



SCTDD

101 Sam Watkins Blvd
 Mt. Pleasant, TN 38474
 Phone: 1-931-379-2929
www.sctdd.org

IV.D. Narrative Information Sheet

1. Applicant Identification:
 South Central Tennessee Development District
 101 Sam Watkins Blvd
 Mt. Pleasant, TN 38474
2. Funding Requested:
 - a. Assessment Grant Type: Brownfields Coalition Assessment Grant
 - b. Federal Funds Requested: \$1,500,000
3. Location (non-lead members):
 - a. City of Shelbyville
 - b. Bedford County
 - c. Tennessee

 - a. Lincoln County
 - b. Lincoln County
 - c. Tennessee

SCTDD will utilize funding from this FY24 EPA Brownfields Assessment Grant to assess eligible sites in communities throughout our 13-county service area (Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, and Wayne counties)

4. Target area:
 - Shelbyville Target Area (STA) – consists of a 0.6-mile-wide corridor that runs from the southwest city border to the northeast (intersection of Martha & Hobson Sts.) in the southwest portion of Shelbyville. The STA covers an area of 1.6 mi² in portions of census tracts 47003950600 and 47003950401. The STA contains numerous closed and underutilized former industrial brownfield properties that are adjoining low-income, high poverty neighborhoods. We are focusing on two large brownfields sites, one a former pen & pencil manufacturer and the other a former dogfood manufacturing plant for this target area.
 - Lincoln County Target Area (LCTA) – is bound by Lowel Dr. to the north, High Ave. to the east, Edison St. to the south, and Main Ave. to the west in the northeast portion of Fayetteville. The LCTA covers an area of 1.4 mi² in CT 47103975400. The LCTA contains several closed former industrial and commercial brownfield properties adjoining low-income neighborhoods. We are focusing on two large brownfields sites, one a former wire & steel manufacturer and the other a former yarn mill for this grant.
 - SCTDD Target Area (SCTA) – is bound by Fairway Dr. to the north, Morningside Dr. to the east, Mayberry St. to the south, and 9th Ave. to the west in the western portion of Fayetteville. The SCTA covers an area of 1.44 mi² in CT 47103975300. The SCTA contains several closed institutional brownfield properties including a former hospital and associated sites in the midst of a low-income neighborhood. We are initially focusing on the Former Lincoln County Hospital site in this target area.

- Priority Sites:
 Elk Yarn Mill, Hwy 231 N, Fayetteville, TN 37334
 R & B Wire & Steel, 4071 Thornton Taylor Pkwy, Fayetteville TN 37334
 Lincoln County Hospital, 700 Maple St, Fayetteville 37334
 National Pen, 342 Shelbyville Mills Rd., Shelbyville, TN 37160
 Mars Dogfood Plant, E Depot St, Shelbyville, TN 37160

5. Contacts:

- a. Project Director:
 Ms. Misti Baker
 Housing Assistant & Solid Waste Coordinator
 931-379-2904
mbaker@sctdd.org
 101 Sam Watkins Blvd.
 Mount Pleasant, TN 38474
- b. Chief Executive:
 Jerry Mansfield
 Executive Director
 931-379-2901
jmansfield@sctdd.org
 101 Sam Watkins Blvd.
 Mount Pleasant, TN 38474

6. Population:

City of Shelbyville, Bedford County, TN – population 23,005
 City of Fayetteville, Lincoln County, TN – population 6,988
 (2021 ACS 5-YR Estimates)

7. Other Factors:

Other Factors	
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Table 1 Page 2
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	

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

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



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION
DIVISION OF REMEDIATION
WILLIAM R. SNODGRASS TENNESSEE TOWER
312 ROSA L. PARKS AVENUE, 14TH FLOOR
NASHVILLE, TENNESSEE 37243

November 6, 2023

Misti Baker
Special Project Coordinator
South Central Tennessee Development District
101 Sam Watkins Blvd
Mt. Pleasant, TN 38474

Re: State Letter of Acknowledgement for the South Central Tennessee Development District
Brownfields Assessment Coalition Grant Application

Dear Ms. Baker,

The Tennessee Department of Environment and Conservation (TDEC) is pleased to acknowledge your efforts to apply for a \$1,500,000 US Environmental Protection Agency (EPA) Brownfields Assessment Coalition Grant for Phase I and Phase II Assessments in thirteen counties in your region (Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, and Wayne Counties), partnering with non-lead members Lincoln County and the City of Shelbyville.

Since many brownfields are abandoned, underutilized, and/or contaminated, TDEC is expressly interested in seeing areas in our state take the initiative to return these sites to productive uses. This effort is also consistent with our mission to enhance the quality of life for citizens of Tennessee and to be stewards of our natural environment. In cooperation with Region 4 EPA, the TDEC brownfields staff will provide technical support and oversight for your grant.

We greatly appreciate your efforts to address brownfields in your 13-county region in South Central Tennessee!

Sincerely,

Paula Middlebrooks

Paula Middlebrooks
State of Tennessee Brownfields Redevelopment Program
Tennessee Department of Environment and Conservation

1. Project Area Description & Plans for Revitalization, a. Coalition Members, Target Areas & Brownfields, i. Coalition Members:

The South Central Tennessee Development District (SCTDD) is a legislatively created special district political subdivision of the State of Tennessee and is classified as a Development District under the Development District Act of 1965. The SCTDD (Coalition Lead, pop. 453,631 – 2021 ACS) is an association of 35 municipal and 13 contiguous county governments (in Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, and Wayne counties) centered in rural south-central Tennessee, approximately 45 miles from Nashville along I-65 (the “Region”). Our mission is to advocate and promote economic and community development within the Region particularly in rural, low-income, and underserved communities.

With our non-lead members, Lincoln County (pop. 35,042) and City of Shelbyville (pop. 23,005), both local units of government, we comprise the SCTDD Coalition (Coalition). Lincoln County and Shelbyville are non-lead members of the Coalition because they don’t have the capacity to apply for and manage brownfields grants, partly due to their size and their lack of access to brownfield resources to address their brownfields on their own. SCTDD

1.a.ii. Overview of Brownfield Challenges and Description of Target Areas: The Region consists of many small to medium-size communities that historically grew as agricultural centers, but after World War II shifted more to numerous industries including forest products, stone & gravel, defense, furniture, automotive manufacturing and products, electronics, and medical products. More recently, tourism, real estate, property management/renting have become more prominent industries in the Region. Although communities in the SCTDD are not traditional “rust belt” communities, we have historically depended greatly on industry to provide quality employment for our residents. Industry and commerce grew in our downtowns alongside neighborhoods, allowing residents to work near their homes. Unfortunately, as surrounding industry has waned since its peak in the 1950’s, our communities have experienced a steady decline in prosperity due to the closure of businesses, the transfer of manufacturing jobs overseas, and increased automation. Closures and manufacturing/service industry reductions at local facilities in SCTDD communities (Aerospace Testing Alliance, Goodman Manufacturing, General Motors, Walker Die Casting, Ryder, Kirchoff Automotive, National Pen, etc.), resulted in over 11,000 jobs lost in the Region the last 12 years (TN Dept. of Workforce Dev. (TN DWD)), devastating many of our communities that have not fully recovered from deindustrialization that started in the 1980s and escalated after the 2008 global financial crash. **This left behind hundreds of brownfields throughout our Region, totaling more than 1,000 acres of blighted or underutilized land, much of it within or adjoining poor neighborhoods and our downtowns, both in urban and rural areas.**

If awarded, SCTDD will utilize funding from this FY24 EPA Brownfields Assessment Grant to assess eligible sites in communities throughout our 13-county service area (as described in 1.a.i.). We have chosen three target areas as our focus where EPA Brownfields Assessment Grant funding will have the greatest initial impact and move these sites towards redevelopment.

Shelbyville Target Area (STA) – consists of a 0.6-mile-wide corridor that runs from the southwest city border to the northeast (intersection of Martha St. & Hobson St.) in the southwest portion of Shelbyville. The STA covers an area of 1.6 mi² in portions of census tracts (CT) 9506 and 9504.01. The STA contains numerous closed and underutilized former industrial brownfield properties that are adjoining low-income, high poverty neighborhoods. We are focusing on two large brownfields sites, one a former pen & pencil manufacturer and the other a former dogfood manufacturing plant for this target area.

Lincoln County Target Area (LCTA) – is bound by Lowel Dr. to the north, High Ave. to the east, Edison St. to the south, and Main Ave. to the west in the northeast portion of Fayetteville. The LCTA covers an area of 1.4 mi² in CT 9754. The LCTA contains several closed former industrial and commercial brownfield properties adjoining low-income neighborhoods. We are focusing on two large brownfields sites, one a former wire & steel manufacturer and the other a former yarn mill for this grant.

SCTDD Target Area (SCTA) – is bound by Fairway Dr. to the north, Morningside Dr. to the east, Mayberry St. to the south, and 9th Ave. to the west in the western portion of Fayetteville. The

SCTA covers an area of 1.44 mi² in CT 9753. The SCTA contains several closed institutional brownfield properties including a former hospital and associated sites in the midst of a low-income neighborhood. We are initially focusing on the Former Lincoln County Hospital site in this target area.

Residents living among brownfields in the STA, LCTA, & SCTA experience low income (Median Household Income (MHI) is 45% to 49% less than that in the US, and 38% to 44% less than TN) and high poverty (27% to 230% higher than in the US, and 12% to 203% higher than TN). We also have a high minority population, especially Hispanic persons in the STA (52% higher than the US and 480% higher than in TN) (see 2.a.ii)(2021 ACS).

The financial challenges experienced by our target area residents have perpetuated a cycle of low-quality jobs; inadequate affordable housing; unhealthy nutritional options; insufficient park/recreational space; and poor community walkability, resulting in social and economic constraints that threaten their physical and financial wellbeing. In addition, none of our target area communities have a Tax Incremental Financing (TIF) district, which has turned away numerous potential investors. We recognize the great redevelopment potential of the STA, LCTA, and SCTA and are making a focused effort address priority brownfields (1.a.ii) and leverage additional funding for these hardest hit parts of our communities where redevelopment investment has the greatest opportunity for success. We are already working hard to repurpose and reshape the businesses and commerce of the STA, LCTA, and SCTA including: the \$1.8M construction of a new sewage pumping station in Shelbyville using a Site Development Grant, and county and city funds to adequately service the Shelbyville/Bedford County Industrial Park; the \$654,000 rehabilitation of 6,750 linear feet of sidewalk along perimeter of Deery Street/Depot Street/Lane Parkway (location of the Mars Dog Food priority brownfield site in Shelbyville) using CDBG and city funds; and the \$757,000 construction of industrial pads at the Runway Center Industrial Park in Fayetteville, Lincoln County, using Fayetteville-Lincoln County Industrial Development Board and Site Development Grant funds, show that we are making an effort revitalize our communities. We believe that strategic investment of EPA assessment funds will revitalize our target areas, making our communities more attractive to new businesses, developers, visitors, and residents.

1.a.iii. Description of the Priority Brownfield Site(s): There are more than 60 brownfield sites in the STA, LCTA, and SCTA combined, ranging in size from less than an acre to over 100 acres in size. Table 1 presents our priority sites that offer the greatest opportunity to trigger successful reuse/resurgence in our target areas. The historical/current uses, likely environmental issues, potential health effects from exposure to these sites, and planned reuses are listed below.

Table 1 – Priority Brownfield Sites and Impacts

Priority Site, Size, Proximity to Target Area Residents	Historic Use / Current Use & Condition / Planned Reuse	Suspected Contaminants*
Elk Yarn Mill, Hwy 231 N, Fayetteville (in LCTA) – 15.4 acres; adjoins low-income neighborhood; adjoins creek	Former cotton mill / Vacant buildings / light industrial or warehousing	PCBs, metals, petroleum, VOCs, PAHs, asbestos, lead paint
R & B Wire & Steel, 4071 Thornton Taylor Pkwy, Fayetteville (in LCTA) – 4.7 acres in commercial area; adjoins residential properties	Former wire manufacturer / Vacant buildings / Multi-tenant commercial redevelopment	PCBs, metals, petroleum, VOCs, PAHs, asbestos, lead paint
Lincoln County Hospital, 700 Maple St, Fayetteville (in SCTA) – 6 acres in low-income neighborhood; adjoins daycare center	Former hospital / Vacant buildings / Mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs, asbestos, lead paint
National Pen, 342 Shelbyville Mills Rd (in STA) - 108 acres, adjoins low-income neighborhood; adjoins Duck River	Pencil & ink pen manufacturer / Vacant buildings / New industrial redevelopment or greenspace	PCBs, metals, petroleum, VOCs, PAHs, asbestos, lead paint
Mars Dogfood Plant, E Depot St (in STA) – 24 acres in old industrial/commercial area; adjoins low-income neighborhood	Former dogfood manufacturer / Vacant-underutilized / Mixed-use redevelopment	PCBs, metals, petroleum, VOCs, PAHs, asbestos, lead paint

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

These sites are our highest priorities because they will meet immediate needs in our target areas, align with our revitalization plans, and redevelopment is imminent due to funding already committed (**City of Shelbyville Multi-use path and River overlook for \$1,379,613 for construction with a 20% match from the City of Shelbyville for \$275,922.60**). The investment to redevelop historic structures, residential/mixed-use commercial assets, and greenspace amenities on priority brownfield properties in our target areas and throughout the SCTDD (we have an initial inventory of over 100 brownfield properties) will serve as examples of success, triggering further investment. For example, the R&B Wire & Steel site potentially impacts the adjoining neighborhood with historical solvents or other industrial chemical releases. The city has plans to repurpose this site, removing the environmental and health threats and transforming it into a much-needed multi-tenant commercial development, bringing desperately needed high-paying employment to this part of our community (as specified in our Revitalization Plans (1.b.i.)).

1.a.iv. Identifying Additional Sites: Our focus at the outset of this grant will be the STA, LCTA, and SCTA. If we complete assessment of all priority sites, additional sites will be identified using the brownfield inventory and community input and will meet the demographic and environmental justice conditions used to define our disadvantaged STA, LCTA, and SCTA, which means they will be in an underserved community and/or a disadvantaged census tract (as defined by EJScreen and/or CEJST).

1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans: Our Coalitions 2023 SCTDD Comprehensive Economic Development Strategy, 2022 Shelbyville Comprehensive Plan, Fayetteville Downtown Master Plan, and Fayetteville Greenway & Blueway Master Plan (Revitalization Plans) specify revitalization of the STA, LCTA, and SCTA target areas as a key initiative and outline critical infrastructure and renovations to enhance our role as a regional economic hub. This mix of brownfields to industrial and mixed-use commercial/residential redevelopment and increased walkability/connectivity in the STA, LCTA, and SCTA will allow target area residents to live, work, shop, and recreate within their neighborhoods and throughout target area communities.

The SCTDD Coalition is requesting \$1,500,000 in grant funding, which is essential to complete environmental assessments of target area priority brownfields. The key to revitalization of our target areas and other portions of the Region is brownfields reuse, for which this EPA brownfields grant is vital. These funds will help us reach redevelopment goals outlined in our Revitalization Plans, tackling environmental challenges associated with the highest priority sites within the STA, LCTA, and SCTA, triggering further environmental and redevelopment funding (1.c.i). Increasing our stock of mixed-use commercial/residential properties and accessible owner-occupied, moderate-income housing near our commercial centers will alleviate our housing shortage and aligns with our goal to increase the walkability/connection of our downtowns to area neighborhoods. Revitalizing the former R & B Wire & Steel site and the former Yarn Mill to become a multi-tenant commercial development and light industrial development or warehousing, respectively, will bring much needed jobs to the LCTA and Fayetteville. Plans are underway to revitalize the former National Pen site to remove blight and attract new industry, potential high tech redevelopment, or create greenspace, benefiting the residents of the STA and Shelbyville. Assessment and redevelopment of the former hospital site in the SCTA would remove the threat of potential environmental contaminants to the surrounding neighborhood and provide a centrally located mixed-use commercial/residential development. The revitalization efforts for our priority sites will create needed jobs, affordable housing, and walkable greenspace within our target areas, improving our residents' quality of life and meeting the visions outlined in our Revitalization Plans. **Significant resources have already been pledged for reuse of STA, LCTA, and SCTA properties (1.c.i), including infrastructure improvements along the Deery Street/Depot Street/Lane Parkway which fronts the former Mars Dog Food priority brownfield site in the heart of the STA.** With EPA funds to cover environmental assessment and planning costs, we will realize the outcomes and benefits outlined below.

1.b.ii Outcomes & Benefits of Reuse Strategy: Assessment and reuse of priority sites such as the former Mars dogfood plant site will remove environmental threats, eliminate blight, reduce crime, and stimulate private sector investment in surrounding properties. This in turn will be linked to successful

reuse outcomes, creating equitable, affordable housing; improving the economic competitiveness of our target area; leveraging current and future investments; and creating unique, healthy, safe, and walkable neighborhoods, particularly in our target areas, where a large number of our low-income, minority, and other sensitive populations reside, supporting environmental justice goals. Reuse of brownfields will also generate higher tax revenue for our communities, and through increased investment, new jobs will be created, new residential units will be constructed, and property values will rise. **Reuse/redevelopment of all Table 1 properties will create an estimated 1,950 construction jobs and over 1,200 permanent jobs and will generate more than \$8.6M in annual income and property tax revenue combined for the target area communities, according to projections.**

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

L.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse: Our target communities have a history of leveraging investment in projects. For example, Shelbyville and Fayetteville have leveraged over \$3.6M in grant funding to improve their industrial parks, streets, sidewalks, greenways, and other infrastructure over the past several years to help revitalize the community. More investment is planned, focusing on the STA, LCTA, and SCTA as outlined below.

- *Private/Public Funding* – see above
- *EPA* - Additional EPA Assessment, Cleanup, Multipurpose, and Revolving Loan Fund (RLF) to further the brownfield reuse goals of the city (\$500K-\$5M)
- *EPA – Targeted Brownfield Assessment Program* – provides Phase I & Phase II assessments, and cleanup planning for eligible brownfields properties (\$50K-\$100K)
- *Federal Highway Administration* - Infrastructure improvements like streets & pedestrian/bicycle pathways (Est. \$5M+)
- *Tennessee Department of Environment and Conservation (TDEC) Brownfield Area Redevelopment Fund* - Provides grants, targeted for investigation and remediation/mitigation at brownfield sites, to local governments for local investments in brownfield sites (up to \$500K per year)
- *South Central Tennessee Development/USDA Rural Development Intermediary Relending Program* - provides loans for development projects in rural areas within the SCTDD 13-county service area (\$250K)
- *South Central Tennessee Development/EDA Revolving Loan Fund (RLF) Program* - RLF funds are intended to provide bridge or gap financing for projects in rural or urban areas that would not otherwise be able to be completed (\$250K)
- *Tennessee Brownfields Redevelopment Tax Credits* - Tax Increment Financing (TIF) and Franchise/Excise Tax Credit for qualifying development projects enrolled in the TDEC Voluntary Oversight and Assistance Program (\$ variable)
- *Community Development Block Grant* – available to non-entitlement communities for projects that eliminate blight, benefit low-moderate income citizens, and/or address imminent health & safety problems (\$400K-\$600K)
- *TN Main Street Program* - revitalize community traditional downtowns (up to \$600K);
- *TN Department of Economic Development/Community & Rural Development Program Petroleum Underground Storage Tank Fund* - State insurance funding for investigating and

remediating eligible petroleum contaminated sites with underground storage tanks (up to \$2M)

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

1.c.ii. Use of Existing Infrastructure: Land use goals in our Revitalization Plans emphasize the build-out of existing parcels, and rehabilitation and infill development in our community's core neighborhoods in our target areas before additional land is considered for development. All priority sites have full utilities already present including 3-Phase electricity, natural gas, city water and sewer, telephone, and fiber optic service. Redevelopment will utilize these existing services and other physical infrastructure such as roads, curb cuts, on- and off-street parking, commerce (I-65, US 41, SR 431, & SR 231), and Fayetteville/Lincoln County's and Shelbyville's greenway trail systems to attract new investment in area brownfields, reducing redevelopment costs of these sites. Traditional transportation infrastructure will be complemented by pedestrian connectivity, bicycle improvements, and universal accessibility. Our utility infrastructure is large and robust enough to handle the added capacity and need brought by the planned redevelopment in our target areas. Revitalization ranging from mixed use commercial/residential to light industrial existing infrastructure will allow for easy access to developers and enable residents the opportunity to work and live in the same neighborhood.

2. Community Need and Community Engagement, a. Community Need, i. The Community's Need for Funding: SCTDD needs EPA's financial assistance because we do not have the necessary funds for environmental assessments in our general budget (\$26.5M FY24) to address brownfields anywhere in our community, let alone in our target area. Indicators of need in the STA, LCTA, and SCTA are evident in numerous key economic-demographic factors: **MHI for the STA, LCTA, and SCTA is 45%, 46%, and 49% less than the US, and is 38%, 40%, and 44% less than TN, respectively). Poverty in the STA, LCTA, and SCTA is 44%, 27%, and 230% higher than the US, and is 26%, 12%, and 203% higher than TN, respectively. Children living in poverty in the STA and LCTA are 72% and 40% higher than the US, and 47% and 20% higher than TN, respectively. Elderly living in poverty in the SCTA are 60% higher than the US, and 56% higher than TN. Our Hispanic population in the STA is 52% and 480% higher than the US and TN respectively. (see 2.a.ii) (2021 ACS).**

The large number of vacant buildings on target area brownfields has resulted in an estimated twofold increase in crime within the STA, LCTA, and SCTA when compared to other parts of their respective communities (according to community estimates), further limiting local government resources due to additional public safety services (police and fire calls) to brownfield sites. The SCTDD's priority brownfield sites further add to the financial burden of target area residents by suppressing residential property values and straining municipal budgets through a reduced tax base.

Bedford County and Shelbyville were negatively impacted by severe winter storms as indicated by the April 21, 2021 Presidential Disaster Declaration - FEMA 4594 DR. The damage caused by this disaster event in conjunction with the disastrous effects on the region as a result of COVID-19, has slowed economic recovery in many areas of southern middle Tennessee. We were disproportionately impacted by the coronavirus due to the large concentration of automotive and automotive supply industries. Repairing damaged buildings and delayed re-openings slowed the economic rebound for many small businesses in southern middle Tennessee. **The loss of over 11,000 quality jobs (Aerospace Testing Alliance, Goodman Manufacturing, General Motors, Walker Die Casting, Ryder, Kirchoff Automotive, National Pen, etc.), in the Region since 2014 (TN DWD),** has added substantially to the economic challenges facing our city, diminishing local income and property tax revenues, and increasing poverty in our communities. The Goodman Manufacturing closure, taking away 1,800 jobs in Lincoln County was devastating and we still have not fully recovered from the loss of such a large employer. Because of our communities' small populations, and with budgets barely able to provide essential services and needed infrastructure maintenance, our target area communities lack the discretionary funds necessary to complete the proactive assessment or remediation, and reuse planning activities that this grant will provide, including clarifying environmental issues on brownfield sites, encouraging developers to seek and invest in them, and eliminating risk to the health and wellbeing of our residents and environment. Ultimately, this EPA grant will allow SCTDD to fulfill the revitalization needs for our target areas and beyond, creating unique, healthy, safe, and walkable

neighborhoods.

2.a.ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations: Our community’s most sensitive populations (low-income residents and individuals living in poverty, especially children & elderly and Hispanic population (in STA)) (Table 2), live in and around our STA, LCTA, and SCTA brownfield sites that are often unsecured, and trespassers (including children), risk exposure to toxic chemicals, asbestos, causing soil and groundwater contamination, and unsafe structures,

Table 2	US ¹	TN ¹	STA ¹	LCTA	SCTA
Median Household Income	\$69,021	\$61,944	\$38,328	\$37,375	\$34,998
Percent Minority	40.6%	27.1%	31%	31%	30%
Percent Hispanic	18.4%	5.8%	28%	2%	2%
Individuals Living in Poverty ²	12.6%	14.3%	18.1%	16%	29%
Children Living in Poverty ²	17%	19.9%	29.3%	23.8%	12.9%
Elderly Living in Poverty ²	9.6%	9.8%	3.5%	3.5%	15.3%
¹ Stats from 2021 ACS ² Last 12 months					

Contaminants such as PCBs, metals, petroleum, VOCs, PAHs, glycols, lead paint, and asbestos are potentially causing harm to our sensitive populations. 63% of houses in City of Fayetteville were constructed before 1980, making them much more likely to contain lead-based paint, a significant threat to young children and pregnant women. **For example, the former National Pen site, adjoining a low-income neighborhood, is potentially impacted with petroleum, VOCs, PAHs, metals, asbestos, and other contaminants that are known to cause various cancers and liver diseases which are experienced by STA, LCTA, and SCTA residents at higher rates than TN and the US (2.a.ii(2)).** The proximity of brownfields to low-income neighborhoods in our STA, LCTA, and SCTA drives down housing values, suppresses commercial investment, and limits residents’ access to adequate employment, resulting in a disadvantage for STA, LCTA, and SCTA residents with no relief in sight.

An infusion of funding from this EPA grant will provide much needed capital for the assessment of blighted properties, clearing the way for remediation and revitalization of the STA, LCTA, and SCTA to include much needed affordable housing, increased greenspace, and connectivity through our growing trail system. The resulting resurgence of commerce will support new and revitalized local retail businesses which in turn will boost local employment with quality diversified jobs. Redeveloping our brownfields will increase tax revenues which will directly benefit SCTDD’s underserved and sensitive populations, including removal of blight, reducing exposure to toxic chemicals, lowering crime, providing safer neighborhoods, and better access to public services, ultimately improving the health of our communities.

2.a.ii(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Contaminants from target area brownfields are affecting the health of our residents. Many of the priority sites are believed to be impacted by PCBs, VOCs, PAHs, petroleum, metals, asbestos, lead paint, and/or other chemicals. Studies on the health effects of exposure to these contaminants has been linked to higher incidences of cancers, liver disease, kidney disease, chronic respiratory disease, asthma, heart disease, etc. As Table 3 below shows, **Lincoln and Bedford Counties have high incidences of cancers, liver disease, and Death by Heart Disease, and all very potentially linked to impacts from nearby brownfields.** Though not available at the municipal level, this data is believed to be representative of our target areas due to the large number of economically vulnerable people living in them.

Table 3 – Health Indicators

Disease/Health Condition	Bedford Co. Rate ³	Rank ¹	Difference	Lincoln Co. Rate ³	Rank ¹	Difference	TN Rate ³
Bladder Cancer ²	23.2	26 th	12% higher	---	---	---	19.8

Colorectal Cancer ²	---	---	---	44.8	28 th	14% higher	39.2
Brain Cancer ²	---	---	---	8.2	6 th	26% higher	6.5
Liver & Bile Duct Cancer ²	12.7	6 th	48% higher	---	---	---	8.6
Death by Chronic Liver Disease & Cirrhosis ⁴	16.7	33 rd	22% higher	---	---	---	13.7
Death by Heart Disease ⁴	253.9	22 nd	24% higher	278.8	13 th	37% higher	204
¹ Out of 95 TN Counties ² Source: 2016-2020 TN State Cancer Profiles ³ Incidence per 100K Residents ⁴ TN Mortality Table							

There are 1,839 SCTDD properties with environmental records on EPA’s Envirofacts Mapper. The cumulative effects of these sites likely contribute to the adverse health conditions impacting our residents. **Removal of sources of environmental contaminants present at brownfields in our target areas will reduce exposure of our underserved populations to these materials and in turn, reduce disproportionate incidences of disease and other poor health outcomes that these residents currently experience.**

2.a.ii(3) Environmental Justice (a) Identification of Environmental Justice Issues: The public health impact from STA, LCTA, and SCTA brownfields and industrial operations, and their proximity to our underserved populations, including low-income and minority residents, has disproportionately exposed them to environmental pollutants, resulting in an inability to maintain their health and wellbeing. **EPA’s EJScreen tool indicates that STA residents are in the 81st to 83rd percentile for Air Toxics Cancer Risk; 89th to 91st percentile for Toxic Releases to Air; 84th to 89th percentile for Underground Storage Tanks; and 85th to 90th percentile for Lead Paint when compared to the US and TN. LCTA residents are in the 83rd to 86th percentile for Low Income Population; 88th to 90th percentile for RMP Proximity; the 76th to 85th percentile for Lead Paint; and 79th to 85th percentile for Underground Storage Tanks when compared to the US and TN. SCTA residents are in the 84th to 85th percentile for Unemployed; 78th to 82nd percentile for RMP Proximity; 69th to 73rd percentile for Lead Paint; and the 77th to 78th percentile for Superfund Proximity when compared to the US and TN.**

The Climate and economic Justice Screening Tool (CEJST) identifies the SCTA as Disadvantaged for 2 categories including: Health and Climate Change (expected population loss rate, Diabetes, and Heart Disease). The STA is identified as Disadvantaged for 1 category: Legacy Pollution (proximity to Risk Management Plan facilities and Low Income). **3 of the 5 priority brownfields sites in 1.a.ii are located within a disadvantaged CEJST census tract.**

2.a.ii(3)(b) Advancing Environmental Justice: Brownfield assessment, cleanup, and reuse strategies will improve the welfare of our sensitive populations in the STA, LCTA, and SCTA by eliminating the health risks they pose, and this EPA grant will play a crucial role, reducing threats by funding environmental investigation work needed to trigger stalled cleanup and redevelopment on priority sites. New jobs in our target area will create gainful employment for residents, reducing poverty, minimizing displacement, and improving the state of our housing by redeveloping some sites as low-income residential. For example, repurposing the former hospital site in the SCTA will eliminate blight, reduce potential exposure to contaminants, provide needed mixed-use commercial/residential development and jobs to the community, and minimize displacement of residents and/or businesses in the disadvantaged neighborhoods surrounding this brownfield site. Grant funds will assess lead-based paint, spurring other federal programs (e.g. CDBG) to help fund lead-based paint abatement and other residential improvements. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of our community neighborhoods, incentivizing investment in other area properties. New tax revenue will be generated and reinvested in the community. **Health indicators such as deaths from cancer, liver disease, and heart disease (2.a.ii(2)) will no longer be influenced by environmental impacts caused by STA, LCTA, and SCTA brownfields. This will be accomplished in areas where low income and minority populations are concentrated, supporting environmental justice for SCTDD residents.**

2.b. Community Engagement, i. Project Involvement & ii. Project Roles: Several community organizations have pledged supporting roles for our brownfields program and grant (Table 4). This diverse assemblage of community groups is well suited to engage the community and public at a

grassroots level. They have regional influence and local ties, maximizing the benefits they bring to the project. For example, the Shelbyville-Bedford Partnership will help connect workers to job opportunities created by this grant, including temporary jobs created during the redevelopment of brownfield sites, as well as permanent jobs for new businesses on redeveloped brownfield properties.

Table 4 – Project Partners and Roles

Partner Name	Point of Contact	Description and Project Roles
Shelbyville-Bedford Partnership	Shane Hooper, President/CEO 931-735-6925 shane@shelbyville-bedford.com	Local economic development & workforce development organization – site selection & prioritization; identify potential buyers; connecting workers to job opportunities created by environmental redevelopment and end use of brownfields; disseminate information about the grant
Bedford County Planning	Chris White, Director 931-685-1336 chris.white@bedfordcountyttn.gov	Local planning & rural development organization – community outreach; provide meeting space; provide input on additional site selection & site reuse planning
Fayetteville-Lincoln County Industrial Development Board	Elaine Middleton, Executive Director 931-433-0607 elaine@flicidb.com	Business development & growth advocate – promote brownfield sites to prospective businesses; identify potential funding sources for Lincoln County brownfield redevelopment projects
Shelbyville Bedford County Chamber of Commerce	Yolanda Flick, Chief Exec. Director 931-205-2730 yolanda.flick@sbccchamber.com	Local business advocacy organization – promote brownfield sites to prospective businesses; disseminate information about brownfield sites, reuse/redevelopment; provide meeting space
Fayetteville Main Street	Aimee Byrd, Executive Director 931-557-5150 fayettevillemainstreet@gmail.com	Downtown revitalization & advocacy organization – provide meeting space; disseminate information about the grant; identify sites; provide input on redevelopment of downtown brownfield sites

2.b.iii. Incorporating Community Input: SCTDD has a culture of community involvement that we will maintain throughout this grant. **A total of 8-12 public meetings will be held during the 4 -year grant period** in various Region communities to maintain stakeholder engagement and continue to gather input on site selection, prioritization, assessment needs, cleanup decisions, mitigation measures from the cleanup and redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. In the event social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA’s Office of Land and Emergency Management *Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). The Region will be updated on progress throughout the grant and will have the opportunity to share input through comment opportunities on SCTDD and community partner websites. For residents with limited internet or cellular network access, paper surveys will be available at local businesses, enabling community input without access to digital resources. SCTDD has multi-lingual personnel available to advertise meetings, interpret presentations, or translate documents in Spanish or other languages as needed. We have already begun engaging Region residents, business owners, not for profits, churches, and other community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and a schedule for future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted through the community Planning & Zoning Departments, Plan Commissions, and Chambers of Commerce to bring awareness of the redevelopment opportunities priority sites offer. When developers are identified, they will be

invited to attend public meetings to describe their plans for reuse. As a project progresses, we will involve target area stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on reuse. As stakeholder input is received, we will evaluate it against our development goals and available resources, adopting input that feasibly meets these criteria.

3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities &

Outputs: SCTDD will begin activities immediately upon award confirmation, working to prepare a Work Plan approved by EPA's PO. No subawards or participant support costs are planned. After the Cooperative Agreement period begins, SCTDD and its QEP will complete the following tasks:

Task /Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization

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

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

iii. Task/activity Leads: SCTDD & QEP

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

Task/Activity 2: Environmental Investigation

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

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

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

iv. Outputs: 36 Phase I ESAs; QAPP, SAPs/HASPs, estimated 32 Phase II ESAs.

Task/Activity 3: Clean-up & Reuse Planning:

- i. Project Implementation:* The QEP, directed by SCTDD, will prepare site specific clean-up plans/documents including: Analysis of Brownfield Cleanup Alternatives, remediation plans, site closure letter requests, and clean-up/reuse funding development (1.c.i).
- ii. Schedule:* Prepared after Phase I and II ESAs are complete, contamination is present, and if cleanup is necessary. Task 3 activities will continue throughout the grant period.
- iii. Task/activity Lead(s):* SCTDD & QEP
- iv. Output(s):* estimated 12 cleanup planning documents

Task/Activity 4: Community Outreach & Involvement:

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

We will work diligently to ensure startup activities are completed per the schedule above. SCTDD will allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the 4-year Cooperative Agreement contract. Because there is an extremely high demand for assessments and site access has already been obtained for some of the highest priority sites in 1.a.ii, it is likely that funds will be spent prior to the end date. We are proactively communicating with representatives of privately-owned brownfields to gain access and resolve issues in anticipation of this grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and reuse, and creates a positive dialog between property owners, local government, and impacted citizens.

3.b. Cost Estimates: The costs outlined in Table 5 were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1. SCTDD will allocate \$1,326,000 (88% of total grant funds) to Phase I and II ESAs.

Table 5 Budget	Budget Categories ¹	1. Program Mgmt. Training Support, Inv / Prioritization	2.Phase I / II ESAs	3. Clean-up / Reuse Planning	4. Community Outreach & Involvement	Budget Category Total
	Travel	\$7,000				\$7,000
	Supplies				\$650	\$650
	Admin. Costs	\$18,000			\$12,000	\$30,000
	Contractual ²	\$30,150	\$1,326,000	\$90,000	\$16,200	\$1,462,350
TOTAL BUDGET		\$55,150	\$1,326,000	\$90,000	\$28,850	\$1,500,000

¹Table 5 only includes budget categories with costs. ²In accordance with Federal, State, and local procurement regulations.

Grant tasks will be completed at the anticipated costs per unit with the following anticipated outputs/outcomes:

1. Program Management & Training Support, Inventory/Prioritization: \$55,150 – *Travel:* Attend 2 National Brownfield Conferences.: airfare x 2 @ \$2,400, 2 rooms, 3 nights lodging for 2 confs. @ \$3,240, meals @ \$960, ground transportation @ \$200 = \$400, *Contractual:* total \$30,150, includes approximately 175 hrs. \$90/hr. = \$15,750 for inventory, & approximately 160 hours \$90/hr. = \$14,400 for program mgmt. *Personnel:* Direct admin. Cost includes 300 hrs. \$60/hr. = \$18,000.

2. Env. Investigation: \$1,326,000 – *Contractual:* 36 Phase I ESAs at an average cost of \$3,500 each = \$126,000, & 32 Phase II ESAs at an estimated cost of \$30,000-\$45,000 (depending on site complexity/environmental conditions) = \$1,200,000 (@ \$37,500 average cost). Though our budget will support 36 Phase I's and 32 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in 1.a.ii.

3. Clean-up & Re-use Planning: \$90,000 – *Contractual:* 12 ABCAs/Clean-up plans or Re-use plans/Design Charettes expected to cost \$5,000-\$15,000 each = \$90,000.

4. Community Outreach & Involvement: \$28,850 – *Supplies:* printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = \$650, *Contractual:* approx. 180 hours at an estimated \$90/hr. = \$16,200. *Personnel:* Direct admin. Cost includes 200 hrs. \$60/hr. = \$12,000.

3.c. Plans to Measure & Evaluate Environmental Progress & Results: We will track, measure, and evaluate progress through meeting minutes, Quarterly and Annual Financial Reports, quarterly review/analysis of grant performance, ACRES entries, and completion of Work Plan tasks. If planned outputs/outcomes are not achieved or milestones/project schedule outlined in 3.a are not being met, we will create a corrective action plan to identify deficiencies and make appropriate adjustments to achieve anticipated outputs on schedule. The Assessment Grant will also have the following measurable outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels cleaned up/redeveloped, acreage made ready for greenspace/recreation, and leveraged monies. These and other statistics will be included in Quarterly Reports and ACRES submittals as data becomes available, which will allow the EPA to better evaluate and highlight the grant program success. At the close of the grant, SCTDD staff will provide a final report to the EPA and our residents summarizing project outputs and outcomes. After evaluation of sites is done, it is in the SCTDD's best interest that redevelopment happens, and as such, close monitoring of subsequent actions will be done diligently. Outputs and outcomes following the close of the grant will be uploaded to EPA's ACRES page for continued monitoring of the program's success.

4. Programmatic Capability & Past Performance, a. Programmatic Capability, i. Organizational Capacity, ii. Organizational Structure & iii Description of Key Staff: SCTDD's Rural Planning Organization and Infrastructure Office (RPO-IO) will manage this grant. RPO-IO has previously managed many other economic development resources valued at well over \$40M over the past 10 years. RPO-IO, along with our Community and Economic Development staff, have the technical, financial, and administrative ability in place to implement this grant project successfully.

Mrs. Misti Baker, Special Projects Coordinator, will serve as SCTDD's Grant Manager. Mrs. Baker is the Solid Waste Coordinator and Housing Specialist Assistant has worked on numerous grants and special projects. She will be assisted by Mrs. Lisa Cross, RPO-IO Director. Mrs. Cross has over 24 years with governmental agencies in grant administration, grant writing, and planning for 13 counties and 35 communities. She has extensive knowledge of the South Central Tennessee Region and State of Tennessee guidelines, coordinates and conducts numerous public meetings, and is in regular communication with State of Tennessee representatives and local officials. Mrs. Cross will supervise this grant program. Baker and Cross will aggressively use their regional planning, grant administration, brownfields redevelopment, and small business growth experience to seek redevelopment opportunities for brownfield properties in the SCTDD target areas and throughout the Region.

Mrs. Anita Turnbow, Finance Director, will serve as the Grant Financial Manager and will be responsible for accounting and financial reporting. With over 20 years' experience in management and accounting and over 13 years of professional experience in governmental accounting and federal policy. Over 20 years of professional experience resulting in exceptional knowledge of financial planning, strategic planning, budgets, logistics management, program implementation and purchasing. Proficient

in grant writing, accounting and budget management.

In the unlikely event that a member of the team leaves their job prior to the completion of grant tasks, the depth of SCTDD’s team, with over 50 dedicated economic development and planning professionals, will allow for a seamless transition to other experienced members.

4.a.iv. Acquiring Additional Resources: SCTDD and our QEP will make every effort to contract with disadvantaged business enterprises (women and/or minority owned) and consultants/contractors who employ disadvantaged people, when possible, and we will require our QEP to make every effort to do the same. SCTDD staff have a history of working cooperatively with state and federal environmental agency personnel and engaging qualified environmental consultants. Through a competitive bidding and procurement process, SCTDD will select a QEP with experience administering EPA Brownfields Grants and working with the Tennessee Department of Environmental Conservation (TDEC) and the Tennessee Brownfields Redevelopment Program (TBRP). The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed 4-year project period. This team will be supported by other SCTDD departments including community and economic development, rural planning, infrastructure, finance, and housing. We will work with the Small Business Administration (SBA) to identify small businesses in the area with strong labor practices who have been vetted by the SBA as qualified to perform remediation activities and other contracted services. We will invite vetted contractors through the competitive bidding process noted above. We will also work with Shelbyville-Bedford Partnership (see 2.b.ii) to link our community members to job opportunities related to the investigation, remediation, redevelopment, and ultimate reuse of brownfields.

4.b. Past Performance & Accomplishments, ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (1) Purpose & Accomplishments:

SCTDD has never received an EPA Brownfields grant. However, we have received other federal and non-federal assistance agreements as indicated in Table 6 below.

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

Awarding Agency	Project	\$ Received	Accomplishments/Outputs/Outcomes/Measures of Success
US Department of Commerce	SCTDD/EDA Revolving Loan Program	\$1,661,000	Administer SCTBDC’s Revolving Loan Fund (Rural Development Intermediary Relending Program) and SCTDD’s EDA Loan Fund to stimulate small business. Has provided more than 94 small business loans totaling \$8.4 million to date to businesses in SCTDD’s 13-county service area.
Tennessee Department of Labor & Workforce Dev.	Workforce Innovation and Opportunity Act Dislocated Workers	\$581,139	SCTDD WIOA Program assists adults, dislocated workers, and youth within our 13-county area to attain employment with economically self-sufficient wages through work-based learning, on-the-job training, or incumbent worker training
US Department of Commerce/EDA	Economic Development Agency Planning Assistance	\$210,000	Established 2 Rural Planning Organizations in the SCTDD to enhance the professional and organizational development of rural transportation planners and others by providing information, peer networking and research initiatives

4.b.ii(2) Compliance with Grant Requirements: All funding assistance agreement terms and conditions have been and are being met for the above projects, including: providing small business loans to small businesses throughout SCTDD’s service area; providing adults, dislocated workers, and youth within our 13-county area with work-based learning, on-the-job training, or incumbent worker training; and providing RPOs to enhance infrastructure improvement in rural areas of SCTDD service area. **All grant goals and outputs/outcomes (indicated in Table 6) have been achieved to date**, all reports were completed in a timely manner, and no corrective measures have been needed. SCTDD is fully compliant with the terms and conditions of these grant programs which are ongoing.

III.B. Threshold Criteria for Assessment Grants

III.B.1 Applicant Eligibility

South Central Tennessee Development District (SCTDD) (applicant and Coalition Lead) is South Central Tennessee Development District (SCTDD) is legislatively created special district political subdivision of the State of Tennessee and is classified as a Development District under the Development District Act of 1965. (documentation attached). The applicant is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.B.2 Number and Eligibility of Non-lead Coalition Members

SCTDD (Coalition Lead) has two (2) coalition non-lead members for this application:

- Lincoln County is a non-lead member, and as a General-Purpose Unit of Local Government as defined under 2 CFR § 200.1 and a political subdivision of the State of Tennessee, is eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.
-
- City of Shelbyville is a non-lead member, and as a General-Purpose Unit of Local Government as defined under 2 CFR § 200.1 and a political subdivision of the State of Tennessee, is eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.B.3 Target Areas

Target areas for the coalition lead and non-lead members are presented in the Narrative Information Sheet.

III.B.4 Existing Brownfields Grants to Non-lead Members

SCTDD affirms that each non-lead coalition member is not the recipient of an open cooperative agreement for MARC Grant funding or a MARC Grant that closed in 2016 or later.

III.B.5 Coalition Agreement

Non-lead coalition members, Lincoln County and City of Shelbyville, have submitted signed letters of agreement to the SCTDD agreeing to participate in the Coalition (documentation attached).

III.B.6 Community Involvement

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

III.B.7 Expenditure of Existing Grant Funds

SCTDD does not have an open EPA Brownfields Assessment Grant or EPA Brownfields Multipurpose Grant.

III.B.8 Contractors and Named Subrecipients

N/A -- SCTDD has not procured/named any contractors or subrecipients.