

1. Applicant Identification

Columbus Consolidated Government  
100 10th Street  
Columbus, GA 31901-2736

2. Funding Requested

- a. Assessment Grant Type: Multipurpose
- b. Federal Funds Requested: \$1,000,000

3. Location

a) City of Columbus b) Muscogee County c) Georgia

4. Target Area and Priority Site Information

**Target Area**

Census Tracts 13215000300, 13215011400, 13215001600, 13215001800, 13215002400, 13215002500, 13215002700, 13215002800, 13215002902, 13215003000, 13215003200, 13215003301, 13215003302, 13215001400

**Priority Site 1**

Cleanup Site: Bradley Circle Properties – eight adjacent properties located in Columbus, Muscogee County, GA 31904 at these addresses:

2838 Bradley Circle	9 27th Street	2719 1st Avenue
2 27th Street	2711 1st Avenue	2805 1st Avenue
5 27th Street	2715 1st Avenue	

**Priority Site 2**

Assessment Site: Winterfield Commercial Center – four adjacent properties located at 2100, 2102, and 2200 Cusseta Road and 2111 North Andrew Circle, Columbus, GA 31903

**Priority Site 3**

Assessment Site: Southside Industrial Park – two adjacent properties located at 2702 and 2912 Martin Luther King Jr Boulevard, Columbus, GA 31903

5. Contacts

a. Project Director

Robert Scott, Director of Community  
Reinvestment  
(706) 225-3918  
scott.robert@columbusga.org  
420 East 10th Street, 2nd Floor  
Columbus, Georgia 31901

b. Highest Ranking Elected Official

B. H. “Skip” Henderson III, Mayor  
(706) 225-4712  
SkipHenderson@columbusga.org  
Mayor’s Office  
Government Center, 6th Floor  
100 10th Street  
Columbus, Georgia 31901

6. Population

City of Columbus, GA: 204,366 (US Census: 2017–2021 American Community Survey)

7. Other Factors

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	NA
The priority brownfield site(s) is impacted by mine-scarred land.	NA
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.)	NA
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4
The reuse of the priority site(s) will incorporate energy efficiency measures.	4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	4
At least 20% of the overall project budget will be spent on eligible site reuse/area-wide planning activities, as described in Section I.B., for priority brownfield site(s) within the target area.	10-11
The target area is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

8. Letter from the State or Tribal Environmental Authority

See attached.

9. Releasing Copies of Applications

Not Applicable.



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

**Jeffrey W. Cown, Director**

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**Land Protection Branch**

2 Martin Luther King, Jr. Drive  
Suite 1054, East Tower  
Atlanta, Georgia 30334  
404-656-4713

October 30, 2023

**VIA ELECTRONIC [Amanda.Herrit@terracon.com](mailto:Amanda.Herrit@terracon.com)**

Ms. Sara Janovitz, Regional Brownfield Program Contact  
US Environmental Protection Agency, Region 4  
Atlanta Federal Center  
61 Forsyth Street, S.W., 10<sup>th</sup> Fl  
Atlanta, Georgia 30303-8960

RE: State Acknowledgement Letter – Brownfield Multipurpose Grant Application  
Columbus Consolidated Government

Dear Ms. Janovitz:

This letter serves as acknowledgement from the Georgia Environmental Protection Division (“GA EPD”) that the Columbus Consolidated Government (CCG) will be submitting an application to the U.S. Environmental Protection Agency (“EPA”) for funding assistance under the federal Multipurpose Grant Program to conduct assessment and cleanup activities. GA EPD understands that CCG is applying for \$1,000,000 to address hazardous substances and petroleum.

EPD would like to take this opportunity to encourage EPA’s positive decision in making a grant award to CCG for both assessment and cleanup. A successful award would greatly assist this community in its redevelopment efforts. Thank you for your consideration.

Sincerely,



Shannon Ridley  
Brownfield Coordinator

cc: Becky H Horace, Terracon  
Tameka Gordon, Terracon

File: FFY 2024 EPA Grant Applicants, Columbus Consolidated Government-Multipurpose

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

### **a. Target Area and Brownfields i. Overview of Brownfield Challenges and Description of**

**Target Area:** Columbus, Georgia, is located at the most northern navigable point on the Chattahoochee River. Established in 1828, it quickly became densely developed with manufacturing facilities. In 1970, Muscogee County and the City of Columbus were combined into one entity, Columbus Consolidated Government (CCG), making it home to the largest Southern riverfront mill district. The Fort Benning Military Installation, located to the south of Columbus, was established in 1909 and provided basic training for World War I and World War II troops. As a result, Columbus developed with a robust industrial rail corridor, textile mill district, commercial centers, and residential neighborhoods. Textile outsourcing peaked in the 1990s, causing a significant industrial decline that left manufacturing and residential areas vacant, creating blight throughout the community.<sup>1</sup>

The **geographic boundary** for this application will be the **jurisdictional limits of Columbus-Muscogee County GA**, with a **target area focused on three neighborhoods: Mill District (Census Tracts 3, 14, 16, 114), a portion of MidTown (Census Tracts 18, 24), and Liberty District/Southside (Census Tracts 25, 27, 28, 29.02, 30, 32, 33.01, 33.02). All of the census tracts in the target area are Justice40 Disadvantaged Communities.** The target area was developed in the late 1800s and early 1900s with the majority of industry placed along the railroad corridor. During war times, Fort Benning supported the buildup of the community and economy, but after WWII with the military downsizing, many businesses closed, resulting in a continuous economic decline that was most pronounced in the 1970s. Within the Southside Corridor, the Winterfield area was once a vibrant and bustling city center. In the northern portion of the target area, the neighborhoods of Avondale and Radcliff became home in the 1940s to the first African American subdivisions, providing a thriving quality of life. These same neighborhoods lost 59% of their population between 1960 and 1980 as a result of military relocation and Urban Renewal Funding that demolished 900 housing units.<sup>2</sup> Urban Renewal projects of the 1950s–1960s historically displaced disproportionately poor and minority populations. The Cusseta Road Area Report documented that commercial properties located in this area were the most blighted in the City with abandoned buildings, unfenced junkyards, and gross neglect of properties. These conditions continued as African Americans relocated to the remaining low-income housing in Southside; by 1980 they accounted for 81% of its population. The **Southside** target area is now known as having the highest concentrations of African American residents, the highest levels of poverty, blighted properties, and crime. EPA Brownfield funding will allow the CCG to provide education and outreach to an underserved, residentially segregated community with persistent poverty (created as a direct result of Urban Renewal policies), develop a Brownfield Revitalization Plan with the direct involvement of community level organizations, and conduct assessments to address the environmental concerns of brownfield sites in a neighborhood with disproportionate impacts from environmental stressors.

ii. **Description of the Priority Brownfield Site(s):** The target area was an area of industry and vibrant residential life, but it is now plagued with blight that includes abandoned warehouses, large auto salvage yards, and derelict trailer parks. The City acquired 14 vacant commercial sites before 2002 that are within the target area and need assessment. The City will work diligently with target-area residents to identify and prioritize brownfield sites through a grant-funded site inventory.

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<sup>1</sup> John S. Lupold, "Columbus, GA," [Georgiaencyclopedia.org/articles/Columbus](https://georgiaencyclopedia.org/articles/Columbus), March 30, 2004, edited July 17, 2018.

<sup>2</sup> 1984 Cusseta Road Area Report

The CCG and target-area residents have identified three priority sites. **Bradley Circle Properties (Cleanup Site):** The CCG owns approximately 8.29 acres of land comprised of eight residential parcels located at 2838 Bradley Circle, 2 27th Street, 5 27th Street, 9 27th Street, 2711 1st Avenue, 2715 1st Avenue, 2719 1st Avenue, and 2805 1st Avenue (Mill District portion of the target area). The site was previously owned by the West Point Manufacturing Company and was deeded to the City in 1966. According to the deed, the unfenced **vacant** parcel was an unregulated landfill that was used by textile mills in this area to dump textile waste. The site was previously assessed as part of the FY17 EPA Assessment Grant awarded to the CCG. It was determined that further assessment was necessary to define the limits of contamination, and cleanup is necessary to redevelop the site. As part of this grant, additional assessment will be completed to determine the remedial actions needed, and cleanup activities will be completed to reuse the site as a public park. The Phase II Environmental Site Assessment (ESA) identified the following contaminants associated with the site from dump materials: volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), Resource Conservation and Recovery Act (RCRA) Metals, and polychlorinated biphenyls (PCBs). Additional assessment will be necessary prior to and in preparation of the cleanup activities.

**Winterfield Center (Assessment Site):** Winterfield once served as a thriving city center and later became the location of the Majestic Night Club. The club became infamous for frequent drug activity and fatal shootings. The City ultimately shut down the club and purchased the property in the interest of public safety. The site consists of five parcels, approximately 2.1 acres, and three structures that previously operated as a nightclub, car wash, auto repair facility, salvage yard, and restaurant. After acquiring the property, the City demolished all structures. The Majestic building was formerly used as a paint store in the 1950s and 1960s. Environmental concerns on the site include dumping (salvage yard); periodic leaks and drips from paint, paint thinners and other solvents, pigments, resin, and additives (paint store); lead-based paint (paint store); and inground lifts and underground storage tanks from the auto repair facility and salvage yard. This site is located adjacent to three historical dry cleaners (solvent contamination: trichloroethylene, perchloroethylene, carbon tetrachloride, and mineral spirits) and two service stations (contamination from petroleum products, solvents, and degreasers such as benzene, toluene, ethylbenzene, xylenes, lead, naphthalene, and MTBE). The City plans for the redevelopment of this commercial block as a commercial and social center for the benefit of the sensitive and underserved populations of the target area. Site assessment is needed to determine whether site cleanup is needed prior to redeveloping the site.

**Southside Industrial Park (Assessment Site):** Approximately 63 acres of industrial property (southern portion target area) contains several storage yards, two warehouses, dumping areas, remnant building pads, and neglected structures overgrown with vegetation. An industrial property since the 1940s, the unfenced facility was previously a storage yard for the railroad and was most recently a precast concrete manufacturer that had periodic leaks from equipment, degreasers, and petroleum products. Potential contaminants of concern include VOCs, SVOCs, and RCRA Metals. The CCG envisions the site as a business park that would have direct access to a railroad. Site assessment is needed to evaluate the historical use of the site for potential contaminants.

iii. **Identifying Additional Sites:** The CCG will work with city staff and elected officials, partner nonprofit organizations, community organizations, and other stakeholders to determine additional brownfield sites located within the proposed target area and Justice40 Disadvantaged Community. Through a recent windshield survey, the City has identified over 20 brownfield properties in the target area. During the grant, the City will develop an evaluation ranking system for determining

the order in which sites will be addressed. In addition, the CCG will work with the underserved community of the target area to request input, identify additional sites, and determine the sites with the highest priority. The City will take into consideration US Census and Climate Economic Justice Screening Tool (CEJST) data and work with Community Reinvestment and Planning staff to review GIS data and the property appraiser's website and further research the additional sites. The CCG will also continue to work with the Land Bank, Chamber of Commerce, and the Development Authority to identify additional sites.

**b. Revitalization of the Target Area** i. Overall Plan for Revitalization: The City has five current redevelopment plans to address the serious need to remove blight, increase tax revenues, and support the local economy within the target area: The City Mill Redevelopment Plan, the South Columbus Redevelopment Plan (SCRCP), the Benning Park Redevelopment Plan (BPRP), the River District Redevelopment Plan (RDRP), and the Midtown Redevelopment Plan (MRP). As part of the SCRCP, the areas of focus include improvements to infrastructure (connectivity for safe walking and biking), affordable housing (rehabilitation, blight removal, and senior housing), and job creation (support of small business and workforce development). Plans for the construction of affordable and senior housing at the Former Booker T. Washington site (target area) are currently underway. The BPRP promotes economic opportunity and addresses the extreme blight and poverty of the target area. The redevelopment plan identifies the following issues: aging structures (the majority of commercial/industrial buildings are over 50 years old), low property appraisal value, low property tax value, and perpetual disinvestment and underuse of properties. The RDRP identifies the primary land-use goals for the target area as infrastructure improvements, infill development, redeveloping commercial and mixed-use nodes, and creating a walkable community with pedestrian/bike-friendly improvements. The MRP was developed to encourage the redevelopment of a poverty-stricken neighborhood with high crime rates. With few greenfield sites, redevelopment will be necessary to improve blighted properties, increase property values, and improve tax revenues. The goals of this plan include redeveloping industrial/commercial corridors and encouraging infill and mixed-use development strategies.

The City's reuse plans for the three priority sites directly align with the current redevelopment plans. The City plans to develop the **Bradley Circle properties into a park for an underserved neighborhood without direct access to green space**. A park will remove blight from the neighborhood and provide a place for safe recreation. For **the Winterfield Commercial Center**, the City plans to transform the site into a **community outreach/health center, neighborhood safety center, and fresh food market**. The auto repair/ carwash and restaurant properties are planned as zero lot line commercial storefronts to promote a more walkable connection to the street and a pedestrian-friendly community. The **Southside Industrial Park redevelopment will provide job opportunities for target-area residents**, who suffer from high unemployment rates (14%).<sup>3</sup> This site will be within walking distance for many residents. Assessments of the priority sites and additional brownfield sites will serve as a critical link to bring underused properties back into productive use, thereby increasing property values and tax revenues.

ii. Outcomes and Benefits of Overall Plan for Revitalization: As described in the redevelopment plans, the target area is an underused, **poverty burdened, distressed neighborhood, with substandard housing** that is primed for economic redevelopment. This area has the existing infrastructure including railroads and roads and a location necessary to re-establish itself as a prosperous live-work neighborhood. The proposed redevelopment of the **Southside Industrial Park** as a business park **strategically located along the railroad main line** would remove blight,

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<sup>3</sup> US Census: 2017–2021 American Community Survey

reduce exposure to environmental threats, bring jobs (approx. 50), raise property values, and increase tax revenue in a historically segregated neighborhood area with high poverty and unemployment rates while also providing direct access through the existing railroad and road system to transport goods and services to this area (**economic benefit**). The redevelopment of the **Winterfield Commercial Center** to include storefronts (approx. three businesses creating 20 jobs) for a community health center, fresh food market, and neighborhood safety station (**noneconomic benefit**) will improve access to healthcare, healthy food options, and safety. The **Bradley Circle Neighborhood Park** will provide the target area with green space (walking track, playground, exercise stations) that is sorely needed in this distressed and underserved community (**noneconomic benefit**).

CCG will educate the community and developers on available incentives for energy-efficient buildings and renewable energy sources and **will encourage redevelopment to use energy-efficient sources and renewable energy** as part of their redevelopment strategy. To promote community resilience, the CCG will work with developers to promote sustainability, improve multimodal transportation, and encourage the use of renewable energy sources to help reduce anthropogenic pollutants.

**c. Strategy for Leveraging Resources** i. Resources Needed for Site Reuse: The CCG as a local unit of government is eligible to pursue private, state, and federal grant options to further redevelopment efforts. The South Columbus Redevelopment Plan identifies public and privately funded programs (revolving loan, workforce development, building repair) that will assist with target-area redevelopment. The target area has three designated Tax Allocation Districts (TAD), Benning Park TAD, River District TAD, and MidTown West TAD. TAD funding will support infrastructure improvements, environmental assessments, and demolition, when necessary, to offset costs and encourage investment in this area. Transportation Special Purpose Local Option Sales Tax (TSPLOST) funding is also available to address streetscape improvement as part of a brownfield redevelopment plan. The CCG has committed funds for the demolition of blighted structures in the target area and will continue as sites are assessed and remediated for this brownfield project. The CCG has purchased multiple properties for redevelopment as part of the Community Development Block Grant (CDBG) within the target area. As identified in the South Columbus Redevelopment Plan, CDBG funds may also be used to demolish buildings or conduct environmental assessments, as necessary. The target area is located within Opportunity Zones (CTs 25, 27, 28, 29.02, 30, and 32), which provides tax incentives for developers to invest and support redevelopment. GA EPD-Brownfield Program enrolled properties may have eligible expenses recouped through tax abatement. The City may use these tax incentives to attract potential investors to properties assessed with grant funding. For sites that require cleanup, the CCG will apply for EPA Brownfield Cleanup Grant funding.

ii. Use of Existing Infrastructure: The CCG's plans for redevelopment within the target area uses existing infrastructure including water/sewer, streets, transportation, and power. The infrastructure to support brownfield redevelopment is already in place at the priority sites and in the target area. As redevelopment continues, infrastructure needs will be evaluated to consider immediate and future requirements for new infrastructure (e.g. new sidewalks to improve neighborhood walkability/accessibility).

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need** i. The Community's Need for Funding: The target area is a historically economically depressed area with the **highest concentrations of minority populations** in the City. The target area has experienced a **significant economic decline since the 1970s** and will

need public/private investment for a positive, long-term impact on its residents. The target area (CTs 3/14/16/18/24/25/27/28/29.02/30/32/33.01/33.02/114) has an average poverty rate of 44% with **59% of children living in poverty, an average median household income of \$23,245, per capita income \$15,101, and unemployment 14%**, significantly higher than the US rate by several multiples: poverty rate 13% (US); children living in poverty 17% (US); median household income \$69,021 (US); average per capita income \$37,638 (US); and unemployment September 2023 3.8% (US).<sup>4</sup>

The CCG lacks available funding for environmental assessments of the magnitude that would be necessary to redevelop this high poverty, minority community due to the 1983 residential tax freeze. The tax freeze severely limits the CCG's available funding resources and hinders future redevelopment efforts. Due to increased crime rates during COVID, a significant amount of the City's budget is allocated to the police department. The cost of other city services has increased due to a lack of sufficient supplies and a reduced workforce. The EPA Brownfield Grant funding will serve as a critical link to break the cycle of generational poverty and high crime rates and will ultimately bring back a sense of community.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: The sensitive populations living in the target area are **minorities**, largely African American (70% for the target area, US 13%), **female head of household** (48%, US 25%) and **children living in poverty** (59%, US 17%).<sup>4</sup> Families living at the poverty level and their children were most affected by the declining economic conditions (per capita average income \$15,101).<sup>4</sup> Historically, there has been a concentration of poverty within the target area (41% in 2000, 39% in 2010, 48% in 2020) with 43% of the residents dependent on government food assistance and the ability to improve their situation made more difficult by limited job opportunities (unemployment 14%).<sup>4</sup>

Although census-tract/target-area health data is not available, the Health Department has noted the following associated health factors for Muscogee County: 12% of the population has limited access to healthy food, 21% is threatened by food insecurity, and 30% of adults are obese. According to the USDA Food Access Atlas, the majority of the target area is a **food desert** with limited access to food and **35% of the target area has no access to a vehicle**.<sup>4</sup> Access to a health center and fresh food through the proposed reuse for the Winterfield Center will help to address these issues. Target-area residents experience **limited access to green space** within walking distance of their neighborhoods. The **proposed reuse of the Bradley Circle site as a neighborhood park** will provide access to green space and help to improve the health outcomes for this neighborhood.

Many properties within the target area are vacant or abandoned, creating a source of blight for the community and an opportunity for squatters, vandals, and unwanted illegal activity. These sensitive populations are living in a community where their welfare is jeopardized daily by high levels of blight, abandoned properties, and crime. The target area represents 3% of the City's total land area, but it has **38% of the City's major crimes, with 58% of murders, 37% of rapes, and 63% of assaults**.<sup>5</sup> Crime data is not available at the census tract level. The obvious blight of vacant properties remaining from the textile industry and commercial uses has produced an economic and social drain, resulting in gradual disinvestment. The proposed reuse of the Southside Industrial Park will replace an underused property with a business park that will create jobs. Site assessments funded by the Brownfield Program will assist the community in facilitating the identification and reduction of environmental threats and will remove blight, promote community revitalization, and

<sup>4</sup> US Census: 2017–2021 American Community Survey

<sup>5</sup> Columbus Consolidated Government Police Department. Crime Data. 2021.



provide opportunities for job creation. Based on the proposed reuses for the Winterfield priority site, the proposed food market, community health center, and neighborhood safety center will help alleviate these welfare issues and promote a rippling effect of community rehabilitation.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: The Centers for Disease Control and Prevention's (CDC) Community Health Status Indicators (CHSI) found Columbus to have a **higher-than-average mortality rate for cancer**, heart disease, Alzheimer's, diabetes, and stroke and higher morbidity rates for diabetes, obesity, and cancer. The Muscogee County Health Department reports the County has higher rates of premature death from **chronic lower respiratory diseases (asthma)** (target area 5.8%, GA 5.7%). The EJ Screen Report indicates that the target area has **higher levels of asthma risk (98th percentile in GA)**. The National Cancer Institute reports that the County has higher rates (cases per 100,000) than most of the state for the following cancers: Non-Hodgkin lymphoma (County 20, GA 18, US 19), liver (County 11, GA 8, US 8), colon/rectum (County 47, GA 42, US 39), leukemia (County 15, GA 15, US 14), lung (County 66, GA 64, US 59). (Census-tract/target-area cancer rates are not available). These figures are troubling considering the presence of **cancer-causing contaminants at all of the priority sites**, such as trichloroethylene, asbestos, and benzene. The potential risk from soil vapor intrusion is also higher for sensitive populations, including pregnant women and young children living near these commercial and industrial facilities, and can lead to respiratory illnesses such as asthma and birth defects. Without the EPA Brownfield Grant funding for site assessments, the CCG will be unable to identify potential contaminants throughout the target area that can exacerbate underlying health conditions.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: The target area has a long and devastating legacy of environmental-related consequences from industry practices, government policies, and long-term private and public economic disinvestment. Historically, factories and mills were constructed with nearby worker housing. The industrial age of the late 1800s to early 1900s brought jobs and prosperity to the area, but also the unknown consequence of environmental contamination. Based on the known industrial practices on properties in the target area, the potential for environmental threats includes heavy metals, VOCs, SVOCs, and pesticides on these industrial properties and properties located within the immediate vicinity of these operations.

Due to factory closures, the target area was identified as an area of urban blight in the 1950s–1960s. As a result, approximately **900 residential structures were demolished with Urban Renewal funding**.<sup>6</sup> These projects were located throughout the US, and minority and impoverished neighborhoods were threatened, including the target area. Poor families and sensitive populations of color were displaced by the government's seizure of their residences, with property owners not only losing their housing but also their source of generational wealth. It has been documented in similar communities that it takes several generations to recover from the government's taking of property through eminent domain without fair and reasonable compensation. Without an implemented plan for redevelopment, the majority of the urban-renewal razed properties remain vacant to this day. As an indirect effect of the multiple brownfield properties and urban renewal areas, crime increased, more businesses closed, and residents of means continued to leave the target area's distressed neighborhood. As a result of government-implemented policies, the population was replaced with a **persistently poor, racially segregated population** with limited access to quality education, healthcare, public transportation, and job opportunities. The high levels of environmental threats, crime, and poverty have led to the perpetual disinvestment of the target area.

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<sup>6</sup> 1984 Cusseta Road Area Report.



**Columbus Consolidated Government, GA  
FY2024 US EPA Brownfields Multipurpose Grant**

Based on the COVID-19 Community Vulnerability Index (CCVI), Columbus is identified as a highly vulnerable community (0.98/1). The CCVI is based on socioeconomic status, minority populations, and access to affordable housing, public transportation, and quality healthcare. The index shows how the cumulative impacts experienced by this distressed community have also led to more vulnerability and greater stressors during and post-pandemic. The CJEST and EJ Screen Report indicates that the target area has **higher rates of asthma** (98th percentile), **lack of health insurance** (77<sup>th</sup>), low life expectancy (78th), low income (94th), unemployment (88th), hazardous waste proximity (80th), and close proximity to extremely hazardous substances (RMP facilities, 92nd). The Brownfield Grant will provide the underserved and threatened community with the ability to redevelop/reuse sites and promote community revitalization by reversing environmental justice issues that have plagued this community for decades.

(b) Advancing Environmental Justice: The CCG will work with community partners, stakeholders, city staff and elected officials to create plans to redevelop brownfield properties while also considering the potential impacts of residential and commercial business displacement and the potential effects of gentrification. The City will promote policies to allow for the continued availability of affordable housing so that residents can remain in their neighborhoods. The CCG will work to involve the community in redevelopment plans and policy development to encourage residents to provide input throughout the process. Such policies may include subsidizing leases, anti-eviction policies, and property tax assistance for housing and small businesses to help maintain residents and small businesses in their neighborhoods. Although **none of the planned redevelopment discussed in this grant application will displace businesses or residents**, the CCG will employ redevelopment strategies to prevent/minimize the potential of any future displacement.

**b. Community Engagement** i. Prior/Ongoing Community Involvement: The CCG staff, elected officials, community partners, and stakeholders have been involved in the Columbus Brownfield Program since 2016. The community was involved in FY17 EPA Brownfield Assessment Grant and FY19 EPA Brownfield Cleanup Grant. Community members have attended community meetings and workshops and have received social media and email correspondence throughout the grant periods. Since the FY19 Cleanup Grant, community engagement has specifically included the target area for this grant application. With the support of the organizations listed below, community engagement will continue in support of this FY24 EPA Brownfield Multipurpose Grant.

ii. Project Involvement & iii. Project Roles

Name of Org.	Point of Contact	Specific involvement in the project
South Columbus Church Organization <b>(Local Community Organization)</b>	Reggie Williams pastorreggie04@gmail.com	Led by Pastor Williams, the South Columbus UMC and other target-area churches will provide grant status updates to the community (distribution of flyers, social media posts, and word of mouth), assist with <b>community outreach</b> , and provide meeting space.
The Housing Authority	Laura Johnson ljohnson@columbushousing.org	The Housing Authority, local public organization, provides affordable housing for Columbus. The Authority will guide the <b>site inventory</b> and <b>future reuse planning</b> with a focus on providing affordable housing within the target area.
Community Foundation of the Chattahoochee Valley	Betsy Covington bcovington@cfcv.com	The Community Foundation connects people and resources to charitable interests for the Chattahoochee Valley. The Foundation will provide sources of local funding for <b>future redevelopment</b> and

		will inform and <b>educate</b> the target-area residents <b>via community outreach</b> throughout the grant period.
West Central Department of Public Health (WCD)	Asante Hilts asante.hilts@dph.ga.gov	The WCD’s mission is to prevent illness and promote healthy living. The WCD will assist with evaluating potential properties for assessment based on environmental risk and <b>site prioritization</b> based on the need of the target area.
The Mill District (Local Community Organization)	Lauren Chambers TheMillDistrict [REDACTED]	The Mill District is committed to developing and implementing creative community-based strategies to enhance economic opportunity, build healthy sustainable neighborhoods, and improve early childhood education in The Mill District. The Mill District will support the CCG by providing <b>site inventory and prioritization</b> assistance, <b>community networking and education opportunities</b> , and assistance to <b>guide redevelopment efforts that align with the goals of the community</b> .

iv. **Incorporating Community Input:** The CCG will continue to involve the community in this project through public meetings, the Columbus brownfields website, and social media. The CCG will promote events online for in-person meetings on the Community Reinvestment and brownfield websites and social media. Comments/questions gathered during Brownfield Program meetings from residents will be collected and addressed through the Community Reinvestment Facebook page, Brownfield website, and at the office for Community Reinvestment every month throughout the grant period. The proposed target area and the grant application were discussed and approved at the Columbus Council meeting on October 24, 2023. Comments from the Brownfield Advisory Board, community, and target-area residents will be incorporated into the decision-making process for developing a priority site inventory and future reuse plans. A survey will be provided via social media (Facebook) to collect data from community members regarding site priority. A needs assessment (based on community input) will be conducted to determine which areas and sites should be considered the highest priority for grant activities. In-person meetings with a virtual option will be held twice a year throughout the grant period to inform and engage members of the public, with periodic updates made during regularly scheduled council meetings. Project updates and other grant project-related documents will be provided on the CCG and Columbus brownfield websites and through email distribution lists, and copies will be made available at the Community Reinvestment office and the Columbus Public and Mildred L. Terry libraries. Target-area residents and property owners are encouraged to join public meetings and an email distribution list to remain informed of the latest news on the project’s progress and upcoming events. Project partners will disseminate information in person to the target-area residents who do not have internet access. Project partners committed to outreach assistance will publicize project progress, events, and accomplishments. The Community Involvement Plan (CIP) created during the FY2017 EPA Brownfield Assessment Grant and updated for the FY2019 Cleanup Grant, will be updated as needed during this project. An email and phone number will also be provided in meeting announcements for non-English speakers to request a translator at public meetings.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Description of Tasks/Activities and Outputs:** The CCG is requesting a US EPA Brownfields Multipurpose Grant in the amount of \$1,000,000.

<b>Task 1: Outreach</b>	
i.	<i>Project Implementation:</i> The CCG Brownfield Project Manager will update the existing Community Involvement Plan (CIP), outreach materials, brownfield project website, and social media posts with the assistance of the environmental contractor (EC). CCG staff will

	lead the community meetings to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, and software to manage the grant.
ii.	<i>Anticipated Project Schedule:</i> CIP created within three months of award. Community meetings held semiannually. Website and outreach materials created in the 1 <sup>st</sup> quarter and posted monthly throughout the grant project.
iii.	<i>Task/Activity Lead:</i> CCG: Kimberly Mitchell - Brownfields Project Manager
iv.	<i>Outputs:</i> Updated CIP, Brownfield Website, 10 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA-required Quarterly Reports.
<b>Task 2: Site Inventory</b>	
i.	<i>Project Implementation:</i> The Brownfields Project Manager will work with the target-area residents during community meetings to create a thorough site inventory for assessment. Abandoned and underused properties identified by the residents will be researched further by CCG staff using the property appraiser’s website. Once a list is compiled, the EC will work with CCG staff to create an evaluation ranking tool to determine, with the help of residents, the order in which the sites will be addressed.
ii.	<i>Anticipated Project Schedule:</i> Community meeting held in 1 <sup>st</sup> quarter will continue the preliminary inventory process that began with this application. Evaluation ranking process will take place in the 2 <sup>nd</sup> quarter and continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> CCG: Kimberly Mitchell - Brownfields Project Manager
iv.	<i>Outputs:</i> Evaluation Ranking Tool, Site Inventory List
<b>Task 3: Assessment</b>	
i.	<i>Project Implementation:</i> The EC will conduct Environmental Site Assessment (ESA) activities at sites selected and ranked through the Site Inventory Task, starting first with the three priority sites listed in this application. ASTM-AAI compliant Phase Is; Generic Quality Assurance Project Plan (QAPP); Phase IIs which will include the SS-QAPP. Prior to assessment, site access agreements and property eligibility determinations approval will be obtained.
ii.	<i>Anticipated Project Schedule:</i> Assessment activities begin in 2 <sup>nd</sup> quarter and continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects of the project with oversight from the CCG: Robert Scott - Brownfields Project Director.
iv.	<i>Outputs:</i> 19 Phase I ESAs, 1 Generic QAPP, 14 Phase II ESAs including SS-QAPP, Site Access Agreements and Property Eligibility Determinations.
<b>Task 4: Remediation/Reuse Planning</b>	
i.	<i>Project Implementation:</i> For projects identified for cleanup, the EC will prepare an Analysis for Brownfields Cleanup Alternatives (ABCA) and/or Cleanup Plans. Cleanup planning will include evaluating cleanup alternatives, calculating cleanup costs and determining site-appropriate remediation/reuse planning to reduce health/environmental risks. The EC will assist the CCG in hosting charrettes/visioning sessions to be held for key properties. A planner will create a Brownfield Revitalization Plan and Site Reuse Assessments.
ii.	<i>Anticipated Project Schedule:</i> Plans & Charrettes to begin in the 6 <sup>th</sup> quarter and will continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> The consultant will implement the technical aspects of the project with oversight from the CCG: Robert Scott - Brownfields Project Director.

iv.	<i>Outputs:</i> 4 ABCAs, 4 Vision Sessions/Charrettes, 1 BF Rev Plan, 4 Site Reuse Assessments
<b>Task 5: Cleanup</b>	
i.	<i>Project Implementation:</i> The CCG’s Brownfields Project Director will oversee the EC as they manage the proposed site cleanup activities including contractor mobilization, abatement and/or encapsulation of ACM and LBP, Asbestos Air Monitoring, clearance sample analysis, contractor oversight, and cleanup reporting.
ii.	<i>Anticipated Project Schedule:</i> Years 3–4
iii.	<i>Task/Activity Lead:</i> The EC will handle the technical aspects of the project with oversight from CCG: Robert Scott - Brownfields Project Director.
iv.	<i>Outputs:</i> 4 sites ready for reuse, 5 remediation jobs created (annualized), 4 cleanup reports
<b>Task 6: Programmatic Support</b>	
i.	<i>Project Implementation:</i> The CCG will procure an EC to assist with the Brownfield Grant Project. The CCG’s Brownfields Project Manager will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The EC will assist the CCG in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the five-year term of the grant. The CCG staff travel budget allows for two staff to attend four national/regional/grantee brownfield training conferences/workshops.
ii.	<i>Anticipated Project Schedule:</i> ACRES Reporting begins in the 1 <sup>st</sup> quarter, and Quarterly Reporting begins in the 2 <sup>nd</sup> quarter and continues throughout the grant project. Annual Reporting and Forms created in the 5 <sup>th</sup> , 9 <sup>th</sup> , 13 <sup>th</sup> , and 17 <sup>th</sup> quarters and during final closeout.
iii.	<i>Task/Activity Lead:</i> CCG: Kimberly Mitchell - Brownfields Project Manager
iv.	<i>Outputs:</i> ACRES Database Reporting, 5 Annual Financial Reports, 20 Quarterly Reports, 5 MBE/WBE Forms, Programmatic Support for the five-year grant period. Two staff to attend four conferences.

**b. Cost Estimates:** Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks*. The budget for this project includes travel, supplies, and contractual costs only. **Ninety-four (94) percent of the budget will be spent on the site-specific work** through the assessment, remediation planning, and cleanup tasks, with **32% designated toward site remediation** and **23% spent on eligible site reuse/area-wide planning activities**.

**Task 1 Outreach:** Contractual: Community Involvement Plan \$1,000 (10hrs x \$100); Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$3,000 (30hrs x \$100); 10 Community Education Meetings \$10,000 (100hrs x \$100; \$1,000/meeting). Supplies: Outreach Supplies (software, printouts, etc.) \$500.

**Task 2 Site Inventory:** Contractual: \$10,000 (100hrs x \$100)  
**Task 3 Assessment:** Contractual: 19 Phase I ESAs \$3,500 each for a total of \$66,500; 1 Generic QAPP \$5,000; 14 Phase II ESAs including SS-QAPP at \$22,500 each for a total of \$315,000.

**Task 4 Remediation/Reuse Planning:** Contractual: 4 ABCAs \$5,500 for a total of \$22,000; 4 Vision Sessions/Charrettes \$8,000 (\$2,000/meeting); 1 Brownfield Revitalization Plan \$80,000 (Planner: 200hrs x \$200; Market Analysts: 174hrs x \$150; Environmental Professional: 139hrs x \$100); 4 Site Reuse Assessments for a total of \$120,000 (\$30,000 each; Planner: 100hrs x \$200; Market Analysts: 50hrs x \$150; Environmental Professional: 25hrs x \$100).

**Task 5 Cleanup:** Contractual: \$74,000 (Additional assessment \$29,000, engineering and field oversight \$20,000; confirmatory sampling and clean fill identification laboratory analyses \$10,000; equipment/supplies/mileage \$2,000; and Remediation Action Completion Report preparation



**Columbus Consolidated Government, GA  
FY2024 US EPA Brownfields Multipurpose Grant**

\$13,000). Construction: \$245,000 (Top three feet of soil excavation, transportation, and proper disposal, \$70/cu. yd. for 3,500 cu. yd. of clean fill placement for a total of \$245,000). **Task 6 Programmatic Support**: Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the five-year grant period \$24,000 (240hrs x \$100). Travel: Two staff to attend four conferences for \$16,000 (flights at \$800, 3 nights in hotel at \$300/night, incidentals and per diem at \$75 per day [4 days] x 2 attendees x 4 events).

Category	Tasks						Totals
	Outreach	Site Inventory	Assessment	Remediation /Reuse Planning	Cleanup	Programmatic Support	
Travel						\$16,000	\$16,000
Supplies	\$500						\$500
Contractual	\$14,000	\$10,000	\$386,500	\$230,000	\$74,000	\$24,000	\$738,500
Construction					\$245,000		\$245,000
<b>Total Budget</b>	<b>\$14,500</b>	<b>\$10,000</b>	<b>\$386,500</b>	<b>\$230,000</b>	<b>\$319,000</b>	<b>\$40,000</b>	<b>\$1,000,000</b>

**c. Plan to Measure and Evaluate Environmental Progress and Results:** To ensure this EPA Brownfield Grant is on schedule, a representative from each target-area community member’s organization, CCG staff, and the qualified environmental contractor will meet quarterly to track **outputs identified in 3.a.**, using an Excel spreadsheet to report progress for work scope, goals, and objectives fulfillment to the EPA via quarterly reports. In addition, expenditures and activities will be compared to the schedule to ensure the Grant Project will be completed within the five-year time frame. Site-specific information will be entered and tracked in the ACRES database. Outputs to be tracked include the number of neighborhood meetings, public meetings, meetings with project partners, environmental assessments, ABCAs and cleanup plans. Tracked outcomes will include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, jobs created, and sites remediated. In the event the project’s performance is not efficient, there are countermeasures in place, including making monthly calls to the EPA Project Officer, and, if needed, creating a Corrective Action Plan.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability** i. Organizational Capacity, ii. Organizational Structure, & iii. Description of Key Staff: The CCG-Community Reinvestment staff has a strong capacity to carry out the programmatic, administrative, and financial requirements of the grant with their previous grant management experience. Community Reinvestment annually manages US Department of Housing (HUD) entitlement grant funds (CDBG & HOME) and State and Local Fiscal Recovery Funds, through the American Rescue Plan, and facilitates the application process for local small businesses and nonprofits who were affected by the pandemic. Robert Scott, Director of Community Reinvestment, will serve as the **Brownfields Project Director**. He is responsible for the oversight and completion of administrative and financial requirements of the grant. Mr. Scott previously served as the Emergency Solutions Grant and HOME Investment Partnerships Senior Program Manager in Gwinnett County for five years. He is responsible for managing real estate acquisitions, disposing and leasing, overseeing the bid contracts, reviewing and underwriting proposals, and preparing reports and budgets. **Kimberly Mitchell**, Assistant Director of Community Reinvestment, has served in this position for one year and previously served as a Senior Planner at Mosaic Community Planning for three years. Ms. Mitchell will serve as the

**Brownfields Project Manager** and will be responsible for the management of the day-to-day activities of the brownfield project. Ms. Mitchell has over five years of experience in community planning. She will be the primary contact and will provide technical oversight for the project. **Angelica Alexander will serve as the Financial Director.** She has over 12 years of experience supervising accounting, purchasing, financial planning, and revenue divisions. She will be responsible for completing the ASAP drawdowns and financial oversight for this grant. CCG will procure an environmental contractor to assist with the technical portions of the grant project.

iv. Acquiring Additional Resources: CCG will procure a qualified environmental contractor (EC) and subcontractors to assist with technical and reporting aspects of the Brownfield Multipurpose Grant. Procurement procedures will be in compliance with both the local contracting and procurement process, and also with EPA requirements for “Professional Service” including 2 CFR §§ 200 and 1500. The CCG’s Purchasing Division has established procedures for hiring qualified environmental professionals for professional brownfield consulting services and is experienced in procuring environmental professional services under the EPA’s Brownfield Cooperative Agreement procurement requirements. Proposals that are received by the City will be reviewed by the Purchasing Division and ranked using quantitative rating criteria. The EC-proposed fees are carefully analyzed and compared. Once EC is selected, the City Council must approve the contractor prior to executing a professional service agreement.

**b. Past Performance and Accomplishments** i. Currently Has or Previously Received an EPA Brownfields Grant: (1) Accomplishments: The CCG was awarded an EPA Brownfield Assessment Grant in 2017 for the 2nd Avenue Corridor. The CCG completed 9 Phase I Environmental Site Assessments (ESAs), 6 Phase II ESAs, the Generic Quality Assurance Project Plan (QAPP), 6 Site-Specific QAPPs, and cleanup planning. The outcomes of these projects were documented in the ACRES system at the time of task completion. The grant was completed and closed in February 2020. The CCG was awarded an FY2019 EPA Brownfield Cleanup Grant for the Former State Farmers Market. The site was assessed during the FY2017 Assessment Grant and found to have asbestos and lead-based paint in the buildings and petroleum contamination in the soil. The cleanup activities were completed, and the grant closed in March 2023. All activities were entered into ACRES at the time of completion. The CCG was awarded an EPA Brownfield Assessment Pilot Grant in 2002 for the Enterprise Zone area. The project area comprised approximately 1,780 acres and 12,883 parcels, with 100 parcels identified as part of the brownfield site inventory. This grant was completed prior to the ACRES system but all reporting was completed and submitted on time. (2) Compliance with Grant Requirements: The FY2017 Assessment Grant was handled properly regarding compliance with grant work plans, schedules, and terms and conditions. The required quarterly reporting and annual report were delivered in a timely manner as well as grant deliverables entered into the ACRES Database. The FY2017 Assessment Grant was completed in February 2020 and all funding was expended. Due to COVID, the EPA granted a six-month extension to complete the cleanup activities for the FY2019 Cleanup Grant. The FY2019 Cleanup Grant was completed in March 2023 and all funding was expended. The 2002 Pilot Grant was handled properly regarding compliance with grant work plans, schedules, and terms and conditions with deliverables provided to EPA in a timely manner. All required Property Profile Forms, annual, and quarterly reporting and closeout reports were delivered in a timely manner. The 2002 EPA Brownfield Pilot Grant was successfully completed and closed in 2005. This grant was a pilot grant, and it was a learning experience for the City. The grant was completed, but there were not sufficient funds to complete a Phase I ESA, which left a remaining balance of \$1,238.95.



## Threshold Criteria

### 1. Applicant Eligibility

- a. Columbus Consolidated Government (CCG), Columbus, Georgia, is eligible to apply for an EPA Brownfields Multipurpose Grant as a local government as defined under 2 CFR § 200.64.
- b. CCG is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

### 2. Community Involvement

The CCG has completed community involvement tasks during their successful FY17 EPA Brownfield Assessment Grant and FY19 EPA Brownfield Cleanup Grant. The CCG will continue to involve the community through public meetings, the Columbus brownfields website, and social media. The CCG first discussed this application during a Brownfield Advisory Board (BAB) training in May 2019 and continued discussions at CCG and BAB meetings throughout 2019 to 2023. The CCG will promote events for in-person meetings and online meetings on the Community Reinvestment and brownfield websites and social media.

Comments and questions made during brownfield meetings from target-area residents will be collected and addressed through the Community Reinvestment Facebook page, brownfield website, and at the Community Reinvestment office monthly throughout the grant period. The proposed target area and grant application were discussed and approved at the Columbus Council meeting on October 24, 2023. Comments from the BAB, community, and target-area residents will be incorporated into the decision-making process for developing a priority site inventory and future reuse plans. A survey will be provided via social media (Facebook) to collect data from community members regarding site priority. A needs assessment (based on community input) will be conducted to determine which areas and sites should be considered the highest priority for grant activities.

In-person meetings, with a virtual option, will be held twice a year throughout the grant period to inform and engage members of the public, with periodic updates made during regularly scheduled council meetings. Project updates and other grant-project-related documents will be provided on the CCG and Columbus brownfield websites and through email distribution lists, and copies will be made available at the Community Reinvestment office and the Columbus Public and Mildred L. Terry libraries. Target-area residents and property owners are encouraged to join public meetings and an email distribution list to remain informed of the latest news of the project's progress and upcoming events. Project partners will disseminate information through community centers and community meetings to the target-area residents who do not have internet access. Project partners committed to outreach assistance will publicize project progress, events, and accomplishments through social media, emails, and brochures available at their offices. An email and phone number will also be provided in meeting announcements for non-English speakers to request a translator at public meetings. The Community Involvement Plan (CIP) created during the FY2017 EPA Brownfield Assessment Grant Project and updated during the FY2019 Cleanup Grant Project, will be updated as needed during this project.





**3. Target Area**

The target area will include Columbus's Southside, Liberty District, and Mill District areas (Census Tracts 13215000300, 13215011400, 13215001600, 13215001800, 13215002400, 13215002500, 13215002700, 13215002800, 13215002902, 13215003000, 13215003200, 13215003301, 13215003302, 13215001400). All census tracts included in the target are Justice40 Disadvantaged Communities.

**4. Affirmation of Brownfield Site Ownership**

The CCG has identified the Bradley Circle site as a brownfield, as defined by CERCLA § 101(39), where cleanup activities will be conducted as part of the EPA Brownfield Multipurpose Grant. The CCG acquired the property in 1966 and affirms it **meets the CERCLA § 101(39) definition of a brownfield and is:** a) not listed (or proposed for listing) on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the US government.

**5. Use of Grant Funds**

- Phase II Environmental Site Assessment – Narrative Page 9
- Remediation Site – Narrative Page 9 and 10
- Revitalization Plan – Narrative Page 1, 9, and 10

**6. Expenditure of Existing Grant Funds**

The CCG affirms that they do not have an active EPA Brownfields Assessment Grant or Multipurpose Grant.

**7. Contractors and Named Subrecipients**

Not Applicable.