potential human health and environmental concerns associated with Lincolnton's brownfields, there are numerous other environmental issues in Lincolnton. There is an extensive list of imminent hazard sites identified by the North Carolina Department of Environmental Quality (NCDEQ). Former textile plants have been cited for surface water, groundwater and soil contaminants, and there are three superfund sites in the immediate area. Homefacts.com lists a total of 298 environmental hazards for Lincolnton, including the superfund sites, 13 registered polluters, and 282 tanks and spills. The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration lists 41 toxic release sites in the Cleveland/Gaston/Lincoln Region with two prior rail and roadway incidents in Lincoln County and a 1-10% annual probability of future occurrence.

In the 2002 rankings for major chemical releases or waste generation, one of Lincolnton's local businesses rated between 80-90% for dirtiest/worst facilities in the US for total environmental and air releases and between 90-100% for air releases of suspected carcinogens, cardiovascular/blood, developmental, endocrine, immune, kidney, neuro, and reproductive toxicants (styrene). A local furniture manufacturer rated 80-90% for dirtiest/worst facilities in the US with a 90-100% ranking for air releases of recognized developmental toxicants (lead).

iii. Cumulative Public Health Impacts: Vacant buildings and multiple fires and vandalism at the brownfield sites through the years have created blight and potential health hazards to the community. The sites create concerns about health dangers and physical risks from fire, vandalism and deterioration. Migration of contaminants through air, groundwater, storm water runoff (flooding) and vapor intrusion into buildings and homes may also be occurring. Residents may be coming into contact with potentially contaminated soil or airborne particulates (inhalation, dermal,

[1]Poverty and Crime Statistics (n.d.) Retrieved from https://vittana.org November 2017

[2] http://public-schools.startclass.com/l/66736/Ge-Massey-Elementary

and ingestion risks), potentially contaminated groundwater in private irrigation and/or drinking wells (dermal and ingestion risks), and possible vapor intrusion of volatile organic chemicals (VOCs) into nearby residential structures (inhalation risk). Some of the suspected contaminants at the targeted brownfields sites are known carcinogens, such as polycyclic aromatic hydrocarbons (PAHs) and heavy metals, which may increase the risk of cancer if residents are exposed. Numerous VOCs including benzene and toluene from petroleum based products (widely used in numerous mill and industrial activities) and chlorinated solvents (widely used as degreasers, parts washers, and in drycleaning applications) are considered carcinogenic.

With a higher unemployment rate than the average for the state, Lincoln County's economic and educational factors can be correlated to access to care, quality of care, quality of life (mental and physical health, chronic disease) and the cost of increased health care to the county (Lincoln County Community Health Assessment 2013). There is less access to primary care physicians and dentists, resulting in increased emergency room visits. Lincoln County is the second highest county for deaths from heart disease and suicide, and the highest for deaths from respiratory disease (State Center for Health Statistics – city level data not available). More than half the adult population and over one third of the child population is overweight or obese (BMI greater than 25.0). The report notes that Lincoln County has a rapidly increasing minority population, at risk for chronic diseases due to genetics, health care access, lack of early screenings, and lack of access to healthy food options, lower incomes, and mistrust of health care providers. There is also an increased aging population, with higher chronic disease rates who are particularly sensitive to environmental toxins.

c. Financial Need

i. Economic Conditions: Like many cities in North Carolina, Lincolnton was once home to several textile mills, creating a labor force primarily rooted in manufacturing. While the mills (including the former Mohican Mills) were in operation, there was an increased demand for water. Mohican Mills alone used 194 million gallons of water annually and accounted for 14% of the total City revenues in sewer usage. Industrial need coupled with a mandated water supply expansion from the State of North Carolina resulted in construction of a 9-million-gallon-per-day water plant and an associated 6-million-gallon-per-day wastewater treatment plant by the City. Around the 1990s, foreign competitors with cheaper materials and labor overseas resulted in local textile companies closing one by one. According to then city manager Jeff Emory, "It'll be difficult, if not impossible, to find another customer that will make up the difference, particularly in a short period of time." Mohican Mills was also one of the largest water and sewer consumers for the City as noted above, and Emory added, "It most certainly affects the city budget and how we move forward. They were an incredible company and customer of this city's utility service for many years and I am saddened by the news, as I am sure the community will be." According to the current Lincolnton City Manager and Finance Director Steve Zickefoose, that loss amounted to 13% of the total revenues from water sales and 16% of the total revenues from sewer usage, a total of greater than $1.2 million. Dr. Jon Cloninger, city councilman at the time remarked, "This is the news we have dreaded to hear for the last several years. We will miss them. I hope the building can be used by another industry that may come in that uses a lot of water. We will get through this, but it is going to be hard." To date, the City has been unable to find a new occupant for the former Mohican Mill, especially one that will come close to the water consumption that Mohican utilized. Meanwhile, the costs of supporting large water and sewer plants, including paying off the debt for their construction continue, to burden the City budget.

In order to adjust to the loss of Mohican Mills and other manufacturing water customers (a large

percentage of the City's annual revenue), Lincolnton has had to make a number of changes to the budget and operations in order to balance the budget. A sampling of these changes include not replacing several positions when employees retired, combining of employee positions where practical while halting the creation of new positions, and postponement of many infrastructural improvement and capital projects. While the City would like to assist future owners and developers that may be interested in re-use of the brownfield sites, we are not in a financial position to provide assistance, hence the need for EPA brownfields funding.

ii. Economic Effects of Brownfields: Thousands of workers in the local industry were laid off, when the mills closed. According to a report from the Brookings Institute (2011), the area saw an industry employment decline of 84.5%. Carolina Mills in nearby Maiden closed in 2002, followed by American & Efird, and Delta in 2003. One of the last closures (2015) was Mohican Mills, one of the largest manufacturers of knitted fabrics in the United States. The closure had a huge economic effect on the workforce, leading to the layoffs of the remaining 157 workers and adding to the already high employment rate (16%). Consequently, the City is experience high levels of poverty – the rates for individuals (28.6%) and families with children under 5 (30.2%) are twice those of the County (13.4% and 15.2%, respectively). The blight of sites are also impacting the housing market, particularly in the mill villages adjacent to the sites. The median home values in the City are approximately $20,000 less than homes in Lincoln County, and nearly half of the housing stock (48.2%) are rentals compared to 22.9% in the County. In addition, the City of Lincolnton has been faced with the financial burden of providing public safety measures for these problematic brownfield sites. The 2013 Lincolnton Fire Department Annual Report cites a cost of $48,000 just to deal with the cleanup of one fire at the defunct Massapoag Mill. Multiply that by several fires over the years, plus the cost of security, police responses, and loss of tax and water and sewer income to account for the total costs associated with these structures. The prevalent brownfields are significant economic burden on the City and our residents.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a. Project Description, Redevelopment Strategy, and Timing and Implementation

i. Project Description and Alignment with Revitalization Plans: The City intends to use these grant funds to conduct the necessary environmental assessments to determine the extent of environmental impact, if any, the former commercial and industrial operations of the mills had on the community. If warranted, we will develop specific cleanup and redevelopment plans to address the contamination suitable for the intended site reuse. When and if concerns are identified, we can then work with other federal, state, and local partners and stakeholders to market properties as ready for redevelopment with potential developers.

Known as one of the "100 best small towns in the Southeast," Lincolnton is a historic community and the economic and cultural hub of Lincoln County. Our continued success resides in good land use management. The City's Land Use Plan as adopted in 2003 focuses on developing the downtown area, maintaining the integrity of some of the older "mill villages" located near the former and existing textile mills, the adoption of a code to address maintenance of commercial buildings, and promotion of adaptive reuse (for manufacturing and other uses) of the city's older industrial buildings, such as vacant textile mills. The proposed brownfields project aligns within this overarching plan, connecting properties of our past to uses benefiting our future.

The City is currently in the process of updating our Strategic Plan. Working as a collaborative effort with community residents, volunteers, government officials, and local business owners, and guided by our Downtown Development Association (DDA), the first of several planned meetings was

dedicated to the concept of equitable development. Held in September 2017, this committed group of citizens began the comprehensive process of planning our future, including tackling some deeply entrenched environmental justice community issues of poverty, economic barriers, environmental quality and health. Of particular interest is removing blight and preventing unwanted access to the Mohican Mill site where toxins are believed to still remain after the site burned. One of the objectives identified was to "define Lincolnton as the hub of distinctive arts, artisans, and active living." The adaptive, sustainable development of Lincolnton's downtown brownfields will help meet this objective by providing increased access to jobs and entrepreneurial opportunities while reusing existing infrastructure and increasing walkability. Environmental justice approaches will include the careful consideration of redevelopment strategies will be employed to ensure unintended negative impacts such as gentrification and/or displacement of low-income and/or minority residents do not occur. This project will also use open and transparent processes that will engage relevant stakeholders, increase resident buy-in to local government initiatives, and increase the ability to meet the needs of all members of our community.

ii. Redevelopment Strategy: This brownfields program will complement the exciting new vision guiding the development of our Strategic Plan. Our focus on the revitalization of historic downtown into a dynamic and energetic district will attract new commercial and retail infill development, including the use of existing brownfields. For example, a developer's preliminary plans are in discussion to convert the historic former Eureka Mill structure into a mixed commercial and retail facility, including a combination of restaurant, microbrewery, retail space with museum space for the Catawba Pottery Museum. An additional former mill (Willowbrook) in downtown is slated for residential redevelopment. Meanwhile, the former gas station on East Main Street could potentially be redeveloped as retail, restaurant, artisan shop to help create that "hub of distinctive arts, artisans, and active living" envisioned in the Strategic Plan. Other potential reuse visions are included in the table in section 1.a.iii. Brownfields funding will be instrumental to these initiatives; providing the environmental assessments and redevelopment planning for target sites will encourage this redevelopment.

iii. Timing and Implementation: Ms. Laura Elam, Planning Director, will serve as the project director and lead the project activities, including:

a. Contractor Procurement: Given the technical nature of this project and the need to be prepared to begin upon grant award, Lincolnton has already procured an experienced and qualified consultant to assist with implementation of the project. Led by Ms. Elam, the City released a Request for Qualifications (RFQ) in August 2017 in accordance with state and federal guidelines (2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500). The City subsequently ranked the responses and selected the top ranked firm. Upon grant award, the City will contract with the firm and will be ready to begin work as soon as grant funds are received in October 2018.

b. Site Inventory, Selection, and Prioritization: Based on initial discussions with the community, the City identified the preliminary inventory of brownfields in Section 1.a.iii. However, within the first quarter of grant funds being awarded, the City will establish a Brownfields Task Force including community representatives to continue to build the site inventory, help set priorities, assist with site access and convey information to the community. Prioritization for assessment activities will be based on the following: 1) Level of perceived contamination and threat to human health and environment; 2) Relevance to local revitalization efforts; 3) Potential for redevelopment and job creation, 4) removal of blight; and 5) level of community support. The inventory and prioritization will be reviewed and updated at every Brownfields Task Force meeting and/or quarterly throughout the grant period in order to make

sure that priority sites are being addressed.

c. Site Access: In preparation for this application, we have had preliminary discussions with several property owners, who have shown interest in participating. Ms. Elam, along with help from the DDA and Lincoln Economic Development Association (LEDA), will continue to lead this effort to secure access to the high-priority sites. Piedmont Companies, owner/developer of Eureka Mill is fully supportive of this application and wants to participate. We will focus on sites that are for sale or redevelopment, property owners of which will more fully appreciate and understand the benefits of participating. For high-priority properties where an owner cannot be located, the City may explore legal options to obtain site access.

b. Task Descriptions and Budget Table

i. Task Descriptions: The City of Lincolnton is seeking funding in the amount of $150,000 for properties with potential hazardous substance contamination and $150,000 for properties with potential petroleum contamination. The following is a description of tasks and expected outputs, as well as cost estimates based on discussions with consulting firms specializing in brownfield assessment and redevelopment and with nearby Burke County who has previously received a brownfield assessment grant.

Task 1: Phase I/II Assessments – Conduct Environmental Site Assessment activities (ESAs) at selected sites – Assessment total $204,000 (50% petroleum/50% hazardous substances) [Contractual]:

- 10 ASTM-AAI compliant Phase I's @ $3,500 each for a total of $35,000
- 1 Generic Quality Assurance Plan (QAPP) @ $7,000
- 6 SS-QAPPs @ $5,000 each for a total of $30,000
- 6 Phase II's @ an average cost $22,000 for each site for a total of $132,000

NOTE: Phase II ESA cost will vary due to the complexity of the site and the type of contaminant(s). Phase I/II funds may also be used for Asbestos and Lead Based Paint surveys to support existing building demolition or renovation activities on brownfields properties.

Task 2: Remediation/Reuse Planning – Develop site appropriate remediation and/or reuse plans to reduce risks to health & environment for selected sites. Community vision & goals will be considered in city-wide remediation/reuse planning – Planning total $52,000 (50% hazardous substances/50% petroleum) [Contractual].

- 4 ABCAs @ $6,000 each for a total of $24,000
- 4 ACM Abatement Plans @ $2,500 each for a total of $10,000
- 2 Redevelopment Plans @ $9,000 each for a total of $18,000

Task 3: Outreach – Develop/maintain strategic partnerships and create a Community Involvement Plan; disseminate information/comments to/from community & stakeholders, host community meetings – Outreach total $20,000 (50% hazardous /50% petroleum) [City $1,000 / Contractual $19,000]:

- 1 Community Involvement Plan (CIP) @ $5,000
- Outreach Materials - 250 Brochures @ $300, 250 Fact Sheets/cards @ $300 totaling $600
- 1 Website design and maintenance @ $5,000
- 6 Community Meetings @ $1,000 each for a total of $6,000
- 1 Community Visioning Charrette @ $3,400

Task 4: Programmatic Support – Ms. Elam will directly oversee grant implementation and ensure compliance with EPA cooperative agreement terms & conditions. The team will complete EPA quarterly reports, MBE/WBE forms, & EPA ACRES database and other programmatic support. Travel funds are budgeted to send Ms. Elam, and potentially additional staff, to national/ regional brownfields-related training conferences. Additionally, the City has secured contractual support from an experienced, brownfield consulting firm to help assist with programmatic tasks – Support total $24,000 (50% hazardous /50% petroleum) [City $8,000 / Contractual $16,000]:

- Travel to various conferences and training @ $8,000
- Programmatic support/reporting @ $375/month for 36 months for a total of $13,500
- 1 Close-out Report @ $2,500

ii. Budget Table

Community Wide Assessment Budget - Lincolnton, NC

Categories	Project Tasks				
	Task 1: Phase I/II Assessments	**Task 2: Remediation/ Reuse Plan**	**Task 3: Outreach**	**Task 4: Programmatic Support**	**Total**
	Hazardous Substances				
Travel	0	0	$500	$4,000	$4,500
Supplies	0	0	$500	0	$500
Contractual	$102,000	$26,000	$9,000	$8,000	$145,000
Total	**$102,000**	**$26,000**	**$10,000**	**$12,000**	**$150,000**
	Petroleum Products				
Travel	0	0	$500	$4,000	$4,500
Supplies	0	0	$500	0	$500
Contractual	$102,000	$26,000	$9,000	$8,000	$145,000
Total	**$102,000**	**$26,000**	**$10,000**	**$12,000**	**$150,000**

c. Ability to Leverage

The City of Lincolnton provides grants, incentives and programs for projects from small business start-ups and expansions and to commercial property owners and real estate developers investing in businesses and properties in the city. The minimum budget is $55,000. In addition, LEDA offers technical assistance to new and existing industry and businesses through building and site selection and review; utility issues; infrastructure development and improvements; employment issues, and workforce development training information. Below is a list of programs budgeted for FY 2017-2018.

Leveraging Resources

Source	Purpose/Role	Amount ($)	Status
City of Lincolnton, Business Incentive Grant	Matching cash grants available for new or expanding businesses to assist with building renovations or rehabilitations.	$15,000	Secured resource
City of Lincolnton, Business Star Up Rebate	Cash rebates paid in monthly installments for new retail and restaurants in Downtown Lincolnton to assist with rent payments for first six months	Determined per request	Secured resource
City of Lincolnton, Architectural Services Grant	Matching cash grants available for properties eligible for listing on the National Register of Historic Places	Matching	Secured resource

Source	Purpose/Role	Amount ($)	Status
City of Lincolnton, Façade Rehabilitation Grant	Matching cash grants are available citywide for commercial buildings more than 50 years old.	Matching	Secured resource
City of Lincolnton, Downtown Redevelopment Revolving Loan	Zero interest loans available for renovations or rehabilitations of downtown properties	$30,000	Secured resources
City of Lincolnton, Smart Growth Incentive Grant	Some or all of increased property taxes due to new construction projects or rehabilitation of existing structures can be reimbursed to the property owner over a 5 year period.	Determined per request	Secured resource
City of Lincolnton, Industrial Development Incentive Grant	New or expanding industries making new capital investments are eligible for an incentive grant	Up to $9,999,999 each	Secured resource

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Engaging the Community

i. Community Involvement Plan: Meaningful involvement of our public is paramount to a successful project, in terms of project support and more importantly, equitable development. To this end, the City has been working with community members to establish a vision for our downtown area as evidenced in the discussion describing the September 2017 Strategic visioning (Section 2.a.i). We will develop a Community Involvement Plan to guide project outreach activities and to ensure our citizens' voices are heard and incorporated into project decisions and future plans. DDA of Lincolnton has committed to partnering with the city as an advocate for community stakeholders and will provide open forums for the community to discuss, strategize and align the city's redevelopment goals, policies and programs. The City will expand upon these efforts with the creation of a program specific Brownfields Task Force. Membership for the Task Force will be recruited from the existing pool of volunteers, who have shown interest in visioning and addressing the civic, social, and economic problems our City is facing, and open to all citizens who are interested. We anticipate membership from local church congregations, business owners, government and civic officials, as well as residents from our various neighborhoods. The Task Force will meet quarterly to: guide site selection activities, ensure project alignment with community interests and needs, promote the project to property owners/potential investors, and communicate project updates to wider audiences. We also plan to utilize our Student Advisory Council as a unique opportunity to gain development perspectives from the next generation. Comprised of no more than 25 senior high school members, the Youth Council meets monthly during the school year (September – May). This platform provides an excellent opportunity to educate community youth in environmental issues and how they relate to civic matters, as well as to provide a voice for this important, yet often overlooked, population. The City also plans to host two public meetings to present project updates, solicit feedback, and invite community participation, and meet with community groups as needed. In the redevelopment planning stages of specific properties, the City will work with DDA to conduct workshops and/or visioning sessions. Public meetings and other significant events will be advertised in local print media as well as the City's website.

ii. Communicating Progress: As previously discussed, one of the main responsibilities of the Brownfields Task Force will be to help communicate progress to the affected communities. In addition, the project team will conduct outreach to stakeholders (the general public, residents, business and industry leaders, civic leaders, the development community, nonprofits, media representatives, professionals, city staff, and elected officials) through personal contact, direct

mail, and/or electronic mailing lists. The City will conduct focus groups and public meetings, as needed. We will coordinate with local media to have media coverage of project activities, develop press releases for significant events or accomplishments, and post updates on social media and the City website. The City will also make project information publicly available on our website and social media sites. Based on the successful public outreach employed for the 2017 Strategic visioning sessions, the proposed communication strategy is appropriate for our target community.

b. Partnerships with Government Agencies

Local/State/Tribal Environmental Authority: The *NCDEQ Brownfields Program* will provide assistance with site selection and petroleum project eligibility letters and cleanup standards. During individual project work, the City will also work with NCDEQ project managers to assure that state regulations are complied with, especially those protective of public health and safety, and the environment (i.e. contaminant levels, acceptable exposure levels and reuse, etc.). NCDEQ will provide oversight for properties entering the North Carolina Brownfields Program.

Other Governmental Partnerships

EPA Region 4 – As the funding agency, the EPA and the regional Project Officer will have significant involvement in the project. We will work with the EPA to ensure all work is completed in accordance with the terms and conditions and all objectives are met in a timely manner.

Lincoln County Health Department - The department is committed to promoting health and protecting the environment in Lincolnton. The health department will serve as a resource for community members, who may have questions or concerns about exposure to any contaminants found during site assessments, cleanup, and/or redevelopment. In addition, a staff member has been dedicated to serving on the Brownfields Task Force. A letter of support is included.

Lincolnton Housing Authority – The Authority has committed to a review of the city's brownfields inventory and consider brownfield sites for potential properties for new affordable housing developments.

City of Lincolnton, Planning Department – Lincolnton Planning has pledged support through a series of development and incentive grants (listed above-Section C). A letter of support is included.

Lincoln Economic Development Association (LEDA) – LEDA will provide technical assistance with site selection/review; infrastructure, and employment and workforce issues. They will also act as a marketing arm for the City's program by advertising the availability of the funds and "selling" brownfield site to potential developers. They are also interested in hosting the brownfields repository and database of brownfield sites.

Electricities of North Carolina – Electrocities has committed to partnering with the City to provide economic development support. Electricities is a member-managed municipal corporation created more than 50 years ago in order to help member communities with direct support for the provision of electric power, rate development, safety training, regulatory compliance, and economic development services. Electricities encourages its members and seeks to utilize brownfield sites to create new economic activity within their communities.

c. Partnerships with Community Organizations

i. Community Organization Descriptions & Roles

The following Community-based Organizations have committed to support in the project.

Community Group	Description	Support for the Brownfield Project
Lincoln County Historical Association	Provides leadership in the preservation and revitalization of the unique architectural heritage.	Participation on the Brownfields Task Force.

Community Group	Description	Support for the Brownfield Project
Lincoln County Chamber of Commerce	Enhance the quality of life and foster a healthy economic environment in Lincoln County.	Work with Chamber membership to identify and prioritize sites; assist with communications and community input opportunities; participation on the Brownfields Task Force.
Piedmont Companies, Inc.	Owner and developer of the of the Eureka Mill Site	Piedmont is working toward redevelopment of the site and are eager to participate in the City's brownfield program.
Lincolnton Downtown Development Association (DDA)	Is the primary economic development mechanism for the City. They have extensive relationships with numerous stakeholder groups, including community groups, through the NC Main St. Program and their work in revitalizing downtown.	Partner with the City as an advocate for community stakeholders and provide an open forums for the community to discuss, strategize, and align redevelopment goals.
Wandering Around Lincoln County (WALC)	WALC is a group of citizens that support trail building throughout the community so that residents can enjoy healthy lifestyles and the greater outdoors.	They are currently working on connecting the City's Rail Trail with the South Fork Trail (connector lies along potential brownfield sites). Will work to help secure access and support community engagement initiatives.

ii. Letters of Commitment: Letters of commitment from the aforementioned community organizations are included with this proposal as an attachment.

d. Partnerships with Workforce Development Programs

Gaston College's Lincoln Campus is locate in Lincolnton and is committed to providing their students with quality courses that enhance their job skills. They provide opportunities for students in numerous areas and seek to place interns with local businesses. The City plans to utilize Gaston College resources in providing training and education opportunities to residents as they pertain to the assessment, cleanup, and/or redevelopment of brownfield sites. LEDA, through their workforce development initiatives, will also work with hired consultants to screen and subsequently recommend individuals for any open positions for work in this program, as well as provide relevant training. Additionally, the consultant has committed to subcontract and source with local firms, when possible.

4. PROJECT BENEFITS

a. Welfare, Environmental, and Public Health Benefits

This brownfields project will produce tangible benefits for our target community. The social and economic welfare for our residents will be improved through increased job opportunities and a healthy downtown economy. An increase of jobs will improve the ability for residents to access employer-sponsored health insurance and realize fewer barriers to access of healthcare. As the downtown core of Lincolnton improves, we anticipate the energy and vitality spurring this change to be a catalyst for the City as a whole.

Two primary **public welfare** concerns for residents of Lincolnton include the disturbingly high crime rates and the poor performance of local schools. Addressing the brownfields and putting them back into meaningful reuse will lessen the amount of vacant buildings available for illegal and clandestine activities to take place. As crime rates drop, safety issues will no longer be a deterrent for families to make a home in downtown Lincolnton, and home ownership will increase. The removal of blight and an improving housing market will have a positive effect on home values, generating more tax revenue for local schools. Increased investment (financial as well as time and talents) in local schools, which will in turn increase school performance.

From a **public health** perspective, the assessment and ultimate cleanup of the brownfield sites will reduce exposure to our residents, the risk of contaminant migration to our water supply, and the risk of stormwater runoff carrying contamination to our surface water bodies. The redevelopment of the former mills, manufacturing facilities, and gas-stations will reduce the amount of contamination in the soil and groundwater, thereby removing the potential sources contributing to the higher rates of respiratory disease in Lincoln County (the leading cause of death in the County). Improving the walkability of Lincolnton will increase opportunities for physical activity, thereby decreasing alarmingly high levels of obesity found in Lincoln County. While the benefits will not be realized immediately, the assessments are the first step in defining the problem and developing the solutions to the public health risks posed by the brownfield sites.

Environmental benefits will occur as environmental assessments are completed that will determine whether contamination is present on the brownfield sites and, if so, to what extent. Assessments will likely determine that many sites have no or minimal contamination and can be safely redeveloped. For other sites, the assessments will allow us to determine the additional steps necessary to make the sites safe for the intended reuse. Many of the proposed brownfield sites in Lincolnton are former textile mill and/or manufacturing facilities that may have contributed to soil, groundwater, surface water, and/or air pollution. Potential contaminants on these sites include petroleum hydrocarbons, volatile and semi-volatile organic compounds, PCBs, heavy metals, asbestos, and lead. Assessment and remediation planning will begin controlling exposures to this contamination. This will help improve the air, soil, groundwater and surface water throughout Lincolnton. Further, the eventual reuse of the brownfield properties will contribute to the creation of a dense, walkable city, which will reduce dependence on vehicles (and associated air emissions and fuel consumption) and suburban sprawl.

b. Economic and Community Benefits

The 2013 Lincolnton Fire Department Annual Report cites a cost of $48,000 just to deal with the cleanup of one fire at the defunct Massapoag Mill. Reducing the risk of fires can prevent this undue tax burden on the city. The redevelopment of the sites will increase the tax values of neighboring properties, which have decreased to almost one third of the 2008 values. Additionally, clarifying the environmental uncertainties on these properties will help the City better market appropriate site to large industrial users of water and sewer services. The City may then be able to recoup some of the annual loss of total revenues from water sales and sewer usage, which previously amounted to 13% (water) and 16% (sewer) of city revenues. As the downtown area begins to turn around with an increase in local entrepreneurship and small businesses returning to the historic area, we expect job opportunities to increase, and with them, an increase in the tax base and also dollars spent in the community. By encouraging our residents to "shop local" we will continue to invest – and reinvest – in our city. The arts and cultural future of Lincolnton is also anticipated to improve as a community benefit of this project. The redevelopment of our downtown into a thriving hub for local artisans, as envisioned by our citizens, will eventually bring more artists and cultural events to the City, making art accessible to all citizens of Lincolnton. Finally, this brownfields project has the added community benefit of strengthening ties among residents, businesses, and city officials. By building community awareness of the problematic sites and empowering the community to work together to reach a redevelopment solution, we will bring all facets of our community together in a unique way.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Audit Findings

The independent firm of Lowdermilk Church & Co., L.L.P., audited the City's financial statements

for the year ended June 30, 2016. No adverse findings were reported.

b. Programmatic Capability

Lincolnton has the requisite capacity to administer the EPA grant funds based on previous experience in federal and state grant management. Laura Elam, Planning Director, will serve as the project director. With 35 years of planning experience (including the past eight with the City of Lincolnton), Ms. Elam is well versed in grant management. Most recently, Ms. Elam successfully managed the City's Rails-to-Trails grants from the Congestion Mitigation and Air Quality program and is currently managing the Carolina Thread Trail grant for sidewalk connectors throughout the City. She will be assisted by Steve Zickefoose, Finance Director and City Manager. The City has selected an environmental consultant to support Ms. Elam and complete the technical aspects of the project. The City followed the procedures detailed in 2 CFR 200 and EPA's rule at 2 CFR 1500 to procure a consultant to provide support in the event of an award. In August 2017, the City released a competitive, public RFQ, reviewed submittals from four (4) firms, and selected the team deemed most qualified by the review committee. As demonstrated, we have the systems in place to procure additional support or resources, if needed to successfully complete the project.

c. Measuring Environmental Results: Anticipated Outputs/Outcomes

Ms. Elam and her team will meet quarterly to track progress. The City will submit quarterly progress reports to EPA and hold monthly conference calls with the EPA Project Officer to review progress and address any issues. If necessary, the City will take corrective actions to ensure the project meets objectives and schedule. Site-specific information will be routinely entered and tracked in the online ACRES database. At a minimum, the outputs to be tracked include the number of task force meetings, public meetings, environmental assessments, ABCAs; and, the outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created.

d. Past Performance and Accomplishments

City staff members have a history of timely compliance with all federal and state grants under the City's direct control. In order to comply with grant program requirements, the City closely monitors progress and conducts annual audits as needed. As stated, no adverse audit findings have been determined. The Federal projects listed in the following table were either completed successfully or are ongoing without any issues that have required any corrective measures. All terms and conditions of the awarding agencies are being met in a timely manner and in accordance with set work schedules. Reports and financials have been submitted in a timely manner to date and applicable grants have been closed, except for those newly awarded.

Assistance Program	Awarding Agency	Amount Awarded	Funds Remaining	Year Awarded	Grant Accomplishments
Congestion Mitigation and Air Quality (CMAQ)	FHWA/ NCDOT	$158,000	$158,000	2016	Sidewalk Connector on East Main Street at Highway 321 (ongoing)
Congestion Mitigation and Air Quality (CMAQ)	FHWA/ NCDOT	$468,000	$0	2010	Rail Trail Phase III (completed)
Transportation Enhancements (TE)	FHWA/ NCDOT	$120,123	$0	2007	Rail Trail Phase II (completed)
Grants In Aid	NC Office of State Budget and	$96,107	$0	2016	Promoted rehabilitation and adaptive reuse of older buildings

Assistance Program	Awarding Agency	Amount Awarded	Funds Remaining	Year Awarded	Grant Accomplishments
	Management (OSBM)				(completed)
4153-DR-NC Mountain Floods	FEMA 4153-DR-NC	$440,686	$166,712	2013-present	Recovery of damages due to flood for emergency protective measures, debris removal, recreation building, water treatment plant, and wastewater treatment plant (completed)
Grants In Aid	North Carolina Department of Cultural Resources	$150,000	$150,000	2017	Expansion of recreational facilities at Betty Ross Park. Phase 1 River Access Point Construction for public canoes, kayaks, fishing and general access (ongoing)

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☒ Preapplication	☒ New	
☐ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
11/16/2017	

5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Lincolnton, North Carolina

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
56-6001269	1599967760000

d. Address:

* Street1: P.O. Box 617
Street2:
* City: Lincolnton
County/Parish:
* State: NC: North Carolina
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 28093-0617

e. Organizational Unit:

Department Name:	Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Laura
Middle Name:
* Last Name: Elam
Suffix:

Title: Director of Planning and Development Services

Organizational Affiliation:

* Telephone Number: 704-736-8930
Fax Number:

* Email: lauraelam@ci.lincolnton.nc.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-17-07

* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Lincolnton Brownfields Assessment Program

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: NC 10
* b. Program/Project: NC 10

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2018
* b. End Date: 09/30/2021

18. Estimated Funding ($):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name: Steve

Middle Name:

* Last Name: Zickefoose

Suffix:

* Title: City Manager

* Telephone Number: 704-736-8980

Fax Number:

* Email: szickefoose@lincolntonnc.org

* Signature of Authorized Representative: Laura L Elam

* Date Signed: 11/16/2017

R04-18-A-062

City of Salisbury
North Carolina

Office of the City Manager

November 10, 2017

Ms. Barbara Alfano
Brownfield Coordinator
Environmental Protection Agency, Region IV
Atlanta Federal Center
61 Forsyth Street, SW 10th Floor
Atlanta, Georgia 30303-8960

RE: Salisbury, North Carolina
FY2018 Brownfields Assessment Grant Application

Dear Ms. Alfano:

Salisbury, North Carolina, is pleased to submit the enclosed application to the United States Environmental Protection Agency (USEPA) for a community-wide Brownfields Assessment Grant in the amount of $300,000 ($200,000 hazardous substance and $100,000 petroleum). Founded in 1753, the City became known as the "Gateway to the West" due to its location as the westernmost city in the Piedmont region. Factories and mills began to spring up around the city, which grew to over 100 manufacturing plants by 1950. As a result, Salisbury became a prosperous and vibrant city.

Today, Salisbury is a much different place. Over the last 15 years, the largest mills and industries have closed, resulting in the loss of thousands of jobs and the creation of brownfield sites. Salisbury began its brownfields program in 2014 to begin to address these sites, but additional funding is needed to continue the successful momentum that is beginning to build. We will continue to target high-priority sites in and around the downtown core, with a particular focus on the southern end of Main Street, where the catalyst redevelopment of the former Empire Hotel into a mixed-use development is poised to begin. USEPA funds will greatly benefit the community by addressing these sites and further encouraging the revitalization of Salisbury.

a. APPLICANT IDENTIFICATION: City of Salisbury, North Carolina
PO Box 479
Salisbury, North Carolina 28145-0479

b. FUNDING REQUESTED:
   i. Grant Type: Assessment
   ii. Assessment Grant Type: Community Wide
   iii. Federal Funds Requested: $300,000
   iv. Contamination: Hazardous Substances $200,000/Petroleum $100,000

217 S. Main St. P.O. Box 479 Salisbury, N.C. 28145 Phone: (704) 638-5228 Fax: (704) 638-8519

c. LOCATION: Salisbury, Rowan County, North Carolina

d. PROPERTY INFORMATION: N/A – community-wide proposal

e. CONTACTS:

i. Project Director:
Janet Gapen
Director of Community Planning
City of Salisbury
P.O. Box 479
Salisbury, NC 28145
Ph. (704) 638-5230
Fax (704) 638-8548
jgape@salisburync.gov

ii. Chief Executive:
Lane Bailey
City Manager
City of Salisbury
P.O. Box 479
Salisbury, NC 28145
Ph. (704) 638-5228
Fax (704) 638-8519
lbail@salisburync.gov

f. POPULATION:

i. 33,653

ii. Salisbury is a municipal form of government.

iii. Salisbury is located in Rowan County, North Carolina, which has not experienced persistent poverty over the past 30 years.

g. REGIONAL PRIORITIES CHECKLIST: Attached.

h. LETTER FROM THE STATE ENVIRONMENTAL AUTHORITY: Attached.

Please find all of the information required for the FY2018 Brownfields application on the following pages. We look forward to working with the USEPA on this project. Thank you for your time and consideration. If you have any questions, please do not hesitate to contact me.

Sincerely,

W. Lane Bailey
City Manager

Regional Priorities Form/Other Factors Checklist

Name of Applicant: **Salisbury, North Carolina**

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s): **Assistance to Communities That Have Limited In-House Capacity to Manage Brownfields Projects**

Page Number(s): **N/A**

Assessment Other Factors Checklist

Please identify with an (X) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	**Page #**
None of the Other Factors Apply	
Community Population is 10,000 or less	
The jurisdiction is located within, or includes, a county experiencing 'persistent poverty' where 20% of more of its population have lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	10
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

Waste Management
ENVIRONMENTAL QUALITY

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL SCOTT
Director

November 2, 2017

Ms. Janet Gapen
Community Planning Services
City of Salisbury
217 S. Main St.
Salisbury, NC 28144

Re: U.S. EPA Brownfields Assessment Grant – City of Salisbury

Dear Ms. Gapen:

The North Carolina Department of Environmental Quality (DEQ) Brownfields Program acknowledges and supports the City of Salisbury's application for a U.S. EPA Brownfields Assessment Grant. The City of Salisbury intends to apply for a community-wide assessment grant for use on hazardous substances and petroleum-impacted properties. The City of Salisbury has successfully implemented an assessment grant, including working toward a NC Brownfields Agreement at the Kesler Mill property, and will continue to build their program with additional funding.

We hope the City of Salisbury is successfully awarded this grant, and we will continue to support you in your brownfields redevelopment efforts. The City of Salisbury has demonstrated the vision and leadership to effectively implement an assessment grant. These funds will allow the economic development momentum to continue.

The Brownfields Program offers technical project guidance in accordance with our program, throughout the life of your project(s). This is a major key to ensuring grant applicants make efficient use of the federal funds awarded. The liability protection offered by the program is also a primary marketing tool for developers and instrumental in securing financing.

The Brownfields Program can also assist with outreach efforts to your local prospective developers regarding brownfields redevelopment and the liability relief and tax incentives available. The liability relief and tax incentives offered by a brownfields agreement can often facilitate deals that would not have been possible without an agreement.

We look forward to working with you regardless of a grant award or not. We truly believe successful brownfields projects can rejuvenate a community.

Sincerely,

Bruce Nicholson
Brownfields Program Manager

ec: Cindy Nolan, U.S. EPA Region 4
Brian Kvam, Cardno

1. COMMUNITY NEED

a. Target Area and Brownfields

i. Community and Target Area Descriptions: Salisbury, North Carolina has a long, rich history that pre-dates Colonial America and spans the American Civil War, the Industrial Revolution, and the Modern Era. The city was founded in 1755 as the county seat of Rowan County and became known as the "Gateway to the West" due to its location as the westernmost city in the Piedmont region of the state. Andrew Jackson studied law in Salisbury prior to becoming the 12th president of the United States. In the early to mid-19th Century, factories and mills began to spring up around the city, which grew to over 100 manufacturing plants by 1950. Like many towns in North Carolina, Salisbury gradually became mill-centered, triggering housing and other businesses to develop around the neighboring mills. At the same time, Salisbury transformed into a rail center, becoming a major rail hub between Atlanta and Washington D.C. This boom of commerce and industry drove Salisbury's establishment as the major economic center for western North Carolina at the turn of the 20th Century. Notable companies, such as grocery chain Food Lion, Stanback Headache Powders, Power Curbers, and Cheerwine soda, were founded in Salisbury.
Today, Salisbury is a much different place. The largest of the textile mills closed in 2000, and there has since been a steady decline of large industry and business. According to the Salisbury Post, thousands of job losses have occurred since 2000 with most of them occurring in the last 17 years. For example, in 2003, Pillowtex, the owner of Kesler Mill, filed for bankruptcy and closed its mills nationwide. Overall, North Carolina lost 4,790 jobs, while Rowan County and neighboring Cabarrus County accounted for 3,984 of those lost jobs.[1] Plant closings have left their mark on the city in terms of scattered brownfield sites and a drop in employment in the City's core. This, along with the growth of suburban shopping areas and the construction of a mall outside the downtown, crippled our downtown main street businesses. Many stores and restaurants were forced to close, and our downtown deteriorated. Over the past three years, however, we have begun to see a resurgence in downtown activity. The north end of Main Street has seen several new businesses and restaurants open and thrive. The southern end, however, still lags behind. Anchored on one end by the empty, former Empire Hotel, South Main Street has several brownfield properties in need of assistance to encourage their redevelopment. Therefore, our target area for this community-wide assessment project will be the historic downtown core of Salisbury with a particular focus on the downtown, South Main Street and the Chestnut Hill, Brooklyn-South Square, and Park Avenue neighborhood areas.

ii. Demographic Information and Indicators of Need: The following table provides demographic data from the 2015 American Community Survey (ACS) for Census Tract 520 (Target Areas), the City, Rowan County, North Carolina, and the US. The minority population in the City is nearly triple that of Rowan County. The data shows that the census tract is fairly similar to the City as a whole, but both have significant socio-economic challenges compared to the county, state and US. For example, Census Tract 520 has a median household income that is 41% less than that of Rowan County, 46% less than that of North Carolina, and 53% less than that of the US. Meanwhile, the percentage of the population that are minorities is 56.7% for the census tract and 45.3% for the city, much greater than the county (21.9%) or state (30.5%). In addition, more than thirty percent of the census tract's and nearly one quarter of Salisbury's population are living below the poverty threshold, including more than twenty percent of families with children under the age of 18. The significant number of brownfields concentrated in this area raises environmental justice concerns for this poor, minority community.

[1] The Center for Applied Research. "Serving Displaced Workers: Lessons Learned and Recommendations." https://www.league.org/sites/default/files/private_data/imported/occasional_papers/0908.pdf, Accessed December 2016.

Salisbury, North Carolina Demographic Information

Demographic	Target Areas	City of Salisbury	Rowan County	North Carolina	United States
Social Statistics					
Population	2,268	33,653	138,361	9,845,333	316,515,021
Percent Minority (Alone)	**56.7**	**45.3**	21.9	30.5	26.4
Percent African-American (Alone)	49.1	37.8	16.1	21.5	12.6
Percent Hispanic (Alone)	6.3	9.0	8.0	8.8	17.1
Percent Children (5 -under)	**7.5**	**6.1**	5.8	6.2	6.3
Percent Elderly (65-over)	15.4	**17.4**	15.8	14.2	14.1
Percent Women of Child Bearing Age	27.8	**37.5**	36.6	39.0	39.5
High School Graduate or Higher	83.6	82.4	83.5	85.8	88.8
Bachelor Degree	14.1	22.8	18.8	28.4	33.1
Economic Statistics					
Individuals Below Poverty Level	**32.1**	**23.3**	18.1	17.4	15.5
Families with Children Below Poverty (under age 18)	**20.0**	**29.1**	19.4	20.5	18.0
Per Capita Income	$16,897	$21,120	$21,706	$25,920	$28,930
Median Household Income	**$25,197**	**$36,701**	$43,069	$46,868	$53,889
Unemployment Rate	**14.2**	**14.0**	**11.5**	9.4	8.3
Median Home Value	$97,800	$121,600	$128,300	$154,900	$178,600
Percent Vacant Homes	18.2	15.1	14.2	14.5	12.3
Percent Rental	**62.2**	50.7	32.6	34.9	36.1

Source: American Community Survey 2015 Five-year Estimate Data Set – www.census.gov, accessed August 2017

iii. Description of the Brownfields: Over **27 brownfield sites** have been identified within the city, with the majority of them strung along the main conduits within downtown Salisbury. Among these were three former dry cleaners, four former industrial sites, two former car dealerships, one automotive repair shop, one historic hotel, one old school, six gas stations, one battery dump site, and several vacant or abandoned buildings and warehouses with varying potential environmental issues. Through meetings and discussions of issues relating to our brownfields, our community members brought 18 specific sites to the attention of the city that they would prefer to be addressed first. In 2014, the City received an EPA Brownfields Assessment grant that allowed us to begin addressing seven of these high-priority sites. Four are now being actively redeveloped, and one is in the preliminary stages of redevelopment. Two of the larger sites are located in the project target area, but need further assessment. Eight of the other identified properties are also located in the target area for this project. The brownfield program has proven to be an effective tool to encourage the redevelopment, and additional funding is needed to address the remaining high priority sites including, but not limited to, the following six high priority sites in the target area.

The former **Kesler Mill** was a textile mill that operated from 1895 up until about 2003. It is located in the Park Avenue neighborhood and encompasses about 12 acres of land surrounded by former mill housing. Several buildings existed on the property that were all demolished and all that remains are large piles of rubble scattered throughout the property. The buildings included the large mill house, several warehouses, a machine shop, and a waste house. A survey confirmed the presence of asbestos-containing materials in the debris piles. The site has become a huge eyesore to the community, a significant health hazard, and an attractive site for criminal activity. Approximately twenty houses share a fence line with the mill site with a direct view of the rubble and debris just a few feet behind their properties. Nearby tenants complain about stray dogs, rats, and snakes that have made these rubble piles their homes. One resident complained about being attacked by a rabid raccoon that had come out of the debris pile. In addition to these health hazards, there are many environmental problems associated with the property. An incident

previously occurred where a fuel tank on-site ruptured with the contents entering groundwater and the nearby creek. A Phase II Environmental Site Assessment (ESA) confirmed the presence of petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), and the heavy metals arsenic, cobalt, thallium, and manganese above regulatory standards. Further assessment is needed to delineate the areas and develop a cleanup plan for the site.

The former historic **Empire Hotel** is a 3-story brick and stone building located on South Main Street in downtown Salisbury, only one block from the nearest single-family residence in the Chestnut Hill Neighborhood. The hotel sits on approximately 1.4 acres and encompasses most of the property. The hotel was built in 1855 and is on the National Registry of Historic Places. The site has fallen into major disrepair. A Phase II ESA was completed under the previous grant. Now, the owner is working with a developer to transform the historic structure into a mixed-use development; however, in order to ensure the project is financially viable, assistance is needed to fully characterize the asbestos and lead-based paint issues in the structure and complete any other assessment or cleanup planning requirements in the potential pursuit of a North Carolina Brownfields Agreement.

The **Star Laundry** is located directly across the street from the Empire Hotel and also only one block away from residential homes. The 20,000 square foot, historic brick building housed a dry-cleaning operation for decades. With the development of the Empire Hotel in the works, significant developer interest is expected in this building. Of course, concerns about chlorinated solvents in soils and groundwater beneath the building will hamper any proposed redevelopment.

The **City Consignment** property is a former car dealership with a large service bay and a building for car body work and painting. The property is located in the middle of the block and stretches the entire depth of the block. The buildings sit on approximately 1.8 acres with **two former gas stations** flanking either side of the main building facing South Main Street. Environmental assessments have not been completed on the building, but concerns exist related to potential releases from the chemicals used in past automotive repair operations (petroleum constituents, solvents), paints (VOCs, SVOCS, metals), the hydraulic lifts present in the service bays (petroleum constituents), PCBs, a potential underground storage tank (petroleum constituents), and asbestos-containing materials in the boiler room. Particularly concerning is the close proximity of the seven single-family, residential homes that share at least one property boundary with the site and the former gas stations.

The City Consignment block is typical of South Main Street, where the residential properties in the neighborhood (Brooklyn South Square Neighborhood, Census Tract 520) are often located no more than one block off either side of Main Street. For this project, we will focus on these properties and others on the downtown stretch of South Main Street, such as the former Belk Department store building which is underutilized and in need of major rehabilitation, at least four vacant or underutilized gas stations, a former drycleaners, and several vacant or underutilized commercial, light industrial, and warehouse-type buildings.

b. Welfare, Environmental, and Public Health Impacts

i. Welfare Impacts: The high poverty rate (23.7%) of individuals coupled with low levels of educational attainment (22.8% college graduate) indicate Salisbury is struggling in the wake of the decline of the textile and manufacturing industries. According to the 2015 ACS, 29.1% of families with children under 18 live below the poverty threshold. The Rowan-Salisbury Public School district reported that in 2011-2012, 62.6% of students were eligible for free and reduced lunches. This number increased 24.3% in the five year timespan from 2007-2012 (most current

available data).[2]

Vacant housing units accounted for 9% of the housing stock in 2000, but then increased in number over the decade to 14.1% of housing stock in 2010. In the target area, 50% of homes are rental units, which tend to be less well-maintained as the occupants are not invested in the property. The existence and condition of the brownfields depress the property values and dampen the spirits of nearby residents, who have little to no incentive to maintain or upkeep their homes if the neighboring property contains piles of debris or is a deteriorating auto repair garage. Funding via a Community Development Block Grant (CDBG) is being utilized to implement a neglected housing initiative to help address housing and blight, but this addresses only part of the problematic puzzle. Funding is also needed to address the brownfields in many of these homes' backyards.

High crime rates, which have been attributed to poverty, also plague Salisbury. Neighborhoodscout.com assigned Salisbury a ranking of 5 out of 100, meaning Salisbury is safer than only 5% of cities across the nation. The City is experiencing 81 crimes per square mile, which is significantly higher than Rowan County's rate of 27 crimes per square mile, and the US median of 32 crimes per square mile. Vacant and derelict brownfield properties are a haven for drug users, vandals, and other criminal elements. In community outreach meetings, residents have complained about people cutting through their yards to duck into these brownfields like the Kesler Mill site as sanctuaries to avoid capture from pursuing police officers.

A 2015 Rowan County Community Health Assessment stated two of the major factors hampering economic development is the lack of a skilled work force and inadequate quality of the local school system. A 2014 article published by the Salisbury Post highlighted the link between poverty and educational attainment: "Children of poverty have fewer experiences and less vocabulary...Because of the working hours of people of poverty, their children are exposed primarily to business language. Children of means, however, are exposed to more conversational language...Poverty...has financial, emotional, mental, spiritual and physical implications. Children of poverty are less likely to have strong support systems, relationships or role models. They are also more likely to be disorganized, act out and only partially complete assignments...Other symptoms of poverty, such as hunger, abuse or neglect, lead to consequences that distract children from the learning process."[3]

The target community has become stuck in a vicious cycle – as employers closed and jobs were lost, those with marketable skills and education left. The remaining population sunk into poverty, while the brownfields (former industrial sites and closed neighborhood businesses) became blighted and crime increased. The neighborhood became no longer attractive to new residents, so the housing stock further deteriorated and the schools performances degraded – making the neighborhood even less attractive to new residents and businesses. Thus, the poverty, blight, housing, crime, and educational attainment further worsened. In order to break the cycle, investment is needed in the neighborhood to address the blighted brownfields and attract living wage jobs, which will in turn improve education and provide a more skilled and educated workforce.

ii. Cumulative Environmental Issues: Contaminated runoff from the brownfield sites has a high probability of making its way into streams and eventually water supplies downstream. South Main Street drains into Town Creek, which flows into the Yadkin River that serves as the drinking

[2] National Center for Education Statistics in the United States. http://www.elementaryschools.org. Accessed September 2017.

[3] Staff Report. "Rowan-Salisbury School System Tackles Literary Challenge." Salisbury Post [Salisbury] October 2014

water supply for 734,000 people. The former Kesler Mill site is within a 1,000 feet of Town creek. High Rock Lake, the first of the Yadkin chain lakes, is the most threatened section of the river and has been classified a 303(d) impaired resource water, complete with fish advisories in place against consumption due to toxic mercury levels. In order to protect this valuable resource, efforts must be made to reduce both point and non-point source pollution.

Located only two blocks off and parallel to Main Street, the railroad brought industry and growth to Salisbury along with environmental issues. Exhaust (first coal now diesel) from locomotives expose residents to potentially dozens of contaminants, including carcinogens, smog-forming compounds, and fine particulate matter. Exposure to fine particles is known to cause asthma attacks, heart attacks, lung cancer, strokes and even premature death. The target community also is impacted by the noise and vibrations from the busy rail line. Plus, many fear an explosive derailment of the long trains transporting oil passing through the City, as seen over recent years in other communities.

In addition to the noted former industries, manufacturing facilities, and the railway, EPA's EnviroFact mapping tool indicates the presence of twenty-one facilities listed with air emissions permits, fifty-four facilities listed as small quantity RCRA generators, and ten facilities being tracked by the Toxic Releases Inventory. As the demographic table demonstrates, a disproportionate concentration of the minority and poor population of Rowan County resides in Salisbury and live in close proximity to the brownfield sites, such as the Kesler Mill, Empire Hotel, and City Consignment properties, as well as the railroad. The disparity of the overburdening of this population is evident, making a strong case for environmental justice concerns.

iii. Cumulative Public Health Impacts: Dignity Health (http://cni.chw-interactive.org/index.asp) determined the severity of barriers to healthcare access in a given community by assigning a Community Needs Index (CNI) to local municipalities within the County. The CNI gathers data about that community's socio-economy such as what percentage of the population is elderly and living in poverty, what percentage is uninsured, what percentage is unemployed, etc. Using this data, a score is assigned to each barrier condition. The scores are then aggregated and averaged for a final CNI score. A score of 1.0 indicates a zip code with the lowest socio-economic barriers, while a score of 5.0 represents a zip code with the most socio-economic barriers. Salisbury received a CNI score of 4.2 and is considered a high need community.

According to data culled from the most recent available data 2016 County Health Rankings report (data is unavailable at the City level), Rowan County ranked very poorly overall at 74th of all 100 counties in North Carolina. The county has elevated rates of multiple measures for health conditions when compared to the state including: heart disease (11% greater than the state), diabetes (12% higher than the state), kidney disease (10% higher than the state), obesity (18% higher than the state), stroke (18% higher than the state), **respiratory disease (22% higher than the state)**, infant death rate (5.9% higher than state), respiratory cancer (17% higher than the state), and **total cancer rate (506.4 Rowan County vs. 182.2 North Carolina)**. In a survey performed by the Blue Ridge Environmental Defense League (BREDL), Salisbury residents were found to have almost twice the incidence of cancer compared to Rowan County incident rates – an amount deemed statistically significant.

All of these sites pose current health risks to the surrounding population. Asbestos is being exposed to the open environment from the debris piles on the former Kesler Mill property and potentially from the former Empire Hotel due to poor roof conditions and broken windows. **Asbestos** is known to cause **respiratory diseases**, such as asbestosis, lung cancer and mesothelioma. **Chlorinated solvents** potentially used in drycleaners, such as the Star Laundry, are known to cause **brain cancers** and neurological disorders. **Benzene** found in soils and groundwater at the Kesler Mill and potentially at City Consignment and the former gas stations

is also **a known carcinogen**. The target area has an elevated percentage children under five, a population that is sensitive particularly to contaminants (such as lead from former gas stations or auto repair) that may affect development or other issues, such as low birth weight (9.6% in Rowan County). This evidence suggests a correlation between the health of the population of these neighborhoods and the presence of these contaminants.

c. Financial Need

i. Economic Conditions: The City of Salisbury has a strong financial need for support in addressing brownfield sites throughout the City. Due to continued budget shortfalls in the past several years and an eroding economic base, the City does not possess the funding sources needed without the grant to address the environmental issues required to redevelop brownfield sites. While city revenues have risen in the last five years, increased costs have caused budget shortfalls in each of these years. Workers compensation and health insurance increased significantly by $810,000. Further, the City lost the privilege license tax for the current year, which accounted for $320,000 in loss revenues. The City Manager was forced to propose a 3.76 cent increase in property taxes to "right-size" the Police Department budget, but despite the increase the budget still had a $2,196,420 deficit relative to revenues.[4] The steady hemorrhaging of jobs has also contributed to these budget shortfalls which have created the inability to address the large number of brownfields with funding from tax revenue. Since 2009, industries that include PGT, Maxon Furniture, Coca Cola, WA Brown & Sons, Performance Fibers, and American Efird have all closed their doors in Salisbury. These companies account for nearly 1,000 job losses alone. In May 2016, the China Grove Yarn Plant closed, taking with it an additional 123 jobs. Most recently, the DuraFiber Technologies plant closed in September, eliminating another 373 jobs in Salisbury. With low per capita and median household incomes, high unemployment, and higher poverty rates (see demographic table), the community cannot be burdened with even higher taxes to fund a brownfields program. The City is leverage other grant programs, such as CDBG, to make improvements in the targeted community, but these funds are limited to blight removal and focused on housing improvements. The 2014 Brownfields Assessment grant was a successful funding solution, but the funds were quickly expended on the seven highest priority sites. Additional funding is needed to build upon these successes and continue the momentum of redevelopment we are now beginning to see in the community.

ii. Economic Effects of Brownfields: The community has not recovered from the closing of the textile mills mentioned above between 1999 and 2003 that accounted for nearly 800 jobs lost in Salisbury. This has driven the unemployment rate in the target community to 14.0 percent (ACS 2015 data). The job losses have resulted in a distressed community, the impacts of which include blight, property vacancies, lower property values, and higher crime. Our significant renter population (50.7%) and vacant housing rate (15.1%) also make stabilizing the area particularly challenging, as transiency contributes to the wear and tear of a dwelling unit and property owners can be slow to make repairs, thus adding to the area's overall deteriorating conditions. These derelict conditions also negatively impact the owner-occupied households who have little incentive to maintain their own properties when the property next-door is run-down, abandoned, burned-out, or has potential contamination. The City is doing what it can with limited resources to improve the safety and appearance of these abandoned, vacant properties. At Kesler Mill, the City has cut grass and repaired the fence (which seems to quickly get breached again). The City has placed liens against the property of $2,600 for the maintenance in 2014 and 2015, but we realize we are unlikely to recover those funds anytime soon. After asbestos was confirmed in the debris piles in 2016, we decided to no longer cut the grass due to the risk of exposure to city employees. As the demographic data illustrates, home values have suffered as a

[4] City of Salisbury 2017-2018 Budget. http://salisburync.gov/Government/Financial-and-Business-Services/Budget

result, and the census data may actually be overstating the values. According to data from Zillow.com, properties in four of several property transfers over the past year have sold for below their assessed values, ranging from a 14% to a 82% discount. For example, one property assessed for $462,783 sold for only $85,000. Not surprisingly, this property is also immediately behind the former City Consignment property. A study found that for each 1 percent nearer to a brownfield a residential property stood, the value of the house depreciated nearly 0.1 percent (one tenth of one percent). Conversely, a 1 percent increase in distance from the closest brownfield corresponded to a nearly 0.1 percent (one tenth of one percent) increase in market value.[5] As industries have closed in Salisbury and our brownfields have multiplied, the assessed value of real property has decreased by 4.9% since 2011.[6]

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a. Project Description, Redevelopment Strategy, and Timing and Implementation

i. Project Description and Alignment with Revitalization Plans: We are actively partnering with our community to make investments and offer incentives specific to the revitalization of the target area. These include incentives and grants for housing improvements, business development purposes, historic preservation, exterior renovations, and site improvements such as parking, decorative lighting, landscaping, etc. (additional details are included in section 2.c.). The brownfields project complement and leverage these investments by addressing the brownfield sites hindering the revitalization efforts. The requested funds will be used to assess and develop cleanup plans and redevelopment strategies for brownfield sites (as described in section 2.b). Funds will also be used to continue to engage the public throughout the process. With the current investments and the requested funding, we will continue to partner with the community to revitalize the target area to create a renewed South Main Street commercial corridor with upper floor residential living surrounded by vibrant urban neighborhoods within walking distance, while still maintaining the historic character of the area. For example, the Empire Hotel redevelopment promises to be a catalyst for the transformation of the South Main Street corridor. The planned renovation and mixed-use redevelopment of the historic, former hotel will bring people, jobs, and retail opportunities to the target area. This will spur redevelopment by encouraging other businesses to locate in the area and on other brownfield sites nearby. The project will incorporate sustainable development practices by encouraging the reuse of brownfields for new jobs, commercial opportunities, and services for the target area; equitable development practices by leveraging City and HUD funds to ensure a mix of housing types across a range of incomes in the target area; and environmental justice practices by providing equal access to all members of the target area in the decision-making process through the brownfields advisory committee and in redevelopment and visioning sessions. However, the sites identified in section 1.a.iii have pressing environmental issues that need to be addressed to benefit the community and further encourage redevelopment interest.

ii. Redevelopment Strategy:

The Empire Hotel is located on South Main Street in downtown Salisbury and has had numerous development interest in the past; however, prospects of redevelopment of this historic hotel fell through due to unresolved questions and costs associated with environmental assessment and cleanup costs. Since the former hotel is located in both local and National Historic Districts, a redevelopment can be partly financed through Federal and State historical rehabilitation tax credits. A major developer has the building under option with a current interest in the property

[5] Mihaescu, Oana, Vom Hofe, Ranier (2013) Using Spatial Regression to Estimate Property Tax Discounts from Proximity to Brownfields: A Tool for Local Policy-making. The Journal of Environmental Assessment Policy Management, 15(1)

[6] City of Salisbury 2016-2017 Budget. http://www.salisburync.gov/Departments/FinancialServices/finance/Budget/Budget%20FY2017.pdf

as mixed-use residential development. The proposal will include first floor retail components with residential units on the second and third floors. EPA funding from the assessment grant to better quantify cleanup costs would certainly serve as an incentive for the developer to continue moving forward with this project. The Star Laundry building's redevelopment would also complement the Empire Hotel's. Ideally situated across the street, the building has potential as a restaurant, retail, offices, or artist studios.

The City is considering an offer of donation of the Kesler Mill property to facilitate the site cleanup and promote its redevelopment. We have held two visioning sessions with members of the Park Avenue neighborhood. The community envisions a mixed-used development with a greenway and passive recreational area within the floodplain along the creek running through the property. However, the lingering environmental issues need to be further delineated and costs associated for any remedial action required for residential development defined before the City can move forward.

The City Consignment property has been underutilized as a consignment and second-hand supply store for several years. The current owners, nearing retirement, have asked the City for assistance in potentially marketing the property for redevelopment. Located on South Main Street, just a block and a half from the Empire Hotel, the large property has significant potential for a mixed-use development, particularly when combined with the two adjacent former gas station parcels. Developers have expressed interest, but again the environmental concerns are hindering the sale.

The other brownfield sites also have potential but also issues. For example, the former Belk building could be turned into retail and residential, but the building have potential asbestos-containing materials. Repurposing these abandoned or underutilized parcels and buildings encourages the reuse of existing road, electrical, gas, fiber, water, and sewer infrastructure.

iii. Timing and Implementation: The City of Salisbury will be ready to begin working immediately upon the grant award. Our Project Director, Ms. Janet Gapen, will be responsible for overseeing and directing city staff and the consultant's work. An environmental consultant will be hired to support project activities and complete the technical aspects of the project. All project tasks will be accomplished in the grant's three year period of performance.

a. Contractor Procurement: After grant announcements, the City will release a Request for Qualifications in June to select a consultant to support project activities. The procurement will be conducted in full compliance with state and federal guidelines (2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500). After reviewing and evaluating submittals, the City will negotiate a contract with the top-ranked firm prior to the October 2018 start.

b. Site Inventory: The preliminary site selection has already been completed based on recommendations from our community advisory committee. The prioritization criteria used includes 1) the site has redevelopment potential and is eligible for the program; 2) the site landowner is willing to give site access and permission for the assessment; 3) assessing the site will assist in addressing public health, welfare, environmental, and/or land-use concerns, 4) projected redevelopment will create jobs and increase the tax base; 5) the owner or developer can provide financial support/in-kind help for cleanup; and 6) redeveloping the site offers public benefit, such as housing, greenways, parks, addressing storm water, and protecting watersheds. The advisory committee will review the site selection and prioritization again at the kickoff meeting, and at least quarterly thereafter, to ensure the highest priorities at that time are being addressed.

c. Site Access: The owners of the Kesler Mill, Empire Hotel, and City Consignment sites have already granted permission to assess their sites. The Project Director, with assistance from our advisory committee, will continue to lead efforts to secure access to additional high-priority sites

as determined by the committee's quarterly meetings and as funding is available. We will continue to take a proactive approach, target sites with redevelopment potential, and focus on sites where the owner is more likely to understand the benefits of participating. We will work cooperatively with property owners and educate them on the program's benefits and the liability and tax incentives offered by the North Carolina Brownfields Program.

b. Task Description and Budget Table

i. Task Description: The City of Salisbury is seeking funding in the amount of $200,000 for properties with potential hazardous substance contamination and $100,000 for properties with potential petroleum contamination. Funding will be used for site assessment, cleanup planning, and community outreach. The City will rely on our own internal capacity to manage the program as in-kind, leveraged services. Our Project Manager, Janet Gapen, will lead the project team in the execution of the project tasks and will complete all monthly and annual EPA reporting requirements. A detailed schedule will be developed at the outset to define expectations and ensure the timely completion of all project activities. Monthly, the project team to include the NCDEQ and EPA Project Managers will meet by conference call to review progress (tasks, costs, and schedule) and take corrective actions, as necessary. Ms. Gapen will also ensure ACRES is regularly updated with accomplishments of project activities. Specifically, the following project tasks and task budgets are anticipated. All cost estimates are based on actual expenses from the previous brownfields program.

Task 1 - Site Assessment – Conduct Environmental Site Assessment (ESA) activities at selected sites: 11 ASTM-AAI compliant Phase I's @ $3,500 each for a total of $35,000 (6 hazardous substances for $21,000 and 5 petroleum or $17,500); 1 Generic Quality Assurance Project Plan (QAPP) @ $4,000, 6 Site Specific (SS)-QAPPs @ $3,500 each for a total of $21,000 (3 hazardous substances for $10,500 and 3 petroleum for $10,500); 3 hazardous substances Phase II's @ an average of $40,000 each for a total of $120,000 and 3 petroleum Phase II's @ an average of $17,000 each for a total of $51,000. Phase II ESA cost will vary due to the complexity of the site and the type of contaminant. Five (5) Asbestos and Lead Based Paint surveys will also be conducted @ $2,900 each to support existing building demolition or renovation activities on brownfields properties for a total of $14,500 in hazardous substance funding. Assessment total: $249,000 ($168,000 for hazardous substances and $81,500 for petroleum).

Task 2 - Cleanup Planning – Develop site appropriate remediation and/or reuse plans to reduce risks to health & environment for selected sites. Community vision & goals will be considered remediation/reuse planning. Five (5) Analysis for Brownfields Cleanup Alternatives (ABCAs) or reuse plans @ $5,500 for a total of $27,500 (3 hazardous substances for $16,500 and 2 petroleum for $11,000).

Task 3 – Community Outreach – Develop/maintain strategic partnerships and create a Community Involvement Plan; disseminate information/comments to/from community & stakeholders and host community meetings. $6,000 in travel funds is budgeted to supplement travel funds from other sources; attendance at national and regional brownfields-related training conferences/workshops is planned. $2,500 is budgeted for printing. $15,000 is budgeted for hosting community-wide meetings, focus groups, charrettes, & visioning sessions – totaling $22,500. ($15,500 hazardous substances and $8,000 petroleum).

ii. Budget Table

Budget	Site Assessments	Cleanup Planning	Community Outreach	Total
Hazardous Substances				
Travel	0	0	$4,000	$4,000
Supplies	0	0	$1,500	$1,500
Contractual	$168,000	$16,500	$10,000	$194,500
Total	**$168,000**	**$16,500**	**$15,500**	**$200,000**
Petroleum Products				
Travel	0	0	$2,000	$2,000
Supplies	0	0	$1,000	$1,000
Contractual	$81,000	$11,000	$5,000	$97,000
Total	**$81,000**	**$11,000**	**$8,000**	**$100,000**
Grand Total	***$249,000***	***$27,500***	***$23,500***	***$300,000***

c. Ability to Leverage

Salisbury is committed to the revitalization of our City. As such, the City is committed to providing in-kind staff time to manage the project and has established several incentive programs and programmed CDBG funds for use in the target area.

Source of Leveraged Funds	Purpose of Funds	Amount Leveraged	Status
City Budget	In-kind services for project management	$30,000	Secured
Downtown Revitalization Incentive (DRI) Grant (City)	Offers prospective developers for projects that will rehabilitate vacant or underutilized buildings	$200,000	Secured
Innes Street Improvement Grant (City)	50/50 matching grant for enhancements to building facades, landscapes, driveways, and parking lots	$5,000	Secured
Downtown Municipal District Grant (City)	50/50 matching grant for enhancements to building facades, landscapes, driveways, and parking lots	$5,000	Secured
Black Point Investments, LLC	Acquisition of Empire Hotel Property	$880,000	Pending
Black Point Investments, LLC	Renovation and redevelopment of the Empire	$18,000,000	Pending

In addition, our Historic Preservation Incentive Grant Program provides assistance to owners, including low-to-moderate income homeowners, of historic homes for exterior maintenance and stabilization projects. In FY 2017-2018, $20,000 was allocated to help finance preservation projects throughout the City. The City has also invested $250,000 toward a Housing Stabilization Initiative over the past two years in the target area. Another $100,000 is available this fiscal year and $350,000 is in the capital improvement plan (CIP) for FY2018-2019. The City funds help leverage existing HUD program funds that average $300,000 per year for affordable housing programs across the City. These housing efforts in the target area neighborhoods will complement and further encourage the redevelopment of the brownfield sites.

We also will encourage developers to leverage the brownfields funding by entering the state of North Carolina's Brownfields Program to gain liability protections and property tax credits. The North Carolina Brownfields Program allows non-responsible parties who have entered into the voluntary cleanup program to leverage various financial incentives, including local property tax relief upon completion of improvements to the brownfield property. The value of such improvements is excluded from future property taxes for five years at a rate of 90% exclusion in the first year, and then gradually decreasing to a 10% exclusion in year five. These property tax credits can be combined with the Historic Tax Credits and Low-Income Housing Tax Credits to help create an economically viable redevelopment. We will continue to work with the development community to facilitate more brownfields redevelopment by providing the gap funding for environmental assessments, while leveraging the private resources to complete the cleanup and redevelopment activity.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Engaging the Community

i. Community Involvement Plan: The City of Salisbury has been hard at work engaging the community and building government and community-based partnerships. Community meetings and visioning sessions have been held both prior to and during the previous assessment grant to discuss issues regarding local brownfield sites and to gain insight into what the public would like to see in regards to future development of these properties. Most recently, we held two community visioning sessions (March and October 2017) with the Park Avenue Neighborhood for the Kesler Mill site. Approximately 20 members of the neighborhood provided ideas and input on potential redevelopment strategies. Also in October 2017, the City hosted an open house to discuss the potential redevelopment of the Empire Hotel. Over 150 members of the community attended, toured the building, and were given the opportunity to ask questions and provide feedback. At both meetings, we also provided information and solicited input on this grant application.

The City will continue to utilize the Brownfields Advisory Committee (BAC), which is instrumental in flowing information between the project team and the community at large. The BAC will continue to prioritize sites, determine the feasibility of proposed redevelopments, review environmental assessment work plans, and monitor the progress of the tasks to be completed for each site, among other duties. The BAC consists of planning, community development, legal, environmental, and real estate professionals that live or work in the target community. The BAC will hold quarterly meetings at a minimum to ensure the objectives of the grant are met. Salisbury will continue to work and communicate with stakeholders, local organizations, state partnerships, neighborhood organizations, and environmental groups to notify the respective communities about the proposed activities.

ii. Communicating Progress: The BAC will be an essential tool for our community outreach efforts; however, we will also continue to use other outreach methods during the project. We will meet with and engage our community organizations to help identify additional sites, priorities, and redevelopment options. At least once a year, we will present at City Council meetings to provide project updates, solicit feedback, and invite the public to participate in the project. In support of these efforts, we will prepare outreach and promotional materials to be distributed at meetings, via mail, newspapers, and the City's website and Facebook page. We will also continue to reach out to local reporters to ensure the information, public meetings, and project successes are covered in the local media. In addition, we will utilize the City's newly implemented Nixle system, a Community Information Service dedicated to helping community members stay connected to the information that matters most to them, based on their interest and location. The system can be used to send targeted messages via phone, text, e-mail, or app to community members who have registered.

We have found the combination of these various methods an effective way to engage our community, as evidenced by the community participation we have had in the brownfields inventorying efforts and previous brownfield project meetings. Therefore, we are confident the outreach methods proposed are the most appropriate way to reach the targeted community. In addition, we will work to ensure that residents with language or other physical barriers are also included. We will provide program materials in Spanish, when working in neighborhoods with a Hispanic population. Plus, all meeting facilities will be ADA accessible to allow residents of all abilities to participate.

b. Partnerships with Government Agencies

i. State Environmental Authority: The City of Salisbury will work closely with the North Carolina Department of Environmental Quality (NCDEQ) Brownfields Program for review of technical

documents, oversight of assessments and cleanup plans, and assistance with state voluntary Brownfields Agreements for properties under this project. The Brownfields Agreements will assist non-responsible parties with liability protection, as well as provide an avenue for the NCDEQ staff to stay involved and provide oversight of project activities.

ii. Other Relevant Governmental Partnerships: The following entities will be key partners in Salisbury's brownfields program:

- EPA Region 4 – As the funding agency, the EPA and the regional Project Officer will have significant involvement in the project. We will work with the EPA to ensure all work is completed in accordance with the terms and conditions and all objectives are met in a timely manner.
- Rowan County Health Department - The department is committed to promoting health and protecting the environment in Salisbury. The health department will serve as a resource for community members, who may have questions or concerns about exposure to any contaminants found during site assessments, cleanup, and/or redevelopment.
- Salisbury-Rowan Economic Development Commission (RowanEDC) – responsible for addressing the comprehensive economic development goals of Rowan County and its 10 municipalities. They will provide support in the form of assistance with marketing and attracting businesses to redevelop brownfield properties.
- Housing Authority of the City of Salisbury, N.C. – The Housing Authority is committed to expanding affordable housing in the targeted community and potentially onto sites assessed under the brownfields program.
- US Housing and Urban Development - HUD has already demonstrated its commitment to the revitalization of Salisbury through CDBG grants aimed at addressing blighted homes. We will leverage existing and future HUD funding to assist in the redevelopment of brownfield sites.

c. Partnerships with Community Organizations

i. Community Organization Description & Role: Provided below is a list of Community-based Organizations that support and are involved in the project.

Community Group	Description	Support for the Brownfield Project
Brooklyn South Square Historic District Neighborhood	Neighborhood association located in the target area	Participate in redevelopment planning and visioning sessions; serve as a liaison to community; help identify sites
Chestnut Hill Neighborhood Association Inc.	First and oldest master planned community within the city; located in the target area	Assist in the identification of high priority sites; participate in vision sessions; communicate info; host information sessions
Downtown Salisbury, Inc.	Downtown development corporation and Main Street Program manager; owner of the Empire Hotel	Provide site access; liaison with downtown property owners, promote redevelopment
Livingstone College	Private historically black institution, founded in 1879, located just six blocks from South Main Street	Help link members of the community to potential employment opportunities
Historic Salisbury Foundation, Inc.	Dedicated to the preservation of historic properties	Promote neighborhood revitalization in areas near brownfields sites; assist with community outreach
Rowan County Chamber of Commerce	Largest business advocacy organization in community with over 850 member firms	Encourage investment in brownfields; partner to bring new business prospects to area; promote the project with elected reps

ii. Letters of Commitment: Letters of commitment from the aforementioned community organizations are included with this proposal as an attachment.

d. Partnerships with Workforce Development Programs: The City of Salisbury will promote local hiring by including it as one of the evaluation criteria in the request for qualifications for a brownfield consultant. The City will also work with the Centralina NCWorks Career Centers to

match community members with opportunities associated with assessment, cleanup, or redevelopment of brownfields sites. Salisbury will also partner with Livingstone College and Catawba College to help place graduates with industries relocating to brownfield sites within Salisbury.

4. PROJECT BENEFITS

a. Welfare, Environmental, and Public Health Benefits: The redevelopment of the priority sites will have a significant positive impact on the targeted community. Residents will realize the following welfare, environmental, and public health benefits:

Welfare – Assessing the brownfield properties, while defining the extent of contamination and the costs of remedial actions will help facilitate their eventual cleanup and redevelopment. With the blight removed, neighboring properties will be encouraged to invest in their own homes and businesses. Our CDBG program will be leveraged to further encourage the rehabilitation of homes in the area and the conversion of many of the rental homes to owner-occupied homes. Crime will be reduced in the community as Kesler Mill and the other havens for vandalism, drug use, and other illicit activities are put back to productive use. As the deteriorating buildings on South Main Street, such as Empire Hotel, Star Laundry, and City Consignment, are rehabilitated and restored, they will bring new residents and businesses to the site itself, but also attract increased interest in the other commercial and retail buildings along the corridor. These new businesses will also create jobs and economic opportunities for residents. As the neighborhood improves and becomes more financially stable, schools will begin to improve. The redevelopment of these brownfield sites can help break the cycle of poverty in the target community.

Environmental – The project will answer many questions regarding the potential presence and effects of soil and groundwater contamination caused by historical commercial and industrial activities on the sites. Properties will be assessed to determine their risk of contamination during a Phase I ESA. If deemed necessary, Phase II ESAs will be conducted that will determine the lateral and vertical extent of any contamination on-site. Once completed, remediation and redevelopment planning can begin. The sites are either known or suspected to have contributed to soil, groundwater, surface water, and/or air pollution. Potential contaminants on these sites include petroleum hydrocarbons, volatile and semi-volatile organic compounds, PAHs, PCBs, heavy metals, asbestos, and lead. Assessment and remediation planning will begin to identify and control exposures to this contamination. Cleanup of contaminated soils at Kesler Mill will eliminate it as a source of harmful stormwater runoff into Town Creek. The abatement of asbestos at Kesler Mill and Empire Hotel will eliminate them as source for spreading contaminated air particulates. The remediation of petroleum sources at City Consignment and the gas stations will prevent the potential migration of benzene, lead, and other potential contaminants to groundwater. In addition, as these properties are put back to viable reuse, the dense, walkable, mixed-use redevelopments will reduce auto-dependence, air emissions, and fuel consumption. They will also reduce development pressure on nearby green space that reduces suburban sprawl and environmental degradation.

Public Health – The extent of potential hazardous substances and petroleum contamination on the brownfields sites is currently unknown. Conducting Phase I and Phase II ESAs will allow us to determine the extent and nature of contamination at these sites and take appropriate actions to mitigate any risks to public health. The eventual mitigation and redevelopment of these properties will reduce the targeted community's exposure risk to the known and suspected carcinogens, such as benzene, PAHs, and heavy metals. Many of the former gas stations operated at a time, when leaded fuels were common. The assessment and eventual cleanup of these sites will reduce the exposure risk of our sensitive population of children under five to lead, which is known to be a contributing factor to development disorders, low birth weight babies, and infant

mortality. Plus, the removal of the debris piles at Kesler Mill and the redevelopment of the Empire Hotel will eliminate these sources of asbestos that may be causing or exacerbating asthma and respiratory diseases. In addition, new employment opportunities will help break the cycle of poverty in the area. With jobs, more community members will gain employer-sponsored health insurance, reducing the barriers to healthcare access.

b. Economic and Community Benefits: High unemployment and poverty rates, coupled with low education attainment and income rates, have created a continuing cycle of poverty and disinvestment in the target community. The revitalization for the South Main Street corridor in accordance with the community's vision and the redevelopment of brownfields will help break this cycle. The City is already beginning to see a renewed sense of civic pride and interest in the development of commercial properties in areas assessed under the previous grant. For example, an assessment on the Washington Building helped develop a restaurant on the ground floor, ten office spaces on the second floor, and apartments on the third. A restaurant has already opened on the first floor, creating five full-time and fifteen part-time jobs. When complete, over $2 million will be invested in the redevelopment. The assessment of a historic gas station is helping its redevelopment into medical offices. The assessment of a former car dealership is facilitating the $5 million investment in new retail construction on the site that is anticipated to create 69 jobs and $6.85 million in sales per year.

Under this project, we expect to see similar economic benefits—increased tax base and new jobs—as we answer the environmental uncertainties and increase the marketability of the priority brownfield properties. For example, the Kesler Mill site, sitting empty and vacant, is currently only assessed at $312,000. The community would like to see the large property redeveloped into multifamily residential to fit within the neighborhood. If it were assessed at comparable values to the housing surrounding it, the assessed value will be at least $3.6 million. The vacant Empire Hotel is currently owned by the non-profit Downtown Salisbury, Inc., so it pays no taxes on the assessed value of $1 million. The proposed mixed-use redevelopment, a potential $18 million investment, will likely increase its value at least five-fold. In addition, the property values of the nearby homes in our community will also increase. Property values generally increase between 2 and 3 percent after brownfields are addressed, according to the EPA[7]. Increasing residential property values again translates into a much needed increase in property tax revenue. Recent research from North Carolina found that for every unit of housing added to a downtown, between $7,000-$9,000 of investments downtown are generated in spending by just that one resident.[8] However, the most significant economic impact will be realized by the creation of an attractive, vibrant community that will once again draw people and businesses to the area.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Audit Findings: The City of Salisbury has successfully managed all Federal, State and Local funds entrusted to the City. There are no past instances of any adverse audit findings.

b. Programmatic Capability: Salisbury has the requisite capacity to administer the EPA grant funds based on previous experience in federal and state grant management. Ms. Janet Gapen, Planning Director and brownfields project manager for the City of Salisbury, is a 2000 graduate of the University of North Carolina at Charlotte with a BS in Geography and an emphasis in Urban and Regional Analysis. As City Planning Director, Ms. Gapen oversees a range of community-oriented enterprises to further Salisbury's ideals related to neighborhood vitality, cultural resources, environmental sustainability and economic prosperity. She also serves on the

[7] EPA Brownfields Program Accomplishments and Benefits: https://www.epa.gov/brownfields/brownfields-program-accomplishments-and-benefits; accessed December 2016.

[8] Downtown Idea Exchange, January 2015.

Executive Committee of Downtown Salisbury, Inc., which implements the national Main Street Program. Since 2004, Ms. Gapen has managed the City's CDBG and HOME Investment Partnership programs. She is assisted by Ms. Deborah Young, Facilities Division Manager. Young, a 1985 graduate of Appalachian State University with a BS, MA in Industrial Technology, also graduated in 2000 from the Babcock Graduate School of Management at Wake Forest University. She is a North Carolina Licensed General Contractor, and has experience in marketing, sales, construction, and business consulting. She obtained certification as a Professional Energy Manager in 2012. Since joining the City in 2003 she has established a comprehensive repair and maintenance division. During this time she has been responsible for the construction and renovation of over 150,000 square feet of facilities including a new Fire Station and Customer Service Center. For technical and programmatic support, the City will follow City procurement procedures in compliance with state and federal (2 CFR 200 and EPA's rule at 2 CFR 1500) requirements to procure a consultant. The Finance Department's Purchasing Division provides a centralized source of procedures, information and support related to the purchase and/or lease of supplies, materials, equipment and contractual services for the City and to manage and maintain a system of fixed asset identification, reporting and accountability.

c. Measuring Environmental Results: Anticipated Outputs/Outcomes: The City's project team will meet quarterly to track the project's progress in fulfilling the scope of work, goals, and objectives. Each Quarterly Report submitted to EPA will include an update of project expenditures and will track activities and expenses against the project's schedule. Corrective action and work plan modification requests will be identified, as appropriate. Specific performance metrics detailed in the Work Plan will be used to summarize project accomplishments. Additionally, site-specific information will be routinely entered and tracked in the online Assessment Cleanup and Redevelopment Exchange System (ACRES) database. At a minimum, the outputs to be tracked include the number of advisory committee meetings, public meetings, meetings with community groups, environmental assessments, ABCAs, and cleanup redevelopment plans; and, the outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created.

d. Past Performance and Accomplishments

i. Currently or Has Ever Received An EPA Brownfields Grant

1) Accomplishments: The City of Salisbury received an EPA Brownfields Cooperative Agreement in October 2014. The project has accomplished the objectives set out in the initial grant application and work plan, including the assessment of the top four priority sites. In addition, three other high-priority sites have been assessed. A total of six Phase I ESAs, five Phase II ESAs, three ACM surveys, one lead based paint survey, and two redevelopment plans were or are being completed. Three of the sites have entered into the North Carolina Brownfields Program. Over $25 million in investment is planned or currently in progress on five of the sites, projected to create over 75 jobs.

2) Compliance with Grant Requirements: The City complied with all grant requirements, including the work plan and the terms and conditions. The project began on October 1, 2014, successfully completed all planned activities, expended all funds, and closed on September 30, 2017. Additional funds are needed to continue the successful project and address other targeted areas in the City. Results of the completed assessments and the completed redevelopments have been and will continue to be entered into ACRES. In addition, the City has submitted all quarterly and annual reporting on time and as required.

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [x] Preapplication
- [ ] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 11/14/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Salisbury, North Carolina

* b. Employer/Taxpayer Identification Number (EIN/TIN): 56-6000237

* c. Organizational DUNS: 0745170200000

d. Address:

* Street1: PO Box 479
Street2:
* City: Salisbury
County/Parish:
* State: NC: North Carolina
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 281450479

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.
* First Name: Janet
Middle Name:
* Last Name: Gapen
Suffix:

Title: Director of Community Planning

Organizational Affiliation:

* Telephone Number: (704) 638-5320
Fax Number: (704) 638-5324

* Email: jgape@salisburync.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-17-07

* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Brownfields Community-wide Assessment Project

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant NC-12 * b. Program/Project NC-12

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2018 * b. End Date: 09/30/2021

18. Estimated Funding ($):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: Lane

Middle Name:

* Last Name: Bailey

Suffix:

* Title: City Manager

* Telephone Number: (704) 638-5222 Fax Number: (704) 638-8878

* Email: lbail@salisburync.gov

* Signature of Authorized Representative: Wade Furches * Date Signed: 11/14/2017

Request Details

Melvin Cruver

Instructions

View Request Status and Approval Details

Details

Start Date 06/20/2018

End Date 06/20/2018

Absence Name Sick Leave Taken

Current Balance 659.00 Hours

Reason Illness/injury/incapacitation

Partial Days Start Day Only

Start Day Hours 2.00

Start Day is Half Day

Start Day Start Time 9:00AM

Start Day End Time 11:00AM

Duration 2.00 Hours

Additional Information

Maxiflex Exception Schd Hours:

Workflow

Status Submitted

Request History

First

Status	Name	Date	Comments
Submitted	Melvin Cruver	06/20/2018	

Abs Mgmt By Supervisor Id

Absence Management: Pending

Abs Mgmt By Supervisor Id

Pending

Lou Gross

Absence By Supervisorid

**Disclaimer The current balance does not reflect absences that have not been processed.

R04-18-A-063

Town of Siler City

Town Manager's Office

November 9, 2017

Ms. Barbara Alfano
Atlanta Federal Center, Environmental Protection Agency Region 4
61 Forsyth Street, S.W., 10th Floor
Atlanta, Georgia 30303-8960

RE: Town of Siler City, North Carolina
EPA Brownfields Community-Wide Assessment Grant Proposal

Dear Ms. Alfano:

The small Town of Siler City (population 8,193) has lost more than 3,000 jobs since 2005 due to the closure of four textile facilities, a chicken processing plant, and various other support businesses. Our mostly minority population (70.6%) is plagued by high unemployment (15.7%), low incomes, and a poverty rate that averages over twice the national average in our target areas (36.1%). Over 73% of our residents have to leave Siler City to find employment. The abundance of blighted brownfield properties within the Loves Creek Watershed, which runs through our downtown and includes our target areas (Norfolk Southern Railroad Corridor & U.S. Highway 64 Corridor), have contributed significantly to these poor conditions and the impairment of our most coveted natural resource, Loves Creek. We were disappointed to learn that we were only a couple points away from being awarded the last three years. However, the Town of Siler City and our community partners are excited to submit this Environmental Protection Agency (EPA) Brownfields Community-Wide Assessment Application for $300,000. As outlined in our proposal, we have continued our efforts over the past year and feel that we are in an even better position to become an EPA Brownfield grantee. The Town and our partners have experienced several successes and received several recent grant awards to enhance the feasibility of success for our brownfields initiative and our entire project.

This funding will be extremely beneficial to improving the Loves Creek Watershed and revitalizing our Town. We plan to focus on the two-mile long Norfolk Southern Railroad Corridor that runs in a north/south direction through downtown and the two and half-mile long U.S. Highway 64 Corridor that runs in an east/west direction through downtown. These two areas have been the focus of multiple community supported redevelopment plans prepared by the Town and community partners. These areas are recognized as lower-income minority communities that have been significantly impacted by the loss of manufacturing (chicken processing, textile and furniture) jobs from 2005 – 2015. These areas today are plagued with numerous blighted commercial and industrial properties.

These grants will assist the Town in removing this blight, creating jobs closer to our residents, and increasing recreation opportunities for the residents of Siler City. This will in turn increase the health of our residents and reduce the obesity that is prevalent in our community. Thank you for your consideration and please feel free to contact me or Jack Meadows (Project Director), if you need any additional information.

Sincerely,

Bryan Thompson,
Town Manager

Bryan T Thompson
Town Manager
PO Box 769 • 311 N Second Avenue
Siler City, NC 27344-0769

bthompson@silercity.org
Phone: 919-742-4731 • Fax: 919-663-3874
www.silercity.org

a. **Applicant Identification:** Town of Siler City, North Carolina
311 North Second Avenue
Siler City, North Carolina 27344

b. **Funding Requested:**
i): Grant Type: Assessment
ii): Assessment Grant Type: Community-wide
iii): Federal Funds Requested: $300,000
iv): Contamination: $200,000 for Hazardous Substances and $100,000 for Petroleum

c. **Location:** Town of Siler City, Chatham County, North Carolina

d. **Not Applicable**

e. **Contacts:**

i) Project Director:
Jack Meadows
Town of Siler City, Director of Planning & Community Development
P.O. Box 769
Siler City, NC 27344
(919) 742-2323
(919) 742-2758 fax
E-mail: jmeadows@silercity.org

ii) Head of Organization:
Bryan Thompson
Town Manager
P.O. Box 769
Siler City, NC 27344
(919) 742-4731
(919) 663-3874 fax
E-mail: bthompson@silercity.org

f. **Population:**
i) Town of Siler City – 8,193 (U.S. Census Bureau, 2015 ACS)
ii) NA
iii) Siler City is not located within a county experiencing "persistent poverty"

g. **Regional Priorities Form/Other Factors Checklist:** Attached

h. **Letter from the State or Tribal Environmental Authority:** Attached

Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: Town of Siler City

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

Assistance to communities that have limited in-house capacity to manage brownfields projects

Page Number(s): 5, 7, 14 (See our consultant and Piedmont Conservation Council)

Assessment Other Factors Checklist

Please identify (with an ***x***) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	**Page #**
None of the Other Factors are applicable.	
Community population is 10,000 or less.	2
The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	9
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	9-10
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

Waste Management
ENVIRONMENTAL QUALITY

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL SCOTT
Director

November 1, 2017

Mr. Jack Meadows, Planning Director
Town of Siler City
PO Box 769
311 North Second Avenue, Room 301
Siler City, NC 27344

Re: U.S. EPA Brownfields Assessment Grant – Town of Siler City

Dear Mr. Meadows:

The North Carolina Department of Environmental Quality (DEQ) Brownfields Program acknowledges and supports the Town of Siler City's application for a U.S. EPA Brownfields Assessment Grant. We understand that your grant focuses on the redevelopment of the Norfolk Southern Railroad corridor and the U.S. Highway 64 corridor. You have identified several industrial sites and mills in need of assessment, cleanup, and redevelopment. The NC Brownfields Program is pleased to have recently assisted through the State brownfields process with the private redevelopment of the former Townsend Inc. poultry processing plant in Siler City. The grant funding the Town of Siler City now seeks would build on that momentum and provide a much-needed catalyst to revitalize blighted properties in the Town.

We hope the Town of Siler City is successfully awarded this grant, and we will continue to support you in your brownfields redevelopment efforts. The NC Brownfields Program offers technical project guidance in accordance with our program, throughout the life of your project(s). This is a major key to ensuring grant applicants make efficient use of the federal funds awarded. The liability protection offered by the program is also a primary marketing tool for developers and instrumental in securing financing.

The NC Brownfields Program can also assist with outreach efforts to your local prospective developers regarding Brownfields redevelopment and the liability relief and tax incentives available. The liability relief and tax incentives offered by a Brownfields Agreement can often facilitate deals that would not have been possible without an Agreement.

We look forward to working with you regardless of a grant award or not. We truly believe successful Brownfields projects can rejuvenate a community.

Sincerely,

Bruce Nicholson,
Brownfields Program Manager

ec: Cindy Nolan, U.S. EPA Region 4
Darin McClure, MidAtlantic

1. COMMUNITY NEED

a. Targeted Area and Brownfields

i. Community and Target Area Description: Around 1750, Plikard Dedrick and Elizabeth Hartzoe Siler started a plantation farm less than four miles from the current downtown Siler City. On March 7, 1887, the NC General Assembly incorporated the Town of Siler City. The corporate limits of the town were defined as being one-half mile from the depot of the Cape Fear and Yadkin Valley Railroad in all directions. The introduction of rail lines in the 1880s turned Siler City into a regional commercial crossroads between the Piedmont and Triangle Regions of the State. The town's major industries have included textiles, furniture, hosiery, and food processing. However, since 2005 we have lost more than 1,500 jobs with the closure of four textile facilities. In addition, with the closure of the Pilgrim's Pride and Townsend Chicken Processing facilities in 2008 and 2009 respectively, an additional 1,500 jobs were lost. The nationwide economic recessions in 2001 and 2007 – 2009 just prolonged the poor economic conditions for the community. Businesses and residents have left the town for more prosperous areas on the opposite side of the county near the Research Triangle Park (RTP). **Now more than 1/3 of the population in our target areas live below the poverty level and 73% of our residents work outside of the town!**

As one enters our town from the east or west on US Highway 64, they are met with dozens of abandoned gasoline and service stations. These are a remnant of the facilities that used to service the traffic entering our central business district. As visitors enter our central business district, the blight associated with our shuttered industries is overwhelming. This is further exacerbated by the lack of retail and service businesses, most of which withdrew to the town limits or left all together as our downtown declined and the RTP area flourished. Today, Siler City's central business district is peppered with a mixture of vacant industrial buildings and struggling retail businesses, and the formerly bustling U.S. Highway 64 corridor is also marked by disinvestment and decline.

Our targeted areas for this project are the Norfolk Southern Railroad Corridor, which runs north to south through our downtown, and the U.S. Highway 64 corridor, which runs east to west through our downtown and is the main entrance into Siler City. Over the past ten years the Town and community partners have completed a series of visioning and planning documents for the Town and our target areas. Redevelopment of our targeted brownfield sites will be key to achieving our goals. The primary focus of these plans and visioning sessions have been our targeted areas, which are located entirely in the Loves Creek Watershed. Since 2005, Loves Creek has been on the 303(d) list of Impaired Waters due to habitat degradation and impaired aquatic life. The abundance of brownfield properties within the Loves Creek Watershed, primarily along our targeted corridors, have contributed significantly to the impairment of Loves Creek due to the hundred plus years of industrial pollution and nonpoint source runoff from impervious surfaces. Our most sensitive populations are living in or in close proximity to these sites, and without assessment funds, we do not have the means to assess them or move them forward toward redevelopment.

Our overall vision includes redeveloping our targeted area of brownfields in conjunction with development of our 1,800 acre "megasite". This is a greenfield site located on the western edge of the Loves Creek Watershed that is targeted for recruitment of a large advanced manufacturer that will bring 1,000+ jobs to Siler City. Our plan to reuse/redevelop some of our brownfields sites will provide residential options for employees and commercial spaces (and jobs) for supporting businesses. Although we (Town and community partners) have had some recent success in obtaining funding for the revitalization and rehabilitation of Siler City and in particular Loves

Creek, we are still in great need of additional public and private funding to make this revitalization happen.

ii. Demographic Information and Indicators of Need: Below is a variety of demographic data for our targeted areas that are being impacted by the abundance of brownfield properties.

Demographic Data (2011 - 2015 American Community Survey – 5 year estimate)

Demographic	Census Tract 204.02 B. Group 1	Census Tract 204.02 B. Group 2	Siler City	Chatham County	NC	United States
	N-S RR	U.S Hwy. 64				
Population	2,795	2,015	8,193	67,431	9,845,333	316,127,513
Unemployment	10.7%	15.3%	15.7%	9.0%	9.4%	8.3%
Percent Minority	77.6 %	73.7 %	70.6%	28.6%	35.8 %	37.8 %
Percent Hispanic or Latino	55.2 %	39.2 %	45.5 %	12.6%	8.8 %	16.3 %
Poverty Rate	27.0 %	45.2 %	25.2 %	13.4%	16.9 %	15.5 %
Median Household Income	$ 35,771	$ 21,419	$ 29,956	$ 56,642	$ 46,868	$ 53,889
% of residents that work outside of Siler City	78.8%	82.6%	73.1%	NA	NA	NA
% of households with no vehicle available	2.6%	21.2%	3.5%	2.1%	6.5%	4.5%
Rent as % of household income >30%	35.0 %	52.4 %	46.2 %	33.0%	36.9%	33.9 %

These demographics clearly show the need for economic reinvestment in our target areas. Poverty levels are staggering (27.0% to 45.2%) when compared to the national (15.5%) and state (16.9%) averages. In addition, the unemployment rates in our target areas are high and the household income levels are extremely low when compared to the state and national averages. Our low income levels are further exacerbated by the fact that the majority of our residents have to travel outside of Siler City for work and an abnormally high percentage of our households spend more than 30% of their household income on rent. The *Affordable Rental Housing Report & Strategy Toolbox* (July 2017) reports that 63% of the low-income renter households spend more than 30% of this income on rent! Finally, 72% of our public school children receive free or reduced lunches, compared to 40% in Chatham County and 60% for NC (Chatham County Public Schools).

iii. Brownfields and Their Impacts: We have completed a preliminary inventory of priority brownfield properties within our two target areas. We have already obtained three signed access agreements (Boling Chair, Former Siler City Mills, Henry Siler School) and anticipate having access agreements with our other priority property owners by Spring 2018! These types of commercial and industrial properties are abundant throughout these small census tracts. Each of the priority sites identified below are located along the identified corridors and directly adjacent to or across the street from our predominantly low-income, minority communities. These communities have no formal associations or actual neighborhood "names".

Priority Properties in Norfolk Southern Rail Corridor

Property Name & Past Land Use	Current Condition	Acreage	Anticipated Reuse	Environmental Issues/Contaminants
Charles Craft Cotton Mill – Cotton Mill	50% Occupied	2 properties totaling 11.39 acres	Regional distribution for farm to table produce - Warehousing and Storage	Hazardous & Petroleum VOCs, SVOCs, asbestos and Lead Based Paint (LBP)
Boling Chair Company - Furniture Manufacturer	Vacant	7 properties totaling 10.31 acres	Environmental Park	Hazardous & Petroleum VOCs, SVOCs, asbestos and LBP

Former Siler City Mills - Dog Food Mill	Vacant	1.71 acres	Farmers Market and/or Indoor recreational facility and dance studio	Hazardous & Petroleum VOCs, SVOCs, pesticides
Premier Woodworks - Cabinet Maker	Vacant	0.68 acres	Light industrial or commercial	Hazardous & Petroleum VOCs, SVOCs
Pilgrim's Pride - Chicken Processing Plant	Vacant	2 properties totaling 8.28 acres	Light industrial or commercial	Hazardous & Petroleum VOCs, SVOCs, asbestos
Former Chatham Hospital	Vacant	4.01 acres	Multi-family residential	Asbestos & Lead Paint
Henry Siler School	Vacant	2.36 acres	Multi-family residential	Asbestos & Lead Paint

Priority Properties in U.S. Highway 64 Corridor

Property Name & Past Land Use	Current Condition	Acreage	Anticipated Reuse	Environmental Issues/Contaminants
Pantry Gas Station – Gasoline Station	Vacant	0.71 acres	Highway commercial	Petroleum VOCs, SVOCs, heavy metals
BP Gas Station – Gasoline Station	Vacant	1.65 acres	Highway commercial	Petroleum VOCs, SVOCs, heavy metals
Kangaroo Gas Station – Gasoline Station	Vacant	1.89 acres	Highway commercial	Petroleum VOCs, SVOCs, heavy metals
Exxon Gas Station – Gasoline Station	Vacant	0.04 acres	Highway commercial	Petroleum VOCs, SVOCs, heavy metals
Hart Furniture - Furniture warehouse & distribution	Vacant	7 properties totaling 3.55 acres	Warehousing, distribution, storage	Hazardous & Petroleum VOCs, SVOCs

*Anticipated reuses in the above tables based on our *Downtown Master Plan* and *Loves Creek Greenway Project.*

The environmental issues/contaminants outlined above are generic because we have not had the resources to test and quantify the environmental impacts of our brownfields sites. However, the fact that Loves Creek (which runs centrally through our downtown) is listed on the 303(d) list of impaired waters leads us to believe that contaminants from our brownfields are adversely impacted this important water body. Additional real and/or perceived negative environmental impacts associated with our brownfields include blight, degradation of natural resources (soil, groundwater and surface water) through contaminant leaching and runoff, and potential degradation of air quality through the release of asbestos or other chemicals into the air. Cancer and respiratory ailments are a concern with contaminants associated with the past uses of our brownfields. Vapor intrusion into nearby homes is a concern as many of our priority sites used petroleum and solvents. There are also general safety concerns as there is unrestricted access to all of our priority sites. Children walk past them to school, play in their shadows, and on the sites themselves!

b. Welfare, Environmental and Public Health Impacts

i. Welfare Impacts: Our targeted corridors are overgrown with the blight from the vacant, dilapidated condition of our brownfields sites. There is over 540,000 square feet of vacant former industrial space in our downtown alone. The condition of these properties has led to a higher rate of vandalism and "unscrupulous" activity in these areas. Our police department reports that over 40% of the nuisance calls to the department originate from around our brownfields sites. Nuisance calls consist of fights, assaults, drug use, alcohol use, domestic violence, etc. These conditions lead to safety concerns for the neighboring residents and takes a psychological toll on them as well. There are no grocery stores in our downtown area, limiting residents access to healthy foods choices and fresh produce. There are also limited recreational opportunities (which we are addressing with our ***Pedestrian Master Plan*** and ***Loves Creek Greenway Project***), pharmacies and the many other local amenities that lead to healthy living in our target areas. The higher

unemployment rates and poverty levels in these areas has led to an "immobile society", particularly in our US Highway 64 corridor where 21.2% of our households have no vehicle available. These conditions negatively impact our tax revenue, which is one reason we have no dedicated bus or transportation service in the town.

ii. Cumulative Environmental Issues: In addition to the known brownfields above, Siler City considered other potential sources of cumulative environmental issues and environmental justice concerns in our target areas and identified the following. The Town has 10 RCRA generators of hazardous waste (EPA Envirofacts website), 79 sites with known releases from USTs, 15 sites with known releases from ASTs, four facilities with permitted sources of air pollution and one site on North Carolina's Pre-Regulatory Landfill list (www.deq.nc.gov). These large numbers of known or potential pollution sources are adversely impacting our community. Loves Creek, which runs through downtown and is a great natural resource for Siler City residents, has been classified as a 303(d) impaired stream by the NC Division of Water Quality. Efforts are underway by the Town and our partners through several different grant programs to install stormwater Best Management Practices (BMPs), restore riparian buffers, and integrate water quality plans and ordinances with the Town. Additional discussion of these leveraged activities can be found in the following sections.

In addition to the large number of brownfield properties in the Town and their impact on Loves Creek, we are also concerned with the amount of vacant and dilapidated housing. Not only are these homes an eyesore on the community they also cause numerous safety and health concerns. In particular are the exposure risks to nearby homeowners, specifically women and children, to asbestos and lead-based paint. Based on the 2015 American Community Survey, of the 2,705 occupied housing units within the Town, 54% of those homes were constructed prior to 1970. We anticipate that the percentage of "older" homes is even higher in the target areas. The Norfolk Southern railway traverses through these residential communities creating noise/air pollution and the daily potential of a hazardous spill or accident. Finally, the high commuter traffic associated with residents traveling outside the town for work adds to the noise and air pollution in our target areas.

iii. Cumulative Public Health Impacts: The sensitive populations of our target areas are without a doubt our high percentage of low income minorities. The currently unknown environmental threats that our many brownfields (coupled with our other cumulative factors) are having on our targeted community and our residents in general is troubling. To date, resources have not been available (either through private or public investment) to test potentially impacted media at these sites. However, it is reasonable to assume based on the past operations at these facilities that the soil, groundwater, and indoor air at and around these sites have been adversely impacted by VOCs, SVOCs, PAHs, metals, and asbestos/lead-based paint. Cancer and heart disease are the leading causes of death in Siler City based on the latest county health assessment (2014). Tetrachloroethylene (PCE) and its' degradation products are known carcinogens and were widely used in textile mills and other facilities like the ones in Siler City. One of PCE's degradation products, trichloroethylene (TCE), has been shown to cause birth defects after short exposures when pregnant women are exposed in their first trimester. Our children and low income residents living adjacent to many of our sites and can be exposed to PCE/TCE by vapor intrusion in their residences, as they enter the unrestricted buildings, or recreate in Loves Creek (impacted groundwater entering the river). The asbestos in our brownfields is known to cause lung cancer and exposure to other contaminants likely present at our brownfield sites (petroleum, solvents,

metals, etc.) are known to cause cancer, asthma, liver damage, nervous system damage or birth defects, particularly in our children, women of child bearing age, and the elderly.

According to the *2016 Health of Chatham Annual Report*, obesity is the number one health priority as rates continue to rise in the county. The vast number of vacant brownfields and lack of community reinvestment has limited the creation of greenspace and recreational options in the target areas. A recently awarded Environmental Enhancement Grant to our **partner, the Piedmont Conservation Council**, calls for the creation of an environmental park on the former Boling Chair property. This vacant property that sits on a tributary of Loves Creek is a few minutes walk of City Hall and downtown. According to the 2015 U.S. Census, 2,370 people live in 866 homes within a half-mile of this property. In addition, a daycare that services a minority population borders the property and another daycare is located within a half mile. The lack of access to healthy food options also contributes to our obesity problem. Higher poverty, unemployment, and lower income has led to residents with limited options for healthy food, either through lack of available options or through lack of financial resources to purchase.

c. Financial Need

i. Economic Conditions: We are a small community with a population of 8,193 that has remained static over the last six years due to the loss of thousands of jobs. Siler City experienced the loss of more than 1,500 jobs since 2005, with the closure of four textile facilities. In addition, with the closure of the Pilgrim's Pride and Townsend Chicken Processing facilities in 2008 and 2009 respectively, an additional 1,500 jobs and over $5-million in water sales were lost. Our current budget is barely enough to fund core services and the vacant and blighted properties only contribute to lower property values and reduced property tax revenues. In 2015 the NC General Assembly placed new limits on municipalities' collection of business privilege license taxes, eliminating an important revenue stream of approximately $100,000 annually. The recent de-funding of the NC Rural Economic Development Center and reduced funding from the Golden Leaf Foundation have further reduced our ability to secure other funding sources. More than 1/3 of the population in our target areas live below the poverty level, further limiting our resident's ability to reinvest and spur economic growth from within.

Over the past ten years the Town has completed a series of visioning and planning documents for the Town that include the target communities (Norfolk Southern Railroad Corridor & U.S. Highway 64 Corridor). These include redeveloping our brownfields with a mix of commercial, industrial, retail and residential uses (see section 1.a.iii.). Unfortunately, we (Town and community partners) have struggled in obtaining the necessary public and private funding to make this revitalization happen. As a small, low income community with a depleted tax base, we are struggling to provide the basic necessities for our community.

ii. Economic Effects of Brownfields: As evidenced by the demographics outlined previously, our targeted communities continue to struggle with many hardships. Between 2005 and 2014, ten large businesses closed in Siler City resulting in the loss of more than 3,300 jobs. These include the Charles Craft Cotton Mill, Boling Chair Company, Former Siler City Mills, Premiere Woodworks, Pilgrim's Pride and Hart Furniture facilities. It also includes the four gas stations noted along U.S. Highway 64, two of which closed in recent years. The town is still trying to recover from the loss of over $5-million in water sales encountered after the shutdown of two chicken process facilities and we forecast a reduction of $468,476 in water sales revenue for the next fiscal year. The latest property revaluation resulted in a 5.5% decrease in value and annual reduction of $109,900 in property tax revenue. These conditions and the blight prevalent in our targeted communities has

discouraged reinvestment and adversely impacted our neighborhoods. Similar stories could be written about other impacts caused by the exodus of retail and support businesses from our downtown. In summary, with the continued idled presence of these facilities the Town has experienced a reduced tax base, loss of jobs and business opportunities, depressed property values, ongoing costs to secure vacant properties, blight, property vacancy, and community disinvestment.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a. Project Description, Timing and Implementation

i. Project Description and Alignment with Revitalization Plans: Our brownfields project aligns with three of our important revitalization plans. Siler City's ***Downtown Master Plan*** guides all future development in the city and specifically targets development in our central business district. Our ***Pedestrian Master Plan*** calls for improving infrastructure for pedestrians, fostering a "walking culture" and increasing the use of existing transportation resources. And finally our ***Loves Creek Greenway Project*** will provide a 1.4 mile paved walking trail along Loves Creek that also connects to the ball fields at Bray Park. The first phase of this is expected to open later this year. Through the development of these plans, visioning activities, and public input we chose the target brownfields sites listed in Table in Section 1.a.iii. and their strategic best use. Most of these are located within walking distance of our greenway project. The Charles Craft Cotton Mill, Boling Chair, Siler City Mill (Dog Food Mill), and Pilgrim's Pride sites encompass more than 45.43 acres and more than 400,000 square feet of viable building space. Our plans call for the Siler City Mill site to be redeveloped as a Farmers Market, including a water feature using the storm drainage flowing through the site, passive activity and art display as well as a venue for large community events. A December 2014, *Facilities Assessment and Revitalization Overview Report* by the non-profit, Construction Professionals Network Institute, Inc., indicated that the Charles Craft Cotton Mill building was well maintained and would be an ideal location for a regional distribution center for "farm to table" produce and meats due to the agricultural focus in the areas. This will help bring healthier food choices to our sensitive populations. The redevelopment of the Boling Chair site as an environmental park was discussed earlier while the Pilgrims Pride site is envisioned as a light industrial/commercial development. The former Henry Siler School and Chatham Hospital are slated for multi-family residential use (potentially affordable housing). Several of the other sites are targeted for a mix of retail, greenspace and light industrial to support our larger redevelopment initiative. All of these targeted redevelopments will occur using the following requirements of our Downtown Master Plan: improve aesthetic appearance of existing buildings and provide guidelines for new buildings and renovations; provide development incentives; increase pedestrian comfort and safety through improved public environments; reuse of existing infrastructure; and, revise town codes and ordinances to facilitate economic growth and opportunity. By bringing businesses, residents and retail/commercial back to our downtown, our results will combat many of the indicators of need cited earlier (low income, high poverty, high unemployment, commuting elsewhere for work). As our project progresses we expect it to bear additional fruit similar to that invested by Mountaire Farms. Mountaire Farms recently purchased the former Townsend Chicken Processing Plant and an adjacent former mill site along the U.S. Highway 64 corridor and committed to a $65-million investment and addition of up to 700 jobs.

Our project will incorporate many equitable and sustainable practices such as: infrastructure reuse and recycling of building materials will further limit negative impacts to Love Creek; redevelopment of our brownfields with residential/commercial components will reduce commuter miles, improve the walkability of our community, improve air quality, and bring additional food options to our target areas; addition of affordable residential components will provide our residents

with more choices for housing, lower the percentage of households spending too much on rent, allow property values to rise, and lower the cost of transportation; as more residents and jobs are brought to Siler City, we anticipate additional businesses to open; new businesses will give our community access to new job opportunities; including our community in the decision making process has ensured that the physical and cultural assets of our community will remain in place while enhancing the quality of our neighborhoods to promote livability and a strong sense of community; and incorporating mixed use concepts and land recycling will help us capitalize on federal funding opportunities for these initiatives. Our commitment to environmental justice is exhibited by the meaningful involvement of our targeted community in the development of our ***Downtown Master Plan, Pedestrian Master Plan, Loves Creek Greenway Project***, our brownfields project, and their representation on our BSC.

ii. Redevelopment Strategy: As stated previously, our redevelopment strategy is clear. Our plans call for the Siler City Mill site to be redeveloped as a Farmers Market, the Charles Craft Cotton Mill building as a regional distribution center for "farm to table" produce/meats (or other such use), the Boling Chair site as an environmental park, and the Pilgrims Pride and Premier Woodworks sites as light industrial/commercial development. The former Henry Siler School and former Chatham Hospital are slated for multi-family residential use (including affordable housing). We fully anticipate more affordable housing options to follow these redevelopments. Several of the other sites are targeted for a mix of retail, greenspace and light industrial to support our larger redevelopment initiative. As these areas are repositioned we also anticipate the abandoned gas stations along US Highway 64 to reopen or reinvent themselves for highway commercial use.

All of our former brownfield sites have existing infrastructure and utilities already in place. Our Planning Board and staff identify needs for governing growth through development of ordinances and regulations by following guidelines in our established plans. Our ***Land Development Plan*** calls for higher residential densities to be restricted to areas where sufficient public water and sewer is available, continual development of affordable housing, and attraction of additional industrial development to existing facilities where infrastructure is in place. Our ***Pedestrian Master Plan*** calls for increasing the use of existing transportation resources and our ***Downtown Master Plan*** has numerous requirements to ensure sustainable development. These include encouraging infill development; reusing existing structures to the extent feasible; recycling of demolition materials generated during these activities; and the use of Smart Growth principles wherever possible. For example, the brick from the demolished Boling Chair site was reused for the local blacksmith shop. Finally, grants through our economic incentive policy are partially based on a project's use of existing utilities, location in existing industrial facilities, and sustainable building features. By encouraging infill development, we will reduce the pressure on building in greenfields, eliminate the need to extend power, water, and sewer lines to new sites, decrease our carbon footprint, and foster a strong sense of community.

iii. Timing and Implementation: Siler City does not have the expertise, administrative capacity or infrastructure to effectively manage a brownfields program. As such, our Board of Commissioners has already approved and hired an experienced environmental consultant in accordance with the procurement standards contained in 2 CFR 200.317-326. Jack Meadows, the Town's Director of Planning and Community Development, will be responsible for overseeing the project and our brownfield consultant. Our project plan calls for completion of Phase I ESAs and our Generic Quality Assurance Project Plan (QAPP) by the Summer/Fall of 2019 and completion of Phase II

ESAs by Summer/Fall 2020. That leaves plenty of time to conduct cleanup planning and work sites through the North Carolina Brownfields Program, as applicable.

Although we have already identified up to 12 target sites, we plan to complete a town-wide site inventory. Initial selection criteria include: sites must meet the definition of a Brownfields and the Site Eligibility requirements for grant projects; sites must meet the Town's overall development goals; sites must have a good proposed beneficial reuse; and sites must be potentially contaminated. The portfolio of sites will be presented at the second Brownfields Steering Committee (BSC) meeting in January 2019. Our current draft criteria for ranking and prioritizing sites includes the following: location in the targeted redevelopment areas; level of perceived contamination and threat to human health and environment; potential of the site for redevelopment and job creation; level of community support for a redevelopment model for the site; and, level to which redevelopment will alleviate blight at the site and to the surrounding areas. At our second BSC meeting, our draft ranking and prioritization criteria will be finalized and the sites will be ranked and prioritized accordingly. An access agreement, signed by both the Town and property owner, will be secured for each site entering our program. Three signed access agreements for our targeted properties have already been obtained (Boling Chair, Former Siler City Mills, Henry Siler School) and we have already held preliminary discussions with the remaining site owners and been told that signed access agreements are forthcoming or will be available once the grants are secured. Educating site owners on the benefits of these assessments, presenting them with our written agreement, and helping them set a strategy for addressing their sites has proven effective in securing access agreements. We will follow this same proven strategy for new sites.

b. Task Descriptions and Budget Table

i. Task Descriptions: Descriptions for each task are summarized in the following tables.

Task 1 – Public Involvement (PI) - Total Budget $25,000				
Description	**Entity Performing**		**Estimated Costs**	
	Contractor	**Town Staff**	**Contractor**	**Town Staff**
Develop Community Involvement Plan (CIP); attend BSC meetings (12); plan and conduct community meetings (4-6); meet with residents/property owners; possible project website, print media (brochures, flyers, facts sheets)*	X	X	$13,000 H $7,000 P	
Travel – two town staff to attend National Brownfields Conference, regional workshop(s), NCDEQ training, etc.		X		$2,000 H $2,000 P
Supplies – Presentation materials, posters, etc.		X		$500 H $500 P
Anticipated Outputs	Completed CIP; # of SC meetings; # of community meetings; # of meeting attendees; # of outreach materials distributed			

Task 2 – Site Inventory (SI) - Total Budget $10,000				
Description	**Entity Performing**		**Estimated Costs**	
	Contractor	**Town Staff**	**Contractor**	**Town Staff**
Town-wide inventory of brownfields; complete portfolio compatible with Town GIS database	X	X	$5,000 H $5,000 P	
Anticipated Outputs	# of sites inventoried			

Task 3 – Environmental Site Assessments (ESAs) - Total Budget $245,000				
Description	Entity Performing		Estimated Costs	
	Contractor	Town Staff	Contractor	Town Staff
Phase I ESAs on eligible sites per ASTM 1527-13 (8 on hazardous sites and 4 on petroleum sites at an average cost of $3,000 to $3,500 per site – depending on size and complexity)*	X		$26,000 H $18,000 P	
Generic Quality Assurance Project Plan (QAPP)	X		$2,500 H $2,500 P	
Phase II ESAs including Site Specific QAPPs and Health and Safety Plans (3 on hazardous sites and 2 on petroleum sites at an average cost of $20,000 to $50,000 per site, depending on size and complexity)	X		$138,000 H $58,000 P	
Anticipated Outputs	# of Phase I and Phase II ESAs completed; # of sites entered into the NC Brownfields Program			

Task 4 – Cleanup Planning (CUP) - Total Budget $20,000				
Description	Entity Performing		Estimated Costs	
	Contractor	Town Staff	Contractor	Town Staff
ABCA or other appropriate cleanup plan (1 on a hazardous site and 1 on a petroleum site at an average cost of $4,000 per plan)	X		$4,000 H $4,000 P	
Redevelopment planning; charrettes; visioning sessions (some in conjunction with the bSC)	X	X	$9,000 H $3,000 P	
Anticipated Outputs	# of ABCAs (or equivalent); # of redevelopment or concept plans; # of mitigation measures implemented			

ii. Budget Table We are requesting $300,000 to accomplish this project. Over 81% of our funds will be used for ESAs with almost 70% of our total funds being used for Phase II ESAs.

	Hazardous Budget					Petroleum Budget				
Budget Categories	**PI**	**SI**	**ESAs**	**CUP**	**Total : (Haz)**	**PI**	**SI**	**ESAs**	**CUP**	**Total: (Pet)**
Personnel										
Fringe Ben										
Travel	$2,000				$2,000	$2,000				$2,000
Equipment										
Supplies	$500				$500	$500				$500
Contractual	$13,000	$5,000	$166,500	$13,000	$197,500	$7,000	$5,000	$78,500	$7,000	$97,500
Other										
Total	**$15,500**	**$5,000**	**$166,500**	**$13,000**	**$200,000**	**$9,500**	**$5,000**	**$78,500**	**$7,000**	**$100,000**
PI = Public Involvement; SI = Site Inventory; ESAs = Environmental Site Assessments; CUP = Cleanup Planning										

c. Ability to Leverage

We anticipate leveraging the following resources for our project:

Source	Purpose/Role	Amount	Status
City Staff	In-Kind Services	$18,000 (est.)	Secured
NCDOT	Pave Portion of Loves Creek Greenway	$250,000	Secured
NCDEQ Section 319	Loves Creek Watershed BMP Project	$150,000	Secured
State of NC	Boling Chair Park Stream & Floodplain Rehabilitation	$270,000	Secured

Clean Water Management TF	Study to address flooding and stormwater in watershed	$136,219	Secured
Chatham S&W Conservation District	Riparian Buffer along Boling Lane Park	$3,618	Secured
Mountaire Farms	Redevelopment of Townsend Chicken Plant	$65,000,000	Secured
USEPA	Targeted Brownfield Assessments	TDB	Pending (as needed)
USEPA	Cleanup Grants	$200,000	Pending (as needed)

We are also home to the NC Arts Incubator (NCAI). The Town and NCAI have collaborated on rehabilitation of several buildings into artist studios, retail and exhibit galleries, an outdoor courtyard and a coffee shop. Each of these projects help complete a piece of our overall revitalization puzzle. These projects tie directly to the redevelopment of our brownfields by providing connectivity options and amenities for the nearby residents. The Town's Board of Commissioners adopted an economic development incentive policy which was instrumental in attracting Mountaire Farms. Grants are provided to businesses and industries to expand the property tax base and job creation. The grants are based on the total investment and number of jobs proposed. Chatham County also offers a strong incentive package, including tax credits for every job created and low interest rates for equipment and renovations. The County also offers a Local Economic Development Grant Program for new and expanding companies, the amount of which is calculated based on investment, number of jobs created, and level of training for workers.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Engaging the Community

i. Community Involvement Plan The overall vision for our revitalization project (including our choice of target properties) was formulated through a variety of community forums, including Board of Commissioners meetings, Planning Board meetings, and quarterly meetings of the Loves Creek Watershed Stewards. To supplement these activities, the City has established a BSC representing a broad spectrum of the community. The BSC last met on September 25, 2017 to refine the priority properties for this grant submittal. The 10 – 12 member BSC will be the lynchpin of our Community Involvement Plan and is made up of Town staff, Chatham County staff, Central Carolina Community College, Community-Based Organizations (Siler City Development Organization, Chamber of Commerce, Wren Industries, etc.), property owners and citizens in the impacted neighborhoods. We have ensured a varied cross-section of the entire community is represented on the BSC so that all persons have an equal voice. Steering Committee members attend quarterly meetings (which are open to the public) to conduct project planning, select and prioritize sites for assessment, discuss cleanup and redevelopment planning, and bring any unidentified properties of concern up for discussion. Steering Committee members will receive project updates and share them with those who they represent, and give their respective community's opinions on assessments, redevelopment/cleanup options, health and/or environmental concerns, and overall project progress/planning. We will hold public meetings in the target areas to give these people a chance to voice their opinion on how to best address issues.

ii. Communicating Progress We will conduct a concerted outreach campaign to raise awareness and educate citizens on brownfields and on how to become involved in the project. The Town will employ a variety of methods that we have used successfully on previous projects to communicate progress to our community, including updates to the Board of Commissioners, press releases and fact sheets distributed to the local newspaper (*Chatham News & Record*), public access channel, updates to the Town website, posts on social media (Facebook and Twitter), and the creation of both an electronic repository and a paper repository to house and share project documents. We will

conduct 12 BSC meetings which will be open to the public and has planned up to six public meetings at civic groups and in neighborhoods to inform and invite community members to be active participants in the project. Although there are no formal associations in the neighborhoods around the target areas, we will go into the communities to share information and gather ideas/concerns, particularly with the neighborhoods that are being directly impacted by the brownfield sites. Educational materials describing the benefits of participating in the brownfields program (both as a property owner and prospective purchaser) will be created and distributed across the Town at local places of business (banks, realtor offices, doctor offices, grocery stores) to spread the word that funds are available to assist with economic development. With a Hispanic population of almost 50%, we will provide informational materials in Spanish and a translator from a community partner for community meetings and discussions. We have bilingual City staff that assist in translation and production of Spanish handout materials, as well as the use of audio equipment that translates English to Spanish for those in attendance at community meetings.

b. Partnerships with Government Agencies

In addition to EPA, we will continue our partnerships with the following entities.

i) Local/State/Tribal Environmental Authority

NCDEQ Brownfields Program – The NCDEQ Brownfields Program staff will also be used during outreach efforts to prospective buyers and as speakers at our BSC meetings and public outreach events to educate all on the benefits of their program.

ii) Other Governmental Partnerships

Chatham County Public Health Department will ensure public health issues are addressed during assessment, cleanup, and redevelopment, and provide information/answer questions at community meetings. A health department staff member is also ready to serve on the BSC.

Triangle J Council of Governments addresses public challenges that transcend political boundaries and serves as the lead regional agency representing member governments in our seven county region. They will continue to assist the Town with other funding opportunities.

Piedmont Conservation Council leverages people and resources for innovative projects that promote conservation and sustainable communities. They will continue to help us apply for and administer grants in our project area and assist with administering these grants.

NCDOT - Siler City will continue its relationship with the NCDOT to complete the Loves Creek Greenway and address road improvements as necessary in the targeted areas.

c. Partnerships with Community Organizations

Although there are no formal community organizations/groups in the targeted neighborhoods, we have already reached out to our most active community based organizations. These organizations are involved with various projects (NC STEP Central Park Committee, Downtown Master Plan, and Loves Creek Watershed , etc.) throughout the Town and will be a great resource to the project in the planning and implementation stages. We have also involved a church that is central to both our target areas. Our community involvement plan calls for engaging our communities through targeted public meetings and citizen participation on the Steering Committee.

i. Community Organization Description & Role

Siler City Development Organization!, Inc. was formed to improve economic, social and cultural quality of life in Siler City through partnerships with the Town and community organizations. A member participates on the BSC and assists us with community outreach.

Chatham Economic Development Corporation is the lead economic development agency for Chatham County. This non-profit provides support to businesses with relocation and expansion

plans and markets Chatham County as the preferred location for emerging growth companies. The EDC has committed to using their expertise to help us focus our efforts on sites with the most economic development potential and assist with business recruitment to these sites.

The Hispanic Liaison is a non-profit whose mission is to empower Hispanics to overcome the challenges they face in our community. They will provide an interpreter at public meetings and assist with educational outreach and promotion of the program and available properties.

Central Carolina Community College has a satellite campus in Siler City and provides an excellent location for hosting public meetings and workshops. The Town and College have a great relationship and will find ways to provide opportunities for students to participate in the brownfield project. They will also assist with job training, job placement and vocational rehabilitation services for Siler City citizens. A representative participates on the BSC.

Wren Industries, Inc. and Wren Family Estate, LLC are commercial property and land owners in Siler City dating back over 50 years. They have promoted the growth of Siler City through property development and revitalization. They are committed to assisting in promoting the project by participating in public meetings, assisting with community outreach, and providing input on the development potential of sites.

Loves Creek Watershed Stewards meet quarterly to discuss ways to further turn the watershed into a green amenity for the Town. The group will continue to support the Town on the brownfields project, assist with outreach efforts and assist in ways to stimulate the local economy.

Chatham Chamber of Commerce is an organization focusing on the economic vitality of Chatham County and the increased visibility and advocacy of its members. The Chamber will support the Town on the brownfields project, assist with outreach efforts and assist in ways to stimulate the local economy.

First United Methodist Church has pledged their support for this project and have offered their facilities for public meetings and will assist with public outreach and with the dissemination of project information and updates.

ii. Letters of Commitment - Letters from the above community organizations are attached.

d. Partnerships with Workforce Development Programs

Siler City will promote local hiring of community members and businesses in the assessment, cleanup, and/or redevelopment phases of the project. The City of Durham, only 50 miles from Siler City, received an EPA Brownfield Job Training grant in 2014. We have contacted the Durham's Office of Economic and Workforce Development to discuss their training program, seek opportunities to work with their graduates, and learn from their successes in the event we apply for a similar grant. We already have a commitment from the Triangle South Workforce Development Board (TSWDB) to help us provide opportunities for local residents in the Town's brownfield project. TSWDB is the designated administrative/fiscal agent for the Federal and State workforce development funds appropriated by the NC Department of Commerce for a four county area, including Chatham County. Finally, we will partner with Central Carolina Community College (CCCC) to proactively address workforce training needs through their Economic and Community Development Division. CCCC has an educational site in Siler City and will bring the necessary training classes to this location.

4. PROJECT BENEFITS

a. Welfare, Environmental and Public Health Benefits

We anticipate the following welfare and public health benefits for our public (in particular our sensitive populations) from these grants:

- Additional jobs, reduced unemployment and increase in the tax base through the successful redevelopment of the Charles Craft Cotton Mill, Pilgrim's Pride and Siler City Dog Mill sites along with the successful development of our megasite;
- Providing more jobs within the target areas of Siler City will reduce the amount of commuter miles, effectively reducing the amount of noise and air pollution from the traffic;
- New affordable housing, through development of the Henry Siler Mill, Chatham Hospital and/or others, will reduce the number of households spending too much on rent/housing costs;
- New, productive uses will reduce the vandalism and "unscrupulous" activity at our sites and provide the amenities (pharmacies, groceries, recreational space) needed in our target areas;
- Increased use of Loves Creek as a community and recreational resource once water quality is improved and properties around the creek put back into beneficial reuse;
- Redevelopment/reuse of our target properties with the envisioned uses will result in removal of blight, higher property values, more job opportunities and less poverty in the impacted areas;
- Higher property values will increase our tax revenue, allowing us to invest in the necessary infrastructure and transportation improvements;
- Removal of blight creates a sense of community pride that encourages residents to go out into the community, which addresses our obesity problem and benefits overall community health and welfare;
- Greenspace development (including the Boling Chair site and Loves Creek Greenway), will increase the value of properties in our target areas and provide residents spaces to exercise and congregate and help address our health and obesity problems; and
- Redevelopment of the Siler City Mill site as a Farmers Market will result in more healthy food options for the surrounding community, further addressing our health and obesity problems.

Cancer, heart disease and obesity are prevalent in our community. Although actual data tying these brownfields to health problems does not exist, anecdotal evidence suggests that residents in these communities are at risk to exposure from these brownfield sites. Years of assessing similar sites routinely uncover VOCs, SVOCs, metals and other pollutants in the soil, groundwater, air, and surrounding surface water bodies. In addition, many of these sites are not fenced or secure, allowed unimpeded access to these structures that are dilapidated and most likely full of asbestos (lung cancer) and lead-based paint (a threat to children). Using these funds to assess the actual conditions at these sites will allow the town and property owners to take steps necessary to remove sources or put systems in place to mitigate exposure, resulting in a safer community. Such steps will invariably improve the health of our community and help address our obesity problem and reduce our leading causes of death (cancer and heart disease).

The Town anticipates the following environmental benefits from these grants:

- Cleaning contaminants will result in cleaner soil, air, groundwater, and surface water in the vicinity of our brownfields resulting in a more attractive, vibrant community, and prevent contaminant exposure to humans, animals, and natural resources;
- Improved water quality, habitat and aquatic life and reduction of potential exposures in Loves Creek and its watershed;
- Increased environmental awareness through our community outreach efforts;
- The reuse and redevelopment of our brownfields will reduce migration away from our downtown and conserve currently undeveloped natural/green space; and
- The reuse of these community assets will reduce air and noise pollution by giving residents the choice to walk or drive fewer miles to work, services, shopping and recreational venues.

For some sites the Phase I ESA will not identify a need for further investigation. For those properties, the Phase I will alleviate the perception of environmental contamination and directly clear the way for redevelopment. The Town recognizes that these sites are valuable assets and removing/addressing the environmental uncertainties will make them significantly more marketable and lead to a better general environment in the community.

b. Economic and Community Benefits

Project outcomes that will lead to numerous economic, non-economic and community benefits include, but are not limited to, the number of new engaged community members resulting from our project, the number of acres of brownfields made ready for reuse, the number of acres actually redeveloped, the amount of greenspace developed (Boling Chair park and Loves Creek Greenway), the number of jobs created and the number of redevelopment dollars leveraged. Redeveloping some of our brownfields into attractive housing, retail and greenspace/recreational areas will lower our unemployment, increase our tax base, and reverse the outward migration of businesses and help attract the large advanced manufacturer targeted for our 1,800+ acre "megasite". This greenfield site is a collaboration between the Town, Chatham Economic Development Corporation and a private landowner. It is anticipated that the user of this site would bring at least 1,000 direct jobs and lead to thousands of related jobs in supplier companies that could easily be located on some of our brownfield sites. We anticipate that redevelopment of our four major brownfields could increase our tax base by as much as $80 Million, resulting in as much as $684,000 in an additional property taxes annually. In addition to improving our tax base, this project will have other economic benefits. Successful redevelopment should spur other property owners to repair their properties and have a positive impact on the targeted communities. Non-economic and community benefits will be realized through the development of the Boling Chair site as greenspace, completion of the Loves Creek Greenway Trail, and the other greenspace/recreational opportunities that will present themselves as the brownfield sites in the Loves Creek Watershed are addressed and cleaned up.

5. PROGRAMMACTIC CAPABILITY AND PAST PERFORMANCE,

a. Audit Findings – We have not received adverse audit findings for current or previous grants.

b. Programmatic Capability

Mr. Jack Meadows, Director of Planning and Community Development, in conjunction with the Board of Commissioners, Town support staff, and BSC will provide the overall direction for our project. Mr. Meadows has 13 years of experience with the Town and managing federal and state grants. Mr. Meadows will provide regular updates and progress reports to the Town Manager, Mr. Bryan Thompson and the Board of Commissioners. Mr. Meadows will be supported by Mr. Roy Lynch, Finance Director for the Town. Mr. Lynch has had extensive experience working with grant projects. In the event of staff turnover, either individual will be prepared to effectively manage the project until the Town is able to fill the open position. Additionally, due to the technical nature of the project and the fact that this is our third attempt at getting this project funded, we recently retained an experienced brownfield consultant to assist the Town with this project. The **Piedmont Conservation Council** will continue to partner with us by applying for an administering additional grants for this project. The project team will have the capabilities to perform all of the required activities immediately upon grant award. If additional expertise or resources are needed, we will procure those services in accordance with Town and/or EPA guidelines.

c. Measuring Environmental Results: Anticipated Outputs/Outcomes

Mr. Meadows will use EPA's Assessment, Cleanup, and Redevelopment Exchange System (ACRES) along with the Steering Committee to assist with tracking, measuring and evaluating our grant progress. These tools will make sure we are on track and achieving our outcomes, outputs and results. He will also communicate regularly with our EPA Project Manager, including weekly status emails and monthly project status calls, as needed. Quarterly reports will also be submitted to EPA. Below is a list of anticipated outcomes and outputs.

Task	Output Measurement	Outcome Measurement
Public Involvement	Completed CIP; # of Steering Committee Meetings; # of Public Meetings; # of attendees; # Outreach Materials Distributed	# of Community members engaged through project activities
Site Inventory and Characterization	# of sites inventoried; # of Phase I and Phase II ESAs; # sites entered into NC Program	Completed inventory; # of acres assessed; # acres in NC Program
Cleanup and Redevelopment Planning	# of ABCAs; # of redevelopment concepts & plans; # of mitigation measures implemented	# acres redeveloped; # acres ready for reuse; # jobs created; # dollars leveraged

d. Past Performance and Accomplishments

ii. Has Not Received an EPA Brownfields Grant but has Received Other Assistance Agreements

1. Purpose and Accomplishments – A summary of the Town's successful history of obtaining grants from the federal and state government as well as successfully managing them follows:

Town of Siler City Example Grant Management			
Granting Agency	Amount	Purpose	Accomplishments
NCDOT	$1,200,000	Loves Creek GW	Paved walking trail along Loves Creek (partially complete). Provides pedestrian access for low-moderate income families to parks, downtown, etc.
NCDOT	$500,000	Safe Route To School	Provides safe pedestrian access for middle school children to nearby neighborhood schools.
NC Rural Center	$125,000	NCSTEP Grant	Allowed all citizens to participate in an economic development strategy process. Downtown master plan, Pedestrian Master Plan, Phase 1 Environmental Assessment in Downtown, 9 Wayfinding signs, more than 20 improved facades downtown, Community Branding Guide
NC CDBG	$350,000	NC Arts Incubator	Downtown building renovation – roof, heating and air, electrical. Allowed the arts community to thrive in downtown Siler City by providing artists a chance to occupy vacant downtown spaces.
NCDEQ	$2,000,000	Expansion of Lower Rocky River Reservoir	Previous water supply did not meet the needs of the existing customers. Increase the safe yield from 4 mgd to 6 mgd.

2. Compliance with Grant Requirements

Town of Siler City Example Grant Compliance					
Granting Agency	Grant Compliance			Status (Complete/In progress/closeout)	Reporting
	Work Plan	Schedule	T & C		
NCDOT	☺	☺	☺	In progress – Began Jan. 2015	Project ongoing, reporting up to date
NCDOT	☺	☺	☺	In progress – Began May 2015	Project ongoing, reporting up to date
NC Rural Center	☺	☺	☺	Closeout	On time, including closeout reporting
NCCDBG	☺	☺	☺	Closeout	On time, including closeout reporting
NCDEQ	☺	☺	☺	Closeout	On time, including closeout reporting

OMB Number: 4040-0004
Expiration Date: 10/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
11/13/2017	Siler City, NC FY18 Assessment

5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Town of Siler City, North Carolina

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
56-6001334	0992291890000

d. Address:

* Street1:	311 North Second Avenue
Street2:	
* City:	Siler City
County/Parish:	
* State:	NC: North Carolina
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	27344-3161

e. Organizational Unit:

Department Name:	Division Name:
Planning Department	

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	Mr.	* First Name:	Jack
Middle Name:			
* Last Name:	Meadows		
Suffix:			

Title:

Organizational Affiliation:

* Telephone Number:	919-742-2323	Fax Number:	919-742-2758

* Email: jmeadows@silercity.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-17-07

* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Town of Siler City, NC EPA Community-Wide Brownfields Assessment Project

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant NC-002 * b. Program/Project NC-002

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2018 * b. End Date: 09/30/2021

18. Estimated Funding ($):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: Bryan

Middle Name:

* Last Name: Thompson

Suffix:

* Title: City Manager

* Telephone Number: 919-742-4731 Fax Number: 919-663-3874

* Email: bthompson@silercity.org

* Signature of Authorized Representative: Roy Lynch * Date Signed: 11/13/2017